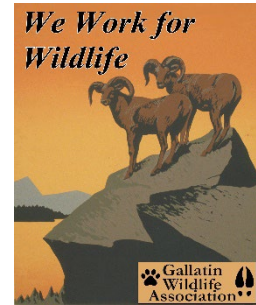


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December 5, 2023

Subject: Proposed changes to Black Bear hunting regulations
As stated in Amendments 4 and 5 from Commissioner Cebull

Dear Montana Fish and Wildlife Commission:

Montana Fish and Wildlife Commission will be holding a meeting on December 14 for the purpose of discussing proposed hunting regulations for the 2024/2025 season. Commissioner Brian Cebull from Region 5 has submitted 5 proposed amendments, of which, amendments 4 and 5 pertain to black bears. The Gallatin Wildlife Association would like to provide comments on these specific two amendments so they might be officially considered for the record.

The Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c) (3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

We will say at the outset that neither amendment was requested by Montana Fish, Wildlife, and Parks. These amendments are a result of proposals by Commissioner Cebull himself.

Amendment 4: Commissioner Cebull moves that the Fish and Wildlife Commission adopt the following amendment to the proposed 2024 and 2025 Black Bear Regulations:

1. Set a statewide spring Hunting season closure for Black Bear to June 15.
2. Expand to statewide the Region 1 pilot that allowed hunters to submit extracted teeth instead of having to present a head and carcass. Also require that each hunter submit 2 molars instead of 1.

Amendment 5: Commissioner Cebull moves that the Fish and Wildlife Commission adopt the following amendment to the proposed 2024 and 2025 Black Bear Regulations.

1. BMU 520: Set spring season to May 1- June 15.

Addressing Amendment 4: Current spring black bear open season dates vary across the state with most hunting districts consisting of an April 15 to May 31 date. Having said that, we recognize that several other hunting districts hold an open season of April 15 to June 15. Amendment 4 standardizes the closing dates by two weeks across the state to those hunting districts not already in compliance with the June 15 closing date. We do need to say these dates are only viable if quotas are unfilled. According to the provided rationale:

“BMU/HD quotas a standardized closing date of June 15 would only remain if the quota was unfilled.”

Therefore, by extending the dates, this wouldn't necessarily increase the quota of black bears taken, but only help ensure that limits (quotas) are met.

GWA opposes this action of extending black bear hunting season simply for no other reason than there is no purpose or scientific rationale for doing so. While we appreciate the desire to standardize closure dates, we do not believe this is a justifiable rationale when it involves the killing of wildlife. To increase the take of wildlife for man's internal purpose, to make life easier for himself is not moral or scientific.

The same holds true for the other reason given, that heavy snowpack in some hunting districts prevents quotas from being met. While we understand the desire to manage hunting means consideration must be given to the human element in this equation, GWA does not believe that it is the agency's responsibility to make sure every hunter makes his/her quota. The fact that a region gets very little hunting opportunity due to heavy snowpack by June 1st is not a scientific driven reason. It is simply based upon trying to obtain hunter satisfaction.

Addressing Amendment 5: This amendment pertains to the specific hunting district 520, the district lying along the northern and eastern face of the Beartooth Mountains. While this proposal does not extend the open season, it primarily pushes the open season back by two weeks. Instead of the open season being from April 15 to May 31, the proposed open season would be May 1 to June 15. Again, the rationale for this move is to allow better access for hunters to the back country that would normally be prohibitive in the past due to heavy snowpack.

GWA once again urges the commission to deny the passage of amendment 5. We do so for the following reasons. One, we can't help but rationalize that there is something larger at play. It seems as if the only reason to make changes is to increase the likelihood of reaching the quota for HD 520, to make life easier for the hunter. The fact that Montana Fish, Wildlife, and Parks didn't request this action is reason enough to question the need for such action. GWA has a hard time granting the request to hunting regulations based upon the request of one commissioner. Changes to regulations and management policies should be based upon sound scientific principles. We don't see that here.

The second reason for not approving of either amendment has to do with the population of black bears across the state. In the spring of this year, it was announced that Montana

Fish, Wildlife, and Parks was going to begin a bear monitoring program across the state, to help gain a better understanding of the black bear population and their habitat. The purpose of doing so is to gain a better accounting for regional differences, to better inform management decisions. According to an article entitled “*Montana black bear study: Montana wants to know how and where black bears live*” published by Montana Living on May 10, found here at this website:

<https://www.montanaliving.com/blogs/outdoors-adventure-in-montana/montana-black-bear-study>

The following statement is made.

“The study aims to estimate bear abundance, where they are found, what types of habitats they use most frequently and provide a better understanding of survival rates and causes of mortality for males, females, and cubs.”

GWA strongly urges that the Commission holds off from making any changes in black bear regulations until results from this study can be analyzed. Let’s make these types of decisions based upon science rather than guessing what needs to be done or based upon the desire to make changes just to increase the take of the black bear, or that of any species. Why not simply wait?

Another point of concern before we close, GWA is concerned about the incidental take of grizzly bears through increased chances of mistaken identity. This is especially concerning as it relates to grizzly bears females with cubs. If the female is killed, the cubs have very low chances of survival in the wild. The chances of this likelihood always increase with opportunity. There needs to be more thought put into mitigating such impacts.

We are in agreement with the statement below as laid out in Amendment 5. This is a proposed action that GWA can support. Commissioner Cebull mentions and recommends that Montana Fish, Wildlife, and Parks implement some training for hunters.

“In addition, since sows are the key to maintaining a population, I’d recommend that the Department implement bear ID training for hunters to help them be able to identify sows to prevent the female harvest from closing the season so early.”

GWA supports this idea, but recommend we take this a step further and recommend that additional training take place in order to ingrain the differences between grizzly bears and black bears. One might think that these differences are obvious to the trained hunter, but we suspect that definition is not as sound we many would like. What may be obvious in a picture may not be in the wild especially when adrenaline is flowing, and excitement builds in the wild. Further training is necessary to prevent the accidental killing of grizzly bears.

For these reasons, GWA urges the entire Montana Fish and Wildlife Commission to reject Amendment 4 and 5 at this time. We thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association