



*Protecting Southwest Florida's unique natural environment and quality of life ... now and forever.*

June 17, 2016

The FWC Commissioners  
Florida Fish and Wildlife Conservation Commission  
620 S. Meridian St.  
Tallahassee, FL 32399

*Sent via email*

Dear FWC Commissioners:

The Conservancy of Southwest Florida writes on behalf of our over 6,000 supporting families in regards to a possible 2016 Florida black bear hunt.

While the Conservancy is not against hunting in principle, we did oppose the 2015 hunt due to the lack of science necessary to establish such a hunt would not have detrimental long-term effects on the black bear population. We continue to have concerns regarding an annual loss of 20% of the bear population, as well as the lack of scientific analysis on how the hunt will affect adjacent bear subpopulations that are at threat of local extirpation.

Given these concerns; the need to focus on the real root of human-bear conflicts (which is unsecured garbage and other attractants), and the outcomes of the 2015 hunt which resulted in overharvest in two of the four hunted units; the best course of action the Florida Fish and Wildlife Conservation Commission (FWC) can take at this time is a moratorium on future hunts.

#### Moratorium on Future Hunts is Necessary to Address Human and Bear Safety Issues

As the FWC has recognized, human safety is the important issue in preventing human-bear conflicts, which usually involves trash-fed bears. In 2015, over 100 bears were killed by the agency due to being considered conflict bears, which is about three times more than were removed from the population the year before. This represents a large loss of the bear population due to a man-made cause that is preventable through ongoing education and the availability of bear proof trash receptacles.

- We applaud the FWC for their work on the issue of trash management. However, we have also witnessed first-hand staff time and resources, as well as public messaging, diverted



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from addressing this issue not just for the time the actual hunt is being conducted, but for many months leading up to the hunt, during, and for many weeks after.

- Further, as the science shows, and as FWC has acknowledged, conducting a hunt will not result in an appreciable reduction in human-bear conflicts. Trash management is the most effective way to address this issue.
- “Although it may be intuitive to assume that harvesting more bears should reduce human-bear conflicts, empirical support for this assumption is lacking despite considerable research.”<sup>1</sup> Additional studies presented at the 4<sup>th</sup> International Human-Bear Conflicts Workshop also concluded that hunting did not appreciably reduce human-bear conflicts.<sup>2</sup>
- Conflicts are likely to continue, as bear habitat continues to be lost to development and many of these residential projects are being sited in heavily-utilized bear areas.<sup>3</sup>
- Collier County has seen over 5,000 new housing units in the past few years, and Lee County has seen over 4,000.<sup>4</sup> Many more developments are currently being authorized or considered in bear habitat in southwest Florida which adds potential for increased human-bear conflicts.

While the Conservancy remains committed to serving on the South Bear Stakeholder Group assisting with trash management issues, FWC’s pursuit of a 2016 hunt takes valuable time and resources away from what should be the highest priority issue of public safety and reducing avoidable bear deaths.

In order to allow for the agency’s good work and progress on the worthy initiatives on trash management to move forward as quickly as possible, a moratorium should be imposed.

#### Moratorium on Future Hunts is Necessary to Maintain a Recovering Bear Population

For the past 18 months of which a Florida black bear hunt has been discussed, the Conservancy has continued to inquire and express concerns regarding lack of scientific support for a bear hunt. The following are some of the substantial concerns we have regarding the basis for the hunt and harvest objectives.

- FWC determined that an approximate 20% loss of the state’s bears would have no detrimental effects on the long-term health of the bear population. This was purportedly

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<sup>1</sup> Obbard et al., 2014. Relationships Among Food Availability, Harvest, and Human-Bear Conflict at Landscapes in Ontario, Canada. *Ursus* 25(2): 98-110. Referencing Garshelis, 1989, Treves and Karanath, 2003, Huygens et al., 2004, Tavss, 2005, Treves, 2009, Howe et al., 2010, and Treves et al., 2010.

<sup>2</sup> Matt, C., 2012. 4<sup>th</sup> International Human-Bear Conflicts Workshop Summary. College of Forestry and Conservation.

<sup>3</sup> Cape Coral-Fort Myers is the 6<sup>th</sup> fastest growing area in the nation, while Naples is the 10<sup>th</sup> (Fletcher, April 4, 2015. Naples Area Among Top 10 In the Nation for Growth. Naples Daily News article).

<sup>4</sup> Mills, May 21, 2015. Collier, Lee See Surge of New Housing, US Census Data Shows. Naples Daily News article.

based on studies<sup>5</sup> not specific to the Florida black bear, and therefore unclear if comparable to Florida's bear population.

- According to Florida biologists, the current scientific information being used to propose the hunt, "lack enough of the right kind of information to indicate the maximum sustainable harvest rate that will maintain stability of these populations."<sup>6</sup> Use of population size and densities are "insufficient metrics for setting harvest objectives."<sup>7</sup>
- Further, such a loss may not be sustainable on an annual basis due to some subpopulation's slow growth rates.<sup>8</sup>
- Continued use of the current methodology, Florida biologists believe "can lead to significant overestimates of allowable harvest,"<sup>9</sup> such as occurred in last year's hunt.
- Two of the four bear management units (BMUs) were overharvested in the 2015 hunt<sup>10</sup> and the effects, including long-term impacts, have not been analyzed by the FWC. In the East Panhandle, the harvest objective was exceeded, with three times the bears taken in the hunt<sup>11</sup> as anticipated to avoid a detrimental long-term impact. The Central Florida BMU also experienced an overharvest;<sup>12</sup> representing a loss of "five times the maximum sustainable rate for maintaining a stable bear population."<sup>13</sup>
- The current reliance on a 20% loss only considers *known documented* mortalities. Additional losses may occur that would not be taken into account by this methodology.
- Black bear mortality from other causes continues to pose a threat to the population, as development and other land use intensifications are increasing, adding more traffic to roadways and more potential for human-bear conflicts from mismanagement of garbage.

FWC may not be able to reasonably rely on a 20% annual loss as the basis of a hunt. Further studies are needed to understand how the Florida population (including slow growth rates and overharvest) compare to the assumptions found in the Bunnell & Tait study which is the basis for the state's entire bear hunt program.

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<sup>5</sup> Studies by Drs. Frederick L. Bunnell and David EN Tait, University of British Columbia, Vancouver.

<sup>6</sup> Aresco, et al., 2016. Letter to FWC Commissioners Regarding Bear Management and Hunting. Dated June 4, 2016. P. 1.

<sup>7</sup> *Ibid.* at 2.

<sup>8</sup> Central BMU is projected to only grow about 1-2% per year based on the 2011 Florida Black Bear Biological Status Review Report. P. 5.

<sup>9</sup> Aresco, et al., 2016. Letter to FWC Commissioners Regarding Bear Management and Hunting. Dated June 4, 2016. P. 3.

<sup>10</sup> FWC, 2015. 2015 Florida Black Bear Hunt Summary Report.

<sup>11</sup> *Ibid.* East Panhandle harvest objective was 40, actual harvest was 114.

<sup>12</sup> *Ibid.* Central Florida harvest objective was 100, actual harvest was 143.

<sup>13</sup> Aresco, et al., 2016. Letter to FWC Commissioners Regarding Bear Management and Hunting. Dated June 4, 2016. P. 4. Referencing Hostetler, et al., 2009.

A moratorium on the bear hunt will allow the agency the time necessary to complete this scientific analysis and ensure that a hunt program will not result in long-term detrimental effects to the bear population.

Moratorium on Future Hunts is Necessary to Recover Vulnerable Subpopulations

The Conservancy is concerned how hunting would impact non-viable subpopulations, like the South-Central BMU in Glades/Highlands Counties. The South-Central BMU is one of the least genetically diverse of all the subpopulations, is in decline (at only about 100 bears<sup>14</sup>), and is considered to be the most fragmented.<sup>15</sup> Although the statewide bear population appears to be increasing, that “should not obscure the fact that multiple bear populations in the state remain isolated, genetically impoverished, and at-risk” for local extinction.<sup>16</sup>

- Although no hunting took place within the South-Central BMU, there may be unintended and negative consequences of allowing hunting to take place just a few miles south, across the political border in Hendry County.
- Florida biologists agree, FWC has not explained how hunting will impact the smaller populations.<sup>17</sup> Impacts may occur as hunting takes Glades bears or may also cut off dispersing bears that act as a source for an infusion of genetics to an unhealthy population.
- Studies have stated that “it is unlikely that [the] populations could approach the desired size of 200 [necessary for viability], thereby making genetic nourishment by other means critical.”<sup>18</sup>

Dispersal of bears from the south and connection of these two populations -a goal of the Bear Management Plan<sup>19</sup> - may be limited by hunting. The FWC staff is proposing to limit the geographic areas that could be hunted in 2016<sup>20</sup> ‘to be more restrictive’ if the agency moves forward with a hunt; however, Hendry County is still shown for hunting, ignoring these concerns.

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<sup>14</sup> Florida Fish and Wildlife Conservation Commission meeting, Dr. Thomas Easton, February 4, 2015, personal communication.

<sup>15</sup> Florida Fish and Wildlife Conservation Commission, June 27, 2012. Florida Black Bear Management Plan. P. 122.

<sup>16</sup> Aresco, et al., 2016. Letter to FWC Commissioners Regarding Bear Management and Hunting. Dated June 4, 2016. P. 5.

<sup>17</sup> *Ibid.*

<sup>18</sup> Dixon, et al., 2007. Genetic Consequences of Habitat Fragmentation and Loss: The Case of the Florida Black Bear. *Conservation Genetics*, 8: 455-464. P. 461

<sup>19</sup> FWC, 2012. Florida Black Bear Management Plan. Approved June 27, 2012. Goal 1.2.2 “Augment bear numbers in subpopulations within BMUs that have less than 200 bears using bears from high-density subpopulations as donors.”

<sup>20</sup> FWC, 2016. PowerPoint presentation, to be presented June 22, 2016. Bear Hunting: One Part of Comprehensive Management. Slide 12.

A moratorium on the hunt will allow FWC the time to analyze the relationship between these BMUs and determine how hunting affects the dispersal of bears that are needed in this at-risk subpopulation, if we are ever to retain this subpopulation of bears.

#### Moratorium on Future Hunts is Necessary to Assess Biological Carrying Capacity

Throughout the Black Bear Management Plan process, the Conservancy raised concerns regarding use of perceived 'social carrying capacity,' or human willingness to coexist with black bears as a yardstick for bear management. We requested then<sup>21</sup>, as we do today, to manage bears based on the biological needs of the population.

- The Black Bear Management Plan contains a goal to conduct an analysis of occupied and suitable unoccupied bear habitat.<sup>22</sup> This analysis should be done prior to any hunt proposal.
- There are three subpopulations (West Panhandle, Big Bend, and South-Central BMUs) that do not currently meet the minimum population needed to be viable and persist into the future. Instead of hunting, the FWC should also look to the Management Plan goal that speaks to using bears from high-density subpopulations as donors to these at-risk populations.

A moratorium on future hunting will allow the agency the ability to conduct these analyses and also achieve other more critical goals of the Management Plan that may reduce the perceived need to limit the bear population growth, while improving the three bear populations that are vulnerable to extirpation.

#### Alternative Actions FWC Should Consider Instead of a Hunt

The Conservancy of Southwest Florida strongly urges the FWC to consider taking the following actions alternatively to a hunt:

- Conduct further studies to understand how the Florida population (including slow growth rates and overharvest) compare to the assumptions found in the Bunnell & Tait study which is the basis for the state's entire bear hunt program.
- Conduct studies of habitat and food availability for each of the Florida black bear populations to determine if bears are exceeding the resources to support them or not. If not, there is no reason to hunt for population management.

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<sup>21</sup> Conservancy of Southwest Florida, 2010. Letter to FWC Re: Draft Black Bear Management Plan. October 4, 2010; Conservancy of Southwest Florida, 2011. Letter to FWC Re: FWC Black Bear Management Plan. December 20, 2011; Conservancy of Southwest Florida, 2012. Letter to FWC Re: Draft 7.0 Florida Black Bear Management Plan. June 1, 2012.

<sup>22</sup> FWC, 2012. Florida Black Bear Management Plan. Approved June 27, 2012. Goal 2.1 "Determine clear criteria for categorizing habitat quality and then assess the current quality, at an appropriate scale, of occupied and unoccupied but potentially suitable bear habitat in each BMU."

- Conduct studies on the effects of last year's hunt on each of the different population areas in combination with the other pressures affecting mortality, to determine whether additional hunting pressure can be sustained without jeopardizing those populations.
- Invest more staff and monetary resources into education and assistance to communities having continual adverse human-bear interactions, so proper conflict avoidance measures are put in place such as securing trash in bear-proof containers and putting out morning of pick up.

Only with the information and results from these aforementioned studies and actions, can the FWC truly make a science-based policy decision as to whether hunting is sustainable and focus on the higher priority issue of reducing human-bear conflicts. In the meantime, a moratorium on the bear hunt will allow the agency the time necessary to complete this scientific analysis and ensure that a hunt program will not result in long-term detrimental effects to the bear population.

Thank you for considering our comments on these matters. If you would like to discuss them further, please feel free to contact me at (239) 262-0304, ext. 286.

Sincerely,



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