PEOPLE AND CARNIVORES
Solutions that work for people and wildlife

July 16, 2020

Montana Grizzly Bear Advisory Council
Delivered via: Shawn Johnson, Facilitator shawn.johnson@mso.umt.edu
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Re: Grizzly Bear Advisory Council Recommendations

Dear Montana Grizzly Bear Advisory Council:

Thank you for all your individual and collective work on behalf of Montana citizens. Please accept this letter as input from People and Carnivores on topics being considered by the Montana Grizzly Bear Advisory Council (the Council). The Council has been tasked with strategic objectives relating to the management of grizzly bears, including human safety, a healthy grizzly population, effective response to conflicts, and more. We appreciate the opportunity to comment.

I. People and Carnivores' Orientation to Grizzly Bear Conservation and Management

We'd like to begin by briefly highlighting our orientation to our shared work of conserving and managing grizzly bears in Montana. For the last twelve years, People and Carnivores (P&C) has been working in the field to reduce conflicts between large carnivores and Montanans. We are the only organization focusing solely on conflict prevention as a means of conserving large carnivores, facilitating ecological connectivity, safeguarding people and property, and helping preserve rural communities and livelihoods. We partner with agencies and landowners to design, implement, and maintain proactive solutions on the ground that keep carnivores separated from people or attractants. We value our strong relationships with federal and state agencies, including the Department of Fish, Wildlife & Parks and others.

At P&C, we focus on solving problems. We seek win-win solutions because we know they're achievable when people are open to participating. We recognize that conservation work, especially involving wolves and grizzlies, is highly nuanced and complex. Although we work towards lethal control being a last resort after proactive solutions are exhausted, we understand that the removal of problem animals is a necessary tool for this work. This approach allows us and our partners to explore the full range of possible solutions to the risks wild carnivores present to people. We embrace the fact that while we may have different perspectives than our partners on some issues, we can still collaborate on shared goals. When we meet people where they are with empathy and respect, we find that goals largely overlap. Conflict prevention is at the heart of this approach and we believe that prevention efforts should be emphasized and

significantly expanded as our state's management of grizzlies continues to evolve. The Council has a unique opportunity to advocate for such an approach.

II. People and Carnivores' Comments on Topics Being Considered by the Council

We have followed the work of the Council with great interest and read the Consolidated Draft Recommendations being discussed and written. Thank you for all our time and effort to craft these recommendations. Below we comment not on all topics included in the Draft Recommendations, but on a few that we find generative and important.

A. Education and Outreach, and Preparation for Grizzly Bear Presence

We wholeheartedly agree with the Council's recommendations related to education and outreach and would highlight the need for a comprehensive program focused on preparing Montana residents and visitors to expect grizzly presence and learn to safely live with them. Such a program should also focus explicitly on preventing conflicts in communities, on ranches and farms, relative to tourism and visitors, and in the backcountry. We particularly support the Council recommending to cities and towns that they develop and implement plans for these purposes. Elevating and articulating the need for preparation, whether it results in certification, community-defined "bear aware" programs, ordinances/regulations, or some other model, the Council's recommendation will carry weight as public officials and residents across the state consider responding to grizzly bear expansion. Some communities may not be aware that it's time for them to prepare for grizzly bear presence. The more we can be proactive and get ahead of bears to prevent conflicts, the less fear and negative experiences will drive the discussion, all of which will support more effective management of grizzly bears.

B. Grizzly Bear Distribution

We are fortunate in Montana to be located largely in the geographic center of grizzly bear presence in the Lower-48 states. While living with grizzlies can be challenging, grizzly bears bring a unique value to the state, its economy, its residents and visitors. In Montana and beyond, our hope is that grizzlies have the ongoing opportunity to recolonize and/or move through areas of historic range, including for the purposes of strengthening recovery zone populations, connecting bears from these established populations, and recolonizing central Idaho.

In the Draft Recommendations, the Council has written that "Grizzly bears should be managed to meet the recovery population goals" within recovery areas. We urge an alternative framing and focus to the issue of distribution: Rather than starting with a limiting goal such as recovery population goals (which are outdated and establish minimal goals), we propose that grizzlies be managed for ecological and conservation purposes (i.e., typical grizzly behaviors and movements leading to range expansion/recolonization and connectivity), and that we simultaneously work to ensure people and property stay safe. Expanding the use of conflict prevention would relax the need to approach management with restrictions and constraints. Obviously, to the extent grizzlies prevent challenges to people and their activities/livelihoods, all tools must be used/considered,

from proactive prevention to lethal control of troublesome bears. But rather than putting a ceiling or limit on grizzly recovery right from the start, we suggest placing the focus on improving the ways in which humans and bears interact throughout occupied grizzly habitat.

C. The Role of Hunting

No doubt this may be one of the most generative and challenging issues for the Council, with strong feelings and opinions on all sides. In its Draft Recommendations, the Council has outlined two main perspectives: (1) A sport/big game hunting-heritage perspective that includes the hunting of grizzlies and which is thought to improve trust with landowners (social tolerance); and (2) A perspective that reflects a few sub-arguments, for example – that grizzly bear management should not require hunting, that discussion of grizzly hunting is premature and not supported by data, and that grizzlies have intrinsic and economic value and thus should be managed for their non-consumptive values.

Interestingly, both of the primary argument streams appear to be mostly value-based. There may be ecological/biological reasons (with scientific support) to forego a hunt; for example, if natural connectivity is a priority, because every dispersing bear is critical and hunting them may impede dispersal and therefore connectivity.

There don't appear to be ecological or biological reasons compelling a grizzly bear hunt. In the discussion about why there should be a hunt, several arguments arise and are referred to in the Draft Recommendations as well as the state grizzly bear management plan. These arguments are that hunting will: build social tolerance for grizzlies, reduce conflicts, teach bears better behavior, generate revenue for the state/FWP, and maintain Montana's strong hunting heritage. Our view is that the last argument, hunting heritage – aside from whether one agrees with it or not – is the only genuine argument in support of a grizzly bear hunt.

We believe the science (see references) squarely supports that:

- Hunting will not improve social tolerance. Studies consistently demonstrate that social tolerance is not improved in any concrete way by hunting bears or large carnivores. In fact, our experience at P&C tells us that using preventative tools is the most effective way to cultivate tolerance in landowners of grizzlies and other carnivores. (1)
- Hunting does not prevent or reduce encounters or conflicts (including by teaching bears better behaviors). There is also consistent science on this point. The landscape and distribution of bears is too broad and diverse (e.g., front country vs. backcountry); bears targeted or killed by hunters are not the same bears that are or likely to be involved in conflicts. Hunting is too random to affect conflicts. For hunting to affect conflicts, the population would have to be hunted to such low numbers/density, which is not under consideration. If anything, hunting has the potential to increase conflicts because (a) it puts people in dense bear country in ways and at times that are contrary to agreed-upon bear safety principles, (b) hunters have injured one another in bear encounters, and (c)

hunters carry guns and often do not carry or use bear spray which is more effective in encounters. (2)

- Hunting has the potential to impede grizzly bear connectivity and recolonization of historic range. Removing dispersers through hunting, just as with any source of mortality, will significantly reduce the potential of movement, connectivity and genetic exchange, and range expansion. (3)

Further, Tribal nations such as the Confederated Salish and Kootenai Tribes have repeatedly and explicitly voiced objections to grizzly hunting. Such positions have roots in both traditional culture and science. Because Montana's bear management unfolds on the ancestral homelands of native peoples, the Council should consider and honor tribal positions on grizzly hunting.

In terms of generating revenue, considering all income and expenses associated with grizzly bear hunting, hunting would cost the state and FWP a substantial amount of money rather than generating net revenue. With low quotas, little funds will be made on licenses/tags, whereas implementing and maintaining a season would require substantial human and other resources.

We urge the Council to remove from the discussion arguments in favor of hunting based on social tolerance, encounter/conflict reduction, and revenue. Issues of social tolerance and human safety are most effectively addressed with proactive conflict reduction tools and strategies that we think still need to be accepted, embraced, funded, and implemented to a much more extensive degree by all stakeholders.

When best practices are used, we have found that conflicts with bears can be prevented or reduced very effectively, both in the backcountry, on agricultural lands, and in the urban-wildlands interface or front country. There are two main strategies that work: (1) Removing attractants from the landscape (e.g., birdfeeders, garbage, carcasses/deadstock); and (2) Keeping bears separated from attractants (e.g., fencing around crops and livestock, scare devices, guard animals). Various types of fencing, strategic grazing management (range riding/herding), scare devices (light and sound), carcass management/composting, guard animals, garbage security (cans, fencing, e.g.), bear safety education and bear spray training, and food storage in the backcountry have all been very effective in our experience to prevent/reduce conflicts between grizzlies and people/property.

We agree with the Draft Recommendations point #26 that hunting should not be an assumed, default component or requirement of grizzly bear management. Going from federal protections to hunting is far too drastic a change, and we urge the Council to recommend at least a five-year learning and dispersal period after protections are removed before hunting is considered. We also think attitudes (state, regional, and national) are changing and that the state of Montana, while having a rich history and heritage in sport hunting, should consider shifting towards contemporary values and attitudes relative to grizzly bear hunting. We would like to add, though somewhat tangential, that we support FWP considering an expanded view of potential revenue sources. The Department would likely be able to add income sources and address budget challenges with non-consumptive revenue streams.

Finally, we believe that hunting, even though it does not improve social tolerance or prevent conflicts, creates a perception that conflict reduction is not the highest priority and best solution to concerns raised about living with grizzlies. We think this is counterproductive, when proactive conflict prevention strategies should be our collective priority and focus. In our consistent and ongoing experience working with rural community members, people also feel good/better when they address concerns proactively.

Prevention work addresses most of the issues discussed relative to the challenges of living with grizzlies. If Montana can focus, scale, and prioritize conflict prevention resources and work, we believe social tolerance would be neutralized or improved, and encounters/conflicts will decrease. There will always be some conflicts and encounters we can't avert, but widespread conflict prevention work will make living with grizzlies safer, easier, and less contentious. It will also help grizzlies go where they want or need to go on the landscape.

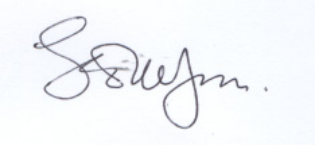
We can achieve these goals if we work together. To date, though, we have not funded and implemented conflict prevention on a large or intensive enough scale. We recommend that the Council take steps to guide the state in that direction. People and Carnivores will help in any way possible.

III. Conclusion

We appreciate all of your work on behalf of Montanans. Overall, we find the Draft Recommendations to be thoughtful and thorough, endeavoring to include diverse perspectives. We do, however, believe that conflict prevention work is by far the most direct path toward better outcomes for humans and grizzlies in our state, and that such work must be a central focus of bear management in the years and decades to come. We remain committed to collaborating with all partners to advance human-grizzly coexistence, implement prevention tools at larger scales, work collaboratively to secure funding mechanisms, and make prevention more accessible to rural community members.

Please let us know if you have any questions about our comments. Thank you again for the opportunity to share our input.

On behalf of People and Carnivores, and Sincerely,



Lisa Upson,
Executive Director

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(2) Hunting will not reduce conflicts (or encounters/attacks); in some cases, hunting could create conflicts

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