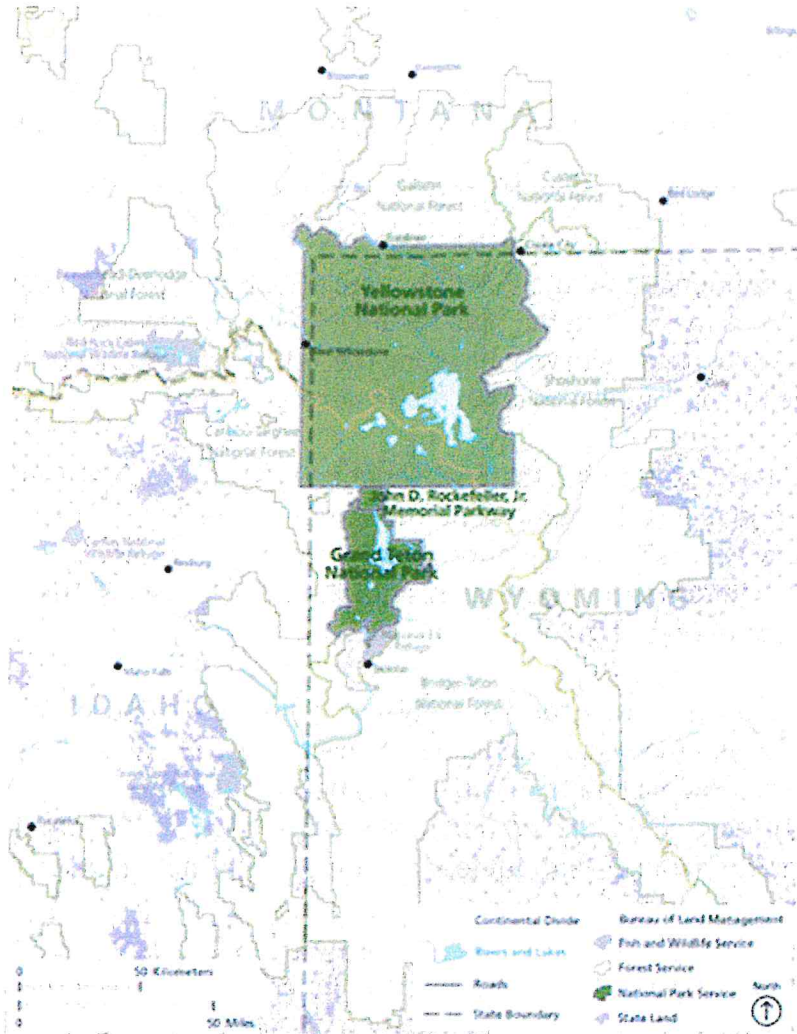


TO: Montana Fish and Wildlife Commissioners
FROM: Footloose Montana
VIA EMAIL: fwcomm@mt.gov
DATE: May 26, 2024

RE: Grizzly Bear Tri-State Memorandum of Agreement (MOA)

- This irrationally low number limit of grizzlies, 850-900, that will be allowed to exist in the vast GYE is designed for trophy hunters, not for the species. It makes interconnectivity, healthy functioning ecosystems and thriving grizzlies impossible. It would mean the unacceptable trucking of bears – [which usually fails](#) – for translocation.



The Greater Yellowstone Ecosystem is this entire map. Description of an ecosystem's size, boundaries, and characteristics can vary greatly.

- Please reject the MOA as written. Management by numbers is a recipe for extinction. Management by numbers makes the big, wild GYE a grizzly game farm that grows America's greatest species for trophy hunts. This plan reduces the great bear to a squalid remnant from the species' essential role as the apex predator that keeps the land and wildlife healthy and thriving. This undermines the intent of the Endangered Species Act which has protected the bear for fifty years.

Sen. Steve Daines recently argued that “we are well over targets” for grizzly numbers. This focus ignores that population numbers are only a small part of the ESA's goals. If only numbers mattered, ESA compliance could be met with bears in zoos. The goal is not numbers of bears, but an ecosystem capable of sustaining bears — and bears sustaining it — in perpetuity. State leaders who take bear numbers — rather than connectivity and ecological function — as the only relevant factor will be the first to justify the culling and geographic restrictions that make a self-sustaining population impossible. Managing merely by the numbers is a classic mistake.

From an [op-ed](#) by Charles Hayes, UM professor of environmental philosophy

- There is little confidence that the IPM (Integrated Population Model) counting method is any less manipulatable than the iPOM method for wolves, which makes it unreliable. As we've seen with wolves along the Yellowstone Park boundary, grizzlies that live inside the park could be lured out for killing.
- Depending on three states with their own agendas to communicate 24/7, cooperate transparently and follow the same implementation of the IPM counting method is completely unrealistic. This is a glaring reason why management by numbers will not work. If your intention is delisting, this burdensome, unwieldy triumvirate scheme will further delay that goal.
- The wolf population is kept insubstantially low in Montana. Wolves cannot restore functioning ecosystems in Montana or contain CWD in central and eastern Montana. This is what will happen with grizzly bears in the GYE—they will exist in insufficient numbers to be healthy and resilient. They will be perpetually under the gun, not free to roam or live without fear and unable to function naturally.
- This MOA disregards the importance of ecosystem health, grizzly sustainability, corridors for connectivity and bears that travel back and forth over the YNP boundary. Numbers do not equal management. Ecosystems are sustained by and sustain wildlife species. The top priority needs to be protection of ecosystems which are in turn kept healthy by species. In this case, grizzly bears are an umbrella species, the most important of all.

We hope you will reject this MOA proposal. It falls far short of meaningful recovery for the grizzly bear. Montanans are justifiably proud of having provided the last refuge in the Lower 48 for this rare and sensitive species. The majority of citizens have tremendous respect for the Great Bear, and do not want to see grizzlies turned into trophies and trash, as the wolf has been in all three states.

Respectfully submitted,

Connie Poten for the Footloose Montana board

www.footloosemontana.org