

# Analysis of Public Comments on DRAFT GBAC Recommendations

Updated as of 5:00 p.m. on August 4, 2020 (last online comment incorporated was #9938). We will continue to monitor and incorporate comments through the end of the day. Note that some of the comments refer to sections and page numbers in the draft documents. The Council's draft documents have changed some in the last two iterations and therefore references might be slightly off from the most recent draft.

<b>Background .....</b>	<b>1</b>
<b>Topics .....</b>	<b>2</b>
Support for Council's Efforts .....	2
Communication and Education .....	2
Conflict Prevention .....	2
Connectivity .....	3
Delisting .....	3
Funding .....	3
Guiding Principle #9 and/or Recommendations #19, #23, #30 .....	4
Guiding Principle #11 .....	4
Guiding Principle #13 .....	4
Guiding Principle #15 .....	4
Habitat .....	4
Hunting – Opposition .....	4
Hunting – Support .....	5
Hunting – Qualified Opposition/Support .....	5
Hunting – Conditions for Hunt .....	5
Hunting – Other .....	6
New Guiding Principles .....	6
Preamble .....	6
Private Land and Property Rights .....	6
Process .....	6
Recreation and Tourism .....	7
Social Tolerance .....	7
Science .....	7
Translocation .....	7
Transportation .....	7

## BACKGROUND

At the request of the Governor's Grizzly Bear Advisory Council (Council) and the public wanting an opportunity to comment on the Council's draft recommendations, FWP invited the public to provide input on the Council's July 17 and July 24 draft documents. The comment period was from July 17 through August 4. This was in addition to the public commenting opportunities that existed since the Council's first meeting in October of 2019. The Council has been monitoring public input since the beginning of the process and will consider this information as it prepares a final report. It is worth noting that the Council is a citizen advisory group with broad representation and diverse interests, an effective format for public engagement in addition to the input provided by other members of the public.

The Council received 134 online comments and several written letters during the July 17 - August 4 time-period. To aid the Council in considering the comments and preparing its final recommendations, FWP analyzed the comments and provided a summary based on observed topics/themes (this document). All the original comments have been provided to the Council, including those dating back to the Council's first meeting.

The Council's process was based on a goal of seeking consensus where possible – voting only when necessary to make process and formatting decisions. Similarly, the Council was advised that the public comments do not serve as a “vote.” The number of comments expressing a similar viewpoint can be informative to gauge public opinion. Equally important, a single viewpoint may contain critical information. The comment analysis does not tally the number of comments expressing a particular view point. The analysis did point to the fact that the topic of hunting grizzly bears received the most comments, including opposition and support for a hunting season.

## **TOPICS**

### Support for Council's Efforts

There was broad recognition and appreciation of the Council's hard work and commitment. The appointment of the Council is indicative of the progress made toward recovering and conserving grizzly bears in Montana. There was recognition of the Council's collaborative, diverse approach for identifying durable solutions for grizzly bear conservation and management.

### Communication and Education

- Importance of communication and education
- Support for additional funding and FTE for Information and Education work
- Support for standardized language, practices and tools
- Important role of education in preventing and minimizing conflicts
- Suggest that Recommendation #2 be revised to require nonresident hunters to obtain bear safety education

### Conflict Prevention

- Support for working with willing landowners, providing dollars and incentives for this to occur
- Support for statewide community guidelines/protocols for urban/resident conflict prevention
- Support for statewide guidelines for waste management
- Support for standardized food storage orders on public lands
- Support for non-lethal conflict prevention measures
- Recommend Council reinsert paragraph 15(b) calling for Livestock Loss Board to conduct research and prepare best management practices for preventing conflicts
- Suggestion that all FWP employees should be trained to shoot encountered grizzlies with rubber bullets to increase fear of humans
- Predation and conflicts are a cost of doing business
- Livestock producers already use non-lethal conflict reduction measures; even with these measures, predation on livestock by large carnivores will continue to occur

- Non-lethal conflict reduction measures must occur in addition to appropriate and durable compensation strategies
- Require hunters to carry bear spray
- Strengthen efforts to reduce human-caused mortality

### Connectivity

Considerations for establishing connectivity between recovery zones:

- Use best available science to define lands of highest conservation value
- Support connectivity in Montana, and between MT, Idaho, Wyoming and Alberta
- More money \$ for researching linkage areas
- Importance of protecting habitat for connectivity
- Genetic and demographic importance of connectivity

### Delisting

- Grizzlies have recovered in Montana and should be delisted
- Grizzlies have not sufficiently recovered and should remain listed
- Delisting decision should be science-based
- Delisting decision should not be based on whether a hunt might occur in the future – the decision should be determined based on the goal of recovered populations
- ESA is broken
- Management does not stop with delisting, it just changes
- Recommendation that the ultimate goal should be delisting the bears
- Opposition to the idea that all four recovery zones need to be recovered in order for bears to be considered recovered

### Funding

- Additional funding for bear management specialists, technicians
- Full funding for Livestock Loss program
- Funding for private land conservation
- Hunters (license buyers) have long supported wildlife conservation and grizzly bear management work specifically
- Reliance on hunting license dollars for wildlife conservation is outdated, especially for GBs; consider new sources of funding
- GB-related tourism is a renewable source of income to the state's economy
- Opposition to additional taxation to support GB conservation/management; should rely on existing FWP budgets, grants, philanthropy, and sharing resources and costs among the agencies
- Private landowners and local communities need financial resources and education to help prevent conflicts
- Recommend that livestock owners must implement non-lethal measures as a pre-requisite to be eligible for financial compensation should they lose livestock to grizzly bears
- Suggest highlighting the need for increased resources for not only conflict prevention tools themselves, but also for implementation of those tools and necessary maintenance

## Guiding Principle #9 and/or Recommendations #19, #23, #30

Concerns about GP #9 and Rec. #30 as written:

- Support for allowing bears to expand eastward
- Incorrect to assume bears expanding East don't contribute to connectivity zones; some do – NCDE strategy supports this
- Opposition to identifying areas where bears are considered less important, where their removal could be prioritized (GP 9 and Recs. 28 – 30)
- Opposed to establishing East/West line
- Request for meaning of language referring to “areas not critical to long-term vitality of GBs”; criteria for doing so?
- Opposed to FWP/USFWS determining where bears should and should not be allowed; natural dispersion should be encouraged

## Guiding Principle #11

- Recommend prioritizing this principle; flexibility and adaptability to complex and diverse landscapes and conditions is essential

## Guiding Principle #13

- Support for recognizing that “biologically suitable does not always mean appropriate”
- Suggest removing sentence “Not all of these settings...”

## Guiding Principle #15

- Comment disagreeing with Guiding Principle #15's assumption that there are places in Montana unprepared for the presence of grizzlies. This can be addressed by way of increase funding for conflict specialists in expanding areas.
- Suggest reframing this principle to a more visionary/positive focus; noting that with adequate resources Montana can figure out ways to live with grizzly bears

## Habitat

Support for protecting habitat:

- Protect large landscapes, roadless areas
- Protect habitat for connectivity purposes
- Important to protect WSAs and IRAs
- Successful recovery of GBs and conservation of their habitat is due in part to the financial support and changes in management practices by public and private landowners

## Hunting – Opposition

Opposition to hunting grizzly bears:

- Opposition to trophy hunting
- Hunting not necessary for managing GB numbers, amounts to a trophy hunt
- Science does not support a hunt
- Bear numbers are not high enough to support a hunt
- Tribal interests opposed to hunt

- Public backlash if a hunt occurs
- Negative impacts on tourism economy
- Already GB mortality from other activities (road kill, trains, management decisions)
- Too many other threats to consider hunting, e.g., climate change, loss of GB food sources
- GBs valued for their existence, intrinsic value
- Hunting would not increase social tolerance for bears
- Hunting would not deter or prevent conflicts with humans, livestock, etc.
- Low reproduction rate of GBs
- Potential for accidental shooting of sows, cubs
- Opposed to hunting GBs in Yellowstone National Park
- Council should recommend that FWP Commission amend ARM 12-9-140(1)(c)(ii); opposed to language stating that sport hunting is the most desirable means of managing GB numbers
- An outside analysis of the public comments estimates that approximately 80 percent of the comments were opposed to a grizzly hunt, with comments coming from Montanans and others around the country

### Hunting – Support

Support for grizzly bear hunting season:

- Support for a limited, science-based hunt
- GBs need to be managed like other wildlife species
- Effective tool for managing bear populations
- Hunting is conservation
- Hunting would generate revenue for GB conservation, wildlife management
- GBs are no longer threatened or endangered, numbers warrant a hunt
- Hunters have been paying for GB conservation, should have opportunity to hunt
- Hunting will teach bears to respect humans, prevent conflicts
- Acknowledgement of original Governors’ Grizzly Bear Roundtable for GYE, the GYE Conservation Strategy, and its conclusion supporting a science-based hunt for managing bear numbers
- Hunting will contribute to social tolerance for GBs

### Hunting – Qualified Opposition/Support

Qualified opposition or support:

- Opposition to a trophy hunt but supportive of hunt based on science, population management
- Opposition to hunt unless no other areas are available for relocating bears and populations objectives have been met

### Hunting – Conditions for Hunt

Input on how a hunt should occur:

- Hunt should target problem bears, hunts aided by presence of FWP staff
- Hunt should not target problem bears, ineffective
- Limited season and harvest
- Limit it to one tag in a person’s life
- Backcountry hunts only – not near roads, human populated areas

- Require utilization of meat
- Require GB hunter education
- Severe penalties for taking of sows, cubs
- Don't establish hunts in connectivity areas

### Hunting – Other

- Suggest splitting the hunting portion of the recommendations into three parts: 1) value considerations for and against, 2) the facts about the role hunting can or cannot play, and 3) potentially important criteria for if a hunt were to take place

### New Guiding Principles

- Suggest adding a new guiding principle recognizing grizzly bears as a native species that should be managed according to public trust principles
- Suggest adding a new guiding principle that identifies coexistence as a primary goal for management

### Preamble

- Suggestion that preamble include both importance of genetic connectivity and demographic connectivity
- Suggestion that preamble recognize that human caused mortality is a major factor

### Private Land and Property Rights

- Recommendation to add a guiding principle that recognizes the importance of private property and related rights, that grizzly bear management/conservation is important but should not diminish these rights
- There should be recognition of the many societal and land management changes and improvements over the years that have aided GB conservation
- Private landowners should be provided with some certainty surrounding the legal and financial risks they incur in having GBs on their lands
- Livestock producers have a connection to the livestock, land and wildlife they steward
- Producers do not want to see livestock killed by GBs; it isn't just a matter of receiving compensation dollars
- Concern over the unnecessary, counter-productive rules and regulations that follow the presence of grizzly bears

### Process

- Diversity of interests on Council further divides sportsmen from FWP and decision-making
- Concern that Council lacked representation of bicycling and trail running interests
- Concern over lack of analysis on public comments received
- Concern that results of Montana household grizzly survey were not available to Council
- Recommend that Council not spend more time trying to reach consensus on topics where consensus has not been reached thus far
- Support for developing a statewide grizzly bear management plan

- Opportunity for Council to influence future planning effort by emphasizing the value of its collaborative, diverse process and recommending a similar approach to the planning process
- Request a minimum two-week formal comment period on the GBAC's final recommendations
- Concern that process didn't include a broader set of scientific presenters, researchers, etc. – beyond FWP

### Recreation and Tourism

- Support for bear-smart tourism and recreation
- Concern over “red font text” in item 16(d) that suggests temporary trail closures and adjustments to special use permits as tools – how these could negatively impact the cycling and trail running community and local economies that benefit from these activities
- Biking community is wildlife aware
- Rather than restricting recreation opportunities, better to emphasize education

### Social Tolerance

- With expanding GB and human populations in Montana, we need a societal shift in attitudes to accommodate the needs of bears and people on this shared landscape
- Tolerance should be extended in both directions, for bears' needs and people's needs – not always deference to the bears' needs

### Science

- Grizzly bear management and related decisions should be based on science
- Value of agency and non-agency science (e.g., NGOs, universities, etc.)
- Socio-economic data should be considered secondary to best available science.
- Research needs to be ongoing and adaptive to new conditions
- Suggest that FWP create a state-wide publicly-accessible database that tracks annual grizzly mortality across the whole state, modeled after GBST database for GYE

### Translocation

- Support developing translocation guidelines to aid connectivity
- Opposition to translocating bears; better social tolerance if they move on their own
- Support for repopulating Bitterroot Ecosystem

### Transportation

- Support for collaboration between FWP, MDT, and other agencies and tribes
- Support for identifying priority areas for wildlife crossing and specifically areas important to grizzly bear passage
- Highways and logging roads impact GB movement and connectivity