



January 23, 2024

Submitted via online Fish and Wildlife Commission Meeting- Public Comment Portal

Submitted via email to FWComm@mt.gov

Montana Fish and Wildlife Commission
Montana Department of Fish, Wildlife and Parks
Wildlife Division
PO Box 200701
Helena, Montana 59620

Re: 2024-2025 Season Setting- Black Bear Proposals

Dear Members of the Commission,

Thank you for the opportunity to comment on the black bear proposals for 2024-2025 season setting. The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, Montana. Its five field offices, strategically placed in Idaho, Wyoming, and on the Wind River Indian Reservation, create opportunities to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem now, and for future generations. For more than 40 years, GYC and our 100,000 supporters from across the country have advocated for a science-driven, collaboration-focused, and forward-thinking approach to keeping lands wild, rivers free-flowing, and iconic wildlife moving throughout a connected and vibrant landscape. The following comments are specific to the proposed hunting districts where black bear hound hunting would be prohibited due to overlap with occupied grizzly bear habitat.

GYC has worked on grizzly bear conservation since its inception 40 years ago. We strive to build collaborative partnerships with agencies and communities to protect core grizzly bear habitat, promote connectivity between grizzly bear populations, and reduce/prevent conflicts. Due to Montana's leadership in grizzly bear conservation, interagency efforts, and community support for grizzly bear recovery and range expansion, grizzly bear conservation is a tremendous success story. As home to the two largest grizzly bear populations in the lower-48 states and connective lands between, we believe Montana is uniquely positioned to build on this success story and ensure grizzly bears thrive in the state long into the future.

Hound hunting for black bears poses a risk for incidental take of grizzly bears. For that reason, we appreciate FWP's proposal for areas where hound hunting for black bears will be limited or prohibited. However, we believe the proposal is incomplete and strongly urge the commission to prohibit hound

hunting of black bears anywhere in or near occupied grizzly bear habitat, in places where grizzly bears may be present, and in important connectivity areas between grizzly bear recovery areas. To meet requirements under Section 7(a) of the Endangered Species Act (ESA), and based on our interpretation of the United States Fish and Wildlife Service methodology for [potential grizzly bear presence](#), the hound hunting closure area should be expanded to include all of black bear management units 200, 240, 216, 301, 316, 317 and 319.

There is consensus among many wildlife professionals and bear biologists that grizzly bears will not respond to pressure from hounds in the same way as black bears. More specifically, grizzly bears are likely to exhibit a fight rather flight response if harassed by hounds. These conflict scenarios will almost certainly lead to human, hound, and/or grizzly bear injuries or fatalities through defensive action by hunters to protect personal or hound safety (especially considering new Montana administrative rules governing citizen take of grizzly bears exhibiting ‘threatening’ behavior). Over 35 wildlife professionals with expertise in grizzly bear conservation and management stated in a January 2022 opinion piece in the Billings Gazette and Missoulian that, “The use of hounds to hunt black bears will result in conflicts and deaths for grizzly bears in the areas where hounds are used.”

Weakened regulatory mechanisms around grizzly bear mortality will make it more difficult for the state to pursue delisting of grizzly bears from the ESA. Therefore, it is not in the state of Montana’s best interest to allow for activities that will likely result in an additional source of conflict related grizzly bear mortality both within Demographic Monitoring Areas *and* important connectivity zones between recovery areas (based on recent best available science; see Sells et al. 2022, 2023a, and 2023b). Demographic connectivity between isolated grizzly bear populations would restore the metapopulation structure that historically characterized grizzly bear presence within the intermountain west (Merriam 1922, Picton 1986, Craighead and Vyse 1996). Restoring an interconnected metapopulation of grizzly bears will be important to the long-term persistence of grizzly bears in the United States (Proctor et al. 2005) because it will address genetic isolation and create resiliency to environmental changes (Haroldson et al. 2010, Breitenmoser et al. 2001, Hedrick 1996, Hedrick, and Gilpin 1996).

We respectfully ask that you expand closures areas for black bear hound hunting to include all current grizzly bear occupied range, areas where grizzly bears may be present, and important connectivity zones between recovery areas. Thank you for your consideration.

Sincerely,

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Wildlife Conservation Coordinator
Greater Yellowstone Coalition

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