



August 21, 2025

Florida Fish and Wildlife Conservation Commission  
Commissioners  
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Tallahassee, FL 32399  
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Florida Fish and Wildlife Conservation Commission  
Executive Director, Roger Young  
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Tallahassee, FL 32399  
[Roger.Young@MyFWC.com](mailto:Roger.Young@MyFWC.com)

RE: Bear Protection, Non-Hunting Related

Dear Chairman Barreto, Commissioners, and Executive Director Young:

The Conservancy of Southwest Florida, on behalf of our over 4,500 supporting families, writes in regards to Florida black bear conservation. Despite the vote on August 13<sup>th</sup>, 2025 to advance the final rules for the hunt, there are many ways that the Florida Fish and Wildlife Conservation Commission (FWC) can amplify conservation of the bears.

It is clear that the people of Florida highly value black bears and their habitat, therefore, we ask that you please consider adopting the following actions:

1. Direct FWC staff to complete an updated Waste Management and Attractants Reduction Action Plan, and reinstate the FWC legislative budget requests to funnel funds to address the critical issue of human-bear conflicts.

FWC staff has testified that available natural habitat is plenty to sustain the current number of bears,<sup>1</sup> so there isn't a biological reason to cull the bear population at this time. Further, the bear hunt will likely not target bears that have become used to human sources of food and have

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<sup>1</sup> Florida Fish and Wildlife Conservation Commission, 2024. Update on Implementation of the Florida Black Bear Management Plan, December 2024.

become a nuisance within developed areas. The agency will need to continue its work educating people about our responsibility to keep these types of attractants away from wildlife.

While FWC is already doing good work addressing human-bear conflicts, more needs to be done. The agency should develop an action plan that not only increase their field work in problem areas, but also ignites action from the cities and counties on how to secure trash. There are 16 counties that represent the highest level of conflict, and more could be done to work with these areas on solutions.<sup>2</sup>

This should include working with cities and counties to revise contracts with waste providers to implement more bear-friendly practices. For example, in 2016, FWC signed a Memorandum of Understanding (MOU) with Waste Pro USA for Escambia and Leon counties to help address bear issues (Enclosure 1); FWC should continue this type of work with other high-conflict counties.



**Developing a Waste Management Action Plan**

- Clearly identify human-bear conflict hotspots
- Prioritize areas for implementation
- Partner with citizens, local governments, waste management companies, and stakeholders
- Ensure reasonable options are available; utilize incentives
- Identify any obstacles
- Pass local covenants, bylaws, or ordinances
- Outreach to residents to ensure participation



*Concept of a Waste Management Action Plan, as presented to FWC Commissioners by staff, September 2, 2015*

2. Work with your Law Enforcement Division to increase enforcement of the state's bear feeding rules, including providing notices and fines for intentionally or negligently allowing human sources of foods to be accessible to bears.

While there are laws on the books,<sup>3</sup> FWC's Law Enforcement has done less enforcement over the last three years to address negligent and intention feeding of wildlife like bears. As reported to the Conservancy, there were zero law enforcement notices in the South Unit in 2023 and 2024,

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<sup>2</sup> *Ibid.*

<sup>3</sup> 68A-4.001, F.A.C.; 379.412, F.S.

despite continued reports of bears in trash cans, draw into neighborhoods or residential areas by unsecured food.<sup>4</sup> Law enforcement also has a role to address human-bear conflicts and trash management.

3. Commit to a public review of hunt quotas and methodologies once scientific studies are completed.

As the FWC researchers complete their population studies over the next few years, we ask the FWC to commit to provide a public meeting agenda item for discussion on how this new information may impact the agency's ongoing bear hunts.

Your FWC staff has stated that the abundance estimate for the South Unit in our region will be done by 2027.<sup>5</sup> A public meeting opportunity should be scheduled for that time to ensure that the ongoing hunts are not placing our bear population at risk. If finalized growth rates are less than what the agency guesses they are at today, future hunts should immediately be canceled and subject to further public review.

4. Increase protection of bear habitat through FWC's technical assistance on development permit reviews, roadway permit reviews, and through partnership with municipal planning entities.

Comments made by the FWC Chairman during the August 13<sup>th</sup> meeting seemed to indicate that the agency didn't have a nexus with loss of bear habitat to development. However, FWC does have the opportunity on every state-level permit (for example, Environmental Resource Permits requested through South Florida Water Management District or Florida Department of Environmental Protection) to provide "technical assistance" on developments, roads, mines, and other proposed impacts in bear habitat.<sup>6</sup>

Over the years, and at our request, FWC has improved its commenting practices, but that's not enough. FWC has a duty under Florida law at 68A-4.009 (Enclosure 2), to provide its expertise

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<sup>4</sup> Bear TAG members receive an update by FWC staff in December of each year, and information presented typically runs from January 1<sup>st</sup> of that year through October 31<sup>st</sup>. 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.

<sup>5</sup> Florida Fish and Wildlife Conservation Commission, 2025. Florida Black Bear Hunting Proposals, August 2025.

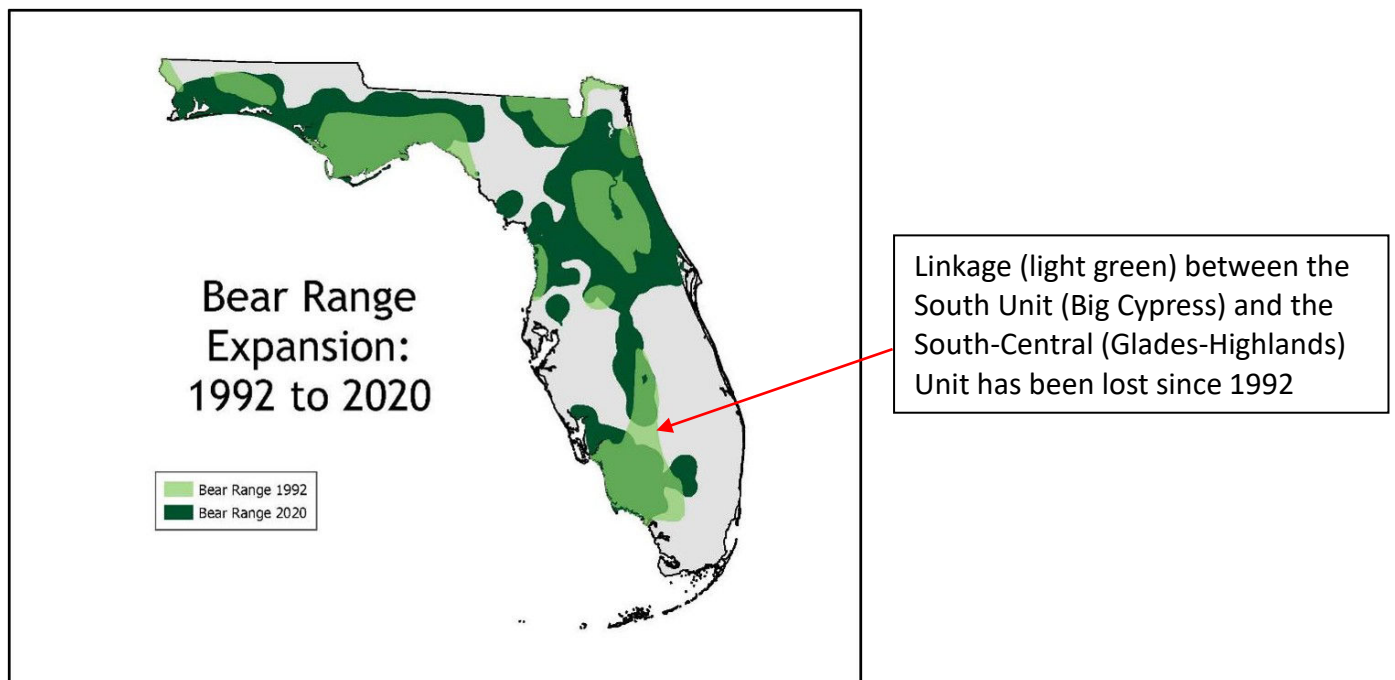
<sup>6</sup> Florida Department of Environmental Protection, Water Management Districts. Environmental Resource Permit Applicant's Handbook Vol. 1. 10.2.2 "As part of the assessment of the impacts of regulated activities upon fish and wildlife, the Agency will provide a copy of all notices of applications for individual (including conceptual approval) permits that propose regulated activities in, on, or over wetlands or other surface waters to the Florida Fish and Wildlife Conservation Commission (FWC) for review and comment, in accordance with Section 20.331(a), F.S. In addition, Agency staff may solicit comments from FWC regarding other applications to assist in the assessment of potential impacts to fish and wildlife and their habitats, particularly with regard to listed species."

to “minimize and avoid potential negative human-bear interactions or impacts of land modifications on the conservation and management of black bears.”

FWC should ramp up their commenting on development, particularly as it relates to protecting bear habitat, corridors, and the need for connectivity between healthy populations and those that are at risk for extirpation/local extinction.

5. Convene a “recovery” task force specifically dedicated to linking healthy bear populations with the at-risk subpopulations that are at risk for local extinction.

This issue has always been the number one reason the Conservancy of Southwest Florida has opposed a bear hunt for the last ten years. The bear population in the Glades-Highlands County area is dwindling, and connectivity to the South Unit (Hendry, Collier, Lee Counties) is desperately needed. In the 1990s, there was a connection between these two bear subpopulations (see FWC map below), but today, genetic exchange is limited, and the population there is estimated at less than 100 bears (down from 175 bears in 2012).<sup>7</sup>



*Map presented by FWC staff, August 13, 2025, with our additions in red*

<sup>7</sup> 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/](https://uknowledge.uky.edu/forestry_etds/2/); Murphy et al, 2017. Consequences of Severe Habitat Fragmentation on Density, Genetics, and Spatial Capture-Recapture Analysis of a Small Bear Population. PLoS ONE.

Yet, the hunting is now authorized to take place just miles away, taking bears that are, instead, needed to supplement this imperiled bear subpopulation.

While we appreciate that the FWC biologists have been researching this issue for years, the agency needs to convene a recovery task force of experts, partners, and non-profit organizations to implement the things necessary to save this imperiled subpopulation of bears, as well as the two other non-viable subpopulations.

### Conclusion

Thank you for considering our comments. Although we are disappointed in the decision to finalize hunting rules, we hope FWC will reignite other work that is desperately needed to protect Florida black bears. If you would like to discuss further or have any questions, please feel free to contact me at (239) 776-5601.

Sincerely,



Amber Crooks  
Senior Environmental Policy Advisor  
Conservancy of Southwest Florida

Cc:

George Warthen, Chief Conservation Officer  
Morgan Richardson, Director, Division of Hunting and Game Management  
David Telesco, Assistant Section Leader, Imperiled Species Management  
Mike Orlando, Bear Management Program Coordinator  
Jenny Moreau, Bear Stakeholder Coordinator

Enclosure:

1. "Bear Resistant Garbage Container Memorandum of Understanding" between FWC and Waste Pro USA
2. 68A-4.009, F.A.C.