Florida Wildlife Federation

May 15, 2025

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

Re: Proposed Florida Black Bear Hunt

Delivered via email

Dear Chair Barreto and FWC Commissioners,

On behalf of the Florida Wildlife Federation (Federation) and Nokuse Plantation, we submit the following comments regarding the proposed Florida black bear hunt. The recovery of the black bear is a conservation success story, though this iconic species still needs a cautious and comprehensive set of management tools. In 2015, the Federation opposed the reopening of bear hunting due to insufficient data and the lack of a science-based foundation for sustainable harvest. Moreover, we provided policy and 'guardrail' suggestions to minimize harm. Ten years later, we share many of the same concerns. We ask that you postpone the bear hunt proposal until Florida Fish and Wildlife Commission (FWC) staff can complete critical data analysis to answer the question, "Do the four largest subpopulations require proposed changes from the current, less resource-intensive, management options?" as outlined in the Bear Management Plan.

In response to the December 2024 request for FWC staff to develop proposals for a hunt, the Federation consulted with the three biologists (Dr. Joe Travis, Dr. Matthew Aresco, and Joe Guthrie) from 2015-2016 to work with FWC staff and leadership to evaluate the current population trends and demographics. **Their attached letter provides an in-depth, science-based perspective on the status of Florida black bear populations relative to the proposed hunt.**

We urge the Commission to proceed only with a firm scientific foundation. Specifically, we recommend the FWC:

- Make decisions based on the best available science, including completing all updated population assessments (2023-2028) and analyses to answer foundational questions, not to support a predetermined outcome.
- Provide rationale for a regulated hunt based on the Bear Management Plan population objectives, particularly in the North BMU.

- Focus on non-lethal conflict prevention and solutions such as waste management, landscape-scale land conservation and connectivity, and establishing a bear sanctuary system.
- Adopt conservative and adaptable quotas that are responsive to changes in population trends and deviations from the anticipated harvest level in any given season.
- Use data collected from a regulated bear hunt to update model assumptions and inform future hunts with an objective of assuring continued expansion of bears into suitable but unoccupied habitat across the state.

Florida's black bear management must be grounded in sound science and take a conservative and precautionary approach to continue to achieve progress toward management objectives. The 2025 proposed bear hunt must not repeat past mistakes of rushed or unsupported quotas. We respectfully call on FWC Commissioners to delay this decision due to remaining uncertainty. Only with comprehensive data and clear safeguards can Florida restore public confidence that a bear hunt will truly be highly regulated and sustainable.

Sincerely,

Sarah Gledhill
President and CEO, Federation

Casey Darling Kniffin
Conservation Policy Director, Federation

Dr. Matthew J. Aresco
Director, Nokuse Land Conservancy

CC: Executive Director Young
Attachment: Expert Evaluation of Current Population Trends and Demographics

Dear Commissioners:

We wish to offer our perspective on the status of Florida Black Bear populations and the possibility of a regulated hunt for bears in four bear management units in Florida (East Panhandle, North, Central, and South). We present our perspective in five position statements.

1. Decisions about whether and, if so, how to permit a hunt should be based on the best available science.

The FWC staff has done excellent work examining trends in Florida Black Bear population size and demography - the rates of birth and death by age. We believe that their analyses of those data, including population modeling and modeling the effects of a regulated harvest, ought to be used to guide policy decisions about whether to permit a regulated hunt and, if so, what the parameters of that hunt should be. How to use those analyses is the key issue because there is no single "right" approach to doing so.

2. There is no ecological rationale for permitting a hunt.

There is no doubt that bear populations are growing in most areas of the state. Among the four management units under consideration, bear populations are growing rapidly in three of them (East Panhandle, North, and South). In one unit, North, the population remains small in terms of conservation issues (estimated 496 individuals). While it is possible that bears have reached the carrying capacity of the available habitat in the Central unit, this is not known for certain. High population growth rates in the other units indicate that the bear populations are not close to their habitats' carrying capacities. Whether the bear populations are approaching a social carrying capacity, that is, a population number as high as the human population can tolerate, is a separate issue.

One issue that is not clear is how much the rapid population growth in the East Panhandle, North, and South units is due to the birth rate of the bears outstripping their death rates and how much it is due to immigration of bears from nearby locations where their habitats have been destroyed or irrevocably altered. It would help to clarify this issue in order to understand how much the state population is growing and how much it is simply shifting locations from places where bears are not counted to places where they are.

3. If a hunt is permitted, harvest levels should be chosen to minimize the probability of long-term harm to the population in each unit.

This statement is easier to write than implement. That is because one can debate what "harm" means and, even then, choose different criteria for minimizing "harm."

We argue that "harm" should be defined in this context as long-term negative population growth. A reasonable view of "long-term" is ten years, which is the criterion used by FWC

staff in their population modeling. The probability of "harm" is, then, the probability that, in ten years, there will be fewer bears than we now can count.

A reasonable policy for minimizing the probability of harm through annual hunting would be to set hunt limits that induce zero population growth of bear populations through the next ten years. This is precisely how FWC staff members have developed the suggested limits on how many bears can be taken. Their population modeling incorporates the possibility of errors in counting bears, in estimating mortality rates in the absence of hunting, and in estimating reproductive rates. Through simulations, they arrived at suggested numbers of harvested females that would, on average, keep bear populations at their present levels (i.e. zero population growth).

Given that estimates of bear population numbers, their birth rates, and their mortality rates are not known exactly but are estimated quantities, it is possible that even with the suggested limits on hunting, bear populations would decrease over ten years. When a given harvest level produces, on average, zero population growth, roughly half of the simulations of the next ten years produce decreases in the bear population, or "harm" as we defined it. This can be seen easily in Figures 2-6 of the FWC bear population modeling report of April 2025. Indeed, that report acknowledged that in some of its simulated models, the population in the North unit could go extinct even with a well-regulated hunt. This suggests the use of a more precautionary criterion: instead of setting a limit that produces, on average, zero population growth, hunt limits should be set such that the probability of harm, or negative population growth, is less than 25%. We admit that 25% is an arbitrary number and others might argue for a more stringent criterion like 10%. These percentages are easily calculated from the FWC population models. Our point is that using the number that generates, on average, zero population growth, is using too high a number.

4. Policies and "guardrails" on the hunt should be designed to make the estimated effects of the hunt, if there is to be one, no more likely to do harm than the "worst case scenario" developed in population models.

The FWC staff, in its population modeling, has attempted to take this objective into consideration. Their models assume that all hunters with a permit will kill a bear, that all bears killed will be female, that no female with cubs will be killed, that the harvest is spread evenly among adults of all ages, and that no one with a permit will kill more than one bear. If fewer bears are killed than permitted and if some males are killed and counted in the quotas, then the long-term effects of the hunt on bear population growth will be less than the models indicate and there will be much less probability of harm.

The key issue is how these assumptions will be translated into policy regulations that form the "guardrails" for the hunt. If the guardrails are ineffective in some ways, the effects of the harvest might be worse than anticipated (e.g. drive population growth rate to negative). If they are effective, the consequences of the harvest might be less dire than modeled (e.g. still have positive population growth). This is particularly important in the North management unit, which has, at most, only half the bears estimated to occur in the

other three units and for which the FWC models show some likelihood of extinction even with a harvest level that would, on average, produce zero bear population growth or decline. There would seem little margin for error in this unit.

5. Establish a Sanctuary System

We recommend that FWC establish a black bear sanctuary system throughout the state with protected areas (no hunting) in each of the BMUs. The purpose of these sanctuaries is to protect core habitat with a breeding nucleus of female bears on well-managed public land where reproduction, recruitment, and survival rates are maximized. Such a sanctuary system would provide for the long-term stability of Florida's black bear population. In Florida, we propose that federal lands such as the National Forests of Florida (Apalachicola, Ocala, and Osceola) encompassing 1.25 million acres, Big Cypress National Preserve (729,000 acres), and Department of Defense lands be designated as black bear sanctuaries. Bear hunting could occur outside of the sanctuaries where appropriate with hunting objectives set through biological sustainability analyses.

Sincerely,

Matthew J. Aresco
Executive Director
Nokuse Land Conservancy
matthewjaresco@gmail.com

Dr. Joseph Travis
Robert O. Lawton Distinguished Professor Emeritus
Department of Biological Science
Florida State University
travis@bio.fsu.edu