



April 24, 2020

Nevada Board of Wildlife Commissioners
6980 Sierra Center Parkway, Suite 120
Reno, NV 89511

RE: Commission Regulation 20-02: 2020 Black Bear Quota

Dear Chairman Johnston and Commissioners:

The Congressional Sportsmen's Foundation (CSF) supports the proposed quota for the 2020 Nevada black bear season under Commission Regulation 20-02. CSF works with bipartisan policy makers across the country to protect and advance sportsmen's policy priorities including hunting, fishing, recreational shooting and trapping.

CSF would like to echo support for the following comments submitted to the Commission by the Coalition for Nevada's Wildlife:

- 1) The Nevada black bear hunt is now entering its tenth season since its inception in 2011. The previous nine (9) years of the Nevada black bear hunt have irrefutably demonstrated that the existing bear harvest limit of up to 20 animals, of which no more than 8 may be females, is sustainable. This is evidenced by a consistent average annual harvest averages over the duration of the hunt and a statewide bear population that continues to grow and expand as documented by separate studies performed by Dr. James Sedinger (2018, Dept. of Natural Resources and Environmental Science, UNR), and Dr. Jon Beckmann (2017, Wildlife Conservation Society).
- 2) Bear harvest metrics monitored by the Nevada Department of Wildlife (NDOW), that include the percentage of females harvested, the mean age of harvested females, and the mean age of harvested males, demonstrate a consistently light harvest of the bear population, both for the duration of the hunt to date (9 years), and over the last three year rolling average. That is to say, the Nevada bear hunt is not overexploiting the bear population. Further, these metrics are in place to provide safeguards against potential overexploitation of the population.
- 3) Mature males (those males greater than four years old) continue to be well represented in the annual harvest composition. While this suggests hunter selectivity, it is also an indication that the bear hunt is not having a significant impact on the bear population.
- 4) Similarly, the percentage of female bears in the harvest composition, both over the duration of the hunt (30%) as well as the last three consecutive years average of 22.7%, continues to be indicative of a light harvest.



- 5) The Nevada black bear population is presently estimated statewide at between 600 and 800 animals. The maximum allowable harvest quota of 20 animals represents a maximum harvest level of 2.5% to 3.3% of the state's population. The average annual harvest over the entire bear hunt (2011-2019) is 14 bears per year, which means that the average rate of harvest is actually closer to 1.8% to 2.3% of the state's population. This is a significant consideration since most North American black bear populations can be and oftentimes are sustainably harvested at much higher rates of 10% to 15%. That is to say, Nevada's bear hunt is managed at substantially lower percentages of the state population than other states and provinces.
- 6) Known anthropogenic causes of bear mortality (including hunter harvest) over the duration of the bear hunt (2011-2019) average about 40 bears per year. This includes an annual average mortality due to vehicular collisions of about 13.6 bears per year – essentially equivalent to the rate of bear harvest in the hunt. An average of 5.8 bears are destroyed annually for various management or public safety considerations. Hunting mortality only represents about 35% of the known anthropogenic bear mortality annually. As the bear population continues to grow, it can reasonably be concluded that hunting mortality is not an additive mortality factor.
- 7) The Nevada black bear population is not an isolated or distinct population of animals. It is in fact, a geographically and genetically connected portion of the substantially larger meta-population of black bears inhabiting the Sierra Nevada ecosystem consisting of portions of Oregon, California, and Nevada. The estimated portion of the population that resides within California is between 35,000 and 40,000 bears. That Nevada's bears are genetically related to the California population is well established within the peer-reviewed scientific literature on the subject.
- 8) In addition to the recent conservation success of black bears in our state, which are repatriating the great basin and continuing to expand throughout their historic range, black bears are doing very well on a national level. In fact, with an estimated population of 850,000 to 950,000 animals across North America, it is hypothesized that there may presently be more black bears in the continent than at any other time in history. Black bears occupy ranges in 41 states and 12 Canadian provinces, and even occur through out portions of Central America. The International Union for the Conservation of Nature (IUCN) lists black bears as a species of least concern. That is to say, from a conservation perspective – which we hope you share – there is no compelling reason to oppose the sustainable hunting of black bears in North America, including the population of black bears residing within Nevada.



- 9) As described in the Human-Black Bear Conflicts Guidance Manual, prepared by the Association of Fish and Wildlife Agencies (AFWA), regulated black bear hunting is compatible with population management objectives, whether those objectives are for increasing, decreasing, or stable populations. That is to say, regulated black bear hunting is consistent with Nevada's black bear population management objectives.
- 10) While the Nevada bear hunt is not presently intended for population control, there may come a time in the future where population control does become necessary in certain locations. This could occur as a result of future black bear populations reaching cultural carrying capacity in eastern and northern portion of the state, as an example. Regulated hunting could be utilized in these situations to reduce population levels to within the cultural carrying capacity.
- 11) Nevada's historic, and often unparalleled wildlife success stories have been achieved by and through our state's sportsmen and women working in conjunction with NDOW to reestablish, conserve, and promote our wildlife resources. Hunting has proven to be one of the greatest tools for wildlife and habitat conservation, not just because of the financial aid from license and tag revenue, which it certainly provides, but perhaps most importantly because it continues to enlist a demographic of people that are deeply invested in the perpetuation and abundance of our wildlife resources (AFWA 2018). This concept is as true for black bears as it is for mule deer, bighorn sheep, or any other game species pursued by Nevada's sportsmen and women.

Thank you for your consideration of the above statements and we respectfully request that the Commission vote to approve CR 20-02 as written.

Sincerely,

Aoibheann Cline
Western States Coordinator
Congressional Sportsmen's Foundation