



The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK for current and future generations.

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February 20, 2014

Bryan L. Swift
NYS DEC Bureau of Wildlife
Bear Management Plan
625 Broadway
Albany, NY 12233-4754

RE: DRAFT-Black Bear Management Plan for New York State 2014-2024

Dear Mr. Swift,

On behalf of the Adirondack Council, I would like to thank you for the opportunity to offer the following comments on the *Draft Black Bear Management Plan for New York State 2014-24*. We appreciate the efforts expended by the New York State Department of Environmental Conservation (NYSDEC) to help protect and manage New York's growing bear population. The Adirondack Council recognizes that long held management strategies need to be updated to reflect a more formalized and scientific approach to handling bear populations into the future.

As we stated in our June 7, 2012 stakeholder input letter, the Council believes that a black bear management plan must provide a comprehensive harvest strategy based on current and sound science, and be holistic in addressing the host of management issues found on an ecosystem level. While we support the Draft Management Plan and its general underlying principles, there are key issues we believe need to be modified and addressed in a final draft.

Black bears (*Ursus americanus*) occupy a key ecological niche within the larger New York landscapes they inhabit. Rarely seen by most people, black bears are one of New York's most charismatic and highly adaptive predators who have long been a symbol wilderness and wildness. As the plan states, the value of black bears to the general public goes far beyond simply being a recreational asset of the sporting community. It is disappointing then that the needs of the photographer and wildlife watchers who are identified in the introduction are not given the same importance as those of the hunter when it comes to management techniques and strategies within the plan.

EXECUTIVE DIRECTOR

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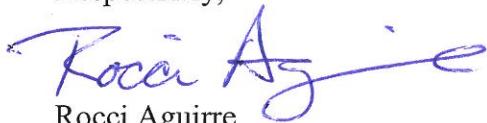
With respect to the proposed Draft Management Plan, the Council offers the following specific comments:

1. As the plan makes clear, bear populations are growing and shifting from traditional habitat zones within New York State. Where impacts and bear-human conflicts exceed a safe or manageable threshold, expanded harvest seasons and other management strategies need to reflect that reality. **But the plan should not promote the possible use of currently banned practices that would make it legal to hunt with dogs, allow the baiting of bears, trapping of bears, and the taking of bears under the age of 1 yrs old (Strategy 2.1.6).** The possible inclusion of these controversial harvest methods in the future would undermine the public trust and reverse years of progressive game management by the NYSDEC.
2. The Council understands and supports the removal of problem bears and the control of populations around urban areas, but we strongly believe that in areas where bear habitat is conducive to more robust populations (rural, semi-rural or agricultural areas) that a comprehensive education process should be the preferred management strategy rather than simply increasing harvest limits. In particular, educating the public on ways to limit habituating bears to human food sources should be given a higher priority when surrounding habitat is conducive to healthy bear populations. As has been demonstrated in the Adirondacks, progressive management strategies and educational programs, such as requiring bear canisters within the High Peaks and the enforcement of indirect feeding of bears, can greatly diminish bear-human conflicts. Given this, *Goal 4: Technical Guidance and Outreach* should be given a higher priority within the draft plan than is currently expressed.
3. Considering the dynamic nature of population shifts and increasing bear-human conflicts, establishing and evaluating bear populations every 10 years as identified in Objective 1.1 would seem to be an impractical time interval. A five (5) year evaluation interval would allow for a more nuanced and flexible management strategy over time and would match the five year evaluation of the hunting seasons and regulations cited in Strategy 2.1.4.
4. The premise of annual monitoring of only three to five (3-5) bear dens *per region* as stated in Strategy 1.2.3 is an inadequate number to get viable and accurate data on bear reproductive and survival rates as the plan states. The Adirondacks, which is predominantly in Region 5, accounts for 50-60 % of the estimated 6,000-8,000 state-wide bear population. Collaring even a maximum of five (5) bears would not provide an adequate baseline for the amount of bears found in the region, and the number should be increased proportionally to reflect the amount of bears found in the region compared to the rest of the state.

5. A truly holistic bear management plan needs to look at the entire spectrum of management related issues, including climate change impacts on habitat and forage, expansion of bear range, dispersal rates of juvenile boars and sows, limits on traditional habitat carrying capacities, as well as human-bear conflicts. Interactions between the wildlife management units and regional complex planning should be investigated more fully so that the entire life cycle of black bears measured across a landscape scale is considered. Negative human interactions in specific locations should not be the dictating influence on the overall harvest rates of bears spread across a regional landscape.
6. Game management plans tend to take on a sportsmen-centric focus, and this plan points out that less than 25% of the big game hunters in New York consider themselves to be bear hunters, with only 10% considering themselves to be active bear hunters (pg 16). Working to promote a larger bear hunting culture among New York hunters may be a viable means to achieve control objectives, but relies on growing a niche segment of the hunting community that has never been particularly strong in New York. Additional efforts should be identified within the plan to increase the resources for scientific monitoring, relocation and other professional staffed solutions that address the larger control question.
7. Given the current staffing and resource shortages at the NYSDEC, concrete examples of funding and resource allocation must accompany *Goal 5: Management Capacity and Resources*. Without identified funding sources and dedicated budgeting, the ability of the NYSDEC to fully implement this plan is questionable. Allocating additional resources to the NYSDEC to ensure proper staffing, research capacity, etc., would be universally supported and a proper use of those funds.

In closing, the Adirondack Council believes that the *DRAFT-Black Bear Management Plan for New York State 2014-2024* is a positive move forward in addressing the rising black bear population in the state. However, we encourage the DEC to continue modifying the Draft Plan to reflect a more holistic and comprehensive bear management strategy. Thank you for accepting and reviewing our comments concerning the various management strategies.

Respectfully,



Rocci Aguirre
Conservation Director