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March 13, 2010

California Fish and Game Commission
1416 Ninth Street
P.O. Box 944209
Sacramento, CA 94244-2090

Via email: fgc@fgc.ca.gov, Director@dfg.ca.gov, eloft@dfg.ca.gov

Dear California Fish and Game Commission:

We, the undersigned organizations representing more than three million Californians, oppose the California Department of Fish and Game's (CDFG) proposals to expand black bear hunting. The agency recently unveiled plans to: allow an unlimited number of bears to be killed across California during the hunting season; permit the use of high-tech global positioning equipment and "tip switches" on hound collars to make it easy to locate and kill a bear; open the first-ever bear hunting season in San Luis Obispo county and expand the hunts in Modoc and Lassen counties; and significantly expand the hound training season, allowing hounds to harass bears nearly all year long. **We urge you to reject these proposals because they are scientifically indefensible, unnecessary, and environmentally harmful.** Specifically, we contend the Commission should oppose CDFG's plans for the following reasons:

- **The agency has not demonstrated any need for these regulatory changes other than to placate hunting interests,** nor does the CDFG provide sufficient information to assess the detrimental effects these changes may have on bears. According to CDFG data, the number of bears killed legally by hunters has steadily increased well beyond the agency's own 1,700 annual season limit. Yet, the CDFG has yet to analyze how these dramatic increases have affected state and local bear populations, behavior, social structure, reproduction, and cubs. Increasing the quota or eliminating the cap altogether will further stress the state's bear population and put some local populations at risk.

- **There is no guarantee that expanding hunting into San Luis Obispo, Lassen, or Modoc counties will not adversely impact the black bear population in those counties.** The CDFG has not conducted specific research in these counties to determine the size, distribution, or demographics of the populations to assess whether these local bear populations can withstand an increase in hunting activity.
- **An expansion of bear hunting will place additional pressures on bears,** who face a host of threats from poaching, habitat alteration, human encroachment into wildlife areas, aggressive government lethal control programs, and climate change.
- **State wildlife officials have failed to assess the impacts of poaching.** Illegal killing of bears has increased world-wide, fueled by a booming market, for bear parts, especially bear gallbladders used in traditional Asian medicine and bear paws, considered a delicacy in soup. Bear gallbladders can go for \$5,000 a pound. Poaching of wildlife has become epidemic across the state. Violations rose from 6,538 in 2003 to 17,840 in 2007. The illegal sale of California wildlife and wildlife parts generates an estimated \$100 million a year, second only to the illegal drug trade, according to CDFG officials. Yet, the state has fewer than 200 game wardens patrolling 300,000 square miles of land and water. It makes no sense to expand bear hunting when state wildlife law enforcement capabilities are so crippled. Permitting hunters to use GPS devices on hounds will only exacerbate poaching.
- **Trophy hunting ignores the ecological value of bears.** Apex species, such as bears, cougars, and wolves, play critical roles in maintaining ecosystems. Black bears often scavenge for food, playing an important role in recycling carrion. Bears also help transport berry seeds. Along salmon spawning streams, bear scat and the remains of fish carried into the woods contribute to the long-term nutrient cycle in old-growth forest. Even cambium feeding by bears, which sometimes kills trees, creates widely scattered snags that benefit other species of wildlife.
- **Hound hunting of bears is unsporting, unethical, and environmentally harmful.** In California, bears can be legally chased by hounds, treed, and then shot by hunters. Hounds have been known to pursue bears with cubs, increasing the risk that cubs could be separated from their mothers, then orphaned. It is not uncommon for hounds to maim bears, especially cubs, and even more common for bears to maim or kill an entire pack of hounds. In addition, hounds may pursue non-targeted animals, including imperiled species, putting additional stress on those species. Allowing hunters to place GPS devices and tip switches on hounds will inevitably make it much easier for hunters, as well as poachers, to kill more bears.
- **Hunting does not reduce conflicts with bears.** Trophy hunters target the largest bears who may look good on a wall or as a throw rug, not the young males who are primarily responsible for conflicts. Furthermore, hunting takes place far from homes, while so-called “problem bears” usually live in the urban-suburban interface. Shooting bears at random is as effective at reducing conflicts as shooting into a crowded room is at reducing crime. And using hunting as an aggressive and expansive lethal control of bears ignores the root cause of bear-human conflicts. Most encounters with bears are the result of irresponsible human behavior (e.g. landowners who refuse to dispose of garbage properly).
- **Hunting of bears puts the public at risk.** California is a densely populated state and many people recreate in bear country. Since hunting hounds are usually off-leash,

packs of hounds may trespass onto private land, harass companion, farm, and ranch animals, and destroy private property. The presence of packs of hunting hounds also disturbs the peace and tranquility of those who recreate in the backcountry.

We therefore urge you to reject the CDFG's proposals to expand bear hunting in California. Should you have any questions, please contact Brian Vincent at Big Wildlife, 604-618-1030 or Nicole Paquette, The Humane Society of the United States, 916-455-1479. Thank you.

Sincerely,

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