



28 January 2022

North Carolina Wildlife Resources Commission
Attn: Rule Making Coordinator
1701 Mail Service Center
Raleigh, NC 27699-1701

Re: Proposed Change G.13 to Land and Water Access Regulations for 2022-2023

Dear WRC Commissioners:

Safari Club International (SCI), the country's leader in advocacy to protect the freedom to hunt and to promote wildlife conservation through sustainable use, thanks you for the opportunity to comment on proposed change G. 13 to the Land and Water Access Regulations for 2022-2023.

SCI strongly supports the Wildlife Resource Commission's (WRC) proposed regulation, and the U.S. Forest Service's request, to allow for new bear hunting opportunities on the Panthertown – Bonas Defeat, Pisgah, and Standing Indian Bear Sanctuaries in the Mountain Bear Management Unit. The WRC has fully explained that this permit-only hunting is consistent with Objective #2 in the Black Bear Management Plan (using regulated hunting to achieve and maintain black bear population objectives).

It is necessary and consistent with the purpose of the bear sanctuaries to rely on hunting to reduce population growth. Sanctuaries were established, and hunting on sanctuaries was prohibited, when the WRC's goal was to restore and increase the State's bear population and geographic distribution. But the bear population on these sanctuaries has clearly recovered. The estimated 7,000 bears now greatly exceed the management objective – and the WRC is properly adapting management of the sanctuaries to recognize the reality of recovery and address concerns with increased human-bear conflicts.

The most effective, impactful and proven method for stabilizing populations – the management objective within this unit – is through increasing regulated hunting opportunities. For this reason, almost every state with a sizable bear population relies on regulated hunting for black bear population control. For the same reason, the International Association for Bear Research and Management supports regulated hunting as a means for states to responsibly achieve bear population management objectives. Accordingly, the proposed change is consistent both with the North Carolina Black Bear Management Plan, best management practices, and the best available science on black bear population control.

In addition, these increased hunting opportunities are also significantly likely to reduce human-bear conflicts in the area. The WRC properly cites to evidence from other management units, where changes in bear harvest successfully reduced human-bear interactions. That conclusion is supported by research from other jurisdictions, most notably New Jersey (the state with the densest human and black bear populations in the country).

SCI believes that sound, science-based conservation involving hunting as the primary management tool is necessary to the long-term health of wildlife – and particularly the long-term health and social tolerance of black bears.

Further, increased hunting opportunities will also increase conservation funds to the WRC. Hunters have long paid the way for conservation, both of game and non-game, and maximizing opportunity for hunting is also key to long-term funding for all conservation.

Thank you again for the opportunity to comment on proposed change G. 13. SCI is dedicated to protecting the freedom to hunt and we appreciate the partnership and work of the North Carolina Wildlife Resources Commission.

Sincerely,

A handwritten signature in black ink that reads "Sven K. Lindquist". The signature is written in a cursive style with a large initial 'S'.

Sven Lindquist
President
Safari Club International