# MINERAL COUNTY BOARD OF COMMISSIONERS

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These comments and recommendations are being offered on behalf of the Mineral County Commissioners. As commissioners, we are charged with the responsibility of managing the safety and financial wellbeing of our businesses and communities to the best of our ability, a roll we take very seriously. With over 90% of the land base in Mineral County tied up in National Forest System (NFS) land, the economic stability of our rural communities is highly dependent on the timber and recreational resources provided by our National Forests across all of Western Montana. Therefore, we are extremely sensitive to restrictive state and federal regulations that inevitably follow grizzly bears as they disperse across the landscape.

Our comments and suggestions will reference Three documents that we believe provide guidance and answers to important questions the Advisory Council will attempt to address regarding grizzly bear management. We have outlined what we believe is key information from these documents that the council may want to consider as they respond to the Governors executive order.

**Governors Executive Order No. 9-2019** (executive order) creating the **Grizzly Bear Conservation and Management Advisory Council** (council)**:**

1. Grizzly bears are feared and can affect people's livelihoods and safety. Long-term coexistence of people and grizzly bears across the landscape will remain a challenge.
2. Develop recommendations related to the conservation and management of grizzly bears in Montana, particularly those issues on which there is significant social disagreement. Provide discrete, actionable, recommendations with clear and meaningful guidance.
3. Recognize existing intra-agency and interagency commitments, conservation strategies, monitoring protocols, commission policies, recovery plan criteria, and forest plans.
4. Maintain and enhance public safety and improve effective response to grizzly conflicts.
5. Ensure a healthy and sustainable grizzly population.

The current **Grizzly Bear Recovery Plan:**

1. States that recovery zones are to be managed Separately.
2. Indicates Populations can be listed as recovered separately from delisting.
3. States Recovery Zones must have a signed conservation strategy before the can be delisted.
4. Discusses population guides for delisting

The "Proposed" **Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem –** 2019**:**

1. A "proposed" strategy was published in 2019. There are references to amendments to the document in early 2020 but we have not found a signed document.
2. The document discusses and provides guidance for grizzly bear movement and connectivity.
3. It addresses public safety and grizzly bear education issues.

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4. It also addresses population issues for delisting and managing after delisting.
5. Proactive and timely response to conflicts is addressed.

The following comments and suggestions address just a few of the concerns we have regarding management of grizzly bears and the suggested recommendations we would like to see the council include in their final report to the Governor. We believe these comments provide the Governor with meaningful, actionable recommendations as requested in his executive order.

1. Over the years the number of grizzly bears required to be consider recovered in the NCDE and the GYE recovery zones has been increased at least twice, each time these population goals have been met and exceeded including the occupancy of females with dependent cubs. By all counts current populations in these two recovery zones exceed current population goals. We believe the council should make the recommendation to officially list the bear population in these two recovery zones as recovered, paving the way for delisting when the conservations strategies are finalized. This action is allowed in the Grizzly Bear Recover Plan.
2. Both the Grizzly Bear Recovery Plan and the proposed Conservation Strategy state that all recovery Zones are to be managed separately. A statement that lumps all four together is not consistent with existing management direction. Additionally, only a very small percentage of the Bitterroot recovery zone is in Montana, the rest is in Idaho. The reason that area has had no effort put towards recovering grizzlies is that the state of Idaho has opposed the program including a lawsuit filed by the Governor. The council can certainly make a recommendation for a recovery program in that area but ultimately it seems that decision lies with the Idaho State Government. We believe a more appropriate course of action would be to make a recommendation to the governor for the State of Montana to be prepared to assist in the Bitterroot recovery effort if and when the State of Idaho decides to move forward with a recovery effort in that ecosystem.
3. Each recovery zone must have a signed conservation strategy adopted before the bear population can be delisted in a particular zone. A final version of the NCDE conservation strategy came out in March but has not yet been signed by all parties. While we have not yet received an update on the GYE conservation strategy we are relatively certain that document is still in the 2016 draft form. We believe this should be addressed by the council to ensure there is a conservation strategy is in place for both the NCDE and GYE recovery zones with a recommended date in 2020 for that to be completed.
4. We believe the issues the council is currently struggling with regarding a vision statement cannot be answered by lumping all recovery zones together. Each Zone is in a different place in the recovery process. Once the NCDE and GYE have signed conservation strategies in place they are ready for delisting. The Cabinet-Yaak is in a much different place and requires a different thought process altogether. We believe the council should recommend delisting of grizzlies in the NCDE and GYE immediately after the conservation strategies are completed.

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5. Grizzly bears are not new to our area or all of Western Montana for that matter. To the credit of the recovery effort, grizzly bear numbers are growing and bears are expanding their range. Miraculously this is happening for the most part without any additional regulations. Over the years, Regulations around grizzly bear management have generally not been a proactive measure put in place to create a desired outcome, they are usually a reaction to an activity or process that has already taken place or that is in the process of taking place. Grizzly bears are welcome with ESA protection, as long as they come without any additional regulations.

   Communities throughout Montana all have different needs, different lifestyles, enjoy different types of recreation, and have different types of employment opportunities. We can't log or Farm in Glacier Nation Park, and there are places where bears don't belong either. However, if we don't beat people over the head with regulations and restrictions, bears will generally be welcome across most agency land. The bears are not the problem, it is the regulations. People don't just generally hate grizzlies, they hate the regulations that follow them. If the council wants to help improve the long-term relationship between people and grizzlies, you should look for ways and make recommendations to reduce regulation not add more.

6. Hunting can be an effective way of managing problem grizzlies and maintaining populations. While it may not be needed immediately following delisting, we hope the council will recommend keeping the option on the table for future management purposes.

In closing, we want to thank the council for the opportunity to provide comments on grizzly bear management in Montana. It is a tough job you have but we believe if you rely on the work that has already been done by the US Fish and Wildlife Service, the Grizzly Bear Recovery Plan, and the Grizzly Bear conservation Strategies for the individual grizzly ecosystems, your job would be much easier. Unless you intend on recommending changes to these documents, they are the guiding documents that will ultimately lead grizzly bear management into the future anyway.

Respectfully,

Duane H Simons

Duane Simons, Mineral County Commissioner

Laurie Johnston

Laurie Johnston, Mineral County Commissioner

Roman Zylawy, Mineral County Commissioner