

# GOA GUN OWNERS OF AMERICA™

March 22, 2023

Congresswoman Harriet Hageman  
1531 Longworth House Office Building  
Washington, DC 20515

**Re: H.R. 1245, Grizzly Bear State Management Act of 2023**

Dear Congresswoman Hageman,

The following comments are submitted on behalf of [Gun Owners of America](#), Inc. and our [Second Amendment Hunters Program](#).

Gun Owners of America, Inc. (GOA) is organized and operated as a nonprofit membership organization that is exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of firearms owners and has become one of the nation's leading Second Amendment advocacy organizations, with more than two million members and supporters nationwide.

GOA supports the Second Amendment Hunters (SAH) program, which was founded with the understanding that hunters cherish the principles of freedom upon which the United States was founded and have played a role in defending American values since our country's beginning. SAH works to protect hunters' rights and hunting opportunities within the bounds of science-based wildlife management policies in America. With over 15 million licensed hunters in the United States, hunters represent a powerful voting group and stand as ardent supporters of our Constitutional Rights, hunting rights, and hunting opportunities.

This letter is written to support H.R. [1245](#), the Grizzly Bear State Management Act of 2023, introduced by Wyoming Congresswoman Harriet Hageman. H.R. 1245 would direct the U.S. Secretary of the Interior to remove the Greater Yellowstone Region's (GYE) grizzly bears from the federal Endangered Species List (ESL). As most residents of Wyoming, Montana, and Idaho know, this effort, commonly referred to as "Delisting", is long overdue.

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Delisting grizzlies would return management to the states -- a concept supported in writing by the Governors of Wyoming, Montana, and Idaho. In 2022, the three state Governors asked the U.S. Fish and Wildlife Service (USFWS) to remove the GYE population of grizzly bears from the ESL.

Grizzly bears are one of America's most intensively studied widely species as multiple state and federal agencies cooperate with universities to assess the population status of grizzlies on a routine basis and have done so for decades.

In a formal petition to the USFWS, the Governors of Wyoming, Montana, and Idaho affirmed that grizzly bears, by all objective scientific measures, have been fully-recovered from "Threatened" status since 2003. The USFWS, the federal agency charged with ESL oversight, and the three impacted state Fish and Wildlife Agencies have affirmed support for ESL Delisting and the Governors' position.

In order to effectively manage grizzly bears after Delisting, the states of Wyoming, Montana, and Idaho have developed a tri-state Memorandum of Agreement (MOA) regarding the management and allocation of discretionary mortality of grizzlies in the GYE. This MOA demonstrates that grizzly populations have expanded their range far beyond the edges of the bears' biological and socially-acceptable range. Grizzlies outside this area can be dangerous to both humans and livestock.

Grizzlies are now found 65 miles outside the Demographic Monitoring Area (DMA) established by the Federal Government's own USFWS as suitable habitat for the long-term viability of grizzlies.

GYE grizzly bear population research demonstrated that an estimated 1,069 grizzlies roamed the DMA in 2021, and this estimate does not account for bears that have moved outside the DMA. This estimate far exceeds, often by more than double, all federal and state scientifically-established requirements for a recovered and viable population. These requirements have been widely researched and publicized over the last four decades.

Delisting opponents downplay the fact that lethal grizzly control must now be regularly implemented by taxpayer-funded government employees to maintain a balanced grizzly population and ensure public safety. In one year (2021), in Wyoming alone, 29 grizzlies were lethally removed by government officials. According to the Wyoming Game and Fish Department, most of these removals occurred outside the DMA (again, the area considered by USFWS as suitable habitat for grizzlies) demonstrating that grizzly populations are

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thriving and moving well outside areas deemed suitable for their coexistence with humans and livestock.

“Delisting” will result in management authority being turned over to the states following American legal traditions established by the North American Model of Wildlife Conservation. This “Model” grants legal authority to the states for the management of most wildlife species except migratory birds and those on the ESL. All 50 state wildlife agencies have a decades-long and proven track record of effectively managing resident wildlife species.

If Congresswoman Hageman’s bill passes and returns management to the states, hunters in Wyoming, Montana, and Idaho may eventually be used to manage grizzly populations using tightly controlled and carefully regulated hunting. Many Delisting opponents simply wish to keep grizzly bears on the Endangered Species List because of concerns that the states will institute this regulated hunting to control grizzly populations.

If hunting is implemented, the need for taxpayer funded killing by paid government employees will diminish, and hunters will actually pay large sums of money for the opportunity to hunt grizzlies. This will not only increase hunting opportunity but will bring significant revenue to the states of Wyoming, Montana, and Idaho in the form of expenditures by hunters pursuing once-in-a-lifetime hunting opportunities currently only available in Alaska or Canada.

Wyoming, Montana, and Idaho have a long-term management plan in place to ensure grizzlies do not need to be “relisted”, and they will professionally manage grizzly bears just like they do all other resident wildlife species. There is no reason to think the states cannot manage grizzly bears in the same manner they manage other low population and high profile big game mammals such as bighorn sheep, bison, moose, mountain goats, and mountain lions. Populations of these mammals have remained steady or thrived under state management for decades.

In closing, grizzly bears met and greatly exceeded all federal and state population recovery goals 20 years ago. Continued management under the ESL wastes taxpayers money, unnecessarily impacts the economies of the affected states, cheapens the intent and purpose of the ESL, and robs hunters of an opportunity to play a role in grizzly bear management.

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Gun Owners of America and Second Amendment Hunters publicly supported grizzly delisting over one year ago, applaud Congresswoman Hageman for introducing the Grizzly Bear State Management Act of 2023, and urge members of Congress to move quickly to remove GYE grizzlies from the ESL and return management to the states of Wyoming, Montana, and Idaho.

Sincerely,



*Mark D. Jones*

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