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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

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Grizzly Bear Advisory Council
Montana Fish, Wildlife and Parks
1420 E. 6th Avenue Helena, MT 59620

Dear Members of the Grizzly Bear Advisory Council:

Thank you for the opportunity to comment on the draft recommendations that you have been working so hard to put together. Please accept these comments on behalf of Western Watersheds Project and our more than 2,000 active members.

First, I would like to thank you for all the work that you have put into creating these recommendations over the last year. Below I have outlined my comments based on the sections that you have established.

Preamble:

We appreciate the acknowledgement of indigenous peoples and their connection to grizzly bears. We suggest that you add that human caused mortality is a leading cause of death for grizzly bears.

Guiding Principles:

Guiding Principle #2

We recommend adding: “Proactive, nonlethal conflict prevention measures...” This is something that holds true throughout this document. You often refer to conflict prevention measures, but this should be made more specific to refer to *nonlethal* conflict prevention measures. As we commented before, nonlethal conflict prevention measures, particularly when it comes to livestock conflict, are the most effective ways to prevent conflict. Since these recommendations do not address how conflict with grizzly bears will be addressed, we can only assume it will continue as it has with the lethal removal of grizzly bears following conflict. (We will address this specifically during the conflict prevention section). However, without proactive nonlethal conflict prevention measures bears are essentially being bated and then killed for responding. Therefore, *proper implementation of proactive, nonlethal conflict prevention measures should be encouraged, supported, and even required in certain instances (such as livestock grazing on public lands).*

Guiding Principle #9

This is essentially drawing lines on the map. Alternatively, the Council should recognize that grizzly bears will expand outside of recovery zones into historically occupied habitat and that proactive education and nonlethal measures should be employed to ensure communities newly experiencing grizzly bears are prepared.

Guiding Principle #15

This is contrary to Guiding Principle #1 that recognizes the importance of all Montana residents and visitors having access to education and tools for conflict prevention. It implies that some areas are not prepared and that they will remain that way. We recommend removing this item.

Conflict Prevention:

Conflict Prevention #14 and #15

In each place where conflict prevention is listed, it should be specified that you are talking about nonlethal conflict prevention measures. In addition, there should be a specific section that addresses how conflict between grizzly bears and livestock is addressed. Nonlethal conflict prevention measures must be a requirement. There is nowhere in this document that addresses lethal removal of grizzly bears. We suggest adding that grizzly bears should not be subject to lethal removal for livestock-grizzly conflict on public lands. Producers utilizing public lands for private business must accept this as the cost of doing business such as lightning strikes or illness. Thus, it should be a requirement for livestock producers grazing on public lands to use every tool available to protect their livestock and at the same time, grizzly bears.

Conflict Prevention #15, iii, 4)

We recommend making this more specific. What are “proper resources?” This Council repeatedly acknowledges the lack of available resources for grizzly bear management, so this requires clarification. If resources are going to private businesses operating on public lands but not to communities who are experiencing grizzly bears for the first time, this does not seem like an appropriate allocation of resources.

Conflict Response and Protocols:

Conflict Response viii)

This is vague and could establish a dangerous precedent depending on who decides what “strictly” means. This again is essentially drawing lines on the map which not something that has received consensus with the Council.

Grizzly Bear Distribution, Relocation, and Connectivity:

Grizzly Bear Distribution, Relocation, and Connectivity #27 and #28

This is another issue of resource allocation. We recommend the Council take a hard look at where they are suggesting that resources get allocated. Protecting and educating people should take precedence

over protecting private property. The council should simply recognize that the population of grizzly bears is expanding. Does allocation of resources away from areas outside recovery zones mean that no education should take place here and bears will just be shot or removed if they are in those areas? The council should do better to recognize that grizzly bears are expanding and that the best way to protect people, property, and bears is nonlethal conflict prevention measures inside recovery zones and out. All of Montana is historic grizzly habitat and therefore should be assumed that some amount of recovery will happen in a variety of landscapes across the state.

Grizzly Bear Distribution, Relocation, and Connectivity #29

This item must be removed. If there are not resources to expend outside of recovery zones and connectivity areas for outreach and education, then there certainly should not be resources expended on relocating or *removing* grizzly bears. Proactive nonlethal conflict prevention measures are more successful and more cost effective than relocation or removal and therefore the Council should recommend more resources allocated to education and implementation of these measures to avoid the bigger costs of relocation or removal, regardless of where the bear is.

Again, thank you for all your hard work. Many of your recommendations are excellent and are a good step towards conserving grizzly bear populations in Montana. Thank you for the consideration of these comments.

Best,
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