



8 March 2024

2023 Montana Draft Grizzly Bear Management Plan
C/O Montana Fish, Wildlife & Parks
1420 East Sixth Avenue
P.O. Box 200701
Helena, MT 59620-0701

Re: 2023 Draft Grizzly Bear Management Plan

Dear Commissioners and Director Temple:

On behalf of Safari Club International, I would like to thank you for the opportunity to comment on the draft grizzly bear management plan and DEIS. SCI appreciates the significant effort FWP has put into these documents. In particular, SCI appreciates the forethought to adopt a robust statewide management plan that will hold up to scrutiny after grizzlies or populations thereof are removed from the ESA threatened species list. SCI has long supported turning over grizzly bear management to state wildlife agencies, including in coordination with the State of Montana in defense of previously adopted GYE delisting rules.

While SCI supports the draft plan and EIS conceptually, we request several specific corrections. Although SCI understands the need to take a cautious approach when managing a recently delisted species, we respectfully disagree that grizzlies should be treated differently than other game species. The FWP and Commission's decision whether to implement a grizzly bear hunting season should not be influenced by unscientific "values" or opinions. Provision of a recreational hunting opportunity for grizzly bears must not be decided by popularity contest. Rather, FWP and the Commission must honor their legal obligations to preserve the harvest heritage of Montana citizens, Mont. Const. art. IX, sec. 7; and to encourage public access for hunting purposes, e.g., MSA sec. 87-1-265. In administering these legal directives, the FWP and the Commission should base decisions on science by implementing a hunt when it would be sustainable to do so.

Hunting is not a threat to grizzly bears. Neither the U.S. Fish and Wildlife Service, nor any court, has found regulated hunting to threaten grizzly bears following delisting. Hunting also does not reduce opportunities for other stakeholders to participate in recreational opportunities related to grizzly bears. SCI is confident that FWP can implement a regulated and sustainable hunt that will not pose risks to the bear population, just as it does for other species. To that end, SCI encourages FWP to provide a stronger commitment in the grizzly management plan to implement a hunting season—with agreement from the Commission—once the five-year waiting period required by regulation elapses (or sooner, should the regulation change). SCI further requests that the draft plan incorporate stronger language recognizing the role that regulated hunting plays in managing grizzly bear populations. While hunting may be more



appropriate in some parts of the State than in others, FWP should fully acknowledge that hunting is the only way to maintain (current or future) population targets within bear management areas.

Again, SCI appreciates FWP's commitment to sensible grizzly bear conservation and management. SCI encourages FWP to commit to working with the Commission to provide a hunt as soon as scientifically and legally appropriate.

Sincerely,

W. Laird Hamberlin
Chief Executive Officer
Safari Club International