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April 29, 2013

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VIA ELECTRONIC MAIL

Mr. John W. Bowers  
Department of Natural Resources  
Wildlife Resources Division  
Game Management Section  
2070 U.S. Highway 278, S.E.  
Social Circle, Georgia 30025

Re: Proposed Amendments to Georgia's Hunting Regulations

Dear Mr. Bowers:

The Georgia Conservancy is a statewide environmental organization committed to developing solutions to protect Georgia's environment through collaboration, education and advocacy. We appreciate the opportunity to submit these comments on the Proposed New Rule 391-4-2-.22 regarding Bear Hunting Regulations in Georgia ("Proposed Rule"). The Georgia Conservancy has concerns that the black bear population in Middle Georgia is not being adequately protected and supports stronger rules to promote the vitality of this population.

Black bears, particularly those in Middle Georgia, are an important species contributing to the rich biodiversity of this state. In fact, it was not long ago that due to habitat conversion and other concerns Georgia made a concerted effort to protect this group of bears by purchasing 10,000 acres of Oaky Woods for \$29 million.<sup>1</sup> Alarming, in 2011 during the first Middle Georgia bear hunt of the season, 32 bears were killed. Half of the bears killed were female. The total amount killed in *one day* accounted for approximately 10 percent of that population.<sup>2</sup> That occurrence was a tragic and avoidable loss to an already vulnerable population. We are encouraged that the Department of Natural Resources (DNR) has taken some steps in the Proposed Rule to prevent a repeat of that incident.

We commend DNR for moving the hunting season in Middle Georgia (Bibb, Houston, and Twiggs counties) in the Proposed Rule from November to the second Saturday in December. We believe this will provide better protection to the females in this population. However, there are other steps that DNR should

<sup>1</sup> See S. Heather Duncan, "State wants feedback on bear hunts before setting new regulations," **Macon Telegraph**, Jan. 16, 2013

<sup>2</sup> *Id.*

consider to protect the bears in this region. First, as you are aware, the University of Georgia is currently conducting a three-year study of the Middle Georgia bear population and their migration patterns. Because this population is at risk and because the state spent a significant amount of resources to protect this population, we believe a reasoned, conservative approach to regulating the annual hunt is best. The additional information provided by this study will assist in future policy making regarding hunts. Therefore, we recommend that DNR enact a moratorium on bear hunts in Middle Georgia until the ongoing University of Georgia study has been completed.

Additionally, we are concerned that there are no caps on the number of hunters eligible to participate in the annual hunt. DNR should follow the example of South Carolina and issue a limited amount of permits for hunts where the bear population is struggling. Again, we recommend using data from the University of Georgia study to determine the appropriate number of permits that should be issued.

Finally, we are deeply worried about the continuing problem of hunting bear using illegal bait. We believe that the recent legislation allowing deer hunting over bait has only exacerbated this issue by providing a defense to those who engage in this illegal method of hunting bear. While we wish to thank DNR for its continued vigilance and enforcement of these crimes, we believe that DNR should initiate further research into policy solutions that will eliminate this practice altogether. One such solution would be to limit the number of permits available for the annual hunt.

Should you have any questions or wish to speak to me regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Pierre Howard". The signature is fluid and cursive, with a large initial "P" and "H".

Pierre Howard  
President