



February 16, 2022

Department of Fish, Wildlife and Parks
P.O. Box 200701
Helena, Montana, 59620-0701

Montana – Rule Amendment Regarding NCDE Grizzly Bear Demographic Objectives - Support

Dear Montana Fish and Wildlife Commissioners,

On behalf of the Congressional Sportsmen's Foundation (CSF), I write in support of the proposed amendments to the Northern Continental Divide Ecosystem (NCDE) Grizzly Bear Demographic Objectives and the intent to provide management objectives that would ensure the continued recovered status of grizzly bear upon delisting and subsequent transfer of management authority to the State of Montana.

Founded in 1989, CSF's mission is to work with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting, and trapping. CSF has a strong track record in Montana, working with the Montana Legislative Sportsmen's Caucus and conservation partners to protect and advance Montana's sporting heritage by supporting pro-sportsmen legislation and state fish and science-based wildlife management objectives. We offer the following comments based on our experience working on conservation policy for more than 30 years.

According to the US Fish and Wildlife Services 2022 report titled "Species Status Assessment for the Grizzly Bear (*Ursus arctos horribilis*) in the Lower-48 States" the grizzly bear population in the NCDE has made significant strides towards recovery. Habitat and demographic factors used to determine ecosystem resiliency were found to be high and the population within the NCDE is estimated to be over 1000 individual bears. In short, the NCDE grizzly bear population is highly resilient and has sufficient viability over the next 30 to 45 years to withstand stochastic events.

The proposed amendments in the NCDE Grizzly Bear Demographic Objectives create regulatory safeguards for when the NDEC grizzly bear is determined to be recovered and delisted by ensuring that the bear population stays above the minimum recovery level, negating the need for a potential relisting effort. By ensuring the grizzly bear is not relisted, Montana Fish, Wildlife and Parks and the Fish and Wildlife Commission can work within the guidelines of the Grizzly Bear Policy to provide for recreational opportunities, hunting included, in addition to allowing hunting as the most desirable

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method of balancing grizzly bear numbers with their available habitat, minimizing depredations against private property within or adjacent to grizzly bear habitat, and minimizing grizzly bear attacks on humans. The proposed amendments would lead to increased access and opportunity for future grizzly bear hunting opportunities by safeguarding against foreseeable future attempts to relist the species.

In closing, CSF urges the Montana Fish and Wildlife Commission to move forward with the proposed amendments to the NCDE Grizzly Bear Demographic Objectives and support this step towards increased access and opportunity for Montana's sportsmen and women upon grizzly bear delisting.

Sincerely,

A handwritten signature in black ink that reads "Ellary Tucker Williams". The signature is written in a cursive style with a large initial "E" and "W".

Ellary TuckerWilliams
Rocky Mountain States Senior Coordinator