



January 29, 2024

Chair Robinson, Commissioners -

On behalf of the Montana Chapter of Backcountry Hunters & Anglers, we submit the following comments on Commissioner Cebull's amendments to the proposed 2024 and 2025 Black Bear Regulations. Our members and supporters value our fair-chase hunting heritage, including our ability to chase Montana's black bears. Our thoughts on this come strictly from a standpoint of wanting these bear hunting opportunities to continue.

First, we are neutral on the minor changes to spring season dates and appreciate the clarification that quotas or sub-quotas would be retained. However, we do have issues with expanding the tooth submission pilot program that replaces the in-person harvest checks to regions 2, 3 and 4, and we respectfully ask that the Commission reject Commissioner Cebull's amendment to expand the tooth submission pilot project.

We had reservations about this pilot program in Region 1 from the beginning, but tabled our opposition due to Covid and staffing concerns stated in previous justifications; those factors no longer seem to be concerning, however, as they are not present in the justifications provided for this expansion.

One thing that is provided though is FWP's response that this pilot program was deemed a 'success,' yet nothing explains how success was measured other than compliance (about 90%), which we agree is good, especially since no citations were issued to those who failed to comply.

Conversely, another data point that was shared is that the pilot program resulted in some "23% of teeth submitted during the pilot year" not being "viable for age analysis which is higher than the 16% average for teeth not viable for age analysis seen by other states." And while requiring a second tooth can certainly help with this, we believe in-person checks and tooth extractions by trained FWP staff will lead to much more reliable harvest age data. If reliable harvest age data is the goal, we'd question whether this pilot program was in fact a success.

Additionally, while this proposal wisely excludes Regions 5-7 because of sow quotas, it's important to note that accurate sow/boar harvest data is still pertinent to the management of black bears in *all* regions. It's been explained to us that while technically yes, gender can be known from tooth samples, it's so expensive that FWP would only ever do that in the event of a court case, for example. But for the current tooth submissions, FWP does not and cannot test for gender. Please correct us if we're mistaken, but we're assuming this is why Region 5-7 with sow quotas have been left out of this tooth submission expansion proposal. Additionally, is there any promise that Regions 1-4 won't have sow quotas at some point in the future?



Similarly, it's been explained to us that while technically yes, black bear and grizzly teeth can be differentiated, it can be surprisingly difficult with these tooth submissions, something we didn't first realize. Again, it sounds like teeth can be differentiated at an extra expense, but not what FWP does with the average test. This too is reason for concern, especially, in the eyes of the non-hunting public.

When it comes to black bear hunting, we feel that hunters should do everything we can to ensure the general public that this sort of wildlife management is necessary and being done with every possible consideration taken into account.

- We take a bear ID test.
- We then buy a license.
- We abide by seasons, bag limits and quotas.
- We pack out all the meat, fat, hide and head.
- We present proof to wildlife managers that we didn't unlawfully harvest a sow with cubs, or cubs, or the wrong species.
- We collect important harvest data which is used to set management regulations, ensuring healthy populations of black bears remain.

In other words, Montana's hunters go to great lengths to check all the boxes we can that we're being responsible bear hunters and serving an important management need. To unnecessarily eliminate some of these reassurances - and to open the door to abuse and attacks from antihunters in the process - we feel would be unwise.

Finally, one often overlooked benefit of the in-person checks is the opportunity for FWP's staff to interface with hunters. These interactions provide more than just a data point; they serve as a way for our management officials to better develop mutually beneficial relationships with the public.

For these reasons, we respectfully ask that the Commission reject Commissioner Cebull's amendment to expand the tooth submission pilot project, but not because we don't trust bear hunters or don't want to see bear hunting continue; on the contrary, we want to make sure that black bear hunting continues and we trust that Montana hunters and see no reason we should be unwilling to get our bear harvests fully inspected. It may be a slight inconvenience, sure, but all privileges come with some level of inconvenience. Pulling and mailing teeth isn't all that fun or easy either, and comes with its own set of drawbacks, as noted in the proposal's mentions of the numerous issues encountered with the pilot program.

Thank you for the opportunity to comment,

The Montana Chapter of Backcountry Hunters & Anglers

