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May 15, 2025

Florida Fish and Wildlife Conservation Commission
Commissioners
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RE: Agenda Item #5, Black Bear Hunt

Dear Chairman Barreto, Commissioners, and staff members:

The Conservancy of Southwest Florida, on behalf of our over 4,500 supporting families, writes in regards to agenda #5 to consider a black bear hunt at the May 21-22, 2025 meeting.

The Conservancy has worked with the Florida Fish and Wildlife Conservation Commission (FWC) on Florida black bear matters since before the species was delisted from the state protected list in 2012. We worked with the FWC on its management plans, and championed a trash ordinance for Collier County to help reduce trash and other attractants. We continue to serve as a member of the Bear Stakeholder Group (BSG) and Technical Assistance Group (TAG), with our southwest Florida region overlapping both the Big Cypress bear subpopulation and the dwindling imperiled Glades/Highlands bear subpopulation.

We ask that the Commissioners **do not advance rules to allow new bear hunting or set any harvest objectives/quotas**. As described below, instead, we encourage the Commission to ramp up efforts to promote human (and bear) safety by mitigating human-bear conflicts stemming from mismanagement of trash & attractants, and reducing injurious vehicle strikes by protecting habitat and corridors. Further, the Conservancy is an advocate for the restoration of the imperiled Glades-Highlands bear subpopulation, which is sadly on track to blip out of existence unless we provide for individuals to make the leap from the South Big Cypress population. Therefore, we ask that the Commission take steps to ensure that hunting, if approved, does not infringe on these efforts.

Current Hunt Proposal May Damage Changes for South-Central Unit Recovery

Florida black bears found along Fisheating Creek and the Lake Wales Ridge -known as the Glades/Highlands subpopulation or the South-Central Unit- are at risk of local extirpation, and we urge FWC to continue its good efforts to research and restore these bears to its next-closest subpopulation to the south. FWC has long held that at least 200 adult bears in these vulnerable subunits are needed to be consistent with the management plan that allowed delisting of the bear in 2012; levels below 200 “may require relisting as a State-designated Threatened Species.”¹

Unfortunately, it appears that the bears here had dwindled from a count of 175 in a 2012 publication,² to an estimated 98 bears just five years later.³ On average, 7 bears in this unit are killed per year by vehicle collisions or due to human-bear conflicts.⁴ FWC believes that the average mortality is 8% of the South-Central subpopulation every year,⁵ with limited understanding of growth rates.

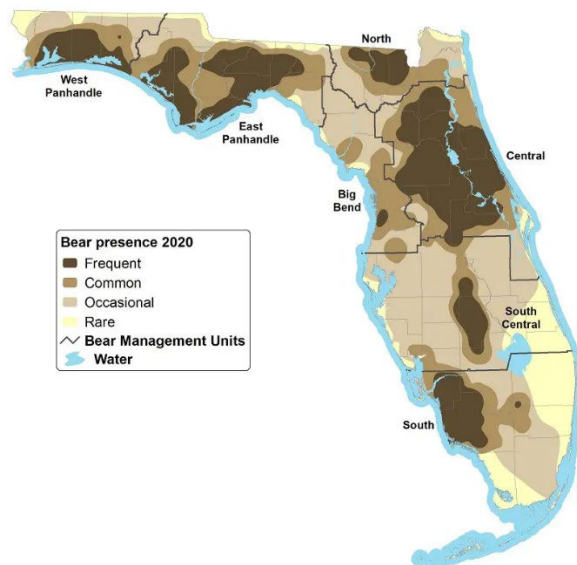


Figure 1⁶

¹ Florida Fish and Wildlife Conservation Commission, 2019. Florida Black Bear Management Plan (*Ursus americanus floridanus*). Approved December 11, 2019. P. 18; A subpopulation objective of at least 200 adult bears is also supported by Cox et al 1994 and Dixon et al 2007.

² Guthrie, 2012. Modeling Movement Behavior and Road Crossing in the Black Bear of South Central Florida. Thesis. University of Kentucky, Lexington. Available at https://uknowledge.uky.edu/forestry_etds/2/.

³ Murphy et al, 2017. Consequences of Severe Habitat Fragmentation on Density, Genetics, and Spatial Capture-Recapture Analysis of a Small Bear Population. PLoS ONE.

⁴ Florida Fish and Wildlife Conservation Commission, 2019. Florida Black Bear Management Plan (*Ursus americanus floridanus*). Approved December 11, 2019. P. 116.

⁵ *Ibid.*

⁶ Florida Fish and Wildlife Conservation Commission. Bear Management Units. Accessed at < <https://myfwc.com/wildlifehabitats/wildlife/bear/bmu/>>

As a small isolated population, like other non-viable bear units in Florida such as Chasshowitzka and Eglin, decreasing genetic diversity compounds the threat. “Besides increasing bear abundance in these subpopulations, genetic diversity can also be increased by removing barriers to bear movements, which would improve genetic interchange within and among subpopulations, and increase the changes of long-term persistence of bears in these areas.”⁷

We appreciate the work that the FWC team is doing in its ongoing analysis if bears are yet establishing a connection between the two subpopulations. Despite an incredible camera-trapping research effort ongoing since 2021, and some northern movement between lands in and around the Florida Panther National Wildlife Refuge and the Okaloacoochee Slough area of public lands, “few have left the occupied range and entered the ‘corridor’ between the subpopulations yet, but these detections confirm that some bears from the large [Big Cypress] subpopulation are moving northward, toward the habitat corridor. Hopefully they or their descendants move toward or into the small Highland/Glades subpopulation.”⁸

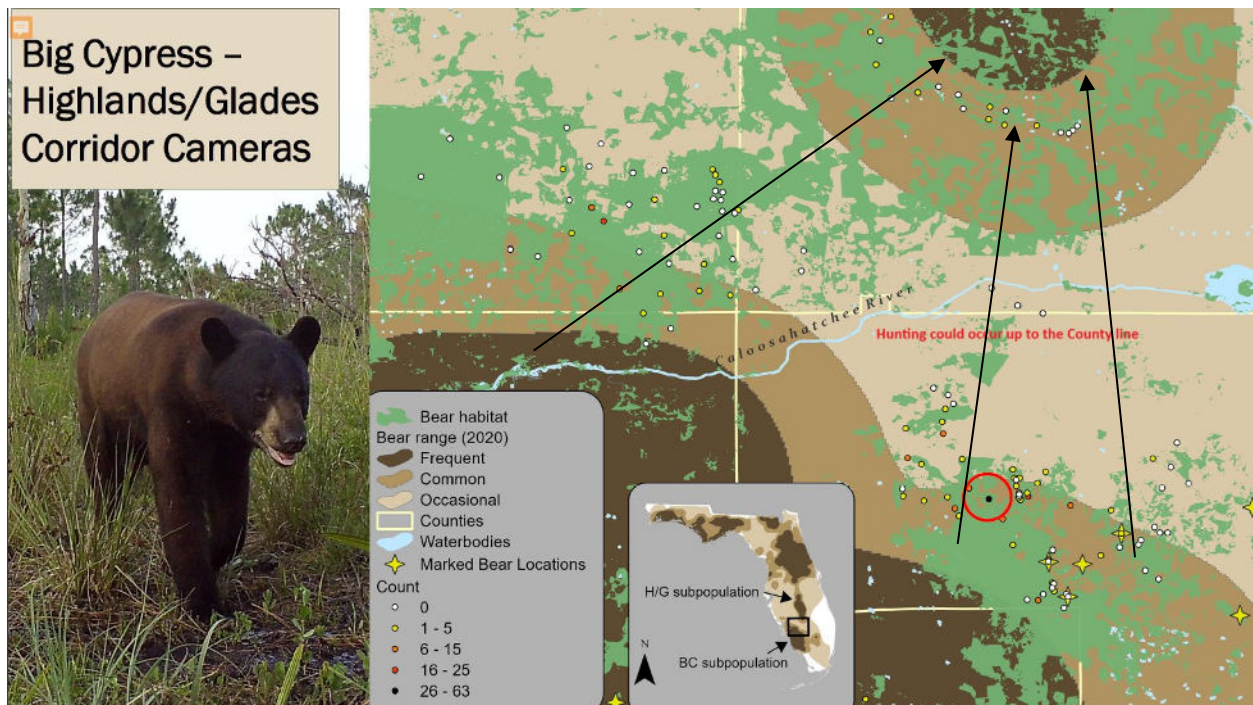


Figure 2⁹

⁷ Florida Fish and Wildlife Conservation Commission, 2019. Florida Black Bear Management Plan (*Ursus americanus floridanus*). Approved December 11, 2019. P. 31.

⁸ Florida Fish and Wildlife Conservation Commission, 2024. Bear TAG Update. November/December, 2024.

⁹ *Ibid.* Conservancy added generalized black arrows following possible habitat, detection points, and destination added, as well as red text.



While much progress is still needed, some of the cameras have detected bears making their way onto lands within the Caloosahatchee Ecoscape Florida Forever project and other potential corridor linkages that would allow connection between the South Unit and the imperiled South-Central Unit.

Unfortunately, the proposed “Hunting Zone”¹⁰ below in Figure 3 would include lands up to the Glades County line, and rules could allow for bear hunting in places like Spirit-of-the-Wild Wildlife Management Area – the very area where FWC’s cameras captured good potential for bears making the leap northward, as seen in Figure 2. FWC has stated that their objective in setting potential bear “Hunting Zones” is to “restrict hunting to suitable areas and maintain buffers/connections to smaller populations,”¹¹ but their current proposal does not achieve that.

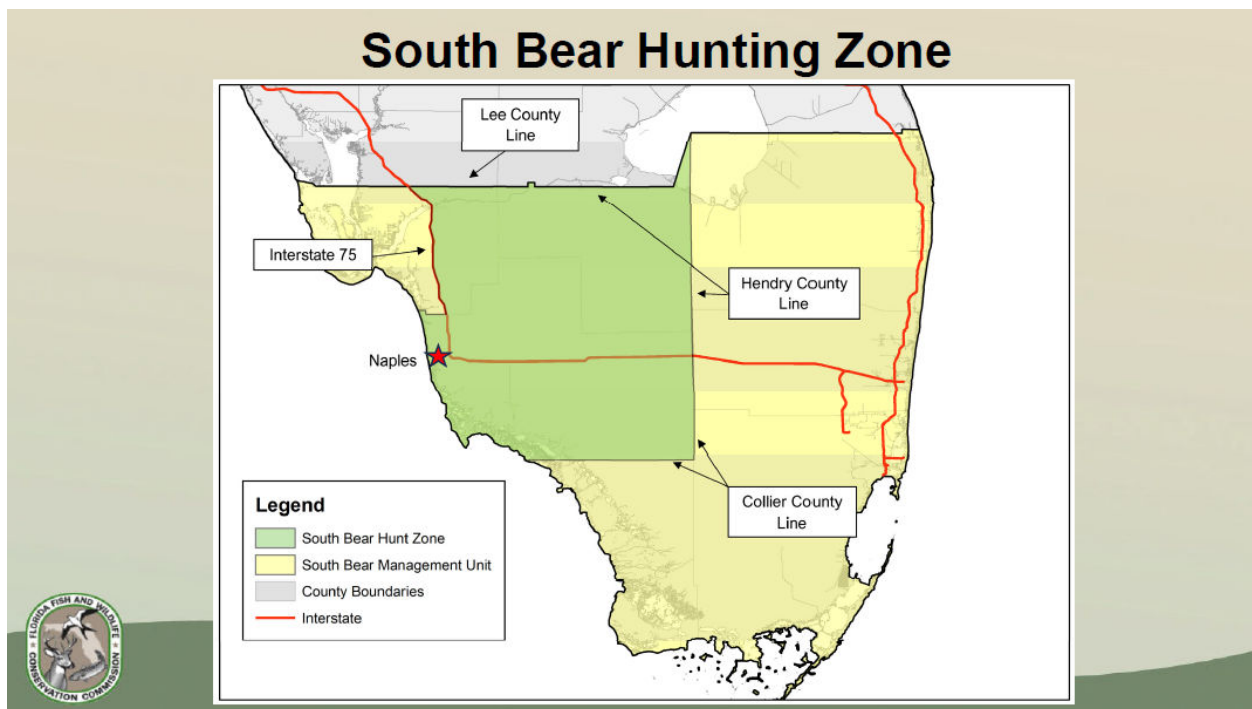


Figure 3¹²

¹⁰ Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.

¹¹ *Ibid.*

¹² *Ibid.*



We recommend:

- 1) No black bear hunting in the state of Florida, and in particular no hunting in the imperiled populations.
- 2) If the FWC authorizes hunting, no hunting in the South Unit Big Cypress subpopulation to ensure that progression of northern movement by these bears will continue.
- 3) If FWC authorizes hunting in South Big Cypress subpopulation, changes be made to the “Hunting Zone,” to avoid hunting in the northern extent of the South Unit. Hunting here may limit bears right where we need them to be the spillover source for the limited non-viable subpopulation just a few miles to the north (Figure 4). Bears within the Okaloacoochee Slough (Spirit-of-the-Wild Wildlife Management Area, Okaloacoochee Slough State Forest, Dinner Island Ranch Wildlife Management Area, and the private lands in this area) are the best opportunity to provide this much-needed source.

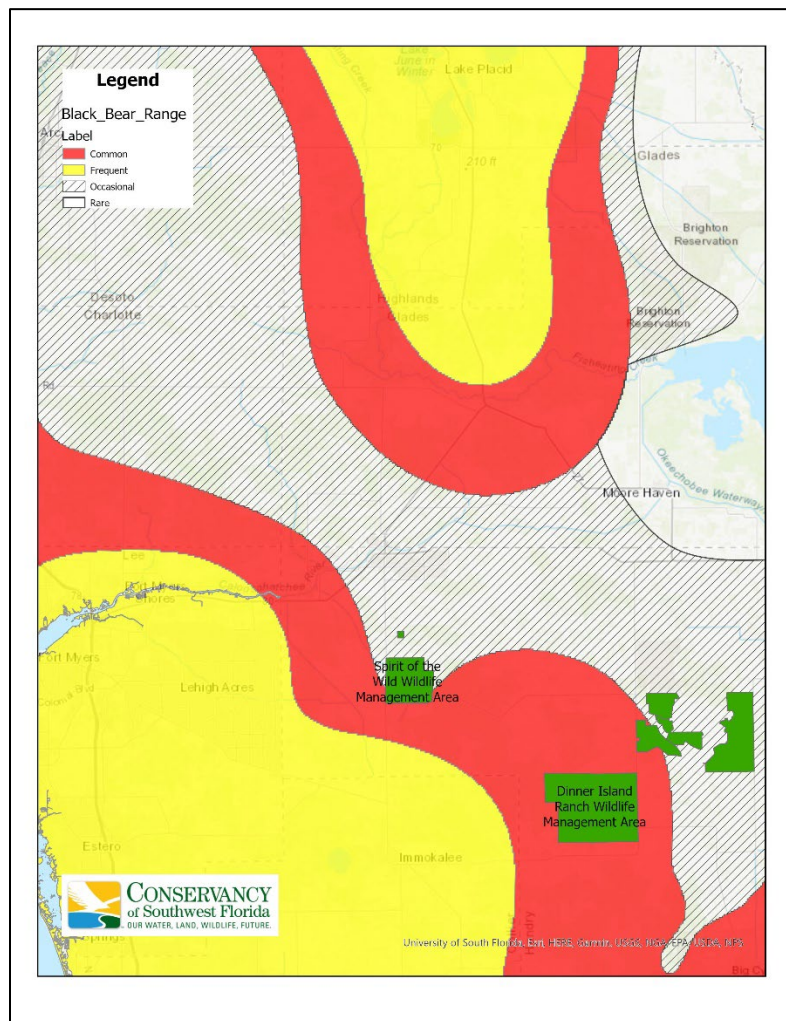


Figure 4

The Black Bear Management Plan goal 1.2.2 states “augment bear numbers in subpopulations within BMUs that have less than 200 bears using bears from high-density subpopulations as donors.”¹³ One management plan -hunting¹⁴ - should not override other management plan needs. **FWC should avoid a short-sighted decision allowing hunting in south Florida when it may diminish the long-term goals of building the Glades/Highlands subpopulation.**

FWC Should Prioritize Work on Trash & Attractants Management

It is critical, now more than ever, that FWC refocus and ramp up efforts to address trash and attractants management throughout the state of Florida. The Conservancy of Southwest Florida is proud to have championed the Collier County ordinance that passed in 2019, *prompted by a presentation to the Board of County Commissioners by FWC about this problem*. While the final ordinance is not perfect, it requires that “garbage be secured from bear intrusion until the container and/or bags are permitted to be placed curbside for collection.”¹⁵

In 2018, FWC changed the feeding rule and penalties, with the idea that this would result in FWC Law Enforcement (LE) better addressing negligent and intentional feeding of bears which can present a safety risk to both bears and people.¹⁶ Despite the Collier County ordinance in place and the feeding rule changes, the South Big Cypress Unit (like many places in Florida) need more attention to address human-bear conflicts.

While calls into the agency to report bear activity have remained somewhat steady,¹⁷ the LE notices have gone down statewide. FWC LE gave 165 LE notices in 2022, but only 47 statewide in 2024. **Zero LE notices were provided in South Unit in 2024**, for the period of record. Zero LE notices were also administered in the South Unit for the period of record in 2023.¹⁸ There have only been 3 given in 2022.

Of the 280 LE notices given statewide in the past three years, *only 3* have been in the South Unit. For a bear population that is third largest in the state, and receiving the third largest number of calls, there seems to be a missed opportunity for the agency and its LE officers to educate residents about the number one rule of coexistence: don’t feed the wildlife.

¹³ Florida Fish and Wildlife Conservation Commission, 2019. Florida Black Bear Management Plan (*Ursus americanus floridanus*). Approved December 11, 2019. P. 194.

¹⁴ *Ibid*. Goal 1.2.5 “Explore options to slow population growth in larger subpopulations, including the use of hunting and habitat modification.”

¹⁵ Collier County Ordinance no. 2019-36.

¹⁶ Florida Fish and Wildlife Conservation Commission, 2018. Information about Wildlife Feeding Rules and Penalties. Available at <https://myfwc.com/wildlifehabitats/wildlife/bear/living/rules/>.

¹⁷ In 2024, from January 1 to October 31, the total was 4,441 calls in the state, with 609 of them coming from the South Unit. For the same time frame, there were 47 LE notices, but zero in the South Unit. In 2020, from January 1 to October 31, the total was 4,507 calls in the state, with 638 of them coming from the South Unit. For the same time frame, there were 128 LE notices statewide, with 14 of them being administered in the South Unit.

¹⁸ Bear TAG members receive an update by FWC staff in December of each year, and information presented typically runs from January 1st of that year through October 31st.

We appreciate that FWC has provided about ~\$2 million to counties to help address human-bear conflicts, but that figure hasn't changed since 2018. In 2020, we asked FWC leadership to continue budget requests to continue this good work that was a specific incentive to Collier County adopting a Bear Wise ordinance.¹⁹ However, despite local governments typically viewing the FWC as the expert agency, FWC responded that local governments are best positioned to address the issues of equipping residents with bear-resistant equipment and Bear Wise programs.²⁰ Fortunately, the non-profit (NGO) community and concerned citizens have continued to be a major resource to the public in the universal need to manage trash and other attractants.

However, coexistence is a shared responsibility. All hands are needed 'on deck' to address human-bear conflicts. As determined by an analysis in 2015, over 1.6 million households were within high human-bear conflict areas²¹ (many areas are miles away from potential hunt zones); more interactions are likely due to the increased development in bear habitat areas since then. The FWC needs to focus its priorities on securing trash in bear areas; the agency's own research has found that conflicts with Florida black bears are significantly reduced by addressing human sources of food.²² In some cases, use of bear-resistant trash cans reduced the bear interactions by 95%.²³ Not only can a fed bear be a human safety risk, but 60 bears have been killed in the state of Florida within the last 5 years, due to being considered food habituated.²⁴

FWC has been clear in its recent communications: "managing bear populations does not manage conflict; **conflict prevention and management will need to continue regardless of hunting status.**"²⁵ Given the longstanding and increasing need to address human-bear conflicts, FWC should refocus its efforts squarely on this issue. Splitting the agency's attention to conduct a hunt will distract from what should be the priority issue: the safety of bears and people, and limiting avoidable conflict.

Recommendations include:

- 1) Reinstating the state legislative budget request for human-bear conflict programs

¹⁹ Conservancy of Southwest Florida, 2020. Letter to FWC re BearWise Funding in Fiscal Year 2021-2022 Legislative Budget Request. August 17, 2020.

²⁰ Tucker, 2020. Letter to Gladys Delgadillo, Environmental Policy Specialist at the Conservancy of Southwest Florida from Melissa Tucker, Deputy Director, Division of Habitat and Species Conservation. September 2, 2020.

²¹ Florida Fish and Wildlife Conservation Commission, 2015. Bear Wise: Waste Management Update. September 2, 2015.

²² Barrett, et al., 2023. Human-Black Bear Interactions and Public Attitudinal Changes in an Urban Ordinance Zones. Human Wildlife Interactions, 17:1, Article 10.

²³ Florida Fish and Wildlife Conservation Commission, 2015. Bear Wise: Waste Management Update. September 2, 2015.

²⁴ Bears killed by FWC in 2020 was 19, in 2021 was 8, in 2022 was 13, in 2023 was 11, and so far in 2024 was 9.

²⁵ Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.



- 2) Completing more Memorandum of Understandings with waste companies, such as the one completed in 2016 with Waste Pro USA, Inc.²⁶
- 3) Resurrect and complete an FWC “Waste Management Action Plan” as envisioned below in Figure 5.



Figure 5²⁷

Population Estimates Are Needed to Ensure Harvest Methodology Is Reliable

The FWC has stated that abundance estimates for all seven of Florida’s bear units will be completed around 2028. Some of the populations are lacking new population estimates, with some as dated as 10 to 15 years old.²⁸ As this information is forthcoming, it is reasonable for the agency to wait until the science is complete. The information being collected and analyzed by FWC would also allow us to understand the growth rates of these bear units.

Around the time of the last call for a bear hunt, the agency estimated there was about 4,350 bears statewide, with about 1,150 bears in the South Big Cypress Unit (Figure 6). Today, FWC estimates the population is 4,036 statewide, with 1,044 bears in the South Unit (Figure 7). In fact, the numbers that FWC is using for its estimates today are *less* than what they utilized ten years ago at the time of the hunt. However, staff has indicated that these populations are

²⁶ Florida Fish and Wildlife Conservation Commission, 2016. Bear Resistant Garbage Container Memorandum of Understanding Among Waste Pro USA, Inc. & Florida Fish and Wildlife Conservation Commission.

²⁷ Florida Fish and Wildlife Conservation Commission, 2015. Bear Wise: Waste Management Update. September 2, 2015.

²⁸ Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.



growing. The agency needs to rectify these numbers for the public to better understand this discrepancy.



Figure 6²⁹

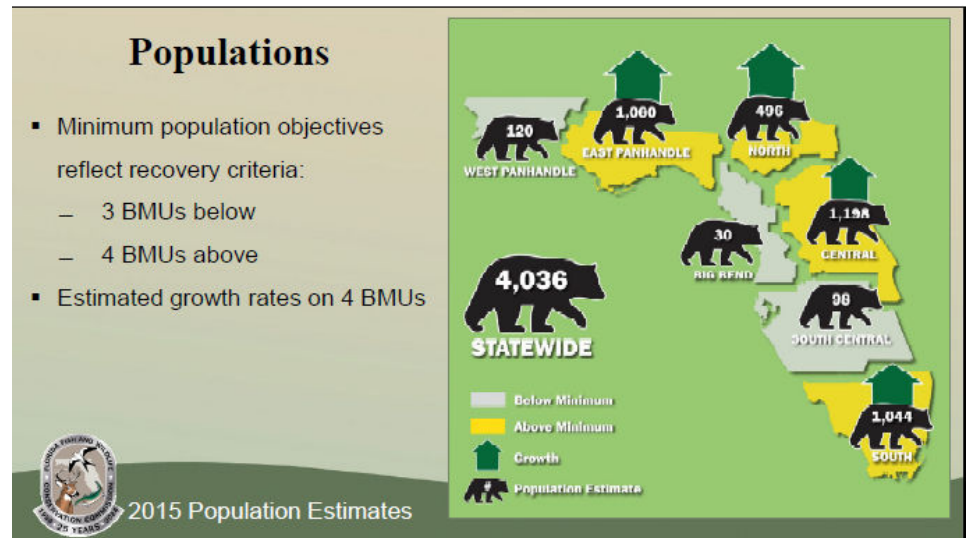


Figure 7³⁰

Additionally, FWC's prior estimate of population growth has not been actualized, based on the best available public information. In the figure below, the agency estimated that, given estimated growth rate, the bear population would be over 11,000 in the state by next year; instead, it appears the population has declined since then.

²⁹ Florida Fish and Wildlife Conservation Commission, 2016. FWC Facebook page. FWC's post notes that bear populations were based off estimates from 2010, 2011, 2014, and 2015, as available for respective subpopulations.

³⁰ Florida Fish and Wildlife Conservation Commission, 2024. Update on the Implementation of the Florida Black Bear Management Plan, Staff Report. Presented at FWC Commissioners Meeting. December, 2024. Numbers used on powerpoint slide appear to indicate population estimates are from 2015.

Table 4. Estimated annual growth rates (FWC 2017), abundance estimates (Humm et al. 2017), and predicted abundances for four subpopulations of Florida black bears.

| Subpopulation | Estimated Annual Growth Rate | | 2014-15 Average Population Abundance (Mean) | 2026-27 Predicted Population Abundance (Based on Mean) |
|---------------|------------------------------|-------------------------|---|--|
| | Mean | 95% Confidence Interval | | |
| Apalachicola | 7.8% | 4.4 to 11.1% | 1,060 | 2,611 |
| Big Cypress | 12.2% | 9.9 to 14.4% | 1,044 | 4,155 |
| Ocala | 2.2% | -1 to 5.3% | 1,198 | 1,555 |
| Osceola | 15.4% | 12.4 to 18.6% | 496 | 2,767 |
| TOTAL | | | 3,798 | 11,088 |

Figure 8³¹

As FWC considers the use of growth models and/or a 20% total mortality per year to justify the hunt,³² **the agency must understand why the population estimate numbers are not yet reflecting the predicted growth. And if the population numbers are not yet available to ensure accuracy of these growth models, then the agency should not move forward with the hunt at this time.**

Comments on Forthcoming Anticipated Proposed Rules

As of the date of this letter, no draft rules have been made available for public comment. We received a copy of a document entitled “New Bear Hunt Rule and Existing Rules that have Needed Additions/Deletions,”³³ through a partner NGO organization. These proposed rules cover a myriad of potential rule changes from season timing, to locations, and more. We also were able to view presentations as provided in FWC meetings in April 2025 that discussed some of the pending proposals.³⁴

Although we oppose any rules that would allow for a new hunt or set harvest objectives, we want to bring a few things to your attention for consideration. The 2015 hunt, by all accounts, was not successful; the overharvest and amount of rule-breaking takes resulted in the public losing trust in the agency and made international news. FWC should not advance any rules that would be *even more controversial or less protective*:

³¹ Florida Fish and Wildlife Conservation Commission, 2019. Florida Black Bear Management Plan (Ursus americanus floridanus). Approved December 11, 2019. P. 38.

³² Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.

³³ Draft document entitled “New Bear Hunt Rule and Existing Rules that have Needed Additions/Deletions,” as of 03-11-2025.

³⁴ Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.



- An October hunt, as was in 2015, resulted in 21% of the females taken showing sign of lactation (and female bears were 59% of the total bears harvested).³⁵ The rules may consider, for the general public or for Private Lands program enrollees, a similar October start date.
- Understanding that dogs and bears can create antagonistic interactions, and that Florida has already experienced problems with illegally using bears to train hunting dogs that lead to several counts of animal cruelty,³⁶ it would be unwise to open up bear hunting with use of dogs. Do not remove the language under the rule 68A-12.007, Florida Administrative Code that currently states “taking bear by aid of a dog is prohibited except that dogs on leash may be used for trailing shot bear.”
- Removal of check stations may alleviate some pull on staff time, however, we are unsure how the new model of verifying harvested bears will allow the agency to be as nimble as they need to be in shutting down the hunt once objectives are met. Another overharvest would be disastrous for the agency’s reputation.
- The agency should dispel with a new program aimed at providing more bear harvest tags for large landowners. There is no rational reason to allow large landowners special rights for harvesting bears beyond what is contained in the rules for the rest of Florida citizens. This is particularly of concern as the requirements to participate include conservation related activities, which seems contradictory to the granted ability to harvest additional bears. Further, some large landowners may participate in other conservation-based incentives programs (e.g. payment for ecosystem services programs) that would contravene the removal of wildlife on these properties.
- As noted above in our first section, we would want to see the FWC amend hunt zone boundaries to accommodate our concern about protecting the vulnerable and imperiled South-Central bear unit.
- Close the hunt when the harvest objective is reached, do not allow it to be open past that point, despite any remaining days left in the calendar.
- Do not allow bears to be taken near or at bait stations. Past language did not allow harvesting within 100 yards, however, there were still reports of infractions regarding this rule. Therefore, we ask that you do not delete the provision “Bear may not be taken if the hunter or the bear is less than 100 yards from a game feeding station when food is present” under 68A-12.002, Florida Administrative Code.

³⁵ Telesco, D., 2025. Bear Technical Assistance Group (TAG). March, 2025.

³⁶ Contorno, S, 2018. Sick Pleasure: Nine Arrested After State Investigation Into Florida Black Bear Abuse and Illegal Baiting. Tampa Bay Times. December 19, 2018. <https://www.tampabay.com/florida-politics/buzz/2018/12/19/sick-pleasure-nine-arrested-after-state-investigation-into-florida-black-bear-abuse-and-illegal-baiting/>



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Conclusion

A bear hunt is unpopular in southwest Florida. Historic polling indicated that 49% of people oppose the hunt in the South Big Cypress Unit.³⁷ Newer informal polling, conducted by the Naples Daily News, showed that 92% of over 3,000 respondents voted against the bear hunt.³⁸ Further, the Remington Research Group conducted a statewide survey and it found that 81% oppose reopening hunting.

A bear hunt is not supported by the general public. A bear hunt is not appropriate to be considered without scientific-based information about the population and growth rates. A hunt could not only potentially further imperil the Glades/Highlands subpopulation, but also could distract the agency from the critical issue of human and bear coexistence. Please do not reopen the Florida black bear hunt.

If you have any questions or would like to discuss further, please contact me at (239) 776-5601.

Sincerely,

Amber Crooks
Senior Environmental Policy Advisor

Cc:

Morgan Richardson, Director, Division of Hunting and Game Management
Mike Orlando, Bear Management Program Coordinator
David Telesco, Assistant Section Leader, Imperiled Species Management

³⁷ Florida Fish and Wildlife Conservation Commission, 2025. Public Meeting on Bear Hunting Proposals. April 2025.

³⁸ Bickel, 2025. Bear Hunt or No Bear Hunt? Survey Takes the Pulse of Floridians on Controversial Subject. Fort Myers News-Press. May 8, 2025.