

MONTANA FISH, WILDLIFE & PARKS
PUBLIC COMMENTS
BLACK BEAR MANDATORY INSPECTION
Comments received as of December 28, 2021

From: [FWP Licensing Rules](#)
To: [FWP Wildlife](#)
Subject: FW: [EXTERNAL] Manatory Reporting on Black Bear Harvest
Date: Monday, December 13, 2021 2:16:22 PM
Attachments: [Tooth Data - MT.pdf](#)
[Tooth Data - MT.pdf](#)

This was sent to the Licensing rules email. I think it is intended for Wildlife.

Jessica Snyder

Paralegal

Montana Fish, Wildlife & Parks

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THE **OUTSIDE** IS IN US ALL.

From: Western Bear Foundation <joek@westernbearfoundation.org>
Sent: Tuesday, December 7, 2021 4:09 PM
To: FWP Licensing Rules <FWPLicensingRules@mt.gov>; commissionerregion1@mtfwf.org;
commissionerregion2@mtfwf.org; commissionerregion3@mtfwf.org; KC Walsh
<commissionerregion4@mtfwf.org>; commissionerregion5@mtfwf.org;
commissionerregion6@mtfwf.org; commissionerregion7@mtfwf.org; Worsech, Hank
<Hank.Worsech@mt.gov>
Subject: [EXTERNAL] Manatory Reporting on Black Bear Harvest

See attached Western Bear Foundations Comment on Mandatory Reporting of Black Bear Harvests

Joe Kondelis | President

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Western Bear Foundation

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RE: 2022–2023 Black Bear Mandatory Harvest Reporting Requirements

Dear Montana FWP Commission and Director Worsech,

It has come to our attention that the Montana FWP Commission will be reviewing a proposal to end the required physical inspection of black bears upon harvest by the hunter. This will be an agenda item on your December 14th meeting. The Western Bear Foundation is opposed to this proposal for several reasons and we caution the Commission to look at this carefully.

The proposal states that this requirement is a burden on the hunter and department, and in lieu of physically inspecting the department is asking the commission to “require” the hunter to submit the pre-molar from the animal to the department within 10 days of harvest.

We believe that this is going to greatly reduce the number of pre-molars the department will receive and it will no doubt affect harvest data which dictates population estimates and species health. We ask you the question you should be asking yourself, “How many bear hunters are going to harvest a bear and not submit a tooth?” By removing the physical in person check in we are allowing for complacency in harvest data. This is a big concern especially considering the state will be conducting hound hunts for black bears this year which is going to increase harvest in many areas.

We feel that with the new hound seasons in place the department and commission should be doing more to monitor harvest data and population health of black bears and not less! This system has been in place for years and the population is healthy and stable. We ask that you continue this method at least until we have several years of a hound hunt under our belts and we can verify the population is stable and sustainable from tooth data.

The Western Bear Foundation supports bear hunting and bear hunters and we approve all legal methods to harvest black bears. We do however not want to see less being done to understand black bears, their population health or habitat needs. We feel this proposal has the potential to reduce data available for biologist and the Commission to make informed decision on the future of black bears in Montana.

Joe Kondelis

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For Bears and Bear Hunters!