



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

May 7, 2023

To: Montana Fish and Wildlife Commission

RE: Comment on Amendments to Administrative Rules of Montana (ARM) addressing Grizzly Bears

<https://rules.mt.gov/gateway/ruleno.asp?RN=12%2E9%2E1401>

We wish to comment on this section of the proposed ARM:

“(ii) Sport hunting is considered the most desirable method of balancing grizzly bear numbers with their available habitat, minimizing depredations against private property within or adjacent to grizzly bear habitat, and minimizing grizzly bear attacks on humans.”

Comment:

The proposed ARM states: *“Sport hunting is considered the most desirable method of... minimizing depredations against private property within or adjacent to grizzly bear habitat and minimizing grizzly bear attacks on humans”*. This statement is not supported by facts or science and is contrary to the published scientific literature on the relationship between sport hunting bears and human-bear conflicts. Hunting of bears has been documented in the peer-reviewed scientific literature to not reduce human-bear conflicts as stated by Obbard et al. (2014)¹ who found: *“Human-bear conflict was not correlated with prior harvests, providing no evidence that larger harvests reduced subsequent human-bear conflicts. Given that variation 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.”*

The Montana Governor's Grizzly Bear Advisory Council said in their final report on p. 18: *“...hunting is not likely to be an effective tool for conflict prevention or reduction”*.²

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>

² Governor's Grizzly Bear Advisory Council. 2020. Final Report: Recommendations and input on the future of grizzly bear management and conservation in Montana. Montana Fish, Wildlife and Parks, Helena. MT. 28 pp. <https://fwp.mt.gov/aboutfwp/commission-councils-committees/grizzly-bear-advisory-council>



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Another recent study³ 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.”*

We believe that the ARM should be revised in section (ii) to say: **“The most desirable and proven method to reduce both human-bear conflicts and grizzly bear attacks on people is to work with local residents on education, capacity building, and management of unnatural human-related food sources that bring bears into close association with people.”** Most grizzly bear attacks on people are due to surprise encounters with bears or to bears that have become food conditioned to human-related foods, especially garbage.⁴

Placing new or enhanced ways to kill bears into bear habitat like sport hunting or permits to landowners to kill bears that are “threatening” livestock without enhancing efforts to help residents reduce attractant availability and promote successful coexistence will just result in more dead bears and not reduce numbers of human-bear conflicts. Without enhanced efforts to secure attractants, bears will continually be drawn into such areas no matter how many are removed with hunting or permits to landowners or management actions. FWP, through their bear management specialists, in partnership with local groups should be the leaders in efforts to reduce the availability of bear attractants and to assist landowners in securing such attractants.

Thank you for this opportunity to comment on this proposed ARM.

Sincerely,

Christopher Servheen, Ph.D.
President and Board Chair

³ 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>

⁴ Gunther, K. A. 2023. Bear-caused human fatalities in Yellowstone National Park: Characteristics and trends. *Human-Wildlife Interactions*, *in press*.

#1

COMPLETE

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Time Spent: 00:05:21
IP Address: 69.146.140.64

Page 1

Q1

Contact information:

Name:	Eugene M Mapelli
City/Town:	Stevensville
State/Province:	MT
Email Address:	emmapelli618@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I am not in favor of growing our Grizzly Bear population here I Montana. I believe they are a public safety hazard, and the population should be hunted to control numbers. Hunting seasons and licenses should be created.

#2

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Time Spent: 00:01:42
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Page 1

Q1

Contact information:

Name: James Sauter
City/Town: Clancy
State/Province: MT
Email Address: zrabbit@aol.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Should proceed

#3

COMPLETE

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Time Spent: 00:05:16
IP Address: 72.174.161.110

Page 1

Q1

Contact information:

Name:	Randy Setter
City/Town:	Anaconda
State/Province:	MT
Email Address:	randysetter325@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Montana should not have a hound season for black bears. Would put grizzlies back on the list. If management does go to the state.

#4

COMPLETE

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Time Spent: 00:15:30
IP Address: 63.153.111.37

Page 1

Q1

Contact information:

Name: Lawrence Abbott
City/Town: Philipsburg
State/Province: MT
Email Address: hatchmatcher@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Regarding item a. v - The economic and forest management benefits of logging in Montana should be given greater weight than Grizzly habitat in considering whether to allow logging in Grizzly county. Regarding item c. ii - I urge you to implement a sport hunting season for Grizzly bears as soon as possible. I live full time in hunting district 216 & spend a great deal of time in the backcountry there. In recent years I have personally witnessed an alarming increase in the number of Grizzly sightings and encounters in that area. I am concerned that unless Grizzly bears populations are controlled and the bears are conditioned to fear humans, it is only a matter of time until a fatal encounter occurs.

#5

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Page 1

Q1

Contact information:

Name: **William McGregor**
City/Town: **Red Lodge**
State/Province: **MT**
Email Address: **burro981chawk@gmail.com**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

If Grizzly Bear populations are stable for management. Then controlled hunting would probably be a good thing. If Grizzly Bear is hunted there could be a chance that they would become less likely to wander into areas where people and livestock are plentiful. It might take time for the Bears to realize they aren't protected anymore therefore in my mind it could possibly reduce their bold and risky behavior to people and livestock. Possibly by being protected for so many years could contribute to their behavior at present. As far as economics it could be a win win for livestock owners and the State of Montana in regards to recreational hunting of this majestic species. I am not a livestock owner but I am a hunter so I am not saying this out of loosing livestock. I do wonder how bold the next time I cross paths with one of these animals as well as the other people who encounter their presence in campgrounds and residential areas. I could be way off base with this thinking because I am not a biologist but to me it could have meaning and consideration. I'm a yes on passing new regulations. Thank you for allowing me to comment.

#6

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IP Address: 155.254.9.23

Page 1

Q1

Contact information:

Name: Paul Roman
City/Town: Three Forks
State/Province: MT
Email Address: proman52@epix.net

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

In my opinion the amendments make good sense and it is time to move forward and put the grizzly management plan into practice.

#7

COMPLETE

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Time Spent: 00:02:22
IP Address: 174.204.64.80

Page 1

Q1

Contact information:

Name: Shane Gainan
City/Town: Wibaux
State/Province: MT
Email Address: shanegainan@gainantaxidermy.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Open a hunting season...and allow baiting as they ate managed in Alaska.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Thursday, April 13, 2023 6:32:52 PM
Time Spent: 00:06:30
IP Address: 107.77.197.99

Page 1

Q1

Contact information:

Name:	Brian Dunaetz
City/Town:	Three Forks
State/Province:	MT
Email Address:	bdunaetz@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I ask that you PLEASE address the rules/regulations regarding grizzly bears and formulate a management plan. They are becoming increasingly common and currently have no fear of humans, on the contrary they see us as a food source (both our flesh and the goodies we bring into the woods with us).

We NEED a management plan in place to thin the numbers to a normal level. We have exceeded the numbers required by the federal government and the only people trying to prevent this management plan don't live/interact with these predators on a regular basis; therefore their opinion should not be taken into consideration

#9

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IP Address: 98.97.118.87

Page 1

Q1

Contact information:

Name:	Mark Radzwion
City/Town:	Troy
State/Province:	MT
Email Address:	mwradz@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

We know DC could not manage a lemonade stand!

My neighbor has seen a juvenile grizzly bear and it is my understanding they are even more prevalent nearby in Spar Lake area. Manage the grizzly bear as you would any other big game species in Montana, elk, wolf, deer, etc. Keep the Feds as far away from this effort as possible!!

#10

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IP Address: 107.191.163.210

Page 1

Q1

Contact information:

Name:	Shawn
City/Town:	Libby
State/Province:	MT
Email Address:	shawnkray@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Move forward with better management for public safety,livestock, etc. allow management through hunting. Allow a certain number of tags both resident and non resident

#11

COMPLETE

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Time Spent: 00:04:00
IP Address: 192.161.70.242

Page 1

Q1

Contact information:

Name: Kimball Leighton
City/Town: Livingston
State/Province: MT
Email Address: kimballl810@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Defer to the federal government to manage grizzly bears in Montana. Otherwise it will result in a slaughter similar to the bison 'hunt' on the northern edge of Yellowstone National Park. FWP has demonstrated its inability to properly manage bison, grizzlies and wolves without bias from the state Livestock Department and greedy developers.

#12

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IP Address: 216.14.237.99

Page 1

Q1

Contact information:

Name: Timothy Mitchell
City/Town: Saint Ignatius
State/Province: MT
Email Address: sti2866@blackfoot.net

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

lets hunt all the bears we can residents only no nonresident tags

#13

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Time Spent: 00:05:07
IP Address: 72.174.74.225

Page 1

Q1

Contact information:

Name:	Kyle Reedy
City/Town:	Great Falls
State/Province:	MT
Email Address:	kyle_reedy@msn.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I support the ARM 12.9.1401 grizzly bear policy.

#14

COMPLETE

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Page 1

Q1

Contact information:

Name: **Gerald Brunckhorst**
City/Town: **Lakeside**
State/Province: **MT**
Email Address: **gerbrunck@gmail.com**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Dear MTFWP Commissioners, as a lifetime Montana resident (57 years) I'm in agreement with the Montana Secretary of State beginning the process to amend the ARM so Montana Fish Wildlife and Parks may move forward in management of Grizzly Bears within our state. Since 1990 I've had several up close and personal encounters with Grizzly Bears as their populations have increased. One of these encounters turned into an all night standoff between the bear and myself. I didn't wish to kill or harm that bear unless I felt my life was in imminent danger. I was circled twenty or more times that night, the bear was as close as 60 yards at one point. All incidents ended without damage to bear or myself. Grizzly population and human population increases are both directly responsible for encounters gone wrong. I agree it's past time MTFWP gains the authority to manage these great bears from within our state.

Thank You,
Gerald Brunckhorst

#15

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Last Modified: Friday, April 14, 2023 10:46:26 PM
Time Spent: 00:28:49
IP Address: 174.212.227.163

Page 1

Q1

Contact information:

Name: **WILLIAM T Kaufman**
City/Town: **Whitehall**
State/Province: **MT**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

On 295, I 120% agree on delisting Grizzlies!! About 8yrs ago I had to instinctively shoot one that came out from under a tree that was attacking my friend with no provocation!! That was when nobody wanted us to even report it!! I shot it directly across from notch station in the ruby!! My point is, before the wolves were delisted, when they moved in, you would cow call or bugle during bow season and a wolf would sound off! I watched and called in I bet 20 wolves in 2yrs, after they were delisted you hardly see one! That's what needs to happen when it comes to the Grizzlies! Animals aren't dumb, there are as many wolves as there were! They just wise up, I hope the same will happen with the Grizzlies!! That same friend was confronted 4 more times in the notch because the bears aren't afraid!!! I can't even take my family, camping or fishing without everyone being armed because of the Grizzlies! The difference between us and Alaska, the bears are the same but they get to eat all year, bears are hungry and always pissed off because we don't have habitat or feed for them! Sorry for the long note, my name is Bill Kaufman and I really know the Grizzlies need delisted!! Thank you

#16

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Time Spent: 00:32:45
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Page 1

Q1

Contact information:

Name: Steve Hammill
City/Town: Eureka
State/Province: MT
Email Address: steve.hammill@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I have a small piece of timberland between a MT section and 320A of USFS. My game cameras have captured a number of grizzlies, they are magnificent animals.

My recommendation is to issue hiker/biker permits for bear territory only on completion of bear interaction test. Human ignorance provoked most of the human-grizzly-black bear interactions I have read about in my 22 years of Montana residency.

Hunters tend to be more informed on this point and carry a conflict resolution tool with them. A close acquaintance killed a griz while stalking elk a few years ago. The bear was defending a cub that he never saw. It was a life changing experience for him and the people around him. You don't need to worry about honest hunters; poachers and glory hounds are another matter.

#17

COMPLETE

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Page 1

Q1

Contact information:

Name:	Don Schwandt
City/Town:	Colorado Springs
State/Province:	CO
Email Address:	don_schwandt@hotmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Hello, here are my inputs to the future Montana FWP grizzly bear regulations. I hope they are of help.

1. Grizzly Permit is awarded once-in-a-lifetime limited entry-controlled draw for a spring hunt or a fall hunt permit.
 - a. The application fee will be \$100 per application per person.
 - b. Resident permit cost if drawn: \$500.
 - c. Non-resident permit cost if drawn \$3000.
 2. To hunt Grizzly bears in Montana, hunters must successfully complete a Bear Identification Test administered by the Montana FWP.
 3. The bag limit for hunting grizzly bears in Montana is one bear, once in a lifetime hunt per person, successful or not.
 - a. Bear cubs or sows with cubs are NOT legally allowed to be harvested.
 - b. Cub bear means a grizzly bear in the 1st or 2nd year of life.
 - c. By means of spot and stalk, using mechanical calling devices, or commercial attractants.
 - d. You must salvage the entire hide (with claws attached) and skull of a grizzly bear.
 - e. Evidence of sex MUST remain naturally attached to hide.
 - f. Bear meat DOESN'T have to be salvaged or removed from the field.
 - g. Bear hides and skulls MUST be sealed by the Montana FWP within 10-days of harvest.
 4. Grizzly Bear Permit quotas:
 - a. Spring - 9 permits (Resident only)
 - 1 permit (Non-resident that requires to be with an Outfitter or relative within second degree of kindred)
 - b. Fall - 9 permits (Resident only)
 - 1 permit (Non-resident that requires to be with an Outfitter or relative within second degree of kindred)
 - c. 1 permit by auction open to all to bid. Good for the spring or fall season.
 - d. 1 permit by raffle open to all. Good for the spring or fall season.
 5. Seasons for limited entry-controlled draw permits:
 - a. Spring Grizzly Bear hunts conducted April 1 - June 15
 - b. Fall Grizzly Bear hunts conducted September 1 - December 31
-

#18

COMPLETE

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Time Spent: 00:07:52
IP Address: 98.97.112.31

Page 1

Q1

Contact information:

Name:	Jeff Reed
City/Town:	Emigrant
State/Province:	MT
Email Address:	jeff@reedfly.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Our Park County tourism business coalition (200+ strong) looks forward to engaging with FWP and the Commissioner's in the forthcoming rule making process. We expect a proportionally weighted say in the rule making process based on our 10:1 economic contribution to the livestock industry in our count, for which HB295 is targeted at (having made no mention of the value of grizzlies to our economy). We are glad that Montana is being proactive in the eventual delisting process, and we hope that the "public process" reflects economic reality.

#19

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Time Spent: 00:04:08
IP Address: 73.214.204.242

Page 1

Q1

Contact information:

Name:	Norma Duffy
City/Town:	Claritin
State/Province:	PA
Email Address:	njd4444@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Whether or not the governor of the state believes in federal law, one thing is absolutely certain. The governor is doing everything he can to kill wild animals, and the grizzly bear is protected by The endangered species act. Do not allow this part-time poacher, to write laws that killed grizzly bears, in the state of Montana. Follow Federal laws and regulations, because that's the right thing for a state that has little or no laws on the books, to handle things inside their state. Let alone the federal government. This Governor is a joke.

#20

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Page 1

Q1

Contact information:

Name: Judy Anderson
City/Town: Hamilton
State/Province: MT
Email Address: queensjunk@blessedinmt.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Reintroduction of grizzly bears into the Bitterroot range should not be considered at all. Whatever rules might be in place would not be any comfort to families who would lose their lives to these predators. People are more important than animals and people are already living and recreating in the Bitterroot. It would be completely irresponsible to plant predators knowing people will be killed or irreparably injured because the animals can't be controlled.

#21

COMPLETE

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Last Modified: Friday, April 21, 2023 12:06:37 PM
Time Spent: 00:10:20
IP Address: 71.36.52.245

Page 1

Q1

Contact information:

Name: Charlotte Heldstab
City/Town: Whitefish
State/Province: MT
Email Address: SaveGrizzlies@aol.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

There is no need to provide the public with "recreational opportunities including sport hunting." There is no need in the world to hunt these bears. Also there's no need for "balancing grizzly bear numbers" , nature, vehicle crashes and poaching, etc., kill enough bears each year. Also, when you kill a bear, it's cowardly for you to use the word "dispatch", simply say that you're killing the bear. Montana is a better state because of the grizzlies that live here.

#22

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, April 25, 2023 10:39:54 AM
Time Spent: 00:15:09
IP Address: 216.24.58.57

Page 1

Q1

Contact information:

Name: James Thramer
City/Town: Kalispell
State/Province: MT
Email Address: jthramer60@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I think it is high time to start addressing the grizzly bear population as it is getting out of hand for the State of Montana. The bear conflicts are becoming more apparent because the human population and the bear populations are colliding due to habitat shrinking for the grizzly. And it's going to get worse.

You can't restrict human advancement into grizzly areas unless you start buying all potential property in grizzly habitat. So your options are to keep the grizzly population at today's numbers and when conflict happens decide what you will do with problem Bear. You can choose to relocate as standard practice or dispatch extremely bad bears. You should choose instead to relocate bad bears from western Montana to Yellowstone ecosystem and visa versa to improve bloodline. Because the ecosystems will never get closer because of human population growth.

Thanks for the opportunity to help address this issue.

Jim Thramer
Kalispell

#23

COMPLETE

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Time Spent: 00:09:43
IP Address: 208.184.22.30

Page 1

Q1

Contact information:

Name:	Michael Faw
City/Town:	Dillon
State/Province:	MT
Email Address:	mikefaw@earthlink.net

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I welcome these ARM rules and believe grizzlies need management, have recovered to permit sport hunting, and their increasing attacks on humans warrants accepting and using these ARM recommendations.

#24

COMPLETE

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Last Modified: Wednesday, April 26, 2023 8:15:14 AM
Time Spent: 00:06:40
IP Address: 35.131.33.26

Page 1

Q1

Contact information:

Name: Grant Tafoya
City/Town: Kalispell
State/Province: MT
Email Address: gframing16@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Please allow the ability to hunt Grizzly bears in Montana. I have lived here and hunted here my entire life; they are not endangered animals. They are too comfortable around humans because of tourists and their poor education on Montana wildlife. They need to be able to be hunted respectfully.

#25

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Wednesday, April 26, 2023 8:55:41 AM
Time Spent: 00:17:47
IP Address: 35.131.33.26

Page 1

Q1

Contact information:

Name: Meagan Wilkinson
City/Town: Kila
State/Province: MT
Email Address: meaganwilkinson70@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Let's go hunting for Grizzly Bears!

#26

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Wednesday, April 26, 2023 9:12:40 AM
Time Spent: 00:03:10
IP Address: 107.122.173.72

Page 1

Q1

Contact information:

Name: Scott A Andrews
City/Town: Kalispell
State/Province: MT
Email Address: ascottandrews18@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

As an outdoorsman in northwest Montana, I have seen the growth of the grizzly bear population. I believe it would be beneficial to have a tagged management system for Grizzly bears. Not only would it make great revenue for the state, or would save state money that has ti go into dealing with problem bears.

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 26, 2023 9:13:20 AM
Last Modified: Wednesday, April 26, 2023 9:14:08 AM
Time Spent: 00:00:48
IP Address: 216.24.59.248

Page 1

Q1

Contact information:

Name: Shelton Todd
City/Town: Kalispell
State/Province: MT
Email Address: shelton.g.todd@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

A controlled hunt would be ideal.

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 26, 2023 9:55:39 AM
Last Modified: Wednesday, April 26, 2023 10:08:29 AM
Time Spent: 00:12:49
IP Address: 184.166.56.184

Page 1

Q1

Contact information:

Name: **Roger Sherman**
City/Town: **Whitefish**
State/Province: **MT**
Email Address: **rlsherman614@gmail.com**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I am opposed to the delisting of grizzly bears. There are two ecosystems for grizzlies, the continental divide and the Yellowstone. These two systems are fractured genetically, so there is a limit on diversity. Also, grizzlies do not reproduce well and the stability of their population is attenuated. There are measures that ranchers can do to limit encounters between bears and livestock. Grizzly bears are a historical icon here in our state and they would we not honor this concept?

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 26, 2023 10:09:28 AM
Last Modified: Wednesday, April 26, 2023 10:15:32 AM
Time Spent: 00:06:03
IP Address: 174.234.4.239

Page 1

Q1

Contact information:

Name: Derek DeWaard
City/Town: Kalispell
State/Province: MT
Email Address: dewderek@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

It is truly my belief that the management of the grizzly should be passed to the state level. Yes there was a time not long ago where the number of bears was not in a great place, but I think we can now all agree that isn't a problem anymore. The bears have expanded their range and continue to do moving in on peoples homes, livestock, etc. They are literally everywhere from I-15 to the west of the state, and east of that in several places. Just like we have done a good job of managing wolves let's continue that with the grizzlies.

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 26, 2023 12:49:08 PM
Last Modified: Wednesday, April 26, 2023 1:13:35 PM
Time Spent: 00:24:26
IP Address: 69.146.208.90

Page 1

Q1

Contact information:

Name: Carole jorgensen
City/Town: Kalispell
State/Province: MT
Email Address: cjmoving2ak@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Please do not adopt the politically motivated anti-predator legislative amendments to Administrative Rules for the following reasons. Montana has been a leader in grizzly bear management, following the science and research about recovering their populations and working with the public and federal agencies to educate people about how to live with grizzly bears and reduce or avoid human interactions and depredations. The amendments void much of that science and experience. While grizzly -ovulations have experienced long fought recovery from nearly extirpated numbers, there are many parts of their range that still experience severe impacts to their recovery: poaching, habitat loss, connectivity issues, excessive removals (usually do to people's poor stewardship or ignorance regarding living in bear habitat. Translocations from good populations to those with reduced numbers should continue. Education on how to avoid bear encounters and depredation should continue. The Department should totally ban neck snares for ANY animal. It's inhumane, scientifically wrong, has high risk of non-target deaths, including other listed species and pets. MFWP has a history of practicing scientific and wise wildlife management. Legislators who lack biological expertise should not force you to make decisions that are contrary to good wildlife stewardship. Grizzly bears have a low reproductive rate. History has documented how bad management and targeting predators can severely impact populations. The state and federal government invested large amounts of money to lead yo grizzly bear recovery. A few years of bad management could counter those years of investments. Human development and roads in Montana are occurring at unprecedented rates. Climate change (whether legislators believe it or not) are threatening the food and habitat of bears and other wildlife. Montana should be proactive in wildlife management. Letting a biased landowner to "assume" Harris giving them a free and I enforced "license" to eliminate grizzly bears in many instances. That is unwise and totally unacceptable. Scientists should evaluate risks. As a retired wildlife biologist, I experienced many situations where landowners violated restrictions in subdivisions where domestic animals were restricted, provided excessive attractants to grizzly bears through laziness or bad stewardship only to kill bears they baited to their areas. DO NOT ACCEPT THIS BAD AMENDMENT TO ADMINISTRATIVE RULES RE: GRIZZLY BEARS. Thank you for maintaining the high standards of wise Montana wildlife management that follows scientific and humane and management.

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 26, 2023 4:21:01 PM
Last Modified: Wednesday, April 26, 2023 4:22:46 PM
Time Spent: 00:01:45
IP Address: 174.198.142.117

Page 1

Q1

Contact information:

Name: Lane Armstrong
City/Town: Missoula
State/Province: MT
Email Address: lane.armstrong94@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I think we should leave the grizzly bears be for a while longer. De listing them is a huge success and it's awesome to see. I hunt in grizzly country. I am not bothered by them. People not exercising caution in grizzly country should not mean we should be hunting them

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, April 27, 2023 2:53:48 PM
Last Modified: Thursday, April 27, 2023 3:00:33 PM
Time Spent: 00:06:44
IP Address: 174.45.250.45

Page 1

Q1

Contact information:

Name:	Patricia A Simmons
City/Town:	Bozeman
State/Province:	MT
Email Address:	psimmons100@gmail.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Grizzly bears are endangered, federal rules determine if the status will change. I object to FWP preparing management plans before the federal government has determined their status. Stop wasting money and time. Instead teach Montanans who live near grizzly bears how to live with them and if they have domestic animals or children there are non-profit organizations like People & Carnivores who have extensive experience educating and providing tools like fencing, flagging, guard dogs, riders, electrifying space, etc. This is a permanent method that FWP should use regardless of the Grizzly Bear status. The bill passed requiring these rules was the majority Republican side with no biologists and other experts involved, nor all the Montanans that love our wild and native Grizzly Bear living in Montana.

Thank you.

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 28, 2023 1:28:42 PM
Last Modified: Friday, April 28, 2023 1:44:01 PM
Time Spent: 00:15:19
IP Address: 162.217.231.127

Page 1

Q1

Contact information:

Name: **karen**
City/Town: **eureka**
State/Province: **MT**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Grizzly bears should not be managed by the state and, unless determined by an objective 3rd party examination to have caused human injury, should not be killed. Grizzly bears should continue to be on the Federal endangered species.

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, April 30, 2023 6:18:46 PM
Last Modified: Sunday, April 30, 2023 6:23:29 PM
Time Spent: 00:04:42
IP Address: 64.25.140.108

Page 1

Q1

Contact information:

Name: Rich Harris
City/Town: Charlo
State/Province: MT
Email Address: rharris@montana.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Folks - I'm afraid this process is rather confusing. My understanding is that the "proposal" here is simply to open the process of amending ARM 12.9.1401, and that, if approved, the department would then begin drafting proposed amendments to bring forward at a subsequent Commission meeting. But from this website, interested citizens are likely to read the existing ARM as the department's proposed amendment. Is that what you intend?

#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 02, 2023 7:25:23 AM
Last Modified: Tuesday, May 02, 2023 7:46:34 AM
Time Spent: 00:21:11
IP Address: 174.45.253.48

Page 1

Q1

Contact information:

Name: Nicholas Kovalcik
City/Town: Bozeman
State/Province: MT
Email Address: nick.kovalcik@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

I am writing today to ask that the language regarding what constitutes an imminent threat to livestock and people be clarified. As it is right now, the plan is very vague about when a private landowner is allowed to kill a grizzly bear, in the event that the bear is posing a threat to the landowner, his/her livestock, or other property. I would like to see more clarification on this, in order to prevent grizzly bears from being killed just for appearing near someone's property. Thank you.

#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 02, 2023 11:24:05 AM
Last Modified: Tuesday, May 02, 2023 11:49:53 AM
Time Spent: 00:25:48
IP Address: 69.146.173.98

Page 1

Q1

Contact information:

Name: Florence Suzy Gilbertson
City/Town: HAMILTON
State/Province: MT
Email Address: mtnwoods@1internet.us

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Mountain Lion hunting quotas should not be increased from the 2019 quota. They are necessary in a State like Montanas balance of nature. Few States have visitors and residents so excited and drawn to the area when seeing a lion. NO ON RAISING HUNTING QUOTA without another scientific review! Thx

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 09, 2023 1:57:51 PM
Last Modified: Tuesday, May 09, 2023 2:00:49 PM
Time Spent: 00:02:58
IP Address: 168.149.244.220

Page 1

Q1

Contact information:

Name: **caryn miske**
City/Town: **missoula**
State/Province: **MT**
Email Address: **caryn.miske@sierraclub.org**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

It is premature to initiate rule-making related to SB 295. The bill is not yet law, bears have not yet been delisted, and the revisions to the grizzly bear management plan are still pending.

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 09, 2023 7:30:19 PM
Last Modified: Tuesday, May 09, 2023 7:38:19 PM
Time Spent: 00:08:00
IP Address: 63.153.88.246

Page 1

Q1

Contact information:

Name:	Laurien Riehl
City/Town:	Missoula
State/Province:	MT
Email Address:	riehl36@yahoo.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

We would like to see one tag given in a Lottery for someone to hunt Grizzly in Montana. Another option should be to sell a Governors tag where the Money spent goes directly to a bear conservation program. These bears need managed and the longer we wait the harder it will be to get a season opened for them.

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 10, 2023 7:31:55 AM
Last Modified: Wednesday, May 10, 2023 2:03:30 PM
Time Spent: 06:31:35
IP Address: 98.97.32.132

Page 1

Q1

Contact information:

Name: **Edwin Johnson**
City/Town: **Gardiner**
State/Province: **MT**
Email Address: **edwin@montanaguide.com**

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Grizzly Bears are a Human Health and Safety Issue around Yellowstone National Park. I have been a Montana outfitter on Royal Teton Ranch outside Gardiner since 1985. Grizzlies need to be hunted. They follow their noses and have lost all respect for the human scent. We currently have seven known Grizzlies feasting on buffalo gut piles outside Yellowstone Park in Beattie Gulch. If a hunted Grizzly population in Alaska sees a human they run away.

In Montana they do not run away from humans. Encounters often end in mauling or death for the people involved. Grizzly bears must be hunted to instill respect for the human scent. Now they associate human scent only with humans who have been handling them; taking blood samples, rectal probes, tissue samples and radio collaring them. Grizzlies have undeniably become a Human Health and Safety Issue in the lower forty eight states

#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 11, 2023 3:24:52 PM
Last Modified: Thursday, May 11, 2023 3:25:51 PM
Time Spent: 00:00:58
IP Address: 205.207.149.242

Page 1

Q1

Contact information:

Name: Nathan Varley
City/Town: Gardiner
State/Province: MT
Email Address: nathan@wolftracker.com

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Dear Montana Fish and Wildlife Commission,

Bear Creek Council is a community-based wildlife conservation and ecotourism organization based in Gardiner that works on key issues affecting our community and its tourism economy. We strive for practical solutions to the complex issues around the abundant native wildlife in the Gardiner Basin and Yellowstone National Park. We also promote our incredible, world-class wildlife resources as a sustainable asset that benefits our community as we welcome people from around the globe.

We are writing to express our serious concerns about the incorporation of SB295 into Montana's grizzly bear management plans. SB295 is bad policy that places the interests of livestock producers over everyone else on our public lands, shows no commitment to long-term grizzly bear conservation and management, and gives Montana a poor image. While Bear Creek Council is not opposed to sharing our public lands with livestock producers, we will not accept a system in which their interests are placed above all others, including those who value native wildlife like grizzly bears.

SB 295 allows for the issuance of kill permits for grizzly bears deemed "threatening" livestock, yet it has no definition of what threatening is. It gives broad discretion to the Montana Fish, Wildlife and Parks Director to issue those permits, and has no guidelines or standards for permits. And it has no time limits on the permits, meaning it will lead to the death of non-conflict grizzly bears. This is counter to Montana's decades-long commitment to grizzly bear restoration and conservation.

Furthermore, this bill is dangerous. Having ranchers with permits shooting at bears will lead to wounded animals on the landscape. This is not appropriate on public lands, where people are out hiking, wildlife watching and pursuing other recreational interests. The idea that we will allow this is impractical and setting our state up for disaster.

Finally, SB 295 would allow the killing of the grizzly bears most important for connectivity of the major populations in the Northern Continental Divide (NCDE) and Greater Yellowstone ecosystems (GYE). The bears outside those designated recovery zones are moving into larger public land areas that are excellent bear habitat, and to target them is wrongheaded, counter to a commitment to grizzly conservation and will further set us back from a delisting from federal protection and ultimate state management of our state animal.

This bill was supposed to address concerns from the U.S. Fish and Wildlife Service over bills passed in the 2021 Legislative session that allowed the killing of grizzlies "threatening" livestock. Instead of addressing that, SB 295 makes state law worse. It reflects an early 20th Century attitude toward grizzlies, one that seeks to kill them on public lands that all Americans own and enjoy, and where we value native wildlife.

The implications of this bill for Montana are significant, and it is unacceptable that we would place the interests of a handful of ranchers with leases on our public lands over everyone else.

For those reasons, we believe rulemaking is ill-advised and premature at this time.

Sincerely,

Nathan Varley
President

#41

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 11, 2023 3:21:00 PM
Last Modified: Thursday, May 11, 2023 3:29:25 PM
Time Spent: 00:08:24
IP Address: 69.20.132.18

Page 1

Q1

Contact information:

Name:	Andrea Zaccardi
City/Town:	Victor
State/Province:	ID
Email Address:	azaccardi@biologicaldiversity.org

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

To the Commission,

We hope that should the Department initiate rulemaking it will consider improving aspects of ARM 12.9.1401. Furthermore, we continue to oppose the language of SB 295 to the extent that it does not define "threatening" and extends to public land. We hope that the U.S. Fish and Wildlife Service will see this broad granting of take similarly and conclude that the state does not have adequate regulatory mechanisms in place to permit delisting at this time. Thank you for your attention to this matter and we look forward to participating in any rulemaking process going forward.

#42

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 11, 2023 5:47:22 AM
Last Modified: Thursday, May 11, 2023 3:53:48 PM
Time Spent: 10:06:26
IP Address: 98.97.36.189

Page 1

Q1 Respondent skipped this question

Contact information:

Q2
Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Dear Montana Fish and Wildlife Commission,

1. We oppose rule making at this time, it is far premature.
2. We strongly oppose any incorporation of SB295 into Montana's grizzly bear management plans for the following reasons:

SB 295 allows for the issuance of kill permits for grizzly bears deemed "threatening" livestock, yet it has no definition of what threatening is. It gives broad discretion to the Montana Fish, Wildlife and Parks Director to issue those permits, and has no guidelines or standards for permits. And it has no time limits on the permits, meaning it will lead to the death of non-conflict grizzly bears. This is counter to Montana's decades-long commitment to grizzly bear restoration and conservation.

SB 295 would allow the killing of the grizzly bears most important for connectivity of the major populations in the Northern Continental Divide (NCDE) and Greater Yellowstone ecosystems (GYE). The bears outside those designated recovery zones are moving into larger public land areas that are excellent bear habitat, and to target them is wrongheaded, counter to a commitment to grizzly conservation and will further set us back from a delisting from federal protection and ultimate state management of our state animal.

Having ranchers with permits shooting at bears will lead to wounded animals on the landscape. This is not acceptable on public lands, where people are hiking, wildlife watching and pursuing other recreation.

SB 295 was created to address concerns from the U.S. Fish and Wildlife Service over bills passed in the 2021 Legislative session that allowed the killing of grizzlies "threatening" livestock. Instead it reflects an outdated attitude toward grizzlies that seeks to kill them on public lands where we value native wildlife.

It is unacceptable that we would place the interests of a handful of ranchers with leases on our public lands over everyone else.

Sincerely,
Helena Edelson
Large Carnivore Fund
Gardiner, MT

#43

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 11, 2023 5:22:59 PM
Last Modified: Thursday, May 11, 2023 8:18:13 PM
Time Spent: 02:55:13
IP Address: 72.174.1.69

Page 1

Q1

Contact information:

Name: Dan Bourdage
City/Town: Lolo
State/Province: MT
Email Address: DBOURDAGE7@CHARTER.NET

Q2

Please comment on the Amendments to Administrative Rules of Montana addressing Grizzly Bears.

Habitat: State and national forests require proper management (particularly timber harvest) to sustain the highest and best use of a renewable resource while reducing the heightened risk of catastrophic forest fires in the current environment. Managing forests to propagate a troublesome and dangerous grizzly bear population is a seriously wrong and mistaken undertaking.

Hunting and recreational use: Regarding grizzly hunting, Montana FWP has already proven that they can not follow their own stringent rules in conducting Grizzly Depredation Hunts...as they certainly did in early May of 1988 with a large male grizzly on the Rocky Mountain East Front out of Augusta. That problem bear received considerable coverage in the media about the time FWP broke their own hunt rules and permitted a "non-timely" hunt for the bear by a non-resident hunter who could not arrive on site by the designated time. The delayed hunt allowed the bear to move to less advantageous terrain with reduced visibility, where the hunter wounded it...and it was not recovered. I suspect it was at considerable department expense (ultimately paid by sportsmen and/or taxpayers) that multiple attempts by FWP personnel finally resulted in the dispatching of this large male grizzly via helicopter over the continental divide in (I believe) August of 1988. What a travesty that an experienced resident hunter who was packed, sighted in and had verified he would be on site the next morning by 6 AM was passed over in order to afford a non-resident the delayed opportunity...even though that meant breaking the department's own stringent rules of the depredation hunt.
