

14 June 2024

California Department of Fish and Wildlife – Wildlife Branch
ATTN: Black Bear Program
BigGame@wildlife.ca.gov

Re: SCI Comments on Draft Black Bear Conservation Plan for California

Dear California Department of Fish and Wildlife:

Safari Club International (SCI) appreciates the opportunity to comment on the draft Black Bear Conservation Plan for California.

In general, SCI supports updating California’s 20-year-old management plan for black bears. SCI supports the emphasis on conservation of this species. However, SCI strongly encourages the California Department of Fish and Wildlife (CDFW) not to lose focus on **managing** this abundant species. The draft Plan estimates that California has over 65,000 bears across approximately 39% of the state, and that black bears have expanded and continue to expand their occupied range. As California’s human population also continues to expand, human-bear conflicts (HBC) are frequent. HBC complaints have almost tripled in the last several years. Draft Plan at 721-727. This range expansion and spike in complaints suggests that CDFW must consider greater emphasis on regulated hunting to properly manage the black bear population within appropriate range and to reduce HBC.

The Draft Plan Should Increase Focus on Use of Regulated Hunting to Manage Abundant Bears

SCI supports the draft Plan’s recognition that “[r]egulated hunting has been a central component of wildlife conservation in California and throughout North America for over a century ... CDFW conservation activities that benefit both game and non-game species alike (e.g., population monitoring, research, land acquisition, habitat improvement, law enforcement etc.) are substantially funded by revenues generated from hunting license fees and from taxes on firearms and ammunition pursuant to the Pittman–Robertson Federal Aid in Wildlife Restoration Act of 1937.” Draft Plan at 154-160. Because hunting is essential to wildlife conservation, responsible management, and conservation funding, SCI questions whether “changing societal views” need to be considered in the draft Plan (*see* lines 166-177). As urban populations become more divorced from nature, their ability to fully evaluate appropriate wildlife management options and the balancing of habitat and predator-prey dynamics is significantly reduced. The views of urban populations are also not necessarily shared by Native Americans, and separate constituencies should not be lumped together.

Accordingly, SCI **requests** that CDFW reconsider this section and re-emphasize the importance of hunting as a wildlife management and conservation tool, especially for black bears. As explained by the International Association for Bear Research and Management, “[w]here the primary management objective is to slow population growth or limit population size or distribution, then increasing human-caused mortality is the only option. A regulated and monitored hunt can do this effectively and is



typically the most practical and socially acceptable way to achieve this.” Hunting as a Tool in Management of American Bear Populations (Mar. 20, 2017); *see also* H. Hristienko & J. McDonald, Going into the 21st Century: A Perspective on Trends and Controversies in the Management of the American Black Bear, *Ursus* 18(1):72-88 (2007); D. Garshelis et al., Population Reduction by Hunting Helps Control Human-Wildlife Conflicts, *PLoS One* (Aug. 11, 2020).

For the same reason, SCI **requests** that CDFW revise the “conservation goal” of “be[ing] inclusive of all Californians in black bear conservation decisions.” Draft Plan at 184-187. Where decisions need to be made to ensure the long-term health of predator and prey populations and ecosystems, as well as to reduce HBC, CDFW may need to make decisions that are less popular with the public but serve CDFW’s mission to manage wildlife for their ecological values and for their use and enjoyment by the public. While being inclusive of all Californians is a laudable goal when it comes to taking public input, CDFW’s decisions need to be made on the basis of sound science and for the benefit of bear populations and human populations that interface with bears. Likewise, while the draft Plan acknowledges that hunting can be an effective tool to reduce HBC (Draft Plan at 786-787), it chooses to focus on non-lethal strategies to reduce HBC, out of concern for “public opposition to increasing black bear harvest.” Draft Plan at 788-792. Respectfully, it is CDFW’s job to responsibly manage wildlife at a level that promotes acceptance and public safety—which means the appropriate level of bear harvest is CDFW’s and the California Fish and Wildlife Commission’s decision, based on best available science and **not** public opinion. SCI **encourages** CDFW to revise this section of the draft Plan and to focus on reducing HBC by increasing regulated harvest.

SCI **requests** that CDFW remove the statement that “researchers generally agree that hunting is a mostly additive form of mortality in black bears. This, combined with their low reproductive rates, indicates that unless management objectives call for population reduction, harvest should be conservative to prevent overexploitation.” Draft Plan at 550-554 (internal citation omitted). Hunting is not necessarily an additive form of mortality. Research suggests that hunting can help reduce HBC, thereby offsetting the potential lethal removal of bears. *E.g.*, Garshelis et al. (2020); J.D. Raithel et al., Recreational Harvest and Incident-Response Management Reduce Human-Carnivore Conflicts in an Anthropogenic Landscape, 54 *Journal of Applied Ecol.* 1552-62 (2017).

SCI also questions whether bears have “low reproductive rates.” The draft Plan notes that adult female bears produce a litter of cubs every other year. Draft Plan at 236-249. While it does not provide average litter sizes, average litter sizes in medium/high-quality habitat (like much of California) is almost three cubs. NJ Fish and Game Council, *Comprehensive Black Bear Management Strategy* (2022). Put simply, every other year, an adult female bear can replace herself and her mate, from the age of first reproduction (typically three or four) and for many years after. This represents significant offspring and not “low reproduction.” It is documented that black bear populations in quality habitat can double in three or four years. *E.g.*, New Jersey Division of Fish and Wildlife, *Black Bear Management* (2022); NJ Fish and Game Council (2022). In quality habitat, like California, research suggests that the maximum sustainable hunting rate for black bear populations exceeds 20%, with 30% as a target to reduce or maintain a black bear population at current or slightly lower rates. *E.g.*, NJ Fish and Game Council (2022); Hristienko & McDonald (2007). The draft Plan does not rely on the best available science in this



section or in its reliance on Miller (1990). SCI **requests** that this section be revised to acknowledge the possibility of high population growth rates and range expansion, and the need to utilize harvest to properly manage black bears, including at harvest rates up to 20-30% (depending on management objective).

Finally, SCI **encourages** CDFW to seek revisions to Title 14, to increase the statewide annual harvest limit. A limit of 1,700 bears (Draft Plan at 1016-1021) represents only 2.6% of the estimated bear population. As noted in the draft Plan, hunter harvest is far below sustainable harvest rates. Draft Plan at 559-567. CDFW is not using nor is it able to use hunter harvest to its fullest potential as a management tool. That inability should be rectified, so CDFW has access to the most successful tool to slow population growth or limit population size or distribution. *E.g.*, International Association for Bear Research and Management (2017). An increase in the statewide annual harvest limit also raises the potential for an increase in conservation revenue for CDFW, for the benefit of black bears and other species, through increased tag sales. Draft Plan at 568-580.

The Section on Hunter Ethics Should Be Removed from the Draft Plan

SCI strongly believes in ethical hunting behavior. We have our own ethics code and an ethics process, and violations of ethical standards can result in expulsion from our organization. With that said, the draft Plan's paragraphs on hunting ethics are totally out of place. The draft Plan should focus on the use of hunting as a management tool—the only management tool available—to reduce abundant black bear populations or maintain bears within core range. The draft Plan is not a hunting guide and should not be focused on a general discussion of hunter education and ethics, which are not relevant to the conservation and management of black bears. SCI **requests** that CDFW remove lines 581-625 of the draft Plan in the final version. Instead, SCI **requests** that CDFW replace this section with a discussion of why hunting is important for black bears, both as a management tool and because it provides meat, opportunity for self-sufficiency and outdoor experience, among other things.

The Draft Plan Should Address How CDFW Will Recruit New Black Bear Hunters

Lines 626 to 637 of the draft Plan state that participation in hunting and fishing have declined in California since the 1970s, and that CDFW is participating in a federal "R3" program to recruit, retain, and reactivate hunters and anglers. However, the draft Plan does not explain **how** CDFW is engaging in R3 initiatives and whether they are working, especially with respect to recruiting new black bear hunters. SCI **requests** that the final Plan describe CDFW's efforts to recruit new black bear hunters and identify new initiatives that CDFW will use. Given the importance of hunting as a black bear management tool, especially in a state like California with an abundant and increasing bear population and increasing HBC, CDFW should develop new strategies to recruit black bear hunters. The Black Bear Conservation Plan is an appropriate medium to identify and describe these strategies.



The Draft Plan Should Incorporate New Technologies into Bear Research and Monitoring

Section 7.1 of the draft Plan discusses research and data collection on California's black bear populations. SCI encourages CDFW to investigate and incorporate new data collection methods, with particular emphasis on new technologies, to improve the scientific basis for management decisions.

Conclusion

Sound science-based conservation is necessary for the long-term health of wildlife. SCI, as well as bear experts around the world, believes that this management strategy should include hunting as the primary management tool. Hunters have long paid the way for wildlife, both game and non-game species alike. Maximizing the opportunity for hunting is key to ensuring long-term funding for wildlife and habitat conservation and support for species across the landscape. Hunting benefits wildlife conservation.

Thank you again for the opportunity to comment on the draft Black Bear Conservation Plan for California.

Sincerely,

W. Laird Hamberlin
Chief Executive Officer
Safari Club International