



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

March 23, 2016

Noreen Walsh, Region 6 Director
U.S. Fish and Wildlife Service
Mountain-Prairie Region
134 Union Blvd.
Lakewood, CO 80228

RE: Proposal to remove grizzly bears in the Greater Yellowstone Ecosystem from the federal list of threatened and endangered wildlife.

Dear Regional Director Walsh,

The Montana Wildlife Federation is our state's oldest wildlife conservation organization. We were founded in 1936 when hunters joined landowners to restore depleted wildlife in our state. MWF and its affiliate clubs work every day to promote abundant wildlife, healthy habitat and public opportunity to enjoy these public resources. We work on key policies on the federal, state and local levels and look for practical solutions to difficult issues surrounding wildlife.

MWF recognizes the restoration of the grizzly bear population in the Greater Yellowstone Ecosystem and elsewhere in Montana as an endangered species success story, one that is nearly complete for this highly valued native wildlife species that Montanans and people throughout the world cherish. As delisting of the grizzly bear is proposed in the Greater Yellowstone and population management is transferred over to the Montana Department of Fish, Wildlife and Parks, there are several points that the Montana Wildlife Federation would like to emphasize regarding the proposal to delist.

POPULATION: Data indicates that the grizzly bear population in the Greater Yellowstone population has stabilized. The population estimate from 2002 to 2014 is 674 bears. Recovery parameters such as well distributed females of reproductive age have been met for many years. Current discretionary mortality rates are within acceptable limits to maintain the existing population. We believe that at this time management of this population should be based on managing for population stability at current levels and not at the lower end of the population estimate confidence interval of 600 bears.

HABITAT: Habitat for this population is managed by a large and diverse group of federal, state, tribal and private landowners. Current habitat management strategies and coordination between these land managers has been instrumental in getting this population to the point of delisting.

The delisting proposal must assure that a conservation strategy is in place that requires that existing strategies and coordination between land managers continue and be improved when possible. Occupation of currently underutilized or vacant habitat should be encouraged with emphasis on linkage zones between existing populations.

HUNTING: Hunting is a proven wildlife management tool that the Montana Wildlife Federation strongly supports. We would support regulated and permitted hunting for grizzly bears where hunting mortality is counted as part of the discretionary mortality limits for this population. Protection of females with cubs should be required. It has taken 40 years to recover this population and many individuals and organized groups do not believe that hunting should be part of any future management strategy. Unsustainable, poorly-managed hunting could fuel opposition to grizzly delisting and set back recovery efforts. We strongly believe that during the first few years after delisting, the state needs to manage for population stability, and build trust and confidence before moving forward with a hunting season.

INFORMATION/EDUCATION: With visitor use and development of private lands increasing in the Yellowstone Ecosystem it is critical that information and education programs currently in place be continued and expanded. Future management and expansion of the Yellowstone grizzly population into new habitat must be accompanied with aggressive information and education programs to be successful.

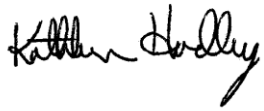
MONITORING/RESEARCH: With such an iconic species such as the Yellowstone grizzly, existing population and habitat monitoring programs need to continue to assure that the population continues to thrive and expand into biologically and socially acceptable habitat. While the Yellowstone grizzly bear population has had significant research associated with it over the last 50 years there is still much to learn, particularly in light of significant environmental changes such as climate change. We support a robust monitoring/research program after delisting of the population, and we strongly encourage you to include specific commitments to that end.

PROACTIVE CONFLICT RESOLUTION: The Montana Wildlife Federation is a strong supporter of bringing diverse interests together to prevent problems before they turn into irreconcilable conflicts. The Yellowstone area led the way in food storage measures to reduce food conditioning and the resultant mortality of grizzly bears. Other areas of Montana have instituted strong programs to help prevent grizzly bear depredation on livestock. These include carcass removal and composting programs, range riders, and electric fencing around chicken coops and other attractants. MWF strongly encourages the U.S. Fish and Wildlife Service and other state and federal agencies to continue to share successes and devote resources to similar programs. These benefit grizzly bears as well as ranchers and private landowners to help create a landscape where bears are welcome.

FUNDING: Funding for wildlife conservation is always a difficult issue. It is clear that grizzly bears, unlike other game species such as deer and elk, will not have sufficient revenue from hunting license sales to cover the costs. The solid work that Montana FWP field biologists do to minimize bear conflicts and manage them is absolutely essential to the success of grizzly bear recovery and sustainability. MWF encourages the FWS to assist the state in obtaining the funding to continue this strong program of state management.

Thank you for the opportunity to comment on this key wildlife issue. MWF is proud to be a partner in the restoration of one of our state's most cherished wildlife species. With solid management and cooperation, we can ensure that future generations of Montanans and all Americans can enjoy this powerful symbol of our state and its wild places.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hadley". The signature is written in a cursive, flowing style with a prominent initial "K".

Kathy Hadley

President