



August 1, 2020

Governor's Grizzly Bear Advisory Council
Montana Fish, Wildlife and Parks
Helena, MT 59601

RE: Consolidated Draft Recommendations

Dear Council,

The mill manufacturing members of the Montana Wood Products Association would like to take this opportunity to comment on the proposed consolidated draft recommendations pertaining to the management of Montana's grizzly bear populations.

Since the grizzly bear was listed as protected by the Endangered Species Act in 1975, considerable progress has been made in restoring once declining populations.

For a species to be delisted from the ESA, the species must meet 5 criteria:

- Is there a present or threatened destruction, modification, or curtailment of species' habitat or range?
- Is the species subject to overutilization for commercial, recreational, scientific, or educational purposes?
- Is disease or predation a factor?
- Are there inadequate existing regulatory mechanisms in place outside the ESA (taking-into-account the efforts by the States and other organizations to protect the species or habitat)?
- Are other natural or manmade factors affecting its continued existence?

Notably, Montana has been at the forefront of grizzly bear management and conservation dating back more than a century. Over the years, wildlife and resource managers have been working in concert and diligently to aide in the bears recovery. Today, Montana has the largest grizzly bear population in the lower 48 states.

The conservation and management of the bear from past to future methods offers an opportunity to make the goal of recovery and delisting a reality.

Once a grizzly bear population is delisted, the “Interagency Grizzly Bear Guidelines,” will be applied to management activities under the guidance of the Montana Fish, Wildlife and Parks agency.

Grizzly bear populations in Montana have grown exponentially. As an example, the best available scientific information shows that the Northern Continental Divide Ecosystem (NCDE) grizzly bear population has the estimated numbers and distribution of reproductive individuals to be self-sustaining. Since the grizzly bear was listed, the NCDE population has substantially increased in size to more than double the recovery plan goal of 391 bears. Costello et al. (2016) evaluated occupancy of the 23 bear management units in the NCDE by females with offspring during 2004 to 2014. Using the six-year running tally as set forth in the recovery plan USFWS (1993), the authors documented full occupancy of the recovery zone starting in 2009 and continuing through 2014 (Costello et al., 2016).

As the grizzly bear is a federally protected species, with identified populations in all but one of Montana’s national forests, bear management within Bear Management Units (BMUs) and Bears Outside Recovery Zones (BORZs) are guided by Forest Plans and Forest Plan Amendments.

As in the case of the Flathead Forest Plan of 2018, the U.S. Fish and Wildlife Service (USFWS) determined that adverse effects on individual grizzly bears as a result of the land management plan will not negatively impact the recovery of the NCDE grizzly bear population. Further, the USFWS stated their expectation that direction in the land management plan will result in conditions that support grizzly bear use of National Forest System lands in the NCDE.

Considering the large size of the NCDE recovery zone, the favorable land management direction within the recovery zone, and the robust status of the NCDE grizzly bear population, adverse effects on grizzly bears as a result of implementing the land management plan would not have negative effects on the status of the NCDE grizzly bear population. Therefore, the USFWS concluded that the land management plan is not reasonably expected to reduce appreciably the likelihood of both the survival and recovery of NCDE grizzly bears (USFWS, 2017a, pp. III-78-83).

Even though Forest Plans recognize land management, including timber harvest, will not adversely impact bear populations, we often find the presence of bears or their range within a timber sale unit, is a catalyst for litigation. Litigation in Region One, pertaining to grizzly bears, has all but stymied and stalled resource management for years.

Cabinet/Yaak and North Continental Divide Ecosystem grizzly bear recovery zones, are two of six grizzly bear recovery zones identified in the Grizzly Bear Recovery Plan (USFWS 1993). Located in northwestern Montana and northern Idaho, the two ecosystems encompass 12,220 square miles of habitat. Portions of the Kootenai, Idaho Panhandle, Lolo, Flathead, Helena, and Lewis and Clark National Forests are included in the recovery areas. Additionally, some state, private, Bureau of Land Management, Glacier National Park, Flathead Indian Reservation, and Blackfeet Indian Reservation lands overlap the recovery zones. Of the 776,460 acres outside of the recovery zone in the Selkirk and Cabinet/Yaak, 726,528 acres are on NSF lands.

There are numerous scientific, social, and economic justifications as to why the grizzly bear in Montana should be delisted. We should all be celebrating an ESA success!

Therefore, we do not believe the Consolidated Draft Recommendations go far enough. The goal should be delisting. Education and outreach, conflict prevention, bear distribution, relocation and connectivity and resources are important, however the Council cannot ignore the fact that

the state Fish Wildlife and Parks department will have jurisdiction over managing bear populations and interaction with people. Again, it is extremely important that the state exhibits adequate regulatory mechanisms that demonstrate the ability continue to protect the bear and its habitat, while reducing instances of bear/human conflicts. For the Council to have a complete and robust set of recommendations for the Governor, it must tackle the role of hunting.

Montana has a history of hunters being on the forefront of wildlife conservation and management. As grizzly bear populations continue to grow and habitats expand, finding solutions to challenges facing habitat and connectivity, encroachment on working landscapes, public safety, and controlling populations, while still maintaining the viability of the bear will require state and federal agencies, tribes and the public (including hunters) to continue to work in concert.

Thank you for this opportunity to comment.

Sincerely,

Julia Altemus

Julia Altemus
Executive Director
Montana Wood Products Association
PO Box 1967
Missoula, MT 59806
406-241-7047
julia@montanaforests.com