



Protecting Montana's wildlife, land, waters, and hunting & fishing heritage for future generations.

January 23, 2024

To: Montana Fish and Wildlife Commission

RE: Comments on proposed revision to the 2024 and 2025 black bear hunting regulations to allow hound hunting and chasing in the Ninemile area

I write to you on behalf of the Montana Wildlife Federation. We are Montana's oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners.

The Montana Wildlife Federation objects to allowing hound hunting and chasing of black bears in the Ninemile area north of I-90. There is no justification for this action, and it clearly contradicts the purpose and intent of the NCDE Conservation Strategy that MT FWP is a signatory to.

On p. 17 of the NCDE Conservation Strategy¹ it states:

“On the northwest and southwest corners of Zone 1, there are two DCAs (demographic connectivity areas) that are intended to support female occupancy and eventual dispersal to the Cabinet-Yaak (CYE) and Bitterroot (BE) ecosystems. In the Salish and Ninemile DCAs, habitat protections will focus on no net increase in motorized route miles or density and managing current roadless areas as steppingstones to other ecosystems.”

The Ninemile DCA is clearly shown on the map of the NCDE shown in Figure 3 on p. 36 of the NCDE Conservation Strategy¹ (shown on p. 2 of this letter).

These DCA's were created to facilitate female grizzly bear occupancy. This DCA area was justifiably closed to hound hunting because these DCA areas "...are intended to support female occupancy and eventual dispersal to the Cabinet-Yaak (CYE) and Bitterroot (BE) ecosystems ". Now, FWP and the Commission propose to open the Ninemile area to black bear hound hunting and chasing. Allowing hound hunting and chasing of black bears in this area will put grizzly bears at risk of mortality or injury due to conflicts with hound hunting of black bears which has a known serious conflict potential for grizzly bears. For FWP and the Commission to allow hound hunting and chasing in the Ninemile area violates the purpose and intent of the NCDE Conservation Strategy, which FWP is a signatory to.

¹ https://igbconline.org/wp-content/uploads/2023/03/NCDE_GrizzlyBearConservationStrategy_8.18.21_WithSignaturesAndEditSummary-2.pdf



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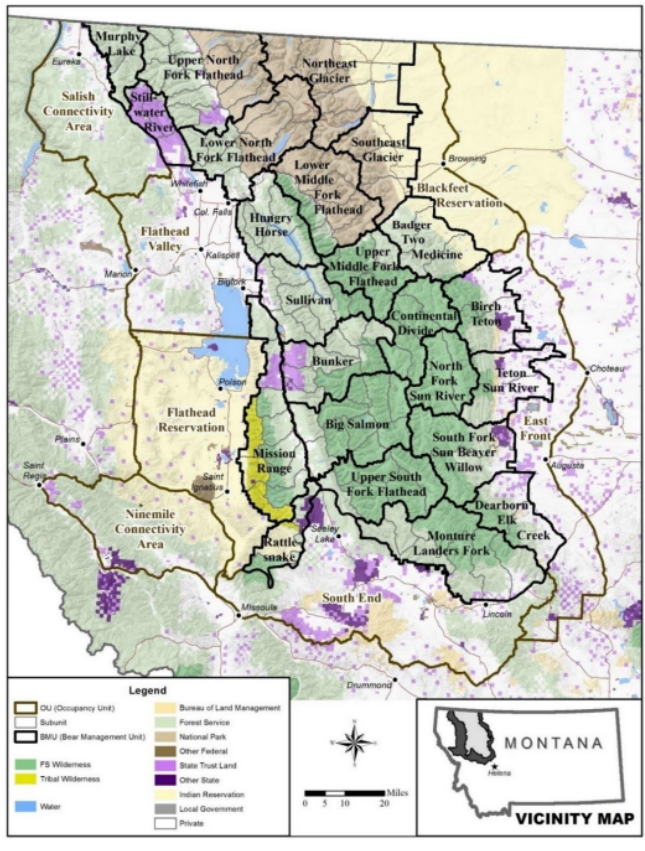


Figure 3. Bear Management Units (BMUs) and Bear Management Subunits (BMU subunits (see Glossary)) within the NCDE Primary Conservation Area, and Occupancy Units (see Glossary) within Zone 1. BMU subunits are outlined in light gray. The DMA includes Occupancy Units that are subdivisions of Zone 1 for population monitoring purposes. BMUs are within the PCA for habitat and population management and monitoring while Occupancy Units are within Zone 1 for population monitoring.

The Montana Wildlife Federation strongly urges FWP and the Commission not to open the Ninemile area to hound hunting and chasing of black bears.

Thank you for the opportunity to comment on this proposed change to the black bear season.

On behalf of the Board and membership of the Montana Wildlife Federation,

Christopher Servheen, Ph.D.
President and Board Chair