



Protecting Montana's wildlife, land, waters, and hunting & fishing heritage for future generations.

November 20, 2023

To: Montana Fish and Wildlife Commission

RE: Comments on proposed revision to Region 1 black bear hunting regulations in 2023

I write to you on behalf of the Montana Wildlife Federation. We are Montana's oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners.

The Montana Wildlife Federation (MWF) wishes to comment on the proposed 2024 and 2025 Black Bear Hunting Regulations, Season Structures, and Hunting District Boundaries. We appreciate the opportunity to comment on these black bear regulations.

MWF fully supports the proposal to require submission of two premolar teeth from all harvested black bears. This is a proposal that will increase the accuracy of aging for all harvested black bears and allow more credible management decisions, and we support this.

MWF is opposed to extending the black bear season to June 15 in BMUs 140, 141, 150, and 170 (or anywhere else in R-1). There are two reasons that MWF is opposed to extending the black bear season to June 15:

- 1) The fact that increased harvest will not reduce human-bear conflicts; and
- 2) Extending the black bear season to June 15 and putting more black bear hunters into core grizzly bear habitat in the Wilderness BMUs 140, 141, and 150 will increase the number of mistaken identity kills of grizzly bears by black bear hunters.

One of the justifications from FWP for extending the season to June 15 is to "*provide additional hunting pressure in BMU 170 to reduce black bear density and bear conflicts in this urban unit.*" The idea that sport hunting will reduce human-bear conflicts on private property is not supported by facts or science and is contrary to the published scientific literature on the relationship between the numbers of sport hunted bears killed and the numbers of human-bear conflicts as stated by Obbard et al. (2014)¹:

"Human-bear conflict was not correlated with prior harvests, providing no evidence that larger harvests reduced subsequent human-bear conflicts. Given that variation

¹ Obbard, M. E., E. Howe, L. L. Wall, B. Allison, R. Black, P. Davis, L. Dix-Gibson, M. Gatt and M. N. Hall. 2014. Relationships among food availability, harvest, and human-bear conflict at landscape scales in Ontario, Canada. *Ursus* 25:98-110. <https://doi.org/10.2192/URSUS-D-13-00018.1>



Protecting Montana's wildlife, land, waters, and hunting & fishing heritage for future generations.

in natural foods, harvest is unlikely to prevent elevated levels of human-bear conflicts in years of food shortage unless it maintains bears at low densities – an objective that might conflict with maintaining viable populations and providing opportunities for sport harvest.”

Another research study published in 2023² also demonstrated that sport hunting of bears did not reduce human-bear conflicts even though bear harvest increased significantly. The authors stated:

“Human–bear interactions, incidents, and harvest were strongly related to the availability of natural foods in all analyses. Regulated, presumably sustainable harvest was ineffective at reducing human–bear interactions and incidents in the near-term and might have increased both. Our results support a long history of research showing that natural food availability is a primary driver of human–wildlife conflict. Programs promoting coexistence between people and wildlife, including education, capacity building, and management of unnatural food sources are likely to be the most successful at reducing conflicts between people and bears.”

To emphasize what the published peer-reviewed science shows, **natural food availability is the primary driver of human/bear conflicts not hunter harvest.** In years when natural foods are low, there are increased human/bear conflicts no matter how many bears are killed by hunters. Human bear conflicts are a direct result of changes in natural black bear foods not the number of bears killed by hunters.

MWF fully supports the idea of reducing human-black bear conflicts in BMU 170 and in other BMUs. The best and most effective way to reduce such conflicts is to work with residents and to help them learn to secure attractants that bring black bears into conflicts with people. This can best be accomplished by increased outreach and education and capacity building such as increased availability of bear-resistant garbage containers and bear-resistant garbage storage systems, and making unnatural human-related foods sources such as bird and pet feed, hobby poultry, fruit trees and other such attractants associated with residential areas unavailable to bears.

The second reason that MWF opposes extending the time of spring black bear hunting to June 15 and putting more black bear hunters into the core grizzly bear habitat of the wilderness BMUs 140, 141, and 150 is that such an action will increase the numbers of mistaken identity kills of grizzly bears by black bear hunters. These wilderness BMUs form the core of grizzly bear habitat in the NCDE. During early June, the grizzly bear population in these wilderness BMUs is concentrated in low elevation areas due to snowpack at higher elevations and because vegetative foods green up early and

² Northrup, J. M., E. Howe, J. Inglis, E. Newton, M. E. Obbard, B. Pond, and D. Potter. 2023. Experimental test of the efficacy of hunting for controlling human-wildlife conflicts. *Journal of Wildlife Management* <https://doi.org/10.1002/jwmg.22363>



Protecting Montana's wildlife, land, waters, and hunting & fishing heritage for future generations.

become available to bears in these low elevation areas in early June. Placing black bear hunters into these low elevation wilderness core habitats where grizzly bears are concentrated will increase the risk to these grizzlies of mistaken identity kills. Increasing this risk to these wilderness grizzly bears is unnecessary and unwarranted.

MWF urges the Commission not to open these wilderness core BMUs to black bear hunting until June 15. Doing so will needlessly increase the risk of mistaken identification grizzly bear kills in core grizzly habitat. If you proceed to do this, it will send a clear message that the Commission and FWP are ignoring their responsibility to assure the implementation of adequate grizzly mortality regulatory mechanisms, which are required if the grizzly is to be delisted.

MWF has the same concerns about extending the black bear season to June 15 in any BMU in R-1 because R-1 has more grizzlies than any other region in Montana and extending the time that black bear hunters will be active in R-1 into mid-June will directly increase the probability of more mistaken identity grizzly bear kills.

Thank you for this opportunity to comment on the proposed changes to the black bear regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Servheen". The signature is written in a cursive, flowing style.

Christopher Servheen, Ph.D.
President and Board Chair