

February 1, 2023

Montana Fish, Wildlife & Parks  
Attn: Grizzly Bear Management Plan  
PO Box 200701  
Helena MT 59620-0701

On behalf of Hellgate Hunters & Anglers (HHA), I write to comment on the Grizzly Bear Management Plan released on December 6th, 2022. HHA is an all-volunteer rod and gun club based in Missoula, and we boast over 500 members in western Montana. Our purpose is to protect, enhance and restore wildlife habitat; promote sound, science-based management of all wildlife species and their habitat as well as educate about hunting and fishing and the biological, cultural and spiritual values of hunting and fishing.

The recovery of the grizzly bear under the Endangered Species Act marks an important victory for Western conservation. While issues with connectivity may delay delisting at this time, we look forward to that day and anticipate the inclusion of the grizzly under the North American model of wildlife management. Grizzlies exist in significant numbers in several of the prime recreation areas in which our members hunt and fish.

HHA supports proactive wildlife management and the management plan drafted by the Montana Department of Fish, Wildlife and Parks is certainly forward looking, but there are a number of elements we would like to express some concern around:

- While we support the use of hunting as a tool for wildlife management, the significant emphasis in this plan for hunting will result in conflicts of a number of forms that FWP and the public must work together to mitigate. Conflict between hunters and grizzly bears as well as social conflicts between hunters and non-hunters are anticipated. We suggest hunter education courses specifically targeted towards hunters seeking to harvest a grizzly. This course would include information about identification, ethical pursuit, efficient harvest, meat management, and respectful public communication of the hunting experience. Additionally, a grizzly hunting season should be accompanied by a public education campaign designed to minimize controversy and help the public understand why hunting is a necessary management tool.
- FWP says that it “supports federal policies for meeting recovery goals in the Cabinet-Yaak Ecosystem and for attaining natural recovery of a population in the Bitterroot Ecosystem.” We would like to see concrete steps taken to achieve this goal identified in the preferred alternative.
- Hunting seasons and other methods of take should not be used as means to preclude the recovery of bears in ecosystems outside of the areas that FWP has identified for core connectivity. Constructing artificial barriers to the recovery of the species in its historic range is at odds with the intent of the Endangered Species Act. Continued adaptive management is encouraged as we work together for the recovery of this species, and this should include natural expansion of the grizzlies outside of the identified recovery zones, albeit with sustainable population management techniques.

In conclusion, we support FWP’s Preferred Alternative B with the above suggestions.

We appreciate the deadline extension for this comment period. This helped working Montanans engage with this draft plan after the holidays.

Thank you for the opportunity.

Sincerely,

Walker Conyngham  
President  
Hellgate Hunters & Anglers