



To: Maine Department of Inland Fisheries and Wildlife
Attn: Becky Orff
 284 State Street
 Augusta, ME 04333

Re: Proposed Amendments to Chapter 16.09 – Bear Hunting.

Position: Oppose

Date: June 5, 2020

Secretary Specialist Becky Orff,

We, the undersigned organizations, write to you today in opposition to the proposed amendments to *Chapter 16.09 – Bear Hunting* of the Maine Department of Inland Fisheries and Wildlife (MDIFW) Rules. This proposal unduly hinders Maine’s sportsmen and women from using bait while bear hunting, while ultimately seeking a sunset on the practice by 2029. This proposal would also eliminate baiting as a management tool for the Department in relying on hunting to control the bear population and reduce human-wildlife conflicts, will negatively impact rural economies, and will diminish the contributions of sportsmen and women to the American System of Conservation Funding (ASCF). Therefore, we respectfully urge you oppose these amendments, and in so doing, protect Maine’s science-based wildlife management practices and the hunting community from this affront against their sporting heritage.

Pursuing black bear in Maine is a long-standing hunting tradition enjoyed by Mainers and non-Mainers alike. For both resident and nonresident license-holders, the use of bait is a key element in the hunting of bears, as it is one of the more widely-accepted and practiced methods of take. In 2019, 65% of the bears harvested in Maine were taken over bait, reflecting the efficacy of this technique.¹ Additionally, the use of bait allows sportsmen and women to be more selective in their harvest, as they are afforded the opportunity to better judge the animal’s size and age than they would otherwise. The undeniable success of bear hunting over bait further demonstrates the irrationality of the proposed amendments to *Chapter 16.09*, which pose to ban the practice by 2029. When the preferred method of take proves its efficiency and resourcefulness as a wildlife management practice, it would be

¹ 2019 Maine Black Bear Harvest. Accessed on May 28, 2020. <https://www.maine.gov/ifw/docs/2019-Bear-Harvest.pdf>.

nonsensical to implement a plan that seeks its ultimate demise.

One of the amendments proposed to *Chapter 16.09* would limit the “intentional feeding” of bears, otherwise known as baiting, by prohibiting the use of “products containing refined sugar,” which is an ingredient included in most, if not all, attractants preferred by hunters and guides. This roundabout method of cutting down the available options for sportsmen and women is meant to put a choke hold on the practice of baiting by going after the key, essential element – the lure. Through banning the use of refined sugar, the State would be implementing a measure that frustrates the likelihood of success for Maine’s bear hunting community, which will undoubtedly be reflected as a reduced number of bears taken in Maine’s harvest report, and in time shown through reduced hunting license revenue.

Another one of the proposed rule changes burdens hunters by stating that hunters who plan to bait bears without “feeding” them must utilize a bear-proof container, preventing any physical contact with the bait. Requiring such devices to prevent bears from accessing the bait so as to not intentionally “feed” them is not only irrational, but it would make this method of hunting cost-prohibitive. Furthermore, hunters believing themselves to be using bear-proof containers that prove to not be bear resistant would potentially find themselves in violation of this proposed ban on “intentional feeding” and may be subject to fines and penalties – a situation that is likely to reduce participation among those who are risk-averse. It’s apparent that the purpose of these two amendments is to make hunting bears with the use of bait nearly impossible, which is likely a response to the devastating loss that the anti-hunting community experienced following the 2014 ballot referendum. As was demonstrated in the referendum, which sought to ban bear hunting with the use of bait, hounds, and trapping state-wide, the majority of voters in the State (over 320,000 individuals) did not support the proposed restrictions on this time-honored tradition.

The proposed amendments to *Chapter 16.09* will also have a detrimental effect on Maine’s guiding community, which relies heavily upon nonresident hunters coming into the State in pursuit of black bears. The MDIFW’s *2019 Maine Black Bear Harvest* reported that “guides assisted 240 residents (27%) and 1,343 non-residents (92%) with their successful hunts,” of which a total of 68% were taken over bait.² When looking at nonresident hunters more specifically, roughly 66% of the bears harvested were through the use of bait.³ Limiting the abilities of guides to implement effective baits containing refined sugar, and/or requiring restrictive, bear-proof baiting devices will most certainly handcuff Maine’s hunting guides. Lower success rates will result in lost business – a crippling outcome for not only the guiding community, but for the State in general. Maine’s sportsmen and women support around \$321 million in salaries and wages, \$71 million in state and local taxes, and have a ripple effect of approximately \$977 million on the State’s economy.⁴ The professional guides must be credited as a staple in recruiting and supporting nonresident sportsmen and women into the State in pursuit of a variety of hunting and fishing opportunities.

This proposal will also negatively impact conservation funding generated by sportsmen and women through the “user-pays, public-benefits” ASCF, which resulted in over \$26 million dollars going towards the conservation efforts of the Department last year alone. According to the U.S. Fish and Wildlife Service’s 2019 National Hunting License Data, the total hunting license, tags, permits, and stamps sold in Maine came to 245,392 – of which 34,087 were to nonresident hunters.⁵ When nonresidents wish to hunt bear over bait, they must first purchase a big game hunting license, which has a base cost of \$115. The gross sum raised for conservation through the sale of nonresident hunting license, tags, permits, and stamps was over \$3.1 million. The proposed amendments will have a significant and detrimental effect on the Department’s ability to fund conservation

² IBID.

³ IBID.

⁴ *Maine Sportsmen & Women*. Accessed on May 28, 2020. http://congressionalsportsmen.org/uploads/page/EIR_Maine_final_low.pdf.

⁵ *Black Bears*. Accessed on May 29, 2020.

<https://www.fws.gov/wsfrprograms/subpages/licenseinfo/Natl%20Hunting%20License%20Report%202019.pdf>.

efforts, not to mention the money that the MDIFW can leverage from the federal government through the Wildlife and Sport Fish Restoration (WSFR) Program.

In consideration of the arguments mentioned above, we implore the MDIFW to reject these proposed amendments, which serve no purpose other than to undermine bear hunting in Maine. In so doing, you will ensure that an emotional appeal by a vocal minority does not override more than a century of sound, science-based management which has resulted in burgeoning wildlife populations throughout the State.

Sincerely,

American Woodcock Society
Congressional Sportsmen's Foundation
Conservation Force
Dallas Safari Club
Delta Waterfowl
Houston Safari Club
Maine Professional Guides Association
Mule Deer Foundation
National Deer Alliance
National Rifle Association, Lauren LePage, Esq.
National Wild Turkey Federation
Orion: The Hunter's Institute
Pope and Young Club
Professional Outfitters and Guides of America
Ruffed Grouse Society
Safari Club International
Sportsman's Alliance of Maine
Sportsmen's Alliance