

# #1

**COMPLETE**

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**Last Modified:** Tuesday, July 12, 2022 7:11:44 PM  
**Time Spent:** 01:50:33  
**IP Address:** 50.52.24.229

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Page 1

## Q1

Contact information:

Name:	<b>Tom Radandt</b>
City/Town:	<b>Libby</b>
State/Province:	<b>MT</b>
Email Address:	<b>tomradandt0@gmail.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I support the NCDE ARM as proposed.

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## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, July 15, 2022 11:10:21 AM  
**Last Modified:** Friday, July 15, 2022 11:19:20 AM  
**Time Spent:** 00:08:58  
**IP Address:** 162.244.173.113

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Page 1

### Q1

Contact information:

**Name:** Terry Peterson jr  
**City/Town:** Eureka  
**State/Province:** MT  
**Email Address:** manyarrowz@yahoo.com

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### Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I support delisting grizzly bears and turning management back to the state of Montana. This is the ultimate goal of the endangered species act in the first place.

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# #3

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**Last Modified:** Friday, July 15, 2022 12:13:39 PM  
**Time Spent:** 00:59:08  
**IP Address:** 70.33.57.231

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Page 1

## Q1

Contact information:

Name:	<b>Caleb Gillis</b>
City/Town:	<b>Glen</b>
State/Province:	<b>MT</b>
Email Address:	<b>calebjohngillis@gmail.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I support using Hunting to manage the Grizzly Bear population when allowed in the state of Montana.

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# #4

**COMPLETE**

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Page 1

## Q1

Contact information:

Name:	<b>Chase</b>
City/Town:	<b>Helena</b>
State/Province:	<b>MT</b>
Email Address:	<b>lvrding86@gmail.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I fully support the harvesting of grizzly bears within the northern continental divide ecosystem.

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# #5

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**Last Modified:** Tuesday, July 19, 2022 8:05:56 PM  
**Time Spent:** 00:13:03  
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Page 1

## Q1

Contact information:

Name:	<b>Richard Wildermuth</b>
City/Town:	<b>Corvallis</b>
State/Province:	<b>MT</b>
Email Address:	<b>rmwildermuth@yahoo.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

Delist and Open the season for the Love of God!! We have met the threshold and it's time to responsibly manage them.

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# #6

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**Time Spent:** 01:13:19  
**IP Address:** 71.36.61.156

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Page 1

## Q1

Contact information:

Name: **Joe England**  
City/Town: **kalispell**  
State/Province: **MT**

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I feel that the grizzlies are well recovered and the state of Montana should keep control of there recovery in our state.

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# #7

**COMPLETE**

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**Last Modified:** Wednesday, July 20, 2022 3:48:12 PM  
**Time Spent:** 00:05:32  
**IP Address:** 172.56.104.148

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Page 1

## Q1

Contact information:

Name:	<b>Dori Bailey</b>
City/Town:	<b>Chimacum</b>
State/Province:	<b>WA</b>
Email Address:	<b>theblackwolf@yahoo.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

Grizzly bears like all animals are important to the ecosystem. And every time I see here or read about a story it's always about killing a bear killing the Cubs killing the Cubs in their dens and that's horrible and it really disgusts me and it makes me angry. Animals are only doing what they are instinctively known to do is hunt. If you want to move them into a different area where they can spread out and have other animals to hunt that is fine but I am 100% against any type of killing these animals

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# #8

**COMPLETE**

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**Last Modified:** Wednesday, July 20, 2022 4:35:29 PM  
**Time Spent:** 03:12:46  
**IP Address:** 174.204.22.63

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Page 1

## Q1

Contact information:

Name:	<b>Joshua Zanett</b>
City/Town:	<b>Bigfork</b>
State/Province:	<b>MT</b>
Email Address:	<b>bobandkristi@hotmail.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

We need hunting seasons on grizzly bears their beyond recovered and have become dangerous as they have no fear of man and are way beyond their habitats capacity.

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#9

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Wednesday, July 20, 2022 7:24:59 PM  
**Time Spent:** 00:17:00  
**IP Address:** 97.121.205.14

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Page 1

**Q1**

Contact information:

Name:	<b>Brooke Shifrin</b>
City/Town:	<b>Bozeman</b>
State/Province:	<b>MT</b>
Email Address:	<b>bshifrin@greateryellowstone.org</b>

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Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

July 20, 2022

Via email to:

fwpwd@mt.gov, fwcomm@mt.gov

Montana Fish and Wildlife Commission

Montana Department of Fish, Wildlife and Parks

Wildlife Division

PO Box 200701

Helena, Montana 59620

Re: NCDE Grizzly ARM

Dear Members of the Commission,

Please see the original comments submitted by Greater Yellowstone Coalition on February 18, 2022 in response to the proposed amendment of ARM 12.9.1403 regarding NCDE grizzly bear demographic objectives (attached as Appendix A).

Sincerely,

Brooke Shifrin

Wildlife Conservation Coordinator

Greater Yellowstone Coalition

Appendix A

Grizzly Bear ARM

Montana Department of Fish, Wildlife and Parks

PO Box 200701

Helena, Montana 59620-0701

Via email to GrizzlyBearARM@mt.gov:

Re: Notice of Proposed Amendment of ARM 12.9.1403 Regarding NCDE Grizzly Bear Demographic Objectives

Dear Department of Fish, Wildlife, and Parks,

Thank you for the opportunity to comment on Montana's commitments around management, genetic health, and allocation of discretionary mortality of grizzly bears in the Northern Continental Divide Ecosystem (NCDE) through the proposed amendment of ARM 12.9.1403. With roughly 7,000 supporters in Montana, Greater Yellowstone Coalition (GYC) works to engage the wide range of people who care about the Greater Yellowstone Ecosystem (GYE) to ensure the wildlife that make our region unique thrive for generations to come. Montana is home to an astounding array of wildlife species, including the iconic grizzly bear. With the two largest grizzly bear populations in the lower-48 states and connective lands between, Montana is uniquely positioned to ensure lower-48 grizzly bears persist long into the future.

GYC has engaged in grizzly bear conservation and management issues for over 35 years. We work as a partner and collaborator with federal and state agencies, as well as people in communities living alongside grizzly bears. Through partnerships and projects on the ground, we strive to protect core habitat, promote connectivity between grizzly bear populations, and reduce/prevent conflicts.

Due to Montana's leadership in grizzly bear conservation, interagency efforts, and community support for grizzly bear recovery efforts and expansion into new habitat, grizzly bear conservation has been a tremendous Endangered Species Act (ESA) success story. GYC is committed to ensuring this success story continues and therefore has a strong interest in how grizzly bears will be managed in Montana post-delisting. We appreciate the clarification in the proposed amendment to ARM 12.9.1403 around hunting and translocation of NCDE grizzly bears as sources of discretionary mortality. This clarification is key to ensuring Montana meets commitments to supporting an estimate of 800 bears within the Demographic Monitoring Area (DMA).

We want to flag a concern in the language of the proposed amendment that we believe could have important implications for how grizzly bear mortality is managed. ARM 12.9.1403 objective (3)(b) describes the intent to manage mortalities from all sources to support an estimated probability of at least 90% that the population within the DMA remains above 800 grizzly bears. Objectives (3)(b) (i-iii) lay out a set of threshold objectives assessed against a 6-year running average that if violated would trigger further management action to limit mortality. Objective (5) implies that disallowing hunting for a year could be one potential action for 'further managing

## NCDE Grizzly ARM Proposal

mortality.' However, the use of the word 'and' instead of 'or' in the language of objective (3)(b)(ii) and objective (5) indicates that all threshold

objectives must be violated against a 6-year running average before additional management action would be taken to further limit mortality. Given the importance of each individual threshold objective (3)(b)(i-iii) for ensuring a stable grizzly bear population, we urge the Department to commit to additional action (e.g., disallow hunting for a year) if any one of the three threshold objectives is violated. A simple remedy in the language of ARM 12.9.1403 would be to replace the word 'And' with the word 'Or' when listing the threshold objectives.

If the NCDE grizzly bear population is removed from the list of Threatened Species under the Endangered Species Act, the application of the management direction outlined in ARM 12.9.1403 will be crucial to ensuring grizzly bear conservation in the lower-48 is a success long into the future. As previously stated, we are supportive of the Department's intent to clarify that translocation and hunting will be considered sources of discretionary mortality in the NCDE, and would like to highlight two considerations GYC has continuously raised in the context of both issues:

1) The importance of functional connectivity: The grizzly bear was listed as a threatened species in the contiguous lower 48 states, and therefore should be recovered and managed as a large, well-connected Northern Rockies metapopulation. Historic evidence supports the existence of a meta-population of grizzly bears in the contiguous United States, including connectivity defined by grizzly bear movement and occupancy between the NCDE and GYE, as well as other populations (Craighead and Vyse 1996, Picton 1986, Merriam 1922). Metapopulation theory directs that connectivity is the best long-term strategy to increase the resiliency and probability of persistence of grizzly bear populations in the lower-48 states (Boyce et al. 2001, Boyce 2000). Translocation of grizzly bears from the NCDE to the GYE is a viable management strategy for addressing genetic isolation but does not address the importance of functional connectivity (i.e., grizzly bears naturally moving between populations) for ensuring resilience to environmental shifts over time. Montana Fish, Wildlife and Parks has indeed acknowledged the importance of natural connectivity as part of the Southwest Montana Grizzly Bear Management Plan. Page 41 states Montana will, "Continue to work with Idaho, Wyoming, and the IGBC to address the issue of linkage between grizzly recovery areas and follow the goal set forth in the IGBC work plan to promote linkage between the GYA and the NCDE grizzly populations." And "It is a long-term goal of FWP to allow the grizzly bear populations in southwest and western Montana to reconnect through the maintenance of non-conflict grizzly bears in areas between the ecosystems."

2) A post-delisting delay on hunting: Greater Yellowstone Coalition recognizes hunting as an acceptable management tool for many species. Unfortunately, the possibility of future sport hunting of grizzly bears under state management injects controversy into the possibility of delisting bears from the ESA due to the difficulty of managing conflicts with humans. In 2020 alone, 54 grizzly bear mortalities resulting from human conflict were documented in Montana. A 5-year post-delisting moratorium on hunting would allow for further review of hunting in light of other sources of grizzly bear mortality which are likely to increase once ESA protections are removed. Greater Yellowstone Coalition works as a collaborative partner to provide resources and support for conflict prevention and reduction on the ground. We believe improving funding sources and partnerships to prevent conflicts throughout the state should take priority over any discussion of sport hunting. There is no evidence suggesting hunting grizzly bears will alleviate conflict. GYC appreciates the opportunity to comment on issues that will impact future management of grizzly bears in Montana.

Sincerely,

Brooke Shifrin

Wildlife Conservation Coordinator

Greater Yellowstone Coalition

Literature Cited:

Boyce, M.S. 2000. Meta-population analysis for the Bitterroot population. Appendix 21C. Pages 6-242 – 6-246 in Grizzly bear recovery in the Bitterroot ecosystem, Final Environmental Impact Statement. U.S. Fish and Wildlife Service, Missoula, MT, USA.

Boyce, M. S., B. M. Blanchard, R. R. Knight, and C. Servheen. 2001. Population viability for grizzly bears: a critical review. International Association for Bear Research and Management, Monograph Series 4.

Craighead, F.L., and E. Vyse. 1996. Brown/grizzly bear meta-populations. In: D. McCullough (Ed.) Metapopulations and Wildlife Conservation Management. Island Press, Washington DC, and Covelo CA. Chapter 14: pp. 325-351.

Picton, H. D. 1986. A possible link between Yellowstone and Glacier grizzly bear populations. Int. Conf. Bear Res. and Mgmt. 6:7-10.

Merriam, C.H. 1922. Distribution of grizzly bears in U.S. Outdoor Life, 50:405-406.

# #10

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Thursday, July 21, 2022 2:28:52 PM  
**Time Spent:** 00:07:21  
**IP Address:** 206.183.119.23

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Page 1

## Q1

Contact information:

Name:	<b>Steve Hoffman</b>
City/Town:	<b>Ronan</b>
State/Province:	<b>MT</b>
Email Address:	<b>srhoffman3@gmail.com</b>

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## Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

I support the amendment pertaining to the grizzly bear demographic objective for the NCDE as stated.

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# #11

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 01, 2022 12:35:59 PM  
**Last Modified:** Tuesday, August 02, 2022 10:59:23 AM  
**Time Spent:** 22:23:24  
**IP Address:** 136.33.234.231

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Page 1

## Q1

Contact information:

**Name:** Christopher Tymeson  
**City/Town:** Overland Park  
**State/Province:** KS  
**Email Address:** [ctymeson@scifirstforhunters.org](mailto:ctymeson@scifirstforhunters.org)

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**Q2**

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

2 Aug 2022

2022 NCDE GRIZZLY ARM 12.9.1403  
C/O Montana Fish Wildlife & Parks  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Mt 59620-0701

Re: 2022 NCDE GRIZZLY ARM 12.9.1403

Dear Commissioners and Director Worsech:

On behalf of Safari Club International, I would like to thank you for the opportunity to comment on the 2022 NCDE GRIZZLY ARM 12.9.1403.

The proposed changes to the 2022 NCDE GRIZZLY ARM 12.9.1403 generally demonstrate responsible and sustainable management of grizzly bears by ensuring that the bear population stays above the minimum recovery level, while maintaining high levels of opportunity for hunters, should the grizzly bear be delisted. SCI believes that sound science-based conservation involving hunting as the primary management tool, while maximizing opportunities for all huntable species, including predators such as grizzly bears, is necessary to the long-term health of wildlife. Hunters have long paid the way for conservation, both game and non-game wildlife, and maximizing opportunity for hunting is also key to long-term funding for all conservation. Hunting benefits wildlife conservation.

Thank you again for the opportunity to comment on the 2022 NCDE GRIZZLY ARM 12.9.1403. SCI is dedicated to protecting the freedom to hunt and we appreciate the continued partnership with the Agency and the Commission. SCI is always first for hunters.

Sincerely,

Sven Lindquist  
President  
Safari Club International

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# #12

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, August 05, 2022 8:24:14 PM  
**Last Modified:** Friday, August 05, 2022 9:01:15 PM  
**Time Spent:** 00:37:01  
**IP Address:** 67.143.192.152

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Page 1

## Q1

Contact information:

**Name:** Gregory M. Strutz  
**City/Town:** East Glacier Park  
**State/Province:** MT  
**Email Address:** gregorystrutz3@gmail.com

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Q2

Please provide comment on the proposal to amend ARM 12.9.1403 pertaining to grizzly bear demographic objective for the Northern Continental Divide Ecosystem.

Thank you for this opportunity to comment on the proposed amendments to the NCDE Grizzly ARM 12.9.1403 which deals with demographic objectives for a delisted NCDE grizzly bear population.

I am opposed to the inclusion of the following language in section (3)(b) because it refers to specific types of bear loss and is unnecessary:

"including hunting and the loss of grizzly bears by translocation out of the NCDE," . Section (3)(b) should simply state that MT FWP "will monitor and manage NCDE grizzly bear mortality from all potential sources to support ..." .

This simple language would obviously include mortalities from a potential future hunting season for grizzly bears in a delisted NCDE population.

In addition, the language related to bears translocated out of the NCDE is unnecessary because translocated bears (such as those moved from the NCDE to augment the Cabinet-Yaak population) have always been considered and recorded as NCDE mortalities.

I am also strongly opposed to the addition of new sections (4) and (5) that contain specific language related to proposed hunting of NCDE grizzly bears after delisting. The inclusion of these two sections makes it appear to both the Montana public and the national public that MT FWP and the Montana Fish and Wildlife Commission have already decided that once NCDE grizzly bears are delisted from the ESA the state of Montana will continue to consider them as a game animal and they will be hunted. This is a form of arrogance since there has yet to be an NCDE grizzly bear delisting proposal from the US Fish and Wildlife Service and MT FWP has not submitted any kind of formal proposal for potential hunting of NCDE grizzly bears after delisting. Sections (4) and (5) should be part of a formal hunting proposal submitted by FWP at the time of delisting and the proposal should allow lengthy review and comment by the public in both Montana and the rest of the nation since NCDE grizzly bears are a Federal public trust resource that belongs to all Americans. Please remove sections (4) and (5) from the proposed amendments to the ARM. Those sections belong in a formal hunting proposal subject to public review and comment, not in a document intended to reiterate the commitment of FWP to support the demographic objectives contained in the NCDE Grizzly Bear Conservation Strategy.

Thank you for considering my comments.

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