



Siskiyou County Fish and Game Commission

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CDFW - Wildlife Branch
ATTN: Black Bear Program
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June 9, 2024

RE: Comments on the Black Bear Conservation Plan for California

Thank you for the opportunity to provide comments on the California Black Bear Conservation Plan.

In developing the plan, the California Department of Wildlife (Department) has taken time to collect a great deal of the available data on bears in California. We appreciate that the Department noted that most of this data collection has been paid for by hunters and collected from hunters' take of bears.

Only two goals for bear conservation are established in the plan, although we fear that neither of these goals are well enough defined so as to provide clear direction to Department staff, or to provide the public a clear understanding of the Department's proposed direction for bear conservation. The goals are not measurable in any way to determine if they are being met or that management actions are successful in moving habitat or populations toward the stated goal. The plan also fails to describe a menu of management opportunities that might be taken to achieve the desired goals.

Goal 1 - "Conserve black bear populations that are abundant, disease-resilient, and genetically diverse statewide and regionally, and conserve and enhance their habitats."

According to the dictionary I consulted, abundant is defined as "present in great quantity; more than adequate; oversufficient". The word "abundant" appears to be a very subjective way to define a population goal for the plan rather than defining management direction and setting measurable goals. A more measurable population goal would be appropriate.

Today's estimated bear population is more than twice what it was estimated to be prior to the plan development. Bears are opportunistic predators that are now found in almost every habitat type in California, and are expanding into areas where they have never been seen before. Data from tooth samples and other sources portray a robust, expanding bear population. Observations of bear populations from those maintaining water sources, trail cameras, and studies conducted in Siskiyou County are seeing bears across the landscape and in high densities. Yet the plan describes their population levels as static.

We believe that there is in fact, a "glut" (an excessively abundant supply of something) of bears within the Cascade and North Coast areas within Siskiyou County that are well above sustainable levels and are expanding to the detriment of other wildlife species including the ungulate populations as cited in

multiple studies. We believe bear population levels within Siskiyou County may be well above the upper ranges of 28,626 for the North Coast region and 22,031 for the Cascade region and immediate action should be taken to reduce these populations.

Goal 2 - "Provide opportunities for black bear hunting, viewing, and public education; minimize human-black bear conflict; consider animal welfare in black bear conservation; and be inclusive of all Californians in black bear conservation decisions."

The plan describes that the primary method of bear population control and data collection is hunting. In fact, according to the plan "most harvest occurs in Northern California where bear densities are highest (i.e., Shasta, Trinity, Siskiyou, and Mendocino Counties), which typically accounts for 35-40% of the overall state harvest (CDFW 2021, CDFW unpublished data)". Even though most harvest occurs in the northern portion of the state, bear densities remain the highest in the state. Harvest levels currently represent only approximately 7% of the population, but may be able to sustain as much as 15-20% of the population and still maintain a static population level.

Because hunting is so important to data collection, funding, and bear population control (up to 15-20% of the population) new incentives must be proposed to attract hunters to bear hunting. We recommend that the plan provide a menu of management opportunities that may be used in local areas. This would give managers a range of opportunities to employ without having to discuss the pros and cons of these techniques every time they are proposed for use. The menu of management opportunities would address opportunities to shorten administrative hurdles, promote and increase hunting opportunities and consider innovative population control techniques.

Examples might include:

Promote Additional Bear Hunting Opportunities (within the increased yearly quota levels)

- Offering multiple bear tags to hunters
- Reducing or eliminating bear tag costs until bear populations are at desired levels
- Allowing the take of bears using other game tags
- Expanding bear seasons to coincide with other game seasons
- Expand bear seasons in general to include much of the year
- Education programs
- Charge non-resident hunters the same tag price as in state hunters
- Others?

Removing Administrative Hurdles

- Revision of the current bear depredation policy to allow the immediate take of bears that are involved in depredation

Other Population Control Efforts

- Sterilization of any bear that is handled by the Department or County Trappers, or within designated areas
- Manipulation of bear population sex ratios thru hunting or other opportunities
- Others?

These management techniques might not be appropriate in every situation, but if covered in the Plan could be used in the appropriate situations. The additional harvest of bears could significantly increase the available data on bears in California.

The current process that is in place to deal with bear depredation is extremely difficult and time consuming. In the past when there were questions about the number of bears in the state and the populations health and condition, it may have made sense to be cautious. With data that documents the health, abundance and distribution of bears in the state it would seem logical to loosen the process up and shorten the steps necessary to deal with problem bears in an effort to reduce livestock and property damage, as well as human safety.

The Bear Plan describes a number of studies to be conducted that will provide additional information on bears and their habitat. Some of the most important studies that we would like to support are those that address the impacts of such a large bear population on ungulates within the County. In the Plan there is a brief discussion of bear depredation on deer and elk calves, as well as a bear's ability to take control of lion kills, which requires that lions need to kill additional ungulates. Deer herd population levels are currently depressed and some of the issues have been identified as fawn survival levels. According to the Final Report Siskiyou Deer – Mountain Lion Study 2015-2020 (Heiko) fawn survival is below desired levels and are having a detrimental impact to deer herds in the C Zones. If funding becomes limited, we would support prioritizing the bear / ungulate conflict studies. Additionally, the recent presences of wolves in the area adds to the harmful predator impacts to the local deer herds.

The Siskiyou County Fish and Game Commission appreciates this opportunity to provide our thoughts on the California Bear Conservation Plan.

/s/ K. Mike Ford

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Siskiyou County Fish and Game Commission Chair