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January 9, 2023

Montana Department of Fish, Wildlife and Parks
1429 East Sixth Avenue
Helena Montana 59620-0701

RE: Comments on Montana Statewide Grizzly Bear Management Plan

To whom it may concern,

I write to you on behalf of the Montana Wildlife Federation (MWF). We are Montana's oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners. We represent a diverse group of public and private land users and advocates who hunt and fish and recreate in Montana. We value Montana grizzly bears as a unique resource, and we are dedicated to the assuring that grizzly bears remain healthy and well-distributed in Montana.

Summary of our concerns

MWF has long supported management actions that would lead to healthy and robust grizzly bear populations and the delisting of the grizzly bear, a return of grizzly bear management to the state, and the potential of limited fair chase hunting. Unfortunately, MWF believes that this plan does not adequately address the issues facing Montana's grizzly bear populations; is misguided, misleading, and incomplete in many places; and will not meet the requirements of adequate regulatory mechanisms that must be in place for the grizzly bear to be delisted. We are disappointed that the emphasis of this plan is on the hunting of grizzly bears rather than the careful stewardship of our grizzly bear populations. Hunting of grizzly bears will not reduce human-grizzly conflicts and would do nothing to address the real issues that face grizzly bears in Montana in the future. The emphasis on hunting throughout this plan will result in distrust and bitterness among many members of the public who value grizzly bears. The hunting-emphasis approach will enflame disagreements with NGO groups and many members of the public who could be partners with FWP in helping to reduce human-bear conflicts and in building a secure future for grizzlies in Montana that eventually might result in limited hunting opportunities. We believe that it is inappropriate to immediately begin to hunt grizzly bears upon delisting instead of choosing a measured approach to be careful managers, demonstrating a commitment to the stewardship of healthy grizzly bear populations.

We recommend that FWP reconsider this management plan and its emphasis on grizzly hunting and instead concentrate on demonstrating FWP's stewardship of grizzly bears by emphasizing the tools of conflict prevention, management response when conflict occurs, assistance for those who may be subject to conflicts, cooperation with groups and NGOs toward conflict reduction, and enhanced outreach and education to increase public tolerance and understanding to maintain the healthy grizzly populations that now live in Montana. Grizzly bears in Montana will face growing threats as increasing numbers of people move into grizzly habitat and as recreational pressures skyrocket pushing bears out of preferred habitats. Grizzly hunting will not address any of these threats. The future of grizzlies in Montana will depend on FWP being a steward of grizzlies and grizzly habitat and being a leader in improved efforts to minimize conflicts with residents and visitors. A stewardship approach by FWP will better



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address the increasing demands of maintaining a recovered Montana grizzly population. As written, this management plan emphasizes and tries to justify ways to kill non-conflict grizzly bears and reduce their numbers and range in Montana immediately upon delisting. FWP can do better than this for Montana's state animal. We strongly advise FWP to change direction and to emphasize grizzly bear stewardship and careful management using a measured approach. Such an approach will build confidence in FWP in the majority of the public who value grizzlies as iconic Montana animals.

Specific Comments

p. 6 - *"FWP's Preferred Alternative does not manage for grizzly bear presence outside of core areas, where the likelihood of conflict is elevated and legitimate concerns about human safety become the single highest priority."*

COMMENT: This sentence contradicts the next sentence *"The likelihood that a bear in a certain location contributes to the long-term persistence and connectivity of the species is a fundamental principle that will guide management in conflict-prone areas."* FWP cannot say they will not manage for grizzly bears outside of core areas and then say connectivity is a fundamental principle that will guide management. Connectivity should be a fundamental principle guiding management of grizzly bears in Montana. Allowing for connectivity and the ability of animals to move across the landscape is a fundamental conservation principle and adds resiliency to grizzly bear populations so they can move as necessary in response to the effects of climate change. There is recent science¹ (some of it by FWP²) about grizzly bear connectivity and its importance and identifying likely movement areas in Montana. The first sentence should be: ***"FWP's Preferred Alternative will manage for grizzly bear presence outside of core areas with the objective of minimal conflicts. Bears that do get into conflict outside core areas will be managed or removed as necessary."*** Dispersing grizzly bears found outside core areas between ecosystems (recovery zones) are important to achieving connectivity. FWP should emphasize reducing unsecured attractants to reduce human-bear conflicts and the resulting mortality of these dispersing bears. There is a need for conflict management and prevention everywhere grizzlies occur. This will help minimize human-bear conflicts, improve tolerance, and facilitate successful connectivity because bears survive in connectivity areas.

p. 6 - *"Thus, grizzly bear presence would not be an objective in areas far from their largely mountain habitats and in prairie habitats where agricultural development predominates. Individual animals in these areas could be accepted to the degree they remain conflict-free."*

COMMENT: This last sentence should be: ***"Individual animals in these areas will be accepted to the degree they remain conflict-free."*** As written, this sentence says that FWP

¹ Peck, C. P., F. T. van Manen, C. M. Costello, M. A. Haroldson, L. A. Landenburger, L. L. Roberts, D. D. Bjornlie, R. D. Mace. 2017. Potential paths for male-mediated gene flow to and from an isolated grizzly bear population. *Ecosphere* 8: 1-19. <https://doi.org/10.1002/ecs2.1969>

² Sells, S. N., C. M. Costello, P. M. Lukacs, L. L. Roberts, and M. A. Vinks. 2021. Grizzly Bear Habitat Selection and Predicted Movement Corridors in Western Montana. Annual Report, Federal Aid in Wildlife Restoration Grant W-154-M-5. Montana Fish, Wildlife and Parks, Helena, Montana. 70 pages. https://fwp.mt.gov/binaries/content/assets/fwpcconservation/wildlife-reports/bears/2-grizzly-bear-movements_annual-report-2021.pdf



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can actively remove bears are conflict-free. This is a statement to remove grizzly bears that are conflict free outside core areas. Such a statement is counter to the mission of FWP and is completely unacceptable.

p. 8 – *“Role of grizzly bears in Montana - Between core populations, FWP would manage for a significantly lower density of grizzly bears to provide opportunities for connectivity.”*

COMMENT: This sentence says FWP will do two things that contradict each other. For connectivity, grizzly bears need to live in areas between core areas. By saying FWP will manage for significantly lower density of grizzly bears between core areas, this sentence states that FWP will do things to increase grizzly mortality in connectivity areas. By doing this, FWP will reduce the probability of connectivity ever occurring. This sentence should be: ***“Between core populations, FWP would work with local communities, residents, and NGO partners to manage for reduced human-bear conflicts in order to provide opportunities for bears to live in these areas with minimal conflicts and to enhance the probability of connectivity.”***

p. 8 – *“Role of private lands in grizzly bear conservation and management. Where grizzly bear expansion does not contribute to connectivity, FWP would have lower tolerance for grizzly bears involved in conflicts.”*

COMMENT: This sentence needs to be enhanced to say that FWP will not remove non-conflict grizzly bears from private lands just because they live there. This sentence needs to read: ***“Where grizzly bear expansion does not contribute to connectivity, FWP would have lower tolerance for grizzly bears involved in conflicts, but FWP would not proactively remove bears if they are conflict-free.”***

p. 9 – *“Destinations of a bear captured in a conflict setting when moving it away from the site is recommended and FWP is allowed to move it under state law (i.e., captured inside RZ): As the known range of grizzly bears changes, FWP would continue to engage with the Commission to gain pre-approval of new sites within Occupied range to which grizzly bears could be moved but would not seek approval of new release sites beyond the most recently updated Occupied range.”*

COMMENT: Relocation sites for bears that could be relocated should not be limited to the Occupied range maps shown in Appendix G. These maps do not represent current data on grizzly dispersal and distribution in Montana. The Occupied range maps and the process used to produce these maps used by FWP are flaws in this plan because the use of these flawed maps will decrease any possibility of connectivity between core areas. The maps in Appendix G should be replaced with maps showing the actual current distribution of grizzly bears in this map: <https://www.fws.gov/media/grizzly-bear-may-be-present-map>

p. 10 – *“Moving non-conflict bears to areas outside of Occupied range: If FWP proposes to move a bear into unoccupied habitat for purposes of recovery or connectivity, it will first complete an environmental analysis and seek approval from the Commission.”*

COMMENT: On p. 8 it says: *“Statewide objectives would include a low density of grizzly bears between RZs or DMAs that could provide connectivity opportunities.”* However, on p. 10 it says: *“If FWP proposes to move a bear into unoccupied habitat for purposes of recovery or connectivity, it will first complete an environmental analysis and seek approval from the Commission.”* The statements about a “commitment to connectivity opportunities” and the only



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way to move a bear into these areas would require and environmental analysis and approval from the Commission are in conflict. This section needs to be rewritten along with the updating of the maps in Appendix G. If FWP has an objective of “*..a low density of grizzly bears between RZs or DMAs that could provide connectivity opportunities*”, then this plan should complete the necessary analysis and the commission decision to implement such grizzly movements into areas between RZ's or DMA's to make this connectivity objective a reality.

p. 10 – “*A potential grizzly bear hunt: Functions, expectations, regulations. If delisted and a hunting season is adopted by the Commission, it could be used to limit expansion where core connectivity is unlikely (particularly in Central and Eastern Montana), but it would be consistent with maintaining an appropriate density of grizzly bears where connectivity is prioritized.*”

COMMENT: Hunting grizzly bears in connectivity is directly contrary to the goal of maintaining an appropriate density of grizzly bears where connectivity is desired. The few bears that move into connectivity areas should not be further reduced by grizzly hunting. Hunter opportunity in such areas would be low anyway, so there is little loss of hunter opportunity if these areas are not open to grizzly hunting. If FWP is serious about connectivity, FWP will not allow grizzly hunting in connectivity areas. This sentence should be changed to: “***If delisted and a hunting season is adopted by the Commission, grizzly hunting would not be allowed in connectivity areas to maintain an appropriate density of grizzly bears where connectivity is prioritized.***”

p. 13 – “*Genetic connectivity*” refers to situations in which neighboring populations exchange individuals and gene flow is achieved through reproduction of immigrants (and their descendants). “*Demographic connectivity*” refers to situations in which neighboring populations exchange individuals and immigrants (and their descendants) contribute significantly to population dynamics.”

COMMENT: It would be useful to add that for animals like grizzly bears with differential dispersal rates by sex and age, genetic connectivity can be achieved by movement (either natural or human-assisted) of males who can mate with females in the target population and move genetic material between areas by doing so. Demographic connectivity increases population productivity, which is the increase in numbers of reproducing females in a population. Demographic connectivity can best be achieved by moving typically subadult or adult females (usually with human assistance) because adult females are usually resident in their existing home range and unlikely to disperse very far from their mother's home range. Females, particularly subadult females, are also less likely to return to their origin areas than males.

p. 31 – “*Moving bears to initiate new or to support existing populations. The action of moving grizzly bears from one population to another to increase the latter's abundance, genetic diversity, or both is known as augmentation. The USFWS has formally proposed augmentation to move bears from other areas into the two established Recovery Zones lacking populations (the Bitterroot, and the North Cascades in Washington State), but implementation of both proposals has been placed on hold.*”

COMMENT: This section confuses augmentation, which is movement of bears into an existing population to advance recovery efforts with reintroduction, which is movement of bears into an area where grizzly bears no longer exist to create a new population. FWS has not proposed augmentation into the Bitterroot or North Cascades ecosystems. FWS did propose reintroduction of grizzly bears into the Bitterroot ecosystem in 2000, but this effort was never



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funded so did not occur. The FWS has not completed the EIS process as of 2022 in the North Cascades to reach a decision on whether to propose reintroduction into that ecosystem. FWS and FWP have been working in partnership since 2005 to augment the existing small grizzly population in the Cabinet/Yaak ecosystem and this work continues.

p. 40 – “Grizzly bears are both “conflict prone” and “conservation reliant” (with the latter term meaning they will always require intensive management).”

COMMENT: This sentence is incorrect. A species is conservation reliant when threats that it faces can never be eliminated, but only managed.^{3,4} This means that the threats to grizzly bears must always be managed, not the bears themselves. Grizzly bears are only “conflict prone” when management agencies and the public fail to secure attractants that draw bears into conflicts. This sentence should be changed to: **“Grizzly bears are a “conservation reliant” species. Conservation reliant means that the threats to grizzly bears and human-related attractants must always be managed.”**

p. 40 – “However, grizzly bears at lower density in some areas between these cores will facilitate connectivity. As those bears will live closer to people, they must be able to adapt to that reality, and will likely have a higher probability of suffering human-caused mortality.”

COMMENT: The second sentence here needs to be enhanced with the following wording: **“For connectivity to work, there must be efforts in place to reduce human-bear conflicts, and FWP will work to reduce these causes of human-caused mortality. The maintenance of grizzly bears in connectivity areas is a priority of this management plan and FWP will work to achieve this with conflict reduction efforts, minimizing discretionary mortality by prohibiting grizzly hunting in these areas, and with outreach and education.”**

p. 40 – “Numerical objectives.”

COMMENT: Grizzly monitoring and reporting systems are central to managing healthy grizzly populations. This should include estimating population size with confidence intervals and monitoring and reporting vital rates such as adult female survival, which can be monitored with marked bears and is a primary determinant of population trajectory and health. This sentence should be added to this section.

p. 40-41 – “Grizzly bear distribution and connectivity.”

COMMENT: Every captured and dead bear anywhere in Montana should have its DNA monitored to determine if any reproduction has occurred between NCDE and GYE bears. Specific wording should be added: **“Every captured and dead bear in Montana will be sampled for DNA to document any possible interbreeding of bears between the NCDE and the GYE, and to document the origins of all bears outside the core areas, particularly in connectivity areas. DNA results will be reported annually by FWP.”** DNA monitoring is an important scientific technique that can document the success of connectivity management efforts, the potential movement of NCDE bears into the GYE, and the interbreeding of bears

³ Goble, D. D., J. Weins, J. M. Scott, and T. D. Male. 2012. Conservation reliant species. Bioscience. 62:869-873. <http://dx.doi.org/10.1525/bio.2012.62.10.6>

⁴ Scott, J. M., D. D. Goble, A. M. Haines, J. A. Weins, and M. C. Neel. 2010. Conservation reliant species and the future of conservation. Conservation Letters 3:91-97. <https://doi.org/10.1111/j.1755-263X.2010.00096.x>



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from both ecosystems in the now-isolated GYE. Such genetic sampling is noted in the tri-state MOU for the GYE, and it should be added to this Montana Grizzly Management Plan.

p. 41 – *Human safety. “Although FWP would continue to be limited in its ability to alter grizzly bear behavior or the geographic distribution of populations, it would use available discretion to remove or relocate grizzly bears involved in conflicts with humans, particularly in areas where connectivity among population cores is unlikely.”*

COMMENT: This is unclear. FWP can in fact alter bear behavior and reduce human-bear conflicts with efforts to reduce attractants combined with public education and outreach. Conflict prevention and outreach and education efforts are valuable everywhere grizzly bears may occur even where connectivity between core areas is unlikely. This section implies that there will be minimal efforts to prevent conflicts in areas where connectivity is unlikely and that removal of bears after conflicts is preferable to efforts to prevent conflicts. This approach is backwards and completely unacceptable. Grizzly bears are a valuable native animal in Montana and FWP has a responsibility to work to help reduce human-bear conflicts wherever grizzlies occur, inside or outside of core areas and in connectivity areas or outside connectivity areas.

p. 42 – *“Destinations of bears involved in conflicts (captured inside RZs) when moving them is planned.”*

COMMENT: The term “Commission-approved release site” in this document but there is no explanation of what this term means. The criteria used by the Commission to approve or disapprove a release site must be explicitly described. The decision for each relocation site should be documented and the criteria used to accept or reject each site publicly reported. Since this approval process will impact where grizzlies can be relocated and their eventual survival, this process is important. This definition should explain how and why the commission approves or rejects release sites, the criteria used by the Commission to reach such decisions, the origins of sites considered for approval or rejection by the Commission, the frequency of periodic relocation site review or revision, the reporting of which sites are used, the dates of such releases, and how many bears are relocated at each site.

p. 43 - *Population research and monitoring. “...if it becomes feasible to estimate grizzly bear abundance or trends in any of the Occupied core areas, FWP would prioritize attempts to do that.”*

COMMENT: This must be a mistake. This makes sense if the word “BETWEEN” is added to this sentence. This sentence should read: **“...if it becomes feasible to estimate grizzly bear abundance or trends BETWEEN any of the Occupied core areas, FWP would prioritize attempts to do that.”**

The monitoring of grizzly bear abundance and trajectory (trend) with accuracy and precision is currently applied in all grizzly monitoring efforts and has been done by FWP in the NCDE, by FWS in the C/Y, and by the IGBST in the GYE. Vital rates, numbers, and the trajectory of bear populations in each core area is of critical importance to understanding the health of grizzly bear populations and the success of FWP's management programs. The management of discretionary mortality such as a hunting season is dependent upon accurate understanding of population health including vital rates, trend, and mortalities from all causes. This section needs to state that FWP will apply science and the best available monitoring systems to annually monitor and report to the public the population trajectory and the minimum numbers of bears in each occupied core area. Vital rates such as adult female survival, subadult survival, average



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litter size, mortality rates by sex and age, annual known and calculated unknown-unreported mortalities and mortality causes should be annually reported. In the non-core areas, particularly in connectivity areas and in all areas surrounding core habitats, annual mortalities should be monitored and reported by sex, age, and location, and mortality cause.

p. 47 – *“Manage mortalities from all sources, including hunting and the loss of grizzly bears by translocation out of the NCDE, to support an estimated probability of at least 90% that the grizzly bear population within the demographic monitoring area remains above 800 bears...”*
COMMENT: This sentence needs to be reworded to: ***“Manage all mortalities from all sources, including hunting, unknown/unreported mortalities calculated each year, known and probable mortalities, and the loss of grizzly bears by translocation out of the NCDE, to assure a probability of at least 90% that the grizzly bear population within the demographic monitoring area remains above 800 bears.”*** Also add: ***“FWP will manage all sources of mortalities in the NCDE grizzly population to assure that this population is stable to increasing and that there is no decline in numbers or distribution of the NCDE grizzly population.”*** There should be this specific direction added: ***“FWP will monitor and annually report all grizzly bear mortalities by sex, age and mortality cause outside the NCDE and GYE DMAs and the Cabinet/Yaak Recovery Area, especially in all connectivity areas.”*** As written, there is no monitoring or reporting requirement for mortalities and their causes outside the NCDE or GYE. Since almost all bears outside the NCDE DMA originated inside the NCDE DMA, the monitoring and reporting of all mortalities outside the NCDE DMA is important to assuring the health and security of the NCDE population. The management of all discretionary mortality inside and outside the NCDE area depends on knowing the number and causes of all mortalities outside core areas. These requirements should also be applied to the GYE to monitor and annually report the numbers and causes of all grizzly bear mortalities anywhere outside the GYC DMA in MT, ID, and WY.

p. 85 – *“FWP interprets these maps as providing optimism that, assuming the continuation of conflict prevention and response programs and the continuation of approximately current levels of human infrastructure, grizzly bear connectivity (at least west of the Continental Divide) can gradually be accomplished—even in the presence of human–bear conflicts, and some resultant deaths of bears.”*

COMMENT: This statement is incomplete and lacks any reference to the importance of minimizing discretionary mortality in connectivity areas for these areas to be functionally successful. This is particularly important because in peripheral and connectivity areas, there will be low numbers of grizzly bears and grizzly density will be low. Any mortalities due to discretionary mortality, other than management removals after serious or repeated conflicts, must be minimal for connectivity to work. It is important that conflict prevention expands beyond human-related attractants and livestock conflicts to include the elimination of black bear hound hunting and wolf trapping using snares, traps and bait. Hound hunting of black bears and wolf trapping with snares, traps, and bait currently occurs in many areas where grizzly bears are present shown in maps on pp. 86 and 87, and in connectivity areas. These conflict-prone activities are in place because of recent laws passed by the Montana legislature. The lack of reference to these laws is a serious omission in this management plan that needs to be addressed. These laws allow activities that are lethal for grizzly bears and these activities will



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result in unknown and unreported numbers of grizzly mortalities.⁵ These activities and the mortalities resulting from them will reduce grizzly connectivity opportunities in Montana. Hound hunting of black bears and wolf trapping using snares, traps and bait in areas where grizzly bears may be present are conflicts that will result in the death or injury of grizzly bears just like unsecured human-related attractants or livestock. FWP must recognize in this plan that these activities (hound hunting of black bears and wolf trapping using snares, traps and bait in all areas where grizzly bears may be present) are direct sources of human-bear conflicts that will result in the death of and/or injury to bears. Hound hunting of black bears and wolf trapping using snares, traps and bait are just as much of a source of human-bear conflict as unsecured garbage and other human-related attractants. If grizzly hunting and/or if black bear hound hunting and wolf trapping using snares and traps and bait are allowed in connectivity areas, the few grizzly bears in these areas will likely be killed, and grizzly numbers will be minimal as will connectivity opportunities between ecosystems. These legislated grizzly conflicts that result in death or injury of grizzly bears will eliminate the ability of FWP to adequately manage grizzly mortality in Montana as required by the ESA and will therefore eliminate possibility of ever delisting grizzly bears. We realize that FWP cannot change state laws, but FWP needs to address in this management plan the locations where application of these laws is prohibited if FWP is to adequately regulate the mortality of grizzly bears in Montana. Everywhere that grizzly bears may be present⁶ should be off-limits to hound hunting of black bears, and wolf trapping using snares, traps and bait from March 16 to December 31 when grizzly bears may be outside of their dens. The fact that this management plan does not address this critically important issue is a fatal flaw in this plan.

p. 89 – *“The contributions of non-governmental organizations (NGOs) in helping to minimize human–bear conflicts cannot be overstated...”*

COMMENT: We suggest you add the Missoula Bear Smart Working Group, which has written a Missoula Bear Hazard Assessment and a Human-Bear Conflict Management Plan for Missoula and surrounding areas. This conflict management plan has been unanimously adopted by Missoula County Commissioners and the Missoula City Council.

p. 96 – *“Moving non-conflict grizzly bears...”*

COMMENT: This plan needs to explicitly detail how and why relocation sites are approved or disapproved by the Commission and how often such approvals occur and are updated. At present the Commission approves and disapproves relocation sites in an unknown manner. The details of this relocation site approval process need to be added to this plan.

p. 96 – *“Note also that the Occupied range map is deliberately not as inclusive as USFWS’s “may be present” concept (Figure 4).”*

COMMENT: FWP should not use the “less inclusive” Occupied habitat mapping process instead of the more accurate grizzlies-may-be-present process.⁶ The Occupied range mapping process used by FWP does not accurately show the distribution of grizzly bears in Montana (see attached map in Figure 1). FWP’s choice of a less inclusive mapping system will put dispersing

⁵ Servheen, C. 2022. Anti-Predator and Anti-Science. The Wildlife Professional.16:33-37.

⁶ <https://www.fws.gov/media/grizzly-bear-may-be-present-map>



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grizzlies outside recovery areas into connectivity areas at mortality risk. The best way to identify areas to prohibit activities that can result in injury or death to grizzly bears including hound hunting of black bears and wolf trapping using snares, traps and bait is to use the more inclusive where-grizzly-bears-may-be-present mapping process³ that accurately represents grizzly bear distribution in Montana. It is important to the goals of this plan that grizzly range

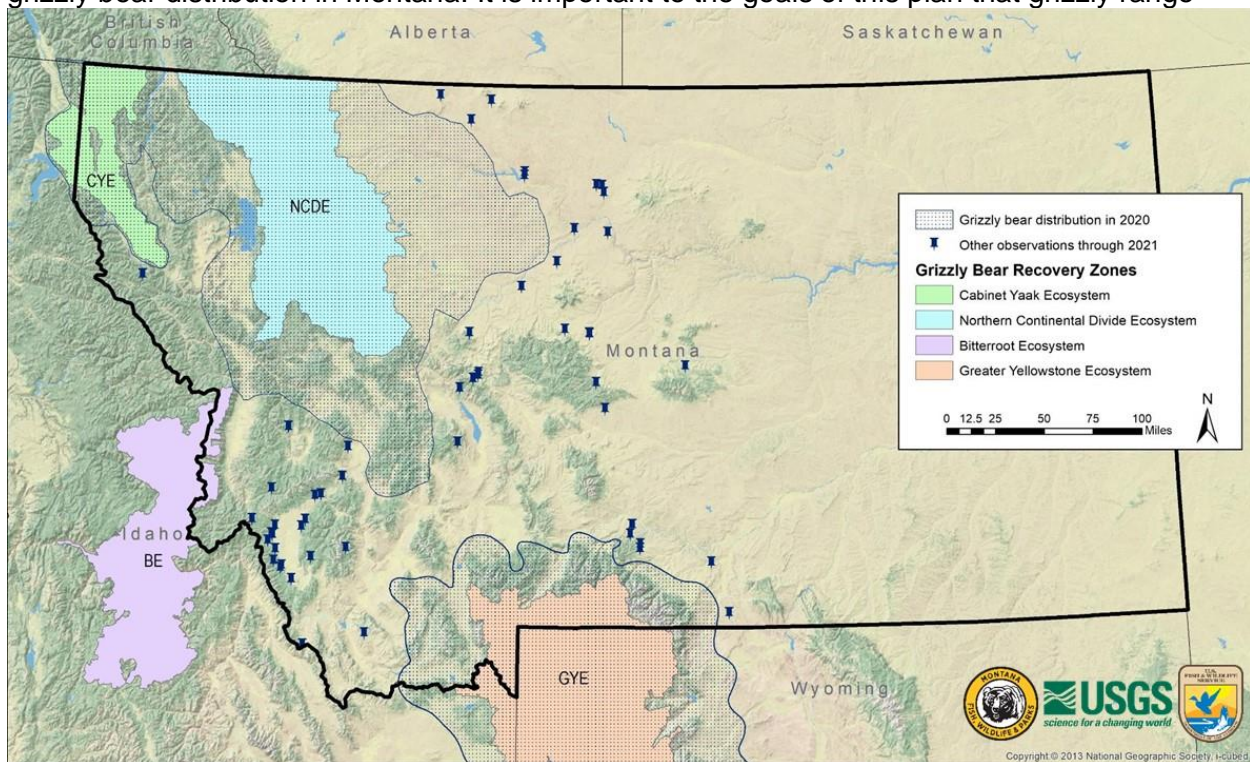


Figure 1. The actual distribution of grizzly bears in Montana as of 2021 using data from FWP, USGS, and FWS. Note how many grizzly bears occur outside the "Occupied habitat" lines (shown as grizzly bear distribution in 2020 on this map) used by FWP in this plan.

expansion by dispersing bears into new connectivity areas continues, and an accurate mapping and management process that protects these dispersers from mortality risk is important to this expansion.

The Grizzly Bear Advisory Committee, the NCDE Conservation Strategy, and this management plan (e.g., "*FWP would prioritize conflict prevention activities in the four cores areas and also the in-between areas where low-density populations for improved connectivity may appear feasible.*" P.41) all stress the importance of connectivity between ecosystems. However, the 2021 Montana legislature passed laws that directly threaten the survival of grizzly bears, particularly bears in areas outside recovery areas. These laws include:

- SB 98 that allows anyone to shoot a grizzly bear if it is "threatening" to kill a person or livestock. Threatening is not defined. This law is superseded by federal law if grizzly bears are listed under the ESA. However, if the grizzly was delisted, this law would allow anyone to shoot a grizzly bear anywhere for vague and undefined reasons. With this law in place, FWP could not limit or manage the number and location of grizzly bear killings and therefore FWP would not have adequate mortality regulatory mechanisms in place.



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This law will preclude delisting of grizzly bears because it would prevent FWP from adequately managing mortality numbers and distribution in Montana.

- HB 224 mandating FWP to allow the use of neck snares to kill wolves that will result in grizzly bear deaths and the deaths of countless numbers of other non-target animals.
- HB 468 allowing the use of hounds to hunt black bears (which had been outlawed in Montana for 100 years). The use of hounds to hunt black bears will result in conflicts and death for grizzly bears in the areas where hounds are used.
- SB 314 allowing the use of bait around wolf traps and neck snares. Bait will also attract grizzly bears and other forest carnivores to these sites where they will be trapped, or neck snared and will be killed or maimed.
- HB 225 extending the wolf trapping and neck snaring season into the time that both grizzly and black bears are out of their dens, which will result in bears being caught, maimed, or killed in wolf traps and neck snares.

These 5 laws are a serious risk to grizzly bears anywhere that grizzly bears are present. These laws will prevent FWP from adequately regulating grizzly mortality as required for delisting.⁷ We believe that these laws passed by the 2021 legislature are an ominous indication of what will happen to grizzly bears if grizzlies were ever delisted. This plan states on p. 5: *"the plan is designed to guide state management while this species remains so listed—and also to articulate FWP's future vision for management should any grizzly bear populations in Montana be delisted and full management authority for them be returned to the state."* Given this objective, the only way to assure that the above-listed laws do not result in dead grizzly bears and do not eliminate the possibility of dispersal and connectivity across western Montana is for this plan to specifically state how FWP will protect grizzly bears from the detrimental impact of these laws.

We recognize that FWP cannot change state laws, but FWP can limit the application of these laws to places where grizzly bears are not present, so these laws do not harm grizzly bears. The where-grizzlies-may-be-present maps³ are the best way to address this issue. This plan should be explicit and state that FWP will prohibit the application and implementation of laws that will result in unregulated grizzly mortalities in areas shown in the where-grizzlies-may-be-present maps. **We specifically request that FWP adopt the mapping process used by FWS (that was done in cooperation with FWP, Tribal, and Federal agencies) to develop where-grizzlies-may-be-present maps in Montana. This where-grizzlies-may-be-present map is more comprehensive and accurate and thus will be more protective of dispersing and connectivity area grizzlies.** Doing so will allow FWP to achieve the dual objectives of adequate regulatory mechanisms for grizzly mortality as required for delisting, and connectivity between core areas. Connectivity between core area populations is recommended by the Montana Grizzly Bear Advisory Committee, the NCDE Conservation Strategy, and this management plan.

This management plan says nothing about how FWP will manage wolf snaring and trapping using bait and hound hunting of black bears in Montana if the grizzly was ever delisted. This is a fatal flaw in this management plan. Current FWP regulations limit the distribution and dates of use for wolf traps and snares with bait in some areas where ESA-listed grizzly bears and ESA-

⁷ Letter signed by 35 wildlife professionals at https://missoulia.com/opinion/columnists/opinion-we-cannot-support-delisting-montana-grizzly-bears-unless-state-laws-are-changed/article_b9d33e93-32c1-5022-bc1f-49666ccac4cf.html



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listed lynx are present. There are currently limitations on hound hunting of black bears in some but not all areas where grizzly bears are present in Montana. The lynx area limitations on wolf trapping and snaring were not a proactive conservation effort by FWP to aid lynx but were the result of a lawsuit that required FWP to limit wolf trapping in areas of lynx habitat. What does FWP plan to do regarding the locations where wolf trapping and snaring using bait and hound hunting of black bears if grizzly bears or lynx were delisted? **This management plan needs to explicitly state how FWP plans to manage the trapping and snaring of wolves using bait and black bear hound hunting in grizzly habitat if the grizzly is ever delisted.** Will there be limitations on these actions to minimize conflicts with grizzly bears? These details must be explicitly added to this management plan if we are to have any confidence in how FWP will manage grizzly bears after delisting.

p. 98 – *“Translocated individuals would be considered experimental animals, and either moved or euthanized should they cause conflicts with humans.”*

COMMENT: This makes no sense and should be removed. Any bears moved should be treated as resident bears and managed as necessary using the IGBC Guidelines. There is no need for special status (experimental) for these bears.

pp. 98 and 209 – *“For any translocated individuals that survive and remain in the Yellowstone area at least 1 year, the allowable mortality limit for that gender for the GYE (per the Conservation Strategy) would be increased by one (to account for the unanticipated addition of that individual, reinforcing that the augmentation is for genetic, not demographic purposes).”*

COMMENT: This statement should be removed. Translocations from the NCDE to the GYE are not to increase the GYE grizzly mortality allowance and allow more bears to be killed, but to improve the genetic diversity of the GYE population. The mortality limit is calculated as a percentage of the total population so any additional bears could be added to the total population size estimate therefore any increase in allowable mortality would not change to any measurable degree with the addition of a few bears to the total population. It is important to note that FWS and FWP did not increase the mortality limit in the Cabinet/Yaak ecosystem nor did the public request this when these agencies augmented that population with dozens of bears over many years. This concept is wrong and unnecessary and should be completely removed from this management plan.

p. 99 – *“Would a grizzly bear hunt be a “trophy” hunt?”*

COMMENT: FWP should be honest and state that any grizzly bear hunt would be a trophy hunt. Trophy hunting is hunting animals for sport as opposed to hunting animals for meat. Few if any people who kill a grizzly bear would do so for the meat. Even though hunters are not supposed to waste edible meat, we strongly suspect that most hunters would not save and consume grizzly bear meat as meat was not the objective of their grizzly bear hunt. Another reason that consuming grizzly meat is unlikely is that grizzly bears can carry high loads of *Trichinella* that can cause severe health risks in humans who eat bear meat. *Trichinella* levels are usually high in grizzly bear meat and 58% of grizzly bears from Wilderness areas in western Montana were found to be infected.⁸ In bear meat from the Yukon, 71% of the grizzly bears tested contained

⁸ Worley, D. E., J. C. Fox, J. B. Winters, R. H. Jacobson and K. R. Greer. 1976. Helminth and arthropod parasites of grizzly and black bears in Montana and adjacent areas. *Bears: Their Biology and Management* 3:455-464.
<https://www.jstor.org/stable/3872794>



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Trichinella spp. and 90% of the infected grizzly bears had *Trichinella* levels above the human safety threshold.⁹ FWP should not be evasive. Grizzly bear hunting would certainly be trophy hunting because almost no one will hunt a grizzly bear to eat the meat. The following sentence in this section is false and misleading: “*In this sense, hunting a grizzly bear would not be different from hunting deer or elk*”. We suggest that the entire sidebar 9 on p. 99 be removed as it is misleading and deceptive.

p. 101 – “*A potential grizzly bear hunt: functions, expectations, and regulations.*”

COMMENT: The issue that readers want to know is will FWP use hunting to eliminate most of the bears outside of the demographic monitoring area east of the NCDE. Uncertainty creates suspicion. It is also important to recognize in this management plan that **grizzly bear hunting is not necessary to manage grizzly bears**, particularly in relation to management of human-bear conflicts and human safety. The fact that grizzly hunting is not necessary for grizzly management is clear after 40+ years of grizzly management in Montana without hunting and also evident in ongoing grizzly bear management without hunting in British Columbia and Alberta where grizzly bear hunting has been discontinued.

p. 101 – “*If hunting occurred, it would be embedded within and consistent with FWP’s overarching goal of maintaining thriving grizzly bear populations within their core areas, under the Preferred Alternative in encouraging connectivity among those areas where doing so is most likely to result in biological benefit and where bear-human conflicts can mostly likely be kept to manageable levels, and maintaining public support for both of those goals.*”

COMMENT: This sentence is misleading. One could read between the lines and conclude that FWP intends to manage hunting in core areas and perhaps not hunt in connectivity areas but outside those areas what will FWP do? There is nothing in this plan about the details of how hunting would be managed such as the distribution of hunters or tags, locations of hunts, and allocations of tags. This is of particular concern in areas such as along National Park boundaries where the management of wolf hunting by FWP was a disaster. These hunts allowed wolf hunters to kill habituated wolves along the YNP boundary and severely damage the resident YNP wolf population. This could also happen with a grizzly hunt along the GNP and YNP boundaries where hunters could kill habituated Park bears. **This plan should specifically state that hunting grizzly bears right along GNP and YNP boundaries would be prohibited to avoid the same situation that occurred with wolves.**

pp. 105-106 – “*Would hunting grizzly bears reduce human–bear conflict?*”

COMMENT: This section presents some information on the lack of effect of hunting on reducing human-bear conflicts. We suggest adding other references to this section including Obbard et al. (2014)¹⁰ who found: “*Human-bear conflict was not correlated with prior harvests, providing no evidence that larger harvests reduced subsequent human-bear conflicts. Given that variation in natural foods, harvest is unlikely to prevent elevated levels of human-bear conflicts in years of food shortage unless it maintains bears at low densities – an objective that might conflict with*

⁹ Harms, N. J., M. Larivee, B. Scandrett, and D. Russell. 2021. High prevalence and intensity of *Trichinella* infection in Yukon black bears and grizzly bears. *Journal of Wildlife Diseases* 57:429-433. <https://doi.org/10.7589/JWD-D-20-00135>

¹⁰ Ursus 25:98-110. <https://doi.org/10.2192/URSUS-D-13-00018.1>



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maintaining viable populations and providing opportunities for sport harvest.” There is no evidence that hunting would reduce human-bear conflicts unless it was so intense as to kill almost all the bears in the area. The Governor’s Grizzly Bear Advisory Council said: “...hunting is not likely to be an effective tool for conflict prevention or reduction”.

p. 108 – *“Auction hunt. Hunting units would not be geographically confined to a DMA, but any animals taken would count against the maximum prescribed within that DMA.”*

COMMENT: We object to allowing auction hunters or any kind of grizzly bear hunting in connectivity areas. Why would FWP want to put the few bears in connectivity areas at risk from hunters and thereby nullify the objectives of connectivity areas?

p. 108 – *“Limited draw, sustainable off-take hunt. The primary anticipated benefit would be an enhanced sense of involvement and engagement among landowners living near the bears subject to this kind of hunt. FWP anticipates that an enhanced sense of landowner engagement that would accompany this type of hunting would help foster communication and cooperation with FWP bear managers and NGO staff working to minimize human/bear conflicts.”*

COMMENT: FWP is saying that allowing hunters to kill grizzly bears would cause the landowners to have an “enhanced sense of involvement and engagement and cooperation with FWP bear managers and NGO staff working to minimize human-bear conflicts”. This is a doubtful assumption given that there is no evidence that a limited hunt of grizzly bears would reduce human-bear conflicts at all. Natural food variation is the driver of human-bear conflicts, thus hunting would have little or no impact on human-bear conflicts. Why would killing non-conflict bears in a hunt increase the “involvement and engagement and cooperation (of local landowners) with FWP bear managers and NGO staff”? This statement is baseless and diminishes the credibility of this entire management plan.

p. 109 – *“Auction hunt. Hunting units would not be geographically confined to a DMA, but any animals taken would count against the maximum prescribed within that DMA.”*

COMMENT: No connectivity areas should ever be hunted, either auctioned hunt permits or general hunting.

p. 109 – *“Auction hunt. Subject to the geographic constraints above, hunting units available to the permittee would allow for considerable choice (but not include areas within, or near, the CYE or BE)”*

COMMENT: Why are connectivity areas between ecosystems not specifically off-limits to such a hunt? Again, we strongly object to any type of believe that connectivity areas should not be subject to hunting, either auctioned hunt permits or general hunting.

p. 110 – *“Auction hunt. Many people object to a hunt that is available only to the highest bidder, a person typically with financial means to bid well above what most can afford. This type of hunt is likely to be considered by most of the public as a “trophy hunt,” which are held in lower regard by many members of the public than hunts available to those of lesser financial means”.*

COMMENT: We believe FWP underestimates the public outrage that will result when they sell a trophy grizzly hunt to a wealthy individual to kill a grizzly bear. The sale of such a trophy hunt of a formerly listed iconic species that was recovered with tens of millions of dollars of public money only to be killed for license money for FWP as a trophy will generate a lot more than funds for FWP.



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p. 110 – *“Population growth reduction hunt. Permits would be limited numerically to produce, at maximum, a slow and modest reduction in the underlying rate of growth but would not be constrained by the maximum allowable mortality limits codified in any multi-agency conservation plans.”*

COMMENT: FWP has stated earlier in this plan that they have no measure of the rate of growth of populations outside DMAs where demographic characteristics and vital rates are not monitored. How then will FWP set the number of bears to be killed in such a hunt to achieve “a slow and modest reduction in the underlying rate of growth”? This does not make any sense. All known and probable grizzly deaths from all causes should be monitored and reported annually including hunting mortalities (should there be any hunts). These mortalities should be carefully evaluated for their impacts on the number and population trajectory in DMA areas and outside DMA areas. There should be specific direction in this management plan that FWP will monitor and annually report the numbers and causes of all grizzly bear mortalities outside the NCDE DMA including the connectivity areas between the NCDE and the GYE, the NCDE and the Bitterroot and the NCDE and the C/Y. As written, this plan requires no monitoring or reporting requirements for mortalities and their causes outside the NCDE or GYA DMAs. Since almost all bears outside DMAs originate inside DMAs or go in and out of the DMAs during various parts of the year, the monitoring and reporting of all mortalities outside DMAs is vital to the consideration of the health and security of the NCDE and GYE populations and the management of any discretionary mortality inside and outside the DMA areas.

p. 110 – *“Population growth reduction hunt”.*

COMMENT: This hunt does not prohibit hunters from killing bears in groups, which is almost always females accompanied by cubs or yearlings or 2-year-olds. It is not ethical hunting to allow the killing of bears in groups. The result of this ill-considered policy will be orphaned young bears most of whom will die a slow death. The survival of orphaned cubs without their mother is unlikely. **This needs to be revised to clearly state that in any “Population growth reduction hunt” outside DMAs shooting of any animals in groups is prohibited to avoid orphaning dependent young.**

pp. 110-111 – *“Population growth reduction hunt. The primary anticipated benefit would be an enhanced sense of involvement and engagement among landowners living near the bears subject to this kind of hunt. FWP anticipates that an enhanced sense of landowner engagement that would accompany this type of hunting would help foster communication and cooperation with FWP bear managers and NGO staff working to minimize human/bear conflicts. FWP anticipates that increased communication and cooperation, in turn, would benefit grizzly bear conservation in areas where connectivity and population growth is an articulated objective. A secondary anticipated benefit would be enhanced acceptance among local residents of remaining bears because of the removal of some bears from these landscapes (i.e., areas where bears are not expected to contribute measurably to connectivity or to establish new populations). Bear-human conflicts would be anticipated to decline slightly simply from fewer bears being on the landscape.”*

COMMENT: These expectations are unsupported and unjustified. There is no evidence that hunting bears will result in “enhanced acceptance among local residents of the remaining bears”. One could just as easily assume that hunting would result in dissatisfaction from some



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residents who are opposed to any grizzly bears unless every bear in the area is killed in a hunt. Killing bears in a hunt would not reduce conflicts to any measurable degree.

Summary comments about hunting grizzly bears:

- Any hunt inside a core DMA based on science and facts should always assure that the population remains stable to increasing based on actual monitoring data.
- If a hunt inside core DMA areas was managed to assure that the core DMA grizzly population remained stable to increasing, the number of bears killed in a hunt would be very small in some years and zero in other years depending on annual mortality from all sources in the DMA.
- A grizzly hunt would be a trophy hunt because few if any people would hunt a grizzly bear to eat the meat.
- Hunting within at least two miles of National Park boundaries should be prohibited to avoid killing habituated park bears.
- A population reduction hunt outside of connectivity areas east of the NCDE should always prohibit the killing of bears in groups to avoid orphaning young bears. Any hunt that allows hunters to kill females with young would be completely unethical and would damage the image of sport hunters and fair chase hunting.
- This management plan must explicitly recognize and disclose that recent laws passed by the Montana Legislature make it difficult or impossible for FWP to adequately manage grizzly mortality because these laws allow anyone to shoot grizzly bears who “threaten” people or livestock, allow wolf trapping/snaring with bait, and allow hound hunting of black bears in areas where grizzly bears may be present. These are all actions that will result in unreported and unknown grizzly deaths or injuries. This should be clearly stated in this management plan because adequate regulation of mortality from a managed hunt depends on knowing how many bears die each year. These laws directly threaten FWP’s ability to manage mortality and therefore manage a hunting season.
- Reported grizzly deaths by those involved in wolf trapping/snaring with bait, and hound hunting of black bears in areas where grizzly bears may be present are likely to be very low because public knowledge of the fact that grizzly bears are being killed in wolf trapping and snaring with bait and black bear hound hunting would threaten the continuation of these activities. The result is that FWP will not know the actual number of grizzly deaths. This would result in FWP not being able to adequately regulate and limit grizzly mortality to sustainable levels, and therefore FWP would be unable to manage a grizzly bear hunt.
- Many of the justifications or “benefits” for hunting grizzly bears in this plan have no basis in fact and rely on tenuous and questionable assumptions and expectations about possible “enhanced acceptance among landowners” or suggestions that human-bear conflicts would decline because of hunting. All these statements to justify hunting based on imaginary benefits should be eliminated to preserve the integrity and legitimacy of this management plan.
- There are statements about financial benefits to FWP from general license sales or from a special tag auction to kill a grizzly that would allow the hunter to have unlimited access to several areas of his/her choice to make it attractive to a wealthy hunter to pay tens of thousands of dollars. A grizzly bear hunt would raise very limited funds for FWP because there should be few bears killed. An auctioned special tag for a trophy hunter to kill a



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grizzly bear might raise enough money to pay part of the salary and benefits of one bear biologist or one FWP bear management technician, but the public image black eye it would cause FWP might not be worth it.

- There are some references to the expected negative costs in terms of public image and public anger that FWP would pay for holding a hunt of an iconic animal that is revered by many parts of both Montana and US society. These should be explicit and recognized as costs in any discussion of hunting.
- There is opposition to grizzly hunting on cultural grounds among some Montana Native American tribes and this is not mentioned in this management plan. While this management plan does not have jurisdiction related to grizzly hunting on Tribal lands, many grizzly bears live parts of their lives on both Tribal and non-tribal lands. Any bears killed close to Tribal land boundaries will be bears that likely spend time on Tribal lands. The opinions and cultural beliefs of Native Americans in Montana about grizzly bear hunting should be considered and should at least be addressed in this management plan.
- In comparing the costs of grizzly hunting with the supposed benefits of grizzly hunting, it is difficult to see how the benefits outweigh the costs in terms of: 1) negative public perceptions about killing iconic animals recently recovered with tens of millions of dollars of public money by the ESA for the recreation of a minimal number of hunters; 2) public aversion to trophy hunting iconic animals (e.g. what happened in British Columbia where the grizzly hunt was abolished due to almost universal public opposition to trophy hunting); and 3) the public relations effort FWP would have to mount to try and offset the public relations damage.

p. 201 – *“If the population within the DMA is less than 600, which the Parties do not expect to occur based on their commitments under this MOA and other inter-agency commitments such as those described in the Strategy, discretionary mortality under the Parties’ respective authorities will not occur, except for management removals to address human safety issues.”*

COMMENT: This sentence makes no sense and should be removed from the Tri-state plan and this management plan. If the GYE DMA population is less than 600, this would be catastrophic decline of more than 40%. Long before the population reached this level agencies should have instituted drastic measures including reductions of all forms of discretionary mortality and other measures. This sentence seems to be a holdover from a previous time with the population estimate was much lower.

Specific suggestions to improve this management plan:

Reduction of human-bear conflicts:

- Increase emphasis on conflict reduction efforts including management response when conflict occurs, assistance with conflict prevention methods and tools for those who may be subject to conflicts, cooperation with groups and NGOs toward conflict reduction, and enhanced outreach and education to build public awareness of how to minimize conflicts with grizzly bears.
- Drop the “occupied areas” mapping process and instead use the where-grizzlies-may-be-present maps to identify areas where actions that will result in grizzly deaths and injuries will be prohibited. The where-grizzlies-may-be-present maps accurately



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represent where grizzlies are in Montana and conflict-free bears in these areas need to be protected from harmful practices that will result in their death or injury.

- Eliminate the tone of intolerance that pervades this management plan. Emphasize that grizzly bears that are conflict-free will be accepted wherever they are found in Montana.
- Drop the ill-advised idea that grizzly bears are conflict prone. Human-grizzly conflicts are almost always due to human actions or failure to secure attractants that bring bears into conflict, not because of bears. FWP should use conflict reduction efforts to reduce these conflicts by working with and assisting the public to secure attractants that get bears into conflicts.
- Emphasize the importance of connectivity areas and their role in maintaining healthy and resilient grizzly populations in Montana.
- Minimize sources of mortality in connectivity areas with conflict prevention efforts and never hunt grizzly bears in these connectivity areas.
- State that where grizzly bear expansion does not contribute to connectivity, FWP would have lower tolerance for grizzly bears involved in conflicts, but FWP would not proactively remove bears from these areas if they are conflict-free.
- Emphasize that conflict prevention and outreach and education efforts are valuable everywhere grizzly bears may occur inside and outside core areas and even where connectivity between core areas is unlikely.

Monitoring and mortality management:

- Require that every captured and dead bear anywhere in Montana should have its DNA monitored to determine if any reproduction has occurred between NCDE and GYE bears and to determine the origin populations of all such bears.
- Manage all mortalities from all sources in the NCDE including unknown/unreported mortalities calculated each year, known and probable mortalities, and the loss of grizzly bears by translocation out of the NCDE, to assure a probability of at least 90% that the grizzly bear population within the demographic monitoring area remains above 800 bears, which is equivalent of the total NCDE DMA population being at least 1000 bears.
- Manage mortalities including any limited hunting mortalities in the NCDE and GYE core area populations so these core area populations are stable to increasing as determined by annual monitoring data.
- Monitor and annually report all grizzly bear mortalities everywhere they occur in Montana by sex, age and mortality cause outside the NCDE and GYE DMAs and the Cabinet/Yaak Recovery Area, and especially in all connectivity areas.
- Recognize that hound hunting of black bears and wolf trapping using snares, traps and bait in areas where grizzly bears may be present are conflicts that will result in the death or injury of grizzly bears just like unsecured human-related attractants will result in the death or injury of bears.
- Require that everywhere that grizzly bears may be present¹¹ be off-limits to hound hunting of black bears, and wolf trapping using snares, traps and bait from March 16 to December 31 when grizzly bears may be outside of their dens.

¹¹ <https://www.fws.gov/media/grizzly-bear-may-be-present-map>



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- Specifically state how FWP will protect grizzly bears from mortality resulting from recent laws passed by the legislature. We recognize that FWP cannot change state laws, but FWP can limit the application of such laws to places where grizzly bears are not present so they will not harm grizzly bears. This plan should use the where-grizzlies-may-be-present maps¹¹ to identify areas where application of these laws concerning hound hunting of black bears and wolf trapping using snares, traps and bait is prohibited to reduce the risk of unregulated and unreported mortality to grizzly bears.
- Since the purpose of this plan is to “...articulate FWP's future vision for management should any grizzly bear populations in Montana be delisted” (this Management Plan, p. 5), FWP should detail how after delisting FWP will manage the areas and dates that wolf snaring and trapping using bait and hound hunting of black bears will be allowed in areas where grizzly bears may be present.

Hunting:

- Drop the idea that grizzly hunting is necessary to manage grizzlies. Hunting is not necessary to manage grizzly bears but could be considered in limited numbers and limited areas. Anyone killing a grizzly bear in a hunt should be required to remove all meat from the field.
- Instead of emphasizing hunting, this plan should emphasize conflict reduction efforts and techniques to decrease human-bear conflicts and increase public acceptance of grizzly bears.
- Never have any kind of grizzly bear hunt in connectivity areas.
- Never allow any grizzly hunters to kill any bears in groups to protect adult females.
- Eliminate the auction hunt. The sale of an auctioned trophy hunt of a formerly listed iconic species that was recovered with tens of millions of dollars of public money only to be killed for license money for FWP as a trophy will generate anger, distrust, and public outcry that will go far beyond any benefits to FWP.
- Eliminate the population growth reduction hunt. It is problematic for many reasons including acquiescing to grizzly intolerance by promoting the removal of non-conflict bears just because they are present and allowing females with cubs and older offspring to be shot thereby orphaning these cubs and offspring. It is unethical and indefensible for FWP to propose this.

Thank you for the opportunity to comment on this management plan.

Sincerely,

Christopher Servheen

Christopher Servheen, Ph.D.
President and Board Chair
Montana Wildlife Federation