

IDAHO BLACK BEAR REHAB, INC. (IBBR)

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Media Advisory

Idaho Black Bear Rehab (IBBR) will address the Idaho Fish and Game Commission during public hearing on **March 9, 2016**. Location: Washington Group – Main Auditorium, 720 East Park Blvd., Boise, Idaho 83712.

Idaho Black Bear Rehab, Inc. (IBBR) has a 27-year history of success in the rehabilitation and release of black bears that is supported by both the scientific literature and post-release data collected on IBBR bears. IBBR has been an invited speaker at numerous professional conferences around the world, and has presented information about its rehab methodologies to attendees that have included wildlife agency personnel - including personnel from the Idaho Department of Fish and Game (Department).



Cinder – Released in 2015

Based on data recovered over the past twenty-seven (27) years, and 225 bears handled to date, IBBR bears have documented survival rates up to six (6) years post release; radio collar tracking and post-mortem retrieval of ear tags document that few IBBR bears ($< .015$) have become involved in nuisance situations within 30 days post release, and ($< .02$) within 31 days to 1 year post release; and most bears ($> .96$) are considered by wildlife agencies to be successfully released. This data alone supports IBBR's position that the methodologies and facilities of IBBR work, and any critique of those methodologies and/or facility designs are unwarranted and unsupported.

From 1989 until approximately 2009, IBBR had a cooperative and mostly effective working relationship with the Idaho Department of Fish and Game. However, beginning with the introduction of the Department's "Best Management Practice" (BMPs) document in 2008/2009, and cumulating with the Department's continued interference with the positive and established working relationships between IBBR and other state wildlife agencies, IBBR must now formally object to the Department's abuse of discretion, and the arbitrary and capricious application of Department policies and procedures regarding the rehabilitation and/or release of black bear in the state of Idaho.

IBBR's grievance with the Idaho Department of Fish and Game (Department) is not so simplistic that it's about the number of bears that IBBR can or cannot care for at any one time; although the Department attempts to make it that simple, as it diverts the focus from the more serious problems evident by the Department's actions since 2009.

Specifically, IBBR objects to the Department's recent decisions that: 1) bar the import of out-of-state black bears to the facilities of IBBR, 2) seek to arbitrarily limit the number of bears held for rehabilitation at IBBR, 3) interfere in the business operations of IBBR to the point of prohibiting free communications between IBBR and other state wildlife agencies, 4) refuse to appropriately consider outside-of-Idaho wildlife agency expertise and preference when requesting placement of bears at IBBR, and 5) refuse to appropriately consider the expertise of black bear rehabilitators when designing standards for the rehabilitation of black bear in the state of Idaho. In addition, IBBR formally objects to the Department's BMPs and agency actions that frequently direct that bears be placed at facilities that have known poor bear husbandry techniques, poor black bear rehabilitation methodologies, and exhibit serious

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animal welfare issues, especially when that placement is objected to by outside wildlife agencies for out-of-state black bears.

What the Department does not want to address is the lack of biological soundness, the lack of basic animal welfare principles, and the lack of the required ethics in public governance principles; all clearly omitted in the actions and procedures utilized by the Department in their oversight of black bear rehab in the state of Idaho since 2009.

What the Department does not want to address is the development of BMPs for black bear rehab that the Department purports follows published national black bear rehab standards, but has blatantly omitted critical portions of those published sizing standards for bear enclosures (i.e. the part where there is an asterisk that says, use this as a part of determining your calculations, and the Department chooses to leave that part out).

What the Department does not want to address is the development of BMPs for black bear rehab that have excluded key Idaho stakeholders and experts, such as IBBR.

What the Department does not want to address is the making up of science when it asserts that by putting unrelated bear cubs together you change the social dynamics and therefore the Department's BMP sq. ft. requirement per bear in rehab is warranted. Note: An informal survey of bear biologists, researchers, and captive bear experts did not result in IBBR finding any published research that supports the Department's theory that unrelated cubs require space of 720 ft² per bear while in rehab.

What the Department does not want to address is the making up of science when it asserts that orphaned bear cubs that are observed to suck on another bear's body parts (in this case the author of the Department's BMPs had a one-time observation of a cub sucking on another cub's penis) is a sign of serious stereotypical behaviors... What the experts say is that any animal (including human babies that suck thumbs) may suck on body parts – wildlife rehabilitators will tell you that many orphaned animals will suck on their own or another's body parts not only to satisfy their need to nurse, but especially in bears, the sucking and chortling sound that accompanies it is a natural behavior for self-reassurance. This behavior typically ceases as orphan cubs mature and time passes post-weaning. What counts in bear rehab is: were those body-part-sucking cubs successfully released; and IBBR can give a definitive and resounding, Yes!

What the Department does not want to address is the receipt of critical comments from around the world about the BMPs, including comments from outside experts and professionals; all of whom encouraged the Department in 2009 to start over, and to bring all stakeholders to the table in the process of the development of standards for bear rehab in Idaho.

What the Department does not want to address is the name dropping of endorsement of the BMPs, where in fact, the research and/or researchers cited during vetting of the BMPs is actually contrary to what the Department purports; where the World Society for the Protection of Animals (WSPA, now known as WAP) not only did not endorse the BMPs, but actually analyzed the BMPs by engaging a bear behaviorist and captive bear expert – producing a final report that stated that the BMPs had multiple and significant flaws and the best procedure was for the Department to start over – again with all stakeholders participating as a part of the process.

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What the Department does not want to address is the bully and strong-arming methods used to interfere with the long-term cooperative working relationships that IBBR has with other state wildlife agencies, and the unprofessional disregard for outside agencies' preference for rehab facility and professional rehab expertise.

What the Department does not want to address is its personal involvement in the McCall Sub-Region facility where the Department continues to try to force outside agencies to place their bears; where the Department continuously places Idaho bears; where it is well known that out-of-state bears have escaped to mix with Idaho bear populations; where a rehab bear unknowingly died and its body was only discovered when the snow melted the following Spring; where the general public has a yearly opportunity to view rehab bears up close and personal (right before those bears are a scheduled to be released back into the wild).

What the Department does not want to address is the lack of insight into basic bear husbandry principles where it's most evident when the Department thinks that the McCall Sub-Region facility's 1-2 acre enclosures could house up to 60-120 bears in rehab – without the Department even considering the carrying capacity of the land. The reality is (based on captive bear experts) that just 60 bears, during the ten week autumn pre-hibernation period, may defecate 3-5 times per day. Therefore, 60 bears defecating five times per day equals 300 feces per day. Multiply this number by the ten week period, and the enclosure is carrying 21,000 feces. This is approximately 1 feces every 2 ft². And that's just a 10 week period before winter. However, the Department ignores all other aspects of basic bear husbandry by proceeding to focus on sq. ft. space per bear, and ignoring the fact that potential fecal material in their preferred facility could be every 2ft².

Based on the foregoing, if the Department continues to support and enforce the poorly designed "Best Management Practice" (BMP) document, it will appear that the Department has an agenda for the rehabilitation of black bear in Idaho that is not based on science, animal husbandry, or a minimum level of captive wildlife animal welfare principles.

Despite IBBR's past attempts to work cooperatively with the Department, as noted during numerous meetings with the Department from 2009 to 2013, the Department continues to refuse to change this drastic course of procedure and action. IBBR continues in its request that the Department work cooperatively with stakeholders such as IBBR during the design and implementation of standards for the rehabilitation of black bear in the state of Idaho. As the Department continues to refuse to work cooperatively, IBBR has no other choice but to voice our concerns publicly, and to take our appeal to a higher regulatory authority.