

**MONTANA FISH, WILDLIFE & PARKS**  
**PUBLIC COMMENTS**  
**GRIZZLY BEAR RELOCATION SITES**

1. As a starting point, I support the agency's recommendation that the Commission approve all grizzly bear relocation sites listed in the attached maps and spreadsheets for at least a 5-year period. However, these lists and maps are inadequate. And, the absence of any map or sites in the Bitterroot Ecosystem (BES) is inexcusable and needs to be remedied for the public to adequately comment. The NCDE contains only two demographic connectivity areas, which are designated specifically to support female grizzlies with cubs. Ninemile on the Lolo NF is one of these areas. However, none of the NCDE maps individually or in combination includes the all-important Ninemile Demographic connectivity area that lies fully within the NCDE. The NCDE middle map shows only the southeasternmost section between Ninemile Cr. and Jocko River, with site 188 McCormick Peak and site 208 Edith Peak displayed in this area. Please make available the full Ninemile Demographic Connectivity area and provide additional relocation sites in this area. The Salish Mountains Demographic Connectivity Area to the north, also part of Management Zone 1 is similarly not adequately displayed on the maps provided. I do not think the NCDE grizzly bear occupied habitat maps reflect the current distribution. The south map shows a habitat boundary close to the Clark Fork River valley. Welcome Creek Wilderness, Rock Creek, Flint Creek, Burnt Fork appear to be excluded from the inhabited area. There have been numerous verified sightings in the past decades both within the BES and the connected landscape leading to it. To the east of the BES, there have been verified or potential sightings in the Sapphires and Beaverhead Mountains, Big Hole and Sula areas, and Stevensville, as well as on private conservation lands such as MPG Ranch. Please add additional public lands to the relocation sites maps and lists. If not already there, grizzly bear are on the way, probably before SB 337 is implemented. To the north, grizzly bears have been verified in Lolo (Ethel), in Ninemile Demographic Connectivity Area and Petty Creek adjoining the Ninemile DCA, in vicinity of St. Regis and other areas of the Bitterroot Mountains in the landscape connecting the Northern Continental Divide Ecosystem (NCDE), Cabinet-Yaak Ecosystem (CYE) and BES. As far back as 2008, a hunter accompanied by a professional outfitter guide killed a grizzly bear in the Kelly Creek drainage of the Bitterroot Mountains. Currently, there is a female with cubs in Missoula's North Hills. With any luck, this family will make its way to the BES, while residents of the Greater Missoula wildland urban interface clean up behaviors leading to food conditioning that threatens the grizzly bear's survival. Maps and a list of potential sites for the BES must be made available to the public for review and comment. The maps must include the aforementioned connected landscapes where a verified or potential grizzly bear sighting has occurred, and the complete BES, including Idaho. Even though this comment period is specific to actions decided by the Montana Fish Wildlife and Parks commission, the broader BES provides needed context. Grizzly bear and other wide-roaming species do not recognize political boundaries. SB 337 Section 1. Section 87-5-301, MCA, is amended to read: "87-5-301. Grizzly bear -- findings -- policy. (1) The legislature finds that: (a) grizzly bears are a recovered population and thrive under responsive cooperative management; (b) grizzly bear conservation is best served under state management and the local, state, tribal, and federal partnerships that fostered recovery; and The MT Department of Transportation has been closely involved in grizzly bear recovery but its unclear how involved DOT has been in planning relocation sites. This is a missed opportunity. The taxpayers of the Montana and nationwide have subsidized some

very expensive wildlife crossings. Some of these projects have been designed with a specific focus on grizzly bear recovery, such as on Hwy 93 north. In other areas wildlife crossings have been designed to connect a broad spectrum of wildlife with quality habitat and/or to reduce wildlife and vehicle collisions that cost citizens billions of dollars each year. The Bitterroot Valley has benefitted from wildlife crossing infrastructure. A report titled, "Evaluation of Wildlife Crossing Structures on US 93 in Montana's Bitterroot Valley. 2017", published in affiliation with the Montana Department of Transportation provides details of these projects specific to connecting the broader BES landscape. (DOI:10.13140/RG.2.2.13242.59848). At the very least, this expensive infrastructure should be considered in planning relocation sites and more broadly in landscape connectivity and distribution of grizzly bears required for natural recovery in the Bitterroot Ecosystem.

([https://www.researchgate.net/publication/313904112\\_Evaluation\\_of\\_Wildlife\\_Crossing\\_Structures\\_on\\_US\\_93\\_in\\_Montana's\\_Bitterroot\\_Valley](https://www.researchgate.net/publication/313904112_Evaluation_of_Wildlife_Crossing_Structures_on_US_93_in_Montana's_Bitterroot_Valley)). The same legislative session that saw SB 337 passed, also mandated snaring, night hunting and bounties on wolves. Montana's increasingly liberal hunting laws have the potential to thwart grizzly bear recovery. Baiting of traps could attract grizzly bears. Add to this expansion of people into the wildland urban interface and slack sanitation as is occurring in the North Hills of Missoula and the risks of conflict are elevated. These conditions necessitate an clause for emergency location sites to meet the crisis situation Montana's new hunting laws and increasing population demand. SB 337 leaves no flexibility for FWP wildlife managers to meet these pressures. SB 337 demands that grizzly bear be managed to avoid conflicts with humans. Unfortunately it has no provisions for humans to avoid conflicts with bears. If conflict arises SB 337 provides FWP only with lethal measures. Please institute emergency clause to provide needed flexibility for FWP wildlife managers to address rapidly deteriorating conditions.

***Claudia Narcisco Missoula, MT***

2. November 22, 2021 Fish & Wildlife Commission Montana Dept. of Fish, Wildlife & Parks 1420 E 6th Ave. Helena, Montana 59601 Submitted via email at [fwpwld@mt.gov](mailto:fwpwld@mt.gov) and online at <https://fwp.mt.gov/aboutfwp/public-comment-opportunities> Re: Grizzly Bear Relocation Sites Members of the Commission, On behalf of the National Parks Conservation Association (NPCA) and the Natural Resource Defense Council (NRDC), I appreciate the opportunity to comment on the proposed Grizzly Bear Relocation Sites (proposal) in the Cabinet-Yaak, Northern Continental Divide, and Greater Yellowstone ecosystems in Montana. This proposal from Montana Fish, Wildlife & Parks (FWP) is in response to Senate Bill 337, passed by the 2021 Montana state legislature, which requires FWP to gain approval from the Commission for all sites where grizzly bears could be relocated in the state. SB337 also prohibits FWP to relocate a conflict grizzly bear that is captured outside of the designated Recovery Zone (RZ) but recognizes that the US Fish and Wildlife Service (FWS) may relocate conflict bears inside or outside of the RZ. Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working with our more than 1.6 million members and supporters, including nearly 7,000 members and supporters in Montana, to preserve our nation's natural, historical, and cultural heritage for present and future generations. NPCA has a longstanding interest in protecting national parks and their resources, including wildlife, land, and water, both inside national parks and on park adjacent landscapes. We are particularly

interested in the proposed project and potential impacts on Yellowstone National Park and Glacier National Park grizzly bear populations and implications of SB337 to disrupt natural population dispersal and genetic connectivity. We believe that for decades state bear managers have been successfully applying their expertise to evaluate the social and ecological components of each unique relocation event and determining where a particular bear will have the best chance of success when relocated. The Commission should continue to rely on the management experience of state bear specialists when determining what sites should be approved for relocation. NPCA and NRDC urge the Commission to not reduce the number or geographic scope of relocation sites and instead approve the full list that was proposed by FWP. In recent years, there has been a push for more funding for bear management specialists to help with addressing problem bears to provide proactive support to mitigate attractants and to do local community education. We should trust the specialized training and applied experience of those staff members to implement on the ground bear management and allow them the greatest number of relocation sites as possible. We believe that the flexibility provided by having the greatest number of relocation sites approved is important for state bear managers to continue doing their jobs of managing bears across the landscape. More relocation site options mean quicker management decisions that reduces the stress on bears and FWP staff. Additionally, to provide adequate options for field staff, we encourage the Commission to consider additional relocation sites in the northern end of the Greater Yellowstone Ecosystem (GYE) and west toward the Beaverhead where bears have been documented and food storage orders are in place. One of the components of successful recovery for GYE bears is genetic connectivity to the bears of the Northern Continental Divide Ecosystem (NCDE). The Commission should support natural genetic connectivity by approving potential relocation sites that are on the farthest edges of the two recovery areas. We also believe that FWP should identify relocation sites in the Bitterroot Ecosystem, since it is an identified grizzly bear recovery zone and there have been bears trapped and identified in that area. The best option going forward for the Bitterroot Ecosystem is to return bears that are trapped within or on the edge of that ecosystem, back into that ecosystem. Finally, we encourage FWP to build plans around how to coordinate with FWS staff to meet the needs of landowners who experience conflict outside the recovery zone. It is imperative that FWP managers can continue to quickly respond to conflicts across all areas occupied by grizzly bears. There needs to be a plan for how FWP managers will quickly engage FWS personnel to ensure that conflict bears captured outside the recovery zone that can be relocated are addressed in a timely manner. Bears that are accidentally trapped outside the recovery zones should be immediately released. We appreciate the opportunity to provide input during this comment period. It is our hope that the Montana Fish and Wildlife Commission considers the information we have provided and analyzes the concerns we have raised regarding the impacts of their decision on the unique resources of Montana National Parks and the surrounding landscapes and communities. Best regards,

Kelsie Huyser  
Northern Rockies Program Coordinator Yellowstone Field Office National Parks Conservation Association Bozeman, Montana  
Jennifer Sherry, PhD Wildlife Science and Policy Specialist  
Nature Program Natural Resource Defense Council Bozeman, Montana

***Kelsie Huyser Bozeman, MT***

3. I believe there needs to be a compromise with grizzly bears. They are very cool animals but there are far too many in Montana right now. I believe they should be in National Parks and maybe some wilderness areas only. They have taken much of the fun out of recreating. Many of my family and friends don't even want to recreate in areas with grizzlies. We need some areas without them. The more grizzly free areas the better.

***Concerned Citizen Missoula, MT***

4. I am opposed to having grizzly bears being throughout Montana's national forests and private lands. They should exist for sure as a species, but in national parks and wilderness areas only. Having them dotted throughout western Montana as a whole is very concerning and dangerous. No longer can I and my children and grandchildren relax while camping and hiking in western Montana due to the fact that grizzlies now are found almost everywhere on a western Montana map. Basically, they used to be in Yellowstone and Glacier and the wilderness areas only and that I can support. If the proposed relocation sites are populated with grizzlies, attacks will occur at an increasing rate. I no longer am at ease trying to recreate in the western part of Montana as I know a grizzly encounter may occur. A compromise is to have them exist in wilderness areas and national parks only.

***Montana Resident Missoula, MT***

5. Sites need to be identified for the Sapphires, Bitterroots, Flints, Pintlars, East and West Pioneers, Tobacco Root and Italian Peaks Mountain ranges. It is inappropriate to move grizzly bears back to the NCDE or GYE when they do not reside there. Please find sites that are not in designated Wilderness but are close to Wilderness and roadless areas.

***Mike Bader Missoula, MT***

6. Very concerned about safety to me and my family with grizzly populations in any areas outside of wilderness areas. What good does introducing them to new areas do other than ruin outdoor recreation for MT citizens? I would like peace of mind while outdoors. Who will be held responsible for increased attacks on humans or even deaths?

***Concerned MT Resident Missoula, MT***

7. I do not think that grizzlies should be relocated anywhere in Montana except into National Parks and wilderness areas.

***Concerned Citizen Missoula, MT***

8. Central Park, NYC

***John Mulligan Eagle, ID***

9. I approve of all sites recommended. However, I note that there are no relocation sites in the Bitterroot Ecosystem other than in the northern Sapphire Mountains. I ask that you add relocation sites to the Bitterroot Mountains and the central and southern Sapphire Mountains. As a resident of Ravalli County, I would like to see the Bitterroot Ecosystem restored to full function, which historically included grizzly bears. And in fact, grizzlies are now returning to the area, and so should not be removed. I am a resident of Ravalli County and I would like you to



ask FWP to propose relocation sites in the Bitterroot Ecosystem and the linkage zones surrounding it including the Sapphires and the Welcome Creek Wilderness area.

**Jeff Lonn Hamilton, MT**

10. I hope all of those relocation sites are utilized. I live in Corvallis, MT. I'd like to see relocations sites in the Selway-Bitterroot Wilderness. I'd also like to see relocation sites in the Sapphire/Bitterroot Ecosystem. As a resident of Ravalli country I want bears back in the Selway and Sapphires. The Sapphires themselves are an important ecosystem and corridor.

**Gary Milner Corvallis, MT**

11. I see no problems with any of those sites. I am a native resident of Ravalli County wondering why there are no sites proposed in the Bitterroot Ecosystem? Please consider this and the linkage zones surrounding it including the Sapphires and the Welcome Creek Wilderness area. Thank you.

**Douglas Soehren Hamilton, MT**

12. Chair Robinson and members of the Commission, My name is Trina Jo Bradley, and I chair the Endangered Species Act Subcommittee for the Montana Stockgrowers Association. At our convention last week, our committee introduced and the membership passed the following policy on Grizzly Bear Relocation: "Whereas science shows grizzly bear populations in the Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) have recovered; and Whereas the grizzly bear populations in established relocation areas are already at or near carrying capacity; and Whereas moving grizzly bears near private ranchlands leads to more conflict with humans and livestock; Therefore be it resolved MSGA urges the Montana Fish, Wildlife, and Parks Commission to refrain from creating any new grizzly bear relocation sites outside of established recovery areas; and Be it further resolved MSGA urges limited use of current grizzly bear relocation sites for known conflict bears to avoid conflict with humans or livestock." We also passed an interim policy that was first introduced at the MSGA midyear meeting that works hand in hand with our thoughts on relocation. The policy reads: "Whereas grizzly bears have expanded their range to private ranchlands; and Whereas livestock depredation numbers continue to rise; and Whereas science shows grizzly bear populations in the Northern Continental Divide Ecosystem (NCDE) and Greater Yellowstone Ecosystem (GYE) have recovered; and Whereas taxpayers shoulder the financial burden of relocating conflict bears that return to kill again; THEREFORE BE IT RESOLVED MSGA recommends lethal removal of grizzly bears suspected or known to have killed a person or livestock after the first offense." Keeping these two new MSGA policies in mind, I would request that the FWP Commission does not add any new relocation sites for conflict grizzly bears anywhere in Montana. Thank you, Trina Jo Bradley

**Trina Jo Bradley Valier, MT**

13. Thank you for the opportunity comment on the proposed grizzly bear relocation sites. Grizzly bears are expanding into areas where they have not been for over one hundred years. We have been working very hard for years trying to help these great, iconic animals to recover and expend back into their once home territory. I do ask the Commission to do the right thing for

the bears and have more relocation areas in the Bitterroot, Sapphire mountains and in the Welcome creek wilderness areas. Also, of paramount importance is to authorize wildlife managers flexibility in having emergency relocation sites. Where bears decide to go is not predictable. There are many variables that we do not understand that lead a bear to go here or there. The new trapping and baiting policies will bring bears into unintended areas. Flexibility is of paramount importance in regard to making certain we do our part to further their safe recovery. Patricia Ames Missoula, MT

14. November 21, 2021 Dear Fish and Wildlife Commission, Thank you for the opportunity to comment on proposed grizzly bear relocation sites. I am a resident of Ravalli County and I support all of the location sites proposed at this time. Please approve every single one. Sadly, the list falls short. Bear Specialists have quite a task on their hands. One never knows where or when a grizzly will turn up. Bear Specialists need flexibility and a variety of places to relocate bears that were just following their noses to easily accessible food sources. Food sources that could and should be better secured. Bears are roaming well beyond recovery areas and relocation sites should reflect that. The US Fish and Wildlife Service 5-year review specified that connectivity and genetic exchange as well as the occupation of the Bitterroot Ecosystem are key to full recovery and the delisting of the species. Please recommend that Fish Wildlife and Parks (FWP) identify for immediate approval new relocations sites in the northern part of the Greater Yellowstone Ecosystem, in the Gallatin National Forest, and the Western portion of the Beaverhead National Forest where bears have been documented. Please ask FWP to propose relocation sites in the Bitterroot Ecosystem and areas near where grizzlies have been documented wandering like the Sapphires, the Welcome Creek Wilderness area, the East Fork of the Bitterroot, and the Bitterroot Mountains between Lolo and Stevensville. Please approve all recommended sites. Everyone was caught unawares a few years ago when a bear showed up on the Stevensville golf course. There is no excuse for surprise now. Bears will and are showing up on the Bitterroot National Forest and in neighboring towns. It will happen again and when it does, Bear Specialists should not be left without options nearby. More distressing is the upcoming trapping season that allows for baited traps when grizzlies are not hibernating. It is likely that grizzlies will be lured into these traps in more remote areas where they have not been documented previously. Specialists need the flexibility to return the bruins to the same area where they have roamed and not caused any conflict or even been seen by people until a smelly, enticing piece of bait was left for them to find. The Commission should follow the expertise and experience of the Bear Specialists. They have been at it, many of them for 30 years or more. Create an emergency location clause that covers areas without sites. The emergency clause should allow them to create and use an appropriate, nearby, relocation site when necessary. Please follow the expertise of the scientists at FWP and allow for more flexibility by asking for relocation sites to approve in all the recovery areas and areas where bears have been documented. Bears that have not caused conflict and first strike bears should be returned to the general area that they know. If they are dropped in a new location, they will search for the easiest food source which will get them into trouble in the future like the Stevensville bear. He found a trailer filled with garbage in a relatively remote area. The bear was killed by bear specialists. Had he been relocated in the area that he knew, he might have fared better. It is unfortunate that attractants are readily available around homes and at transfer stations. This problem is easily rectified. People who wish to live near the wild places that

Montana offers, need to modify their behavior. Please recommend enforceable regulations concerning securing attractants in areas where grizzlies are and soon might be. We are Montanans, we live here for the wild and we are willing to do what it takes to preserve the wild places we love. Grizzlies are an iconic symbol of the wild that is Montana and we are one of only 3 states that have them. Thanks again for the opportunity to comment.

***Michele Dieterich Hamilton, MT***

15. In order to minimize grizzly conflicts, why aren't ideal grizzly habitats outside of these relocation sites being considered. The Bitterroot Ecosystem is an excellent example of high quality grizzly bear habitat that should be included in any relocation site plan. In addition, Montana is such a large state with a relatively small population so it makes no sense to limit grizzly bears to only certain sites in the western part of the state and not allow them to establish populations further east. Dispersing grizzlies across a larger range would concentrate fewer bears in areas with growing populations. Also, instead of concentrating so much of Montana's tourism dollars to regions near the two already big draws (YNP and GNP) expanding the bear's presence could also encourage visitors attracted to Montana's wildlife to spend their dollars in parts of the state that are losing population and economic opportunities. And finally, decisions of where to relocate grizzly bears should not be predicated on prevailing political whims, but rather on the science that informs where grizzly bears will survive and thrive.

***Barbara K Jones, Ph.D. Emigrant, MT***

16. Dear Commissioners: I strongly urge you to interpret and implement Senate Bill 337 in a manner that relies on the best available science and keeps politics out of wildlife management decisions. Please do not hamstring Montana's professional and highly experienced grizzly bear managers. They should be the ones that make the day-to-day decisions about where to relocate a conflict bear. Also, please do not limit relocation sites to just the existing recovery zones. This will lead to all kinds of problems, most importantly it will hinder improved connectivity between zones which data shows is critical to genetic diversity and the full recovery of this species. I have been fortunate to see and be part of the work-up of a captured conflict grizzly. I've seen how stressful it can be on bears, particularly sows and their cubs. While a brief capture period is a necessary part of the process, I do not want to see bears languishing for hours in culvert traps while bear managers and the USFWS scramble to get through the bureaucratic entanglement of identifying a relocation site and doing the actual release. We will undoubtedly lose bears from such a protracted process. Given all these concerns, I respectfully ask that you do the following: - Approve the proposed relocation sites submitted by FWP, including those both inside and outside of established recovery zones. - Add relocation sites to the Bitterroot Ecosystem. This region is a critical part of the puzzle for recovery and Montana (not to mention Idaho) has not done enough to help the trickle of bears moving through the area become a stable and healthy population. Thank you for your important work. I hope you will take my comments into consideration. Regards, Tina Zenzola

***Tina Zenzola Bigfork, MT***

17. They all look OK. We need this to be done asap for grizzlies in the Bitterroot Ecosystem, INCLUDING THE SAPPHIRES and various BE connectivity areas..

**Larry Campbell Darby, MT**

18. The grizzly bear recovery is one of the great success stories of the ESA. It is now time to delist the grizzly bear and let the states manage the species. If relocations need to happen, it should be done in a manner that does not impact the multi use concept of public lands and minimize bear conflict with other users of public lands including livestock grazing.

**Kris Descheemaeker Lewistown, MT**

19. Thank you for the opportunity to comment. I have an issue with the continuous relocation of a protected species at the expense of Montana sportsmen. If the Federal agencies want to have Grizzly bears on the landscape then they should foot the bill and find other states that had Grizzly bears in the past, (ie.) California, Washington, Oregon, etc. and relocate our abundance to these areas. I believe that this approach will help elevate the problem and get the Grizzly bears delisted from the ESA in a short period of time. Thank you for your time.

**Tim McKenrick Boulder, MT**

20. Hi, I've been in Libby for 20 + years and I work for the Forest Service so I'm familiar with your relocation of bears, BMUs, BORZ etc. I'd don't support relocation of bears close to community or population centers. Your relocation sites # 20, 52 and 27 look too close to community centers. Also, I'm concerned about how many bears are going to be planted here? How often is this going to take place? Bears cover a lot of ground and just because you plant them somewhere doesn't mean they stay. I'd like more info. on this. Also, I'm already concerned about the heavy restrictions that are in place when it comes to any kind of forest management practices occurring in BMUs and now the BORZ. The BORZ are also restrictive. I do not embrace more restrictions on our land management practices. This just opens federal land up to more lawsuits. I'm all for recovery of wildlife but I don't support how wildlife recovery and ESA have turned our federal lands into a political pawn and it has become exceedingly difficult to manage our own lands due to all the bear restrictions!

**April D Rainey LIBBY, MT**

21. Please include my comments in the hearing record. Grizzly bear managers need flexibility when deciding to relocate a grizzly bear. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones. Relocation sites in the Bitterroot Ecosystem should be added. Montana's bear managers have the most knowledge and expertise to evaluate each unique situation where relocation of grizzly bears is deemed necessary, and where a particular bear will have the best chance of success when relocated. The Commission should continue to rely on the management experience of state bear specialists when determining what sites should be approved for relocation, and should give bear managers the most flexibility by approving the highest number of relocation sites. All proposed relocation sites are in currently occupied grizzly bear range, and many have been used for years by bear managers. One of the components of successful recovery, as noted by the Ninth Circuit in reinstating protections for grizzly bears in the Yellowstone region, is genetic connectivity to other populations such as the Northern Continental Divide around Glacier. The Commission should support natural genetic connectivity by approving potential relocation sites

that are on the farthest edges of these recovery areas. FWP should identify, and the Commission should approve, more relocation sites in the northern end of the GYE in the Gallatin National Forest and west in the Beaverhead National Forest where bears have been documented and food storage orders are now in place. FWP should identify, and the Commission should approve, relocation sites in the Bitterroot Ecosystem, which is an identified grizzly bear recovery zone. Grizzly bears have been trapped and identified in that area, and the best option going forward for recovery in the Bitterroot Ecosystem is to return bears that are trapped within or on the edge of that ecosystem, back into that ecosystem. Thank you for helping protect Montana's wildlife!

***Ruth Swenson Helena, MT***

22. Thank you for allowing comments about grizzlies. The greatest threat to successfully relocating grizzlies is the shortage of information residents have about grizzlies. Our bear-proof container was attacked by a grizzly. The grizzly punched holes around the lid, but the container successfully prevented the grizzly from eating. We never saw a grizzly after the unsuccessful attack on our bear-proof container. Our neighbor a quarter mile away fed dogs on the porch. The dog food attracted a bear which had to be killed because bits of dog food was available on the porch. We treasure our Montana lifestyle, but grizzlies will no longer be part of our lifestyle if we make food available to bears. Relocating grizzlies without first helping people understand they can't allow bears access to food will result in the death of grizzlies. I've been blessed to watch seven grizzlies in Montana's wild places. I wish all Montanans could see grizzlies just being grizzlies. Without helping residents better understand grizzlies, the plans to relocate grizzlies will be a step towards the death of grizzlies in Montana. As humans we've reduced the population of grizzlies from about 50,000 to about 2,000 in the lower 48 states. Let's see if we can keep grizzlies alive in Montana. For those that hate grizzlies there are about 46 states where they can live without grizzlies. Let's keep grizzlies part of Montana. Your consideration is appreciated

***Lee Boman Missoula, MT***

23. We believe that FWP wildlife biologists use science to select the best areas for grizzly relocation. They should be able to act without the Fish and Wildlife Commission injecting politics into the process. We need less politics and more science dictating policies toward our iconic wildlife species. Montanans love our native wildlife heritage and we will fight to keep it.

***Gail and John Richardson Bozeman, MT***

24. Dear Fish and Wildlife Commission: Grizzly bear managers, with their experience, are the experts and the Commission should approve their suggested relocation sites. It will be important to keep in mind the long-term goal of connectivity between the Northern Rockies and Yellowstone ecosystems for maximum genetic diversity, and it is also important to allow some relocations in the Bitterroot area. Thank you for considering my comments. Jerome Walker, M.D., Missoula

***Jerome Walker Missoula, MT, MT***

25. Hi, Please allow FWP to judge each incident and make the best choice for each individual bear. Each situation is different and we need to give them the freedom to make the best choice possible for both the landowner and the animal. By limiting their options we are not allowing them to do their job which is to protect the wildlife that we as Montanas love and is part of the reason that we have tourism to our state. As a wildlife filmmaker I work on projects that help show the diversity of our state and we need to give FWP every option to help the wildlife. Thank you, Maaike

***Maaike Middleton Emigrant, MT***

26. The relocation sites must be selected based on the science of bear management and not made a political issue.

***Judy Moore Florence, MT***

27. Grizzly bear managers need flexibility when deciding to relocate a grizzly bear. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones; and Relocation sites in the Bitterroot Ecosystem should be added. Montana's bear managers have the most knowledge and expertise to evaluate each unique situation where relocation of grizzly bears is deemed necessary, and where a particular bear will have the best chance of success when relocated. The Commission should continue to rely on the management experience of state bear specialists when determining what sites should be approved for relocation, and should give bear managers the most flexibility by approving the highest number of relocation sites. All proposed relocation sites are in currently occupied grizzly bear range, and many have been used for years by bear managers. One of the components of successful recovery, as noted by the Ninth Circuit in reinstating protections for grizzly bears in the Yellowstone region, is genetic connectivity to other populations such as the Northern Continental Divide around Glacier. The Commission should support natural genetic connectivity by approving potential relocation sites that are on the farthest edges of these recovery areas. FWP should identify, and the Commission should approve, more relocation sites in the northern end of the GYE in the Gallatin National Forest and west in the Beaverhead National Forest where bears have been documented and food storage orders are now in place FWP should identify, and the Commission should approve, relocation sites in the Bitterroot Ecosystem, which is an identified grizzly bear recovery zone. Grizzly bears have been trapped and identified in that area, and the best option going forward for recovery in the Bitterroot Ecosystem is to return bears that are trapped within or on the edge of that ecosystem, back into that ecosystem.

***Rochelle Gravance Columbus, MT***

28. We have a cabin in Mortimer Gulch near Gibson Reservoir, along with many other people that both recreate and live in the Sun Canyon. Relocating troubled grizzlies to site #273 may result in higher than desired probabilities of continued trouble. I'd propose removing site #273 from consideration.

***Chad Searle Wilsall, MT***

29. There should be no relocation of grizzly bears in Montana. They are becoming over populated and need to be delisted and managed properly. There has been too many bear mauling

incidents and way too much livestock depredations. Grizzly bears are interfering with way of life for Montanans.

***Justin Boulder, MT***

30. Dear FWP Commissioners, I am asking that you approve all of the proposed Grizzly Bear relocation sites inside and outside of the the recovery zone. I live in northwestern Montana near Glacier National Park. I am asking that you approve all of the proposed Grizzly Bear relocation sites which will have a huge benefit in safety, and time management. By doing this, it will provide wildlife staff with more options in which to transport and relocate a grizzly much quicker. It will create a safer, less stressful situation for grizzlies in transit, and for FWP staff, and they can be transported in a time sensitive manner faster which will be a huge time management savings to FWP instead of endangering the grizzly by driving long distances, and using up a large amount of time and man power of FWP. Approving these relocation sites is an enormous benefit to all! I am not in favor of not relocating grizzlies in conflict that are in non recovery zones. They like grizzlies in recovery zones should be safely transported to relocation sites without harm. Thank you for your time. Best, Carolyn Hall 1603 Fran Lou Park Lane Columbia Falls, MT 59912 406-823-0526 [carolynhall1998@gmail.com](mailto:carolynhall1998@gmail.com)

***Carolyn Hall Columbia Falls, MT***

31. Grizzly bear managers need flexibility when deciding to relocate a grizzly bear. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones; and Relocation sites in the Bitterroot Ecosystem should be added.

***Ruth Swenson Helena, MT***

32. Hi, as a resident of Trout Creek Montana I am totally 100% against the relocation of grizzly bears all around my property! I asked that you would please take into consideration the families that live through out here that have children,pets and livestock and not release grizzlies that would harm our children and animals. This is the last thing we need here and Sanders County! Please respect the citizens here and do not release grizzly bears on the residence. Mary

***Mary reed Trout creek, MT***

33. Please approve FWP's proposed grizzly bear relocation sites and also add sites in the Bitterroot ecosytem. Bear managers need maximum flexibility in choosing sites for effective relocation. Thank you.

***Milla L Cummins Livingston, MT***

34. MT FWP biologists and wildlife personnel need flexibility when relocating grizzly bears. Please, Commission, approve FWP's list of relocation sites, both inside and OUTSIDE of recovery zones. Also, there needs to be relocation sites within the Bitterroot Ecosystem. Thank you, Matt Holloway 836 10th Street West Columbia Falls, MT 59912

***Matt Holloway Columbia Falls, MT***

35. Grizzly bear managers need flexibility in relocating and not killing Grizzly bears. Also, include and add sites they can be relocated to, such as the Bitter Root Valley. FWP know good locations for

these bears and should be able to work together for the benefit of these bears. Humans have to observe laws regarding any wild animal, stricter laws and enforced. Example: Yellowstone. I like the Bears, but respect them. Please do not force these beautiful animals into a reservation per say. They deserve freedom, and respect.

**Annette SmithGr Anaconda, MT**

36. Please accept these comments from the Ninemile Wildlife Workgroup (NWW) on the proposed grizzly bear relocation sites. The Ninemile Wildlife Workgroup is a group of Huson/Ninemile/Alberton residents and other parties committed to promoting knowledge and stewardship of wildlife and habitats within these communities and surrounding public lands. Details about us can be found on our website: <http://www.ninemilewildlife.org/>. Our mission area is in an important connectivity area between the large Bitterroot (Selway-Bitterroot Wilderness) and Crown of the Continent (Bob Marshall Complex Wilderness) ecosystems. We have been working to strengthen this biological bridge to enhance wildlife movement and genetic exchange between these vast islands of security for far-ranging species of wildlife to persist. Habitat loss due to fragmentation and isolation caused by human activity—which impedes movement and alters local climate and cover—is a major cause of extinction or local extirpation. The Ninemile Wildlife Workgroup’s area of interest and the portion we are most knowledgeable about is the Ninemile Demographic Connectivity Area (DCA) and the area surrounding it. Our comments will focus on that area. The Ninemile Demographic Connectivity Area was created in part to support occupancy by female bears and allow movement to the Bitterroot recovery zone. The bridges between the Ninemile and Petty Creek exits on I-90 allow for easier passage for large animals such as grizzly bears to cross from one side of the interstate to the other without the risk or fear of crossing the four lanes of the interstate. Bridges, even though not necessarily designed for wildlife passage can facilitate movement such as was demonstrated with grizzly bear 11072874 near Drummond in 2020—2021 who finally crossed the interstate by going under a bridge after many apparent futile attempts to go south over the interstate. There are 41 wildlife crossings on the Flathead Indian Reservation between Evaro and Polson that go over and under highway 93, many of them adjacent to the Ninemile DCA. According to June 20, 2013, Missoulian article, in 2011, game cameras documented 22,466 animals moving through the passages. That’s up from 12,022 critters in 2010. The tally included 25 species – grizzly bears, river otters, badgers, elk, and bobcats among them. “Over four to six years, we expect to see increasing use,” said Marcel Huijser, a research ecologist from Montana State University who’s gathering data on the crossings. The NWW would like to see a wildlife friendly bridge constructed where Sixmile Creek crosses underneath the interstate highway to facilitate wildlife movements across I-90. The Ninemile Demographic Connectivity Area supports grizzly bears that are frequently sighted along the Reservation Divide and occasionally noted in the lower valley as documented by photos and radio telemetry. Citizens here value wildlife connectivity and have been working to improve habitat and conditions favoring wildlife movement. Looking at an ownership map, you will see that contiguous Federal, State and Tribal lands comes closer together in the Sixmile/Ninemile area than anywhere else in Missoula County along the I-90 corridor. This provides wildlife the best opportunity to move between the Northern Continental Divide Ecosystem and the Bitterroot Ecosystem, which include two of the largest wilderness areas in the continental United States, with minimal threat of future



development that would lessen connectivity potential. The Ninemile DCA is centrally located between the Northern Continental Divide, the Selkirk, the Cabinet-Yaak, and the Bitterroot ecosystems. The Nature Conservancy's Montana Legacy Project has greatly increased the amount of protected state and federal land from former Plum Creek timber lands. If you look at the Legacy Project's maps (<http://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/montana/placesweprotect/montana-legacy-project.xml>), you can see that land transfers contributing to wildlife connectivity effectiveness of the Ninemile DCA include the Mill Creek, Fish Creek and Lolo Creek areas. This project has transferred over 300,000 acres to help to block up public lands so habitat will not be fragmented and connectivity between ecosystems will be enhanced. Private landowners within the Ninemile DCA have been working to maintain and improve conditions for wildlife. A large percentage of the private land in the Ninemile and Sixmile Valleys is protected by conservation easements held by Montana Land Reliance, Vital Ground Foundation, Rocky Mountain Elk Foundation, and Five Valleys Land Trust. These private landowners have voluntarily retired their development rights to protect wildlife habitat from fragmentation for now and into the future. The Nine Mile/Remount Weed Management Area created in the 1990's has received multiple grants from the Noxious Weed Trust Fund to combat noxious weeds and enhance ranch and wildlife habitat in the valley. Trout Unlimited, in partnership with individuals and government agencies, has restored many former mining sites along tributaries and portions of the Ninemile Creek improving riparian and aquatic habitats for multiple species. The Ninemile Wildlife Workgroup established a Bear Aware Program in 2009. We educate residents about living safely in bear country through meetings, newsletters, our website and our Facebook page. We operate a bear alert program that notifies residents through emails when there are problem animals in the area. The Ninemile Wildlife Workgroup along with multiple partners received a grant through the Missoula County Resource Advisory Committee to place bear resistant garbage cans in a large portion of the Sixmile and Ninemile Valleys. The Elk Meadows Homeowners Association has also constructed a bear enclosure around their dumpsters to keep bears away from attractants. Most of Sixmile Creek and much of Ninemile Creek now has bear resistant garbage containment. Defenders of Wildlife, along with partners that include the Ninemile Wildlife Workgroup, have provided monetary and technical assistance to place electric fences around bear attractants such as orchards and livestock. These actions, along with the Lolo National Forest Food/Wildlife Attractant Storage Special Order F11-005, help to prevent human/bear conflicts within and near the boundaries of the Ninemile DCA. All of these efforts by numerous private citizens, government agencies, organizations, and the Confederated Salish Kootenai Tribal government have maintained or enhanced the potential for grizzly bears, other wide-ranging carnivores and a host of other wildlife species to more safely utilize the Ninemile DCA as a steppingstone for moving between the large, protected areas of the Northern Continental Divide, the Selkirk, the Cabinet-Yaak, and the Bitterroot ecosystems.

Recommended Release Sites—Because of our area of interest and the connectivity importance of the Ninemile DCA, we ask you to consider connectivity needs between the NCDE Recovery Zone, Ninemile DCA and the Bitterroot Recovery Zone. We support the use of the release sites north of the Blackfoot River and to the west. Sites 123, 124, 125, 126, 67, and 69 would move bears close to the DCA. Sites 188 and 208 are both within the DCA. Use of any of these sites would increase the possibility of genetic exchange between ecosystems that may be critical for

grizzly bear long term survival. If you are considering other sites that may be appropriate for release, we would suggest some sites west of Missoula and south of I-90 that could facilitate movement towards the Bitterroot Ecosystem, and near Siegel Pass at the head of the Ninemile Drainage for the above stated reasons. The Board of Directors of the Ninemile Wildlife Workgroup appreciates this opportunity to comment on grizzly bear release sites and welcomes your consideration.

***Pat Sweeney Huson, MT***

37. I feel that FWP is just kicking the can down the road as far as relocating bears. The inevitable is that bears have to come off the endangered list and be dealt with accordingly before more lives and property are lost. Objective numbers have been accomplished and we have nothing more to look forward to except more problems. Common sense allows that bear conflict will only get worse with more population. And bear advocates need to realize that The more bears the more problems and if the problem bears are just killed, why increase the numbers? This issue has become a big problem for Livestock owners, homeowners, hikers, hunters and other recreationists who have to fear for their lives while out enjoying the outdoors .I feel it is time to be content with the number of bears we have and allow them to be hunted so that conflicts will be fewer and bears will adapt to the country they are best suited for, away from livestock and people. Thank you for allowing me to comment.

***Chris Carey Boulder, MT***

38. Montana's Livestock Loss Board is opposed to any grizzly bear relocation sites outside of the core recovery areas. This includes the zones adjacent to the core recovery areas due to predation occurring within these zones. Livestock depredations from grizzly bears has steadily increased each year placing a financial hardship on ranchers and Montana taxpayers. Our funding to pay livestock loss claims is from the state general fund. We have had to ask legislators to increase funding just four years ago and at the current rate of depredations, we will need to ask for an increase again. At some point payments for loss claims will outstrip our funding to pay loss claims. Our board has been asked to pay a multiplier for losses which cannot be confirmed. This is for the increased livestock losses that cannot be verified because of a lack of evidence. Only a portion of livestock loss are found in time to obtain a verification before the animal is fully consumed.. We do not have funding to pay a multiplier and ranchers are suffering losses beyond what our board is able to pay. Our board has been told of grizzly bears being relocated only to have them eventually return to the same area where the predation originally occurred. Some of these relocation sites have been in the zones outside of the core recovery area. Please do not approve any relocation sites on private or public lands near any site where livestock may be located. We also encourage FWP to provide funding to USDA Wildlife Services for their efforts to trap problem grizzly bears. They are the first responders to livestock predation. Currently only the Livestock Loss Board has provided USDA Wildlife Services any state funding and that is primarily for their investigation work related to livestock loss. Ranchers provide approximately 45% of their funding with the remainder being federal funding. Helping to fund USDA Wildlife Services for their grizzly bear work would go a long way toward fostering a better relationship with landowners.

***Livestock Loss Board Helena, MT***

**39.** These bears are recovered. Montana has plenty of grizzly bears!! We do not need them in towns & peoples home sites. More people are going to die just like the lady in Ovando. This is what is already happening. The bears DO NOT NEED to be relocated. If it isn't working for the bears where they are living then you need to manage that area. They need delisted & not relocated.

***Sandra Carey Boulder, MT***

**40.** Please leave this critical task to those who can assist with the longevity of this animal

***Meagan Dailey Bozeman, MT***

**41.** Grizzly bear managers need flexibility when deciding to relocate a grizzly bear. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones; and relocation sites in the Bitterroot Ecosystem should be strongly considered

***Mary Owens Lolo, MT***

**42.** Regarding SB337 The locations for releasing grizzly should be in the hands of experts and not commissioners Putting the decisions for relocating bears could delay their release and keep them caged for multiple days while decisions are being made by non wildlife individuals Locations for release are based on local populations and densities of grizzlies which requires scientific tracking and a thorough understanding l've grizzly behavior Please leave the management of grizzly releases in the hands of our wildlife managers Thank you

***Nicholas Gistaro Bigfork , MT***

**43.** I am in support of FWP having the flexibility to relocate grizzly bears where the SCIENCE says is the best choice, including the Bitterroot. At times, these iconic bears have been relocated to areas that do not provide for connection, further endangering the species. Thank you.

***Peg Brownlee Florence, MT***

**44.** It is important to follow FWP biologists suggestions on the bear relocation sites. It is important to have multiple sites which can be accessed. Please don't let politics or social pressures dilute the ideal relocation sites.

***Mike Mershon Billings, MT***

**45.** Dear Commissioners; Please follow the recommendation of the harding working bear managers when addressing release sites for grizzly bears. It is imperative to follow the science and honor the local expertise in successful relocations. Bear managers know personally and work closely with locals; this is the best possibility for successful release of bears. Please also add the Bitterroot area to potential release areas. Bears have already been confirmed in this area. Their presence in the Bitterroot is an important piece in re-establishing the connectivity of grizzly bear populations which will greatly aid in the long term genetic health of this endangered species. Thank you for your consideration.

***Dr. Suzanne Daniell Hildnerr Witefish, MT***

46. Please reject this relocation restrictions and allow bear experts more freedom to relocate according to science and data

**Salvatore vaspol Bozman, MT**

47. SB 337 is SO wrong! They need to allow the bear managers to decide where to relocate the grizzlies. These biologists KNOW the bears and which areas are best suited for relocation! If left to the hands of a group of political thinking commissioners, the poor bears will have to sit for days in a cage waiting for someone who knows nothing about relocation. This is bad for the bears and everyone involved! Things should continue the way they have been....allow the managers to put the bears where they can thrive. The FWP relocation sites should be approved along with the addition of the Bitterroot area. PLEASE do the RIGHT thing and allow the bear managers the flexibility to make the decision of where the bears go!

**Peggy Brewer Bigfork, MT**

48. Grizzly bear managers need flexibility when deciding to relocate a grizzly bear. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones; and Relocation sites in the Bitterroot Ecosystem should be added. Let's leave the decisions with science based data and out of the political arena- PLEASE!!

**Gin Miller Missoula/Seeley, MT**

49. Thank you for the opportunity to provide my comments on the proposed grizzly relocation sites. Grizzly bear managers need flexibility in any decisions involving the relocation of grizzly bears. The Commission should approve FWP's proposed relocation sites, both inside and outside of established recovery zones. In addition, relocation sites in the Bitterroot Ecosystem should be added.

**Mark Roberts Superior, MT**

50. No maps provided to review for the Cabinet-Yaak Ecosystem (CYE)... Why Not!?!?

**Scott Troy, MT**

51. I attended the meeting in Libby several years back with the IGBA. I made a suggestion then, if California is the Great Bear State, why do they not have any bears? The Fish and Game needs to stock Yosemite Park with Grizzlies. I ask the biologist there why they did not do that. Their answer was barely audible, "We thought about it." Well if it was good enough to think about it, and I was good enough to bring it up again, why not do it?

**Gerald Cuvillier Trout Creek, MT**

52. FWP and other agencies must focus more on delisting in the GYE and NCDE where most bears will need to be relocated due to grizzly bear populations exceeding carrying capacity. Food conditioned bears may become more dangerous to people and should not be relocated except within wilderness areas. Do not relocate any grizzly bears to the Bitterroot, let the bears re-colonize on their own to avoid future conflicts. NO more grizzlies should be released in the Cabinet/Yak locations 9 -16 are pretty much our backyard. We have a high volume of predators (mt. lions, wolves, black bear and coyotes - and grizzlies!) and ever decreasing ungulate

populations. I hear CA would like grizzlies, perhaps we should send them some of ours! There's plenty! Thank you, Stacy Kandel Whitepine/Trout Creek, MT

***Stacy Kandel Whitepine, MT***

53. Remove proposed relocation sites 210, 209, 207 from the NCDE SOUTH due to probable future conflict, each of these sites poses significant risk to humans and agriculture operations for the following reasons. Known data indicates conflict increases during long term natural food source shortages that may be caused by drought, large scale intense wildfire, diminished prey populations, etc. these shortages would likely change grizzly bear food habits therefore no bears should be relocated in these areas or during or after these events. Very old bears are prone to seek anthropogenic food sources even if they did not do this during their younger years, therefore they should not be relocated within proximity to livestock or farming operations. General comments concerning relocations: Any relocation must consider grizzly bear influenced human challenges, FWP and other agencies should not be so imbued with rushing to recovery that their decisions cause harmful after-effects to people's lives. FWP and other agencies must focus more on delisting in the GYE and NCDE where most bears will need to be relocated due to grizzly bear populations exceeding carrying capacity. Food conditioned bears may become more dangerous to people and should not be relocated except within wilderness areas. Do not relocate any grizzly bears to the Bitterroot, let the bears re-colonize on their own to avoid future conflicts.

***Keith Kubista Stevensville MT, MT***

54. Relocation of grizzly bears should be restricted to wilderness areas only to reduce human conflict. Relocation should not occur in the Bitterroots or Sapphire mountains as bears are inhabiting these areas on their own. Also these areas are close to major human inhabitations and will endanger livestock and human recreation.

***Paul Rossignol Lolo, MT***

55. You should not be relocating grizzlies outside of the recovery zone boundary. If bears cause problems they should be destroyed rather than relocated.

***Marcus Byler Bonners Ferry, ID***

56. Absolutely disagree relocating these killer bears within all sites in cabinets, Yaak and surrounding areas. The bears should be poisoned.

***Thomas J Schneider Kalispell, MT***

57. Site 20 and 21 one are located in Cattle Grazing allotments. They are also near a housing subdivision on private land. Site 19 is near the Cottonwood drainage. This area is in a cattle Grazing allotment that has lost numerous cattle to grizzly bear depredation in the past several years. More bears here would only increase the problem, and would expand the problem in the area. Site 20 is near a lot of housing. Site 18 is in a cattle grazing allotment. Relocating PROBLEM Bears to these sites would only increase the Depredation and human interaction problems. Bears need to be relocated to wilderness areas, far from grazing and housing. Grizzly bears in the Gravelly Mountains already cause a lot of problems, depredation, human incidents

and added cost and stress of working in Grizzly Bear areas by humans. These sites should be eliminated from consideration.

**Arthur Hall Sheridan, MT**

58. I would encourage the agency to expand relocation areas to any remaining areas capable of maintaining sustainable grizzly habitat, focusing only on science and ecology. Social, political, and economic values and impacts should be secondary to habitat considerations.

**Larry Mitchell Helena, MT**

59. Please do not bring more Grizzlies to more places of our backyard here in the northwest corner of Montana. If your truly relocating them to prevent conflict you will be doing the exact opposite by bringing putting them in these new locations. Relocating them here would not benefit the people or the Grizzlies. Put them at the state capital or in missoula. We dont want them here and they dont want to be here.. ita a no brainers and a win win. Stick with the original places. Take them to the plains areas so people can see them before it's to late to save themselves. Stop creating more problems. You should highly consider not releasing grizzlies in these proposed areas.

**Kimberly Klin Libby, MT**

60. The outcome of this will not be favorable for the bears or the people. Keep the bears in the current designated recovery zones.

**Don Libby, MT**

61. I do not believe we need additional Grizzly Bear relocation sites in the Troy area. In my view, if the Grizzly Bear population is growing more than the current relocation sites can support, then the Grizzly Bear population should be reduced. Plenty of hunters would love to harvest a Grizzly. In my case, I already gave to deal with what is likely a Black Bear on my land which likes to eat from my apple trees and pear tree. I don't want to also have to deal with a Grizzly. They are much more dangerous.

**Dean Erickson Troy, MT**

62. Not all Forest Service personnel that need to be informed on the location sites were notified. Transportation Planners, Engineering, and Wildlife biologists need to have been contacted to coordinate these locations. All areas that are a Bear relocation sites need to be posted to warn the public before and after they are released. Several of your listed location sites on the Cabinet Ranger District have problems. Location sites #1, #2, #4, #5 are in Bear Management Zone 4 which is out of compliance and these areas are currently under the NEPA process to possibly close Roads #1118-Dry Creek, Road 2272 - Berray Mountain, Road 2289 - Goat Rocks or Snake Pass area that has been used in the past for relocation, and some road's location in the Government Mountain Area are also going to be affected. Your locations are too vague from this map. If these closures happen these roads would be bermed and your location sites would need to be changed. These possible closures are due to FWP guidance on secure habitat needed for grizzly bears that the FS must comply with. Site #1, #2, #3, and #4, are Trail heads that are used a lot by recreationist. I do not agree with letting Confused Grizzly Bears go at Trail heads. Site #1

is also the route into a lookout tower. #7 Willow Creek is a Campground location for the FS. I don't agree with this location either. Site #10 Grouse Mountain dot is in the wrong location on the map. The dot is in Marten Creek and the dot needs to be south of Vermilion River. Sites #12, #14, #15, #16 should NOT be considered because these areas are outside the BORZ and CORE areas. By letting them go in areas that are not designated as BORZ or CORE already then you will be creating more Habitat for Bears and which will result in FWP forcing the Forest Service to close more roads to the public. The public already HATES the Forest Service, and this will cause more hate and destruction of government facilities (gates, berms). #13 dot Vermillion Pass on the map is in the wrong location. The pass is between sites 7 and 55. #26 Silver Butte Divide dot on the map is in the wrong location. It should be located south of dot #25.

***Mickey Carr Trout Creek, MT***

63. No. To many grizzly bears around Libby now. Just another excuse to gate more public roads. Someone is going to get killed. You guys need to be held responsible. You know the more bears the more conflicts will happen. We the people are fed up!

***William Hoffman Libby, MT***

64. Proposed relocation site 50 is way too close to a number of homes along O'Brien Creek. Any plan to increase the number of grizzlies in the area will pose a risk to residences along the creek. Also, will the impacted residents be individually notified in writing before this proposal comes up for approval?

***Vincent Lapi Troy, MT***

65. Ones near Lake Koocanusa are a bit close to where a lot of people vacation. People who don't know bears. Seems a bit careless on your part to want to put them there.

***Cathleen Broers Libby, MT***

66. First I want to thank you for the opportunity to express my opinion of Grizzlies in and around Troy. I grew up in Troy and even when I was a kid, I remember seeing tracks in our yard 4 miles south of Troy on Iron Creek. I know bears have been here for a long time and most often are not seen or heard which is fine. But lately, it seems they are being seen more and more and closer to town. I know someone this summer who took a picture of a grizzly on the hill right above the high school. I have some close friends who moved here from Florida and had always dreamed of hunting elk. I showed them a wallow in August in the drainage above the Kootenai falls Rec area where a game cam was placed. All we got pictures of were Grizzlies, black bears, and cougar. I would hope you would by now begin to understand our frustration as the public and having these bears (and wolves) pushed on us all these years and now, they seem to be closer than ever and far more brazen. So the point I make is this: When is enough enough? Bears are great, but relocate them further out at least. Logic tells us they may not stay there, but one of your relocation dots is practically IN my yard. C'MON GUYS!!!

***Ward Davis Troy, MT***

67. There are enough relocation sites already. Many of the new proposed sites are near hiking trails and residential areas. Please reconsider. Thanks.

**Stephanie Fredin Libby, MT**

68. It is insane to think you would move bears into the Yaak Cabinet recovery area from outside places. This area is overrun with bears now. We had six grizzly bears in our neighborhood less than a mile from the middle school, in just the last three weeks. You are asking for trouble.

**Phil Soucy Libby, MT**

69. No we don't need or want anymore bears. 90% of the people don't want them. We have more than we need. And putting them close to people is stupid your going to get the bears killed. Don't get me wrong grizzlies are my favorite animal.

**Robert Viergutz Libby, MT**

70. Cabinet/Yaak Sites 50,51 and 53 are in a populated area and they are not good sites for the bears.

**Rebecca Osborne Troy, MT**

71. I feel that this list of new relocation area's will most definitely NOT end up good for the Bears!, Becsuse it's NOT good for the people!. These area's are way too close to town, the newest proposed ones!,and some of them, near people's homes. It seems as if someone is wanting trouble?!!!. You would be forcing the hand of civilians to protect themselves,and families against these relocated bears. You can't put Grizzlies in people's yards, and near town,and too close to schools etc..

**Brenda Rowberry Troy, MT**

72. I may be in the minority but I think this area would be good habitat for a few more Grizzly Bears.

**Victoria Johnson Troy, MT**

73. Relocation of grizzlies to the Noxon area would be a very unsafe thing to do. This area is popular with tourists and there are many homes in the area. I personally do not want to have grizzlies added to the already long list of predators in the area. The public lands should remain open in these areas and grizzlies need to be relocated to areas without so many people.

**Tammy Donnelly Noxon, MT**

74. I agree with all relocation sites. We definitely need more grizzlies in the Cabinet Yaak ecosystem.

**Tony Johnson Troy, MT**

75. **Kevin Christensen Libby, MT**

76. Cabinet mountains by libby will put the bears right in town, your inviting confrontation. You better think this thru, you might hurt the bears more then helping them. Last fall a sow with two cubs was right next to the golden coase. They are coming in and feeding on the hunters scraps.

**Randy Stufflebeam Libby, MT**



77. I am concerned with relocating bears within short distances of populated areas. I would support relocation areas no closer than 10 miles of private lands/industrial timberland. In particular, locations 27, 50, 51, and 53 should be dropped from consideration as the likelihood of human interactions would seem high. Thank you for the opportunity to comment.

***Bruce Rowland Libby, MT***

78. I support the grizzly bear relocation sites as proposed by FWP. The biologists at FWP and partnering agencies have, over the years, worked out where the best release sites are, based upon human and bear safety as well as multiple biological considerations. I encourage the F&G Commission to approve the sites as proposed. Thank you, Steven Kloetzel

***Steven Kloetzel Ovando, MT***

79. Having absolutely no idea of their history, science or potential issues why aren't there relocation sites farther west? Mineral and Sanders Counties? Mineral is over 90% public land anyway.

***Pelham Monte Turner Superior, MT***

80. Move them to California to bring back their Grizzly Bear Population there. We don't need anymore Grizzly Bear here in Montana. The other is open a season on them.

***M A Matteson Missoula, MT***

81. As pointed out by a vague statement from Mt FWP, the Grizzly Bear program is Not funded by the managing agency which would be USFWS. Relocation of bears has nothing to do with genetic Diversity nor augmentation of an already sprawling population. This population is so spread across Mt that USFWS refuses to count bears outside their comfort zone and even then they use computer modeling to count. Sportsman dollars used by FWP to perform management of Bears for USFWS is a gross misuse of those dollars and can only lead to mistrust by the sportsmen that pay into the program. As the USFWS has no direction toward delisting there should be no obligation for the state to perform a task that is costly and potentially a liability risk that can only end up costing the department a lot of money and more importantly someone's life. There is NO suitable site for bear relocation except possibly inside the two Federal parks and only if the USFWS performs the moves and monitors the movement of the Bear to keep those bears inside the Park boundaries. The result of FWP's continued relocation program will lead to further intolerance by the public that has to live with the bear and a reduction of the overall population of the Grizzly Bear. Respectfully, David McEwen

***David McEwen Galata, MT***

82. All problem bears should be euthanized, not relocated. People are dying as a result of overpopulation of grizzly bears. These ferocious predators need to be kept at the minimal population required to prevent extinction, and no more. Season after season FWP warns Montanans that grizzly bears are making use of more and more human habitat. This is an admission of the danger wildlife officials are putting us, Montanans, in. We are told to carry bear spray, even on the plains now. How many more people must die or be horribly disfigured before wildlife officials finally admit that they serve out-of-state interests only, by allowing

grizzly bear populations to rise to dangerous levels, threatening all outdoorspeople in Montana, including those whose dollars support our economy. Keep the bears in Yellowstone.

***Christopher O Murray Billings, MT***

83. Why would anybody want them by Deer Lodge? Just trying to put them in very popular hunting area to encourage hunter encounters?

***Andrew Poskaitis Anaconda, MT***

84. I do not believe grizzly bears should be relocated anywhere in the proposed NCDE South zone. Why would we dump problem bears into an area outside of the recovery zone? We need places that we can hunt, hike, and camp without fear of getting our faces eaten off by a predator in the middle of the night....

***Dan Missoula, MT***

85. With the quantity of these bears now appearing in Montana I suggest due to the folks wanting to protect them until they get to the plains of Montana, and they have more rights than the average person they should be relocated in places like San Francisco, Beverly Hill, CA, San Jose California, Chicago, IL, Washington DC Mall downtown Denver, uptown Helena. By relocating the animals to these locations the people wanting them can enjoy them 24/7. Good luck I do not think relocation will do much good quantity will overcome space and then they head east for the plains area of Montana.

***John Turcotte Billings, MT***

86. They need to be released in the backyards of the people who are trying to keep them on the endangered species list along with the wolf lovers

***Andrew Lenik Finleyville, PA***

87. I do not agree with the additional relocation sites on the Kootenai National Forest. Public Safety is at risk and the increasing numbers of bears on this forest is becoming to be problematic. It is time to find an additional ecosystems that support bear habitat. (Not on the Kootenai N.F.) Increasing the numbers of relocation sites is increasing the risk to local residents, visitors, workers, etc. With the increased numbers of population within the rural communities you increase the probability of encounters, attacks, loss of livestock, and potential fatalities. It is truly time to manage the numbers to reduce these risks. Other states have similar ecosystems that would suffice and support additional or initiating the habitat. The rural communities of Libby, Troy, and Eureka are growing substantially which no longer supports an increasing number of predators for relocation. Each bear (depending upon gender) need 300-600 miles square miles of range. You have now began to overlap and over-populated the Kootenai National Forest where we are starting to see an increase of activity in areas the bears should not be. Too many bears on one forest is a recipe for disaster, causing harm to those trying to recreate and enjoy the forest or their community. I do not support an increased number of relocation sites on the Kootenai National Forest due to impacting recreation, livestock, and mostly PUBLIC SAFETY. It is time to find a different state if the bears are truly needing to be relocated.

***S. Ray Libby, MT***

88. Please stop shoving these grizzly bears down our throats! Until this population is hunted and develops a fear of humans, it makes no sense to relocate them. Problem bears should be removed from the population instead of making it someone else's problem. I have a young family and we camp near many of these proposed relocation sites and the last thing I want are the woods full of problem bears. Last year, a woman was killed in her tent in the town limits of Ovando, just wait until it's someone's kid that gets killed. Please use common sense with grizzly bears and keep them in the wilderness and national parks, but not outside those areas.

***Dan Gagner Helena, MT***

89. The proposed relocation sites look good to me. Hopefully it will help with grizzly bear movement and possible keeping some new DNA floating around. For us to get more bears we have to give them the spaces they need.

***Dorian Boling Libby, MT***

90. I do not support any proposed Grizzly Bear relocation sites. I support destroying problem Grizzly Bears as opposed to relocating them.

***Kyle Weaver Kalispell, MT***

91. Save our Grizzlies

***Manny Zanger Roscoe, NY***

92. We don't need any relocation sites 200 201 202 in Whitetail basin area. These areas are inhabited with livestock and will only cause problems. There are already some grizzlies in there. I am not a cattleman nor do I work for one. I have been around grizzlies north of Yellowstone most of my life and I don't understand the need to have them everywhere other than to create jobs for government employees.

***Don Drake Whitehall, MT***

93. I object to any proposal to relocate grizzly bears in the O'Brien creek area northeast of Troy. There are a number of residences along obrien creek that could be negatively impacted. I would also like to see a more active effort by the FWP to notify individual property owners in writing when such plans are being proposed.

***Vincent Lapi Troy, MT***

**From:** [Trever, Kathleen](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Comment on MFWP Proposed Grizzly Bear Release locations  
**Date:** Monday, November 22, 2021 4:30:23 PM  
**Attachments:** [Montana Proposed Grizzly Bear Release Locations 22Nov2021 idaho signature.pdf](#)

---

Please see attached on behalf of the Idaho Governor's Office of Species Conservation and Idaho Department of Fish and Game.

Kathleen E. Trever  
Deputy Attorney General  
Office: (208) 287-2710

*The information contained in this email may be privileged, confidential or otherwise protected from disclosure. All persons are advised that they may face penalties under state and federal law for sharing this information with unauthorized individuals. If you received this email in error, please reply to the sender that you have received this information in error. Also, please delete this email after replying to the sender.*



Idaho Governor's Office of Species Conservation

304 N. 8<sup>th</sup> Street Ste. 149  
Boise ID 83702

Mike Edmondson  
Administrator



PO Box 25  
Boise ID 83712

Ed Schriever  
Director

---

November 22, 2021

Montana Fish Wildlife Parks  
Attn: Wildlife Division  
Via Email: [fwpwld@mt.gov](mailto:fwpwld@mt.gov)

Re: Montana Fish, Wildlife & Parks' Proposed Grizzly Bear Relocation Sites

The Idaho Governor's Office of Species Conservation and Idaho Department of Fish and Game have reviewed the draft grizzly bear relocation sites for ESA-listed bears recently shared for public review and comment by Montana Fish, Wildlife and Parks. Experience tells us that relocation of grizzly bears has the potential to increase bear-human conflict and expand bear distribution, including expansion into habitat known or expected to be unsuitable for the long-term. When agencies consider relocation of bears because of undesirable behaviors posing risks to public safety or property, there is increased sensitivity regarding potential release locations.

Increased grizzly bear conflict has practical consequences to our agency wildlife management resources. In addition, range expansion and conflict occurring outside of identified ESA recovery zones has greater potential to reduce local community support for grizzly bears in the Northern Rockies, including in Idaho.

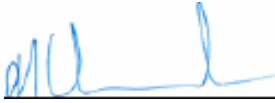
Our agencies are especially concerned with Montana's proposal for multiple relocation sites outside of identified ESA recovery areas. We are concerned that relocation to such sites is likely to increase conflict potential. Such conflict potential, in combination with human-aided range expansion, is likely to be detrimental to the conservation efforts our respective states have supported through participation in the Interagency Grizzly Bear Committee (IGBC) and other interstate coordination efforts. Of particular concern are the relocation sites entirely outside of current grizzly bear range, or at the edge of current range, particularly along our mutual border, or in areas long identified as unsuitable habitat (such as the "keyhole" in the Cabinet-Yaak Recovery Area and other valley communities excluded from Recovery Zones).

Potential relocation sites outside of identified recovery areas merit further discussion among our respective state wildlife management agencies and federal wildlife and land management agencies, to assess the consistency of relocation sites with IGBC guidelines, and their potential to increase conflict.

Should the Montana Commission consider approving grizzly bear relocation sites outside of identified suitable habitat in ESA recovery zones (*e.g.*, outside the GYE Demographic Monitoring Area, Cabinet-Yaak or NCDE Recovery Areas along the Montana-Idaho border), we ask that some discussion occur among our respective agencies before taking final action.

If you have any questions regarding these comments, please contact the State of Idaho using the following contacts: IDFG's Wildlife Bureau Chief, Toby Boudreau, at 208-287-2745 or [toby.boudreau@idfg.idaho.gov](mailto:toby.boudreau@idfg.idaho.gov), and OSC's terrestrial species manager, Joshua Uriarte, at 208-332-1556 or [joshua.uriarte@osc.idaho.gov](mailto:joshua.uriarte@osc.idaho.gov).

Sincerely,



Mike Edmondson, Administrator  
Office of Species Conservation



Ed Schriever, Director  
Idaho Department of Fish and Game

**From:** [Erin Edge](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] DOW to FWP Comments on Grizzly Bear Relocation Sites  
**Date:** Monday, November 22, 2021 9:34:31 AM  
**Attachments:** [211122 DOW to MT FWP Grizzly Bear Relocation Policy.pdf](#)

---

Hello,

Please accept these comments on the grizzly bear relocation site proposal.

Thank you for the opportunity to comment



**Erin Edge** *(she/her)*

Senior Representative, Rockies and Plains Program

**[DEFENDERS OF WILDLIFE](#)**

PO Box 1858, Missoula, MT 59806

TEL: 406.728.9436

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Medium](#)



**Missoula Office**  
P.O. Box 1858 | Missoula, Montana 59806 | tel 406.728.9436  
[www.defenders.org](http://www.defenders.org)

November 22, 2021

Wildlife Division  
PO Box 200701  
Helena, MT 59620-0701  
Submitted at: [fwpwld@mt.gov](mailto:fwpwld@mt.gov)

RE: Montana Fish, Wildlife and Parks Grizzly Bear Relocation Policy

Dear Director Worsch and Members of the Fish and Wildlife Commission:

Thank you for the opportunity to comment on the Montana Fish, Wildlife and Parks (FWP) proposed grizzly bear relocation policy. Defenders of Wildlife (Defenders) is a national non-profit conservation organization with 9,300 members and supporters in Montana and more than 2.1 million nationwide. Over the last three decades, Defenders has played an important role in grizzly bear recovery in Montana. This work included our long-running livestock loss compensation and conflict prevention programs. We transitioned our grizzly bear compensation program to the Montana Livestock Loss Board in 2013 after the passage of Montana House Bill 323. We continue to assist livestock producers and residents in Montana with conflict mitigation tools and techniques to minimize losses to grizzly bears and other predators and work towards finding long term sustainable funding for such efforts. Examples include our popular Electric Fencing Incentive Program which saw the completion of its 500<sup>th</sup> electric fence in 2021 and our work with USDA Wildlife Services and NRDC to lobby for federal funding for Wildlife Services' non-lethal conflict prevention work in Montana. We operate our projects in partnership with county, state, tribal and federal agencies as well as local landowners and residents.

Unfortunately, this year's extreme legislation in Montana has tied the hands of FWP bear management specialists by disallowing relocations of conflict bears outside recovery zone lines. During my time on the Montana Grizzly Bear Advisory Council, we repeatedly heard from bear managers that maintaining flexibility was important. Montana FWP bear management staff are highly qualified and trained in these time-sensitive decisions that often involve discussions with the landowners. As was stated by FWP staff at the October 28<sup>th</sup> Commission meeting, the sites identified in this proposal by bear management personnel allows for some such flexibility. It is important that the Commission support its bear management staff and not further limit where they can relocate grizzly bears. Therefore, we urge the Commission to approve all sites identified for relocation by FWP.

We also ask the Commission to request from FWP staff identification of additional sites in-between occupied ecosystems and in-between occupied ecosystems and the Bitterroot ecosystem for inclusion in this relocation policy. Grizzly bears have been confirmed in or near the Bitterroot ecosystem over the last few years but there is no viable population within the Bitterroot recovery zone. In 2018 a young male grizzly bear nicknamed "Stevi" was captured on a golf course near Stevensville, Montana.



This was a non-conflict grizzly bear. There should have been an opportunity for relocation closer to where this bear was captured but nearby sites for this type of relocation had not yet been identified. In addition, in 2021 the US Fish and Wildlife Service confirmed the presence of two grizzly bears near the headwaters of the east fork of the Bitterroot River. An adequate number of relocation sites must be identified to align with the reality of where grizzly bears are moving. Otherwise FWP bear managers will once again be inappropriately constrained in options for management of these bears if/when another situation like the one in Stevensville arises.

In conclusion, we ask the Commission to approve all sites currently proposed by Montana Fish, Wildlife and Parks for relocation and additionally, request that Montana Fish, Wildlife and Parks identify, and the Commission approve, additional sites for relocation in-between occupied ecosystems and in-between occupied ecosystems and the Bitterroot ecosystem.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Erin Edge". The signature is written in a cursive, flowing style.

Erin Edge, Senior Representative, Rockies and Plains Program  
[eedge@defenders.org](mailto:eedge@defenders.org)

**From:** [Kelsie Huyser](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly Bear Relocation Sites - Comments  
**Date:** Monday, November 22, 2021 2:45:12 PM  
**Attachments:** [image001.png](#)  
[2021 FWP Commission Grizzly Bear Relocation Sites NPCA NRDCcomments.pdf](#)

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Members of the Commission,

Attached are comments on behalf of the National Parks Conservation Association and the Natural Resource Defense Council regarding the proposed Grizzly Bear Relocation Sites in Montana.

Please feel free to reach out with any questions.

Regards,



**Kelsie Huyser**

Northern Rockies Program Coordinator | Yellowstone Field Office  
National Parks Conservation Association

**P: 406-970-0734** | [khuyser@npca.org](mailto:khuyser@npca.org) | [npca.org](http://npca.org) [[npca.org](http://npca.org)]

*Your parks. Your turn.*



November 22, 2021

Fish & Wildlife Commission  
Montana Dept. of Fish, Wildlife & Parks  
1420 E 6<sup>th</sup> Ave.  
Helena, Montana 59601

Submitted via email at [fwpld@mt.gov](mailto:fwpld@mt.gov) and online at <https://fwp.mt.gov/aboutfwp/public-comment-opportunities>

**Re: Grizzly Bear Relocation Sites**

Members of the Commission,

On behalf of the National Parks Conservation Association (NPCA) and the Natural Resource Defense Council (NRDC), I appreciate the opportunity to comment on the proposed Grizzly Bear Relocation Sites (proposal) in the Cabinet-Yaak, Northern Continental Divide, and Greater Yellowstone ecosystems in Montana. This proposal from Montana Fish, Wildlife & Parks (FWP) is in response to Senate Bill 337, passed by the 2021 Montana state legislature, which requires FWP to gain approval from the Commission for all sites where grizzly bears could be relocated in the state. SB337 also prohibits FWP to relocate a conflict grizzly bear that is captured outside of the designated Recovery Zone (RZ) but recognizes that the US Fish and Wildlife Service (FWS) may relocate conflict bears inside or outside of the RZ.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working with our more than 1.6 million members and supporters, including nearly 7,000 members and supporters in Montana, to preserve our nation's natural, historical, and cultural heritage for present and future generations. NPCA has a longstanding interest in protecting national parks and their resources, including wildlife, land, and water, both inside national parks and on park adjacent landscapes. We are particularly interested in the proposed project and potential impacts on Yellowstone National Park and Glacier National Park grizzly bear populations and implications of SB337 to disrupt natural population dispersal and genetic connectivity.

NPCA believes that for decades state bear managers have been successfully applying their expertise to evaluate the social and ecological components of each unique relocation event and determining where a particular bear will have the best chance of success when relocated. The

Commission should continue to rely on the management experience of state bear specialists when determining what sites should be approved for relocation. NPCA urges the Commission to not reduce the number or geographic scope of relocation sites and instead approve the full list that was proposed by FWP.

In recent years, there has been a push for more funding for bear management specialists to help with addressing problem bears to provide proactive support to mitigate attractants and to do local community education. We should trust the specialized training and applied experience of those staff members to implement on the ground bear management and allow them the greatest number of relocation sites as possible. We believe that the flexibility provided by having the greatest number of relocation sites approved is important for state bear managers to continue doing their jobs of managing bears across the landscape. More relocation site options mean quicker management decisions that reduces the stress on bears and FWP staff. Additionally, to provide adequate options for field staff, NPCA encourages the Commission to consider additional relocation sites in the northern end of the Greater Yellowstone Ecosystem (GYE) and west toward the Beaverhead where bears have been documented and food storage orders are in place.

One of the components of successful recovery for GYE bears is genetic connectivity to the bears of the Northern Continental Divide Ecosystem (NCDE). The Commission should support natural genetic connectivity by approving potential relocation sites that are on the farthest edges of the two recovery areas. We also believe that FWP should identify relocation sites in the Bitterroot Ecosystem, since it is an identified grizzly bear recovery zone and there have been bears trapped and identified in that area. The best option going forward for the Bitterroot Ecosystem is to return bears that are trapped within or on the edge of that ecosystem, back into that ecosystem.

Finally, we encourage FWP to build plans around how to coordinate with FWS staff to meet the needs of landowners who experience conflict outside the recovery zone. It is imperative that FWP managers can continue to quickly respond to conflicts across all areas occupied by grizzly bears. There needs to be a plan for how FWP managers will quickly engage FWS personnel to ensure that conflict bears captured outside the recovery zone that can be relocated are addressed in a timely manner. Bears that are accidentally trapped outside the recovery zones should be immediately released.

We appreciate the opportunity to provide input during this comment period. It is our hope that the Montana Fish and Wildlife Commission considers the information we have provided and analyzes the concerns we have raised regarding the impacts of their decision on the unique resources of Montana National Parks and the surrounding landscapes and communities.

Best regards,

Kelsie Huyser  
Northern Rockies Program Coordinator  
Yellowstone Field Office  
National Parks Conservation Association  
Bozeman, Montana

Jennifer Sherry, PhD  
Wildlife Science and Policy Specialist  
Nature Program  
Natural Resource Defense Council  
Bozeman, Montana

**From:** [Brooke Shifrin](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly Bear Relocation Sites- Comments  
**Date:** Monday, November 22, 2021 11:59:36 AM  
**Attachments:** [image001.png](#)  
[GrizRelocation\\_GYCLetter\\_FINAL.pdf](#)

---

Hello,

Please see attached for comments from the Greater Yellowstone Coalition regarding the proposed Grizzly Bear Relocation Sites currently under consideration by the Commission.

Best,  
Brooke



**Brooke Shifrin** | *Senior Wildlife Conservation Associate* | *She/Her*  
Greater Yellowstone Coalition | [GreaterYellowstone.org](http://GreaterYellowstone.org) [[greateryellowstone.org](http://greateryellowstone.org)] | 406.586.1593

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November 22, 2021

*Via email to fwpwld@mt.gov:*

Montana Fish and Wildlife Commission  
Montana Department of Fish, Wildlife and Parks  
Wildlife Division  
PO Box 200701  
Helena, Montana 59620

*Re: Grizzly Bear Relocation Sites*

Dear Members of the Commission,

Thank you for the opportunity to comment on the proposed grizzly bear relocation plan from Montana Fish, Wildlife, and Parks (FWP). The Greater Yellowstone Ecosystem (GYE) is home to an astounding array of wildlife species, including the iconic grizzly bear. With roughly 7,000 supporters in Montana, Greater Yellowstone Coalition (GYC) works to engage the wide range of people who care about our region to ensure the wildlife that make Greater Yellowstone unique thrive for generations to come. We have been working on grizzly bear conservation and management issues for over 35 years. GYC works 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. As home to the two largest grizzly bear populations in the lower-48 states and connective lands between, we believe Montana is uniquely positioned to build on this success story and ensure grizzly bears thrive in the state long into the future. A recent social survey conducted by the University of Montana (U of M) and FWP demonstrated that 92% of Montanans agree or strongly agree that grizzly bears have a right to exist in the state, and 85% of Montanans believe grizzly bears are part of what makes the state special (Nesbitt et al. 2020). While conflict prevention is the most important way to ensure people and bears thrive on shared landscapes, relocations are an important management tool in the event conflicts do occur.

In general, GYC supports the sites FWP proposes for grizzly bear relocation in the GYE and Northern Continental Divide Ecosystem (NCDE) South. We recommend that FWP consider relocation protocols

that ensure transparency and strong communication with potentially impacted communities and interested publics.

We recommend the Commission approve FWP's grizzly bear relocation proposal for the following reasons:

- The proposed relocation sites are biologically suitable and consistent with the best available science regarding relocation success for both conflict incidents and non-target captures. The scientific literature suggests relocations have a higher chance of success when release sites minimize other potential mortality or conflict risk factors like roads, human activity, etc. The sites proposed are all in remote areas on public land. 86% of Montanans reported it acceptable or very acceptable that grizzlies live in places that are forested and mostly publicly owned (Nesbitt et al. 2020).
- FWP's proposed relocation sites represent many years of knowledge and expertise by the Department's bear management specialists. The recent U of M/FWP social survey indicated 77% of Montanans trust that FWP knows how to respond to grizzly bear conflict, and 70% percent of Montanans believe FWP knows how to effectively manage grizzly bear populations (Nesbitt et al. 2020).
- Senate Bill 337 has tied the hands of FWP bear managers outside the recovery zone. If the Commission is interested in supporting the communities that live with grizzly bear conflict, then the Commission should do what it can to support the FWP bear managers who have local on-the-ground knowledge and relationships. Retracting sites from FWP's proposal would only further limit the flexibility bear management specialists need. FWP staff must be able to evaluate incidents on a case-by-case basis and have management options. For example, the sites proposed in the Gravelly mountains (18-22) are for non-target captures and could provide an opportunity for FWP to release a non-conflict bear that was accidentally captured. Having relocation sites defined would provide options for bear managers for non-conflict bears and for a future scenario where FWP has management jurisdiction of grizzly bears. By removing this tool from a bear manager's toolbox, you would effectively be setting them up for failure when they are the future decision maker. This is especially important because today, Montanans are confident that FWP bear managers make good decisions. Let's not erode that trust. In our experience, bear managers evaluate each scenario individually and carefully weigh all important considerations, especially potential for prolonging conflict.
- There are many aspects of the Montana Grizzly Bear Advisory Council's vision, guiding principles, and recommendations that are in alignment with FWP's relocation proposal. The Council stated in their final report that their guiding principles be, "Accounted for in any decision or process related to grizzly bear management in the state of Montana" and that they were, "Representative of the communal voice existing among the diverse individual members of the council." Here are a couple excerpts from the council's report particularly relevant to this matter at hand, with emphasis added:
  - Principle 8: Montana's diverse landscapes and complex circumstances **require flexibility** in grizzly bear management decisions.
  - Recommendation 19: FWP should continue to **allow natural movement to new areas** between all four identified recovery zones in Montana.

- Recommendation 23: Relevant agencies should expedite work with landowners, agricultural producers, and communities to prioritize the **creation of new suitable relocation areas inside and between recovery ecosystems** which further the conservation, connection, and recovery of grizzly bears in Montana while ensuring existing land uses are supported.

We recognize that as grizzly bears expand into historic habitat, there are new challenges in addressing conflicts and coexistence with bears. We understand that grizzly bear conflicts put real strain on the working ranches that are an important part of Montana. We believe that adopting and approving a grizzly bear relocation plan creates opportunities for improving coordination and communication with potentially impacted agricultural producers. The Montana Grizzly Bear Advisory Council put a strong emphasis on crafting recommendations around conflict response that would better engage landowners, livestock producers, and communities and maximize transparency. We encourage the Commission to consider the recommendations of the Ruby Valley Strategic Alliance around what that transparency and coordination could look like.

Given the current status of grizzly bears as listed on the ESA, the U.S. Fish and Wildlife Service has the authority to determine a grizzly bear relocation plan that differs from what FWP has proposed and the Commission may adopt. There may be circumstances where a relocation is deemed the appropriate management action in capture incidents on connective lands between grizzly bear ecosystems. In these scenarios, it will be important that grizzly bears be relocated to the nearest suitable area. Moving bears long distances back to the core of recovery ecosystems will hinder the long-term goal to connect grizzly populations recognized as important by the Montana Grizzly Bear Advisory Council. We believe this potential scenario highlights the ways in which removing FWP bear managers from the equation when bears are captured outside the recovery zone is not in the long-term best interest of the communities living alongside grizzly bears. FWP bear managers have extensive on-the-ground knowledge, and an understanding of the interests of local communities. For people and grizzly bears to thrive on shared landscapes over the long-term, it is vital that FWP bear managers have the flexibility to partake in management actions in areas between recovery zones. FWP could be encouraged to develop an MOU with the U.S. Fish and Wildlife Service that makes explicit a policy of relocating to the nearest suitable area and specifies protocol for consultation and transparency with potentially impacted communities.

GYC strongly encourages the Commission to approve FWP's proposed relocation sites and appreciates the opportunity to share our perspective.

Sincerely,

Brooke Shifrin

Senior Wildlife Conservation Associate, Greater Yellowstone Coalition

Literature Cited:

Nesbitt, H.K., A.L. Metcalf and E.C. Metcalf. 2020. Human dimensions of grizzly bear management in Montana. University of Montana Survey of Montana residents. *Missoula, MT*.



**From:** [Leah Johnson](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly Bear Relocation Sites-Comment from Montana Wool Growers  
**Date:** Monday, November 22, 2021 11:05:43 AM  
**Attachments:** [MWGA GrizzlyRelocationComments 11.18.21.pdf](#)

---

Hellon Montana Fish, Wildlife & Parks Wildlife Division,

Thank you for the opportunity to submit public comment on the Grizzly Bear Relocation Sites. The following 2 page attachment is comments from the Montana Wool Growers Association.

Thank you,  
Leah Johnson

--

**Leah Johnson**  
**Executive Secretary**  
**Montana Wool Growers Association**

**Work: (406) 210-2852**  
**Home: (406) 733-2079**

Montana Wool Growers Assoc.  
PO Box 1693  
Helena, MT 59624



Phone (406) 442-1330  
leah@mtsheep.org  
www.mtsheep.org

November 18, 2021

Montana Fish, Wildlife & Parks  
Wildlife Division  
P.O. Box 200701  
Helena, MT 59620-0701

Re: Proposed Grizzly Bear Relocation Sites

Dear Wildlife Division:

The Montana Wool Growers Association (MWGA) provides these comments on behalf of its members. MWGA membership consists of hundreds of families and individuals throughout the State of Montana who rely on sheep production as a primary source of income. Decisions regarding grizzly bear placement directly and indirectly affect these individuals and their livelihoods. Grizzly bears pose a direct threat to the members' families, their animals, and their crops through risk of injury, death, and loss of income. Grizzly bears also impact MWGA members indirectly through the taxes, per capita fees, and assessments each livestock owner pays for predator control. As grizzly bear numbers increase, more resources are devoted to grizzly bear management at the expense of other predator control measures.

Grizzly bears are relocated when their presence in an area becomes a problem. Relocation is expensive, time intensive, and takes personnel away from other important predator control activities. Livestock owners bear the bulk of the expense for the relocations, so livestock owners have a vested interest in the relocation's success. Relocating a problem bear from one populated area to another merely shifts the problem from one person to another. This type of relocation does not alleviate the problem or help mitigate the expense of grizzly bear management. MWGA does not support relocating problem bears.

To the extent Montana Fish, Wildlife & Parks (FWP) is required to relocate a grizzly bear, MWGA supports the use of clearly defined relocation sites that place the problem bears as far as possible from areas of potential conflict. The following proposed relocation sites are acceptable to the MWGA as sites with the least likelihood for future conflict.

- **Cabinet–Yaak Ecosystem:** MWGA does not oppose FWP using the proposed relocation sites within the currently defined grizzly bear recovery zone boundary in the Cabinet–Yaak Ecosystem. MWGA opposes FWP using any proposed relocation sites

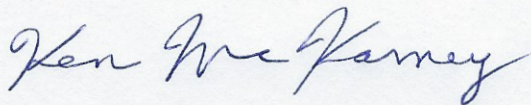
located outside the currently defined grizzly bear recovery zone boundary in the Cabinet–Yaak Ecosystem.

- **Greater Yellowstone Ecosystem:** MWGA supports using Site Nos. 14, 15, 16, and 26 in the Greater Yellowstone Ecosystem. MWGA opposes all other proposed sites within the Greater Yellowstone Ecosystem.
- **Northern Continental Divide Ecosystem:** MWGA supports using Site No. 263 in the Northern Continental Divide Ecosystem. MWGA opposes all other proposed sites within the Northern Continental Divide Ecosystem.

In the interest of promoting successful relocations and hastening the delisting process for grizzly bears, MWGA urges FWP to approve only the proposed relocation sites identified above. MWGA urges FWP to reject all other proposed relocation sites as unsuitable for relocation and unlikely to resolve conflicts.

Thank you for this opportunity to comment on the proposed grizzly bear relocation sites.

Respectfully,



Ken McKamey  
MWGA President

CC: MWGA Board of Directors

**From:** [Raylee Honeycutt](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Public Comment: Grizzly Bear Relocation Sites  
**Date:** Monday, November 22, 2021 4:15:27 PM  
**Attachments:** [Grizzly Bear Relocation Comments 11.22.21.pdf](#)

---

Please see attached.

**Raylee Honeycutt** | Director of Natural Resources  
MONTANA STOCKGROWERS ASSOCIATION | MONTANA ASSOCIATION OF STATE GRAZING DISTRICTS | MONTANA  
PUBLIC LANDS COUNCIL  
o: 406.442.3420 | c: 406.799.4378 | [mtbeef.org](http://mtbeef.org) [[mtbeef.org](http://mtbeef.org)]



November 22, 2021



Montana Fish and Wildlife Commission  
 Wildlife Division  
 Box 200701  
 Helena, MT 59620-0701

**Re: Grizzly Bear Relocation Sites**

Montana Fish & Wildlife Commission:

On behalf of the Montana Stockgrowers Association (MSGA) and the Montana Public Lands Council (MPLC) we appreciate this opportunity to provide comments regarding the grizzly bear relocation sites. Our organizations represent producers who manage livestock on private, state, and federal lands in Montana and have a significant and long-standing interest in grizzly bear management. Our organizations remain dedicated to advocating on the behalf of producers for the delisting of grizzly bears. Conflicts between grizzly bears and livestock continue to increase and we feel it is important to continue work to reduce conflicts. Bear relocations should not put additional burden on livestock producers.

As membership organizations, our members have adopted policy regarding grizzly bear relocation sites, it reads:

*WHEREAS science shows grizzly bear populations in the Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) have recovered; and*  
*WHEREAS the grizzly bear populations in established relocation areas are already at or near carrying capacity; and*  
*WHEREAS moving grizzly bears near private ranchlands leads to more conflict with humans and livestock;*  
**THEREFORE, BE IT RESOLVED** *MSGA urges the Montana Fish and Wildlife Commission to refrain from creating any new grizzly bear relocation sites outside of established recovery areas related to SB 337; and*  
**BE IT FURTHER RESOLVED** *MSGA urges limited use of current grizzly bear relocation sites to avoid conflict with humans or livestock.*

Additionally, we ask for the commission to take under consideration the following points when finalizing relocations sites:

- 1) Relocation sites that are within active livestock grazing allotments should be removed from the list. Relocating bears to known sites where cattle are grazing increases the likelihood of bear-livestock conflict.
- 2) Relocation sites that are within a five-mile radius of locations where confirmed livestock conflict or depredation has occurred should be removed from the proposed site list.
- 3) Relocation sites with a five-mile radius of a homesite should be removed to lower the risk of human-bear conflicts.

MSGA and MPLC would like to thank the Fish and Wildlife Commission for your consideration of our comments. Since 1884, we have been dedicated to finding proactive solutions for Montana ranching communities and will continue to work to do so.

Sincerely,

Raylee A. Honeycutt  
 Director of Natural Resources | Montana Stockgrowers Association  
 Executive Staff | Montana Public Lands Council

**From:** [Bonnie Rice](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Sierra Club comments on proposed grizzly bear relocation sites  
**Date:** Friday, November 19, 2021 11:05:08 AM  
**Attachments:** [Sierra Club Comments on FWP Grizzly Bear Relocation Sites Proposal - Nov 2021.pdf](#)

---

Please see attached comments from the Sierra Club on the proposed grizzly bear relocation sites.

Thank you,

--

Bonnie Rice  
Pronouns: she/her  
Greater Yellowstone/Northern Rockies Senior Campaign Representative  
Sierra Club  
P.O. Box 1290  
424 E. Main Street, Suite 203C  
Bozeman MT 59771  
Phone (406) 582-8365 x1  
Fax (406) 582-9417  
[bonnie.rice@sierraclub.org](mailto:bonnie.rice@sierraclub.org)  
[www.sierraclub.org](http://www.sierraclub.org) [[sierraclub.org](http://sierraclub.org)]



Sent via email to: [fwpwld@mt.gov](mailto:fwpwld@mt.gov)

November 19, 2021

Director Hank Worsech, Montana Fish, Wildlife and Parks  
Montana Fish and Wildlife Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Mt 59620-0701

**Re: Grizzly Bear Relocation Sites**

Dear Director Worsech and Members of the Fish and Wildlife Commission:

Thank you for the opportunity to comment on Montana Fish, Wildlife and Parks' ("FWP") proposal regarding grizzly bear relocation sites. We provide these comments today on behalf of more than 13,000 Sierra Club members and supporters in Montana and over 18,000 members and supporters in Idaho.

We appreciate the work that FWP has undertaken to identify relocation sites to aid in reducing conflicts involving grizzly bears, and to further the achievement of natural connectivity between grizzly bear populations.

We support the relocation sites in FWP's proposal, and ask the Fish and Wildlife Commission ("Commission") to approve these sites. Montana's bear management specialists consistently do an excellent job in what are often very challenging circumstances, balancing between the needs of humans and the needs of grizzly bears. These specialists have a wealth of on-the-ground knowledge and expertise, and are best able to evaluate each unique situation where relocation of grizzly bears is deemed necessary, and where a particular bear will have the best chance of success when relocated. The Commission should continue to rely on the management experience of state bear specialists when determining what sites should be approved for relocation, and should give bear managers the most flexibility by approving the highest number of relocation sites. As noted by Ken McDonald, FWP wildlife division administrator, *"The last thing we want is to have a grizzly bear in a trap approved for relocation but no approved release site within a reasonable distance."*<sup>i</sup>

Additionally, we ask FWP to identify, and the Commission to approve, more relocation sites to assist bears in achieving natural connectivity between populations. One of the components of successful recovery, as noted by the Ninth Circuit in reinstating protections for grizzly bears in the Yellowstone region, is genetic connectivity to other grizzly populations such as in the Northern Continental Divide. The Commission should support natural genetic connectivity by approving potential relocation sites that are on the farthest edges of these recovery areas. This would include, but not be limited to, establishing more relocation sites in the northern end of the Greater Yellowstone ecosystem on the Gallatin National

Forest and west on the Beaverhead National Forest where bears have been documented and food storage orders are now in place.

We also urge FWP to identify, and the Commission to approve, relocation sites in the Bitterroot Ecosystem which is an established grizzly bear recovery zone but that currently has no resident grizzly bears. Grizzly bears have been trapped and identified in that area, and the best option going forward for recovery in the Bitterroot Ecosystem is to return bears that are trapped within or on the edge of that ecosystem back into that ecosystem, so that a resident population can be established.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Bonnie Rice". The signature is written in a cursive, flowing style.

Bonnie Rice  
Senior Representative, Greater Yellowstone-Northern Rockies Regions  
Our Wild America Campaign

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<sup>i</sup> <https://fwp.mt.gov/homepage/news/2021/oct/1022-fwp-proposing-grizzly-bear-release-sites-for-commission-public-review>



**From:** [Pieske, Shawna](#)  
**To:** [Bill Lane](#); [Brian Cebull](#); [Jana Waller](#); [KC Walsh](#); [Lesley Robinson](#); [Pat Byorth](#); [Pat Tabor](#)  
**Cc:** [FWP Wildlife](#)  
**Subject:** FW: Boone and Crockett Comments re: Grizzly Bear Release Sites  
**Date:** Friday, November 19, 2021 2:02:19 PM  
**Attachments:** [Conservation Policy MT Grizzly Bear Relocation Sites Comments.pdf](#)  
[image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Hi All,  
Please see attached letter.  
Thanks,  
Shawna



**Shawna Pieske**  
**Commission Secretary**  
Director's Office  
[Montana Fish, Wildlife & Parks](#)

P.O. Box 200701  
Helena, MT 59620-0701  
Ph: 406- 444-7826 or 406-444-3186  
[Montana FWP](#) | [Montana Outdoors Magazine](#)



THE **OUTSIDE** IS IN US ALL.



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**From:** Charlie Booher <[charlie@watershedresults.com](mailto:charlie@watershedresults.com)>  
**Sent:** Friday, November 19, 2021 1:01 PM  
**To:** Pieske, Shawna <[Shawna.Pieske@mt.gov](mailto:Shawna.Pieske@mt.gov)>  
**Subject:** [EXTERNAL] Boone and Crockett Comments re: Grizzly Bear Release Sites

Good Afternoon, Shawna,

Please find a letter from the Boone and Crockett Club attached regarding the proposed Grizzly Bear Release Sites. As I mentioned in my voicemail, it didn't appear that the online portal allowed for the submission of a file and I wanted to make sure that we met the deadline of 11/22.

Please don't hesitate to reach out with any questions and thank you in advance for adding this to the

compilation of public comments!

Take care,

Charlie Booher

**Watershed Results**

Cell: (608) 807-7480



FOUNDED IN 1887 BY

THEODORE ROOSEVELT

**BOONE AND CROCKETT CLUB**

November 18<sup>th</sup>, 2021

Montana FWP Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Mt 59620-0701

RE: NCDE Grizzly Bear Relocation Sites

Dear Montana Fish, Wildlife, & Parks Commission,

Founded in 1887 by Theodore Roosevelt, the Boone and Crockett Club is North America's oldest conservation organization and is headquartered in Missoula, MT. To stimulate private sector leadership on wildlife research, education, and management, the Boone and Crockett Club purchased a working cattle ranch in prime wildlife habitat along Dupuyer Creek on the Eastern Front of the Montana Rockies in 1986. The mission of the ranch, known as the Theodore Roosevelt Memorial Ranch, is research, education, and demonstrating integrated livestock management and wildlife conservation that is integral to the economic viability of private and adjacent public lands. Recently, the TRMR has been identified as a model for coexistence between livestock and all manner wildlife.

Conservation Policy has long been a priority of the Club. In addition to issues involving habitat and wildlife health, the Club has been working on issues associated with the Endangered Species Act for several years. This includes efforts to delist both the GYE and NDCE populations of grizzly bears and return them to state management. While delisting is our long-term goal, that process will likely require both regulatory and legislative fixes. Our activities over the last two years have focused on dealing with problem bears. In October of 2019, the Club hosted a tour on the TRMR for Secretary of the Interior David Bernhardt and then-Congressman Greg Gianforte to discuss grizzly bears. The tour was followed by a diverse round table discussion in Choteau, where it became clear that agency staff lacked the capacity and the resources to deal with problem bears. After this discussion, Secretary Bernhardt made arrangements to transfer \$250,000 annually in FY 2020 and FY2021 from the Interior Department to APHIS-WS to be used to manage problem bears and increasing the response time to bear incidents. The Club continues to monitor how this money is spent and is working with federal partners to ensure those dollars continue to come to Montana.

When the bear relocation site recommendations were released by FWP, we were naturally concerned about two sites in Pondera and Teton Counties (260 and 264) that are in close proximity to our cattle operation and those of our neighbors. While we are aware all the sites in the FWP recommendation have been used to relocate bears before, we suggest applying some specific, science-based criteria for releasing bears on each of these sites. Such methodology is commonly put into place with other wildlife translocations, like reintroduction activities, and has been shown to greatly improve desired management results. For grizzly bears, this could ensure some level of comfort among livestock producers and the public that utilize those areas, by minimizing human-bear conflicts. For example, relative to sites 260 and 264 proposed relocation language should include: 1) no bears suspected of killing livestock be released at either of these sites, and 2) no bears be released at either of these sites during the fall hunting seasons (9/1-12/31) due to the heavy recreational use of these areas.

We believe it would be appropriate to accompany other proposed sites with similar, thoughtful considerations rooted in the best available science and in recognition of the recommendations put forth by the Interagency Grizzly Bear Committee. The Club is ready to assist this effort however is most helpful.

Sincerely,



**From:** [fjords@frontiernet.net](mailto:fjords@frontiernet.net)  
**To:** [FWP Wildlife](#)  
**Cc:** [fjords@frontiernet.net](mailto:fjords@frontiernet.net)  
**Subject:** [EXTERNAL] COMMENT ON GRIZZLY BEAR RELOCATION SITES  
**Date:** Monday, November 8, 2021 1:08:18 PM

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**Comment on Grizzly Bear Relocation Sites      Ruth  
Bushnell 510 CC Rd,Troy,MT 59935**

Could you please send me a receipt so I know this went through? Thank you. Nov 8, 2021

I reside in a prime bear habitat and have for some 33 yrs at this site. In preceding years I lived in this county as well. I was raised in the lower Yaak. I am 80 yrs old so well ingrained in the knowledge of the fabric of this region. My Grandfather homesteaded in the Upper Yaak (Overdale) where my father was raised. We did not consider killing or eating bears, they never bothered us. I like bears but I DO NOT WANT GRIZZLY BEARS transplanted here; so close to the Curley Creek Valley. I notice on your map #47 that you have targeted this region for GB habitat and I urge you to remove this area from your consideration.

I ask you, if you have done a study on population growth here? In the past few years new homes have noticeably increased here. To my north there is a new dairy and sheep farm and I am quite sure they would not want marauding Grizzly Bear's nearby! I have noticed an increasing number of human/bear encounter's nationally, so why in the world be expanding their number's?!

I am yet dismayed over the abysmally poor idea of

introducing Wolves into this region! I now have some on the ridge above here, have seen a couple near my home, and am afraid to walk out unarmed. They were NOT here before your introduction, they are unwelcome latecomers. I fleetingly saw ONE wolf several years ago just below the old Upper Ford Ranger Station and that was it !! for my entire life up until about 10 yrs ago.

How can anyone think that transporting these predatory animals into a residential community is a good idea???? So don't say to me "they were here first," BECAUSE THEY WERE NOT. and any few there were were afraid of people--these are NOT AFRAID of people.

You would not want invading Grizzly's come into your home area so please don't consider doing it to others.

Signed: Ruth Bushnell

**From:** [Hayley Newman](#)  
**To:** [FWP Wildlife](#)  
**Cc:** [Skye Borden](#); [Hayley Newman](#)  
**Subject:** [EXTERNAL] GBCA grizzly relocation sites comment  
**Date:** Wednesday, November 17, 2021 2:36:48 PM  
**Attachments:** [GBCA FWP Comments\\_Nov2021.pdf](#)

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Dear MT FWP Wildlife Division,

Comments from the Great Burn Conservation Alliance concerning grizzly relocation sites are attached. Thank you very much for the opportunity to comment.

Cheers,  
Hayley



*Hayley Newman*  
*Co-Executive Director*  
*Great Burn Conservation Alliance*  
*406-546-2329*  
[www.greatburn.org](http://www.greatburn.org) [[greatburn.org](http://greatburn.org)]



2825 Stockyard Road  
Suite A7  
Missoula, MT 59808  
406-240-9901  
[www.greatburn.org](http://www.greatburn.org)

November 17, 2021

Subject: Grizzly Bear Relocation Sites

Dear Montana Fish, Wildlife and Parks Team,

The Great Burn Conservation Alliance (GBCA) appreciates the opportunity to comment on the Grizzly Bear Relocation Sites. Our comments are specific to the western Lolo portion of the amendment and the Ninemile Demographic Connectivity Area (DCA).

Through education, advocacy, and on-the-ground stewardship, GBCA has worked for nearly fifty years to protect the wild and remote character and ecological integrity of the northern Bitterroot Mountains in western Montana and northern Idaho. In particular, the GBCA strives to maintain the wilderness characteristics of the Proposed Great Burn Wilderness and surrounding inventoried roadless areas, making up over 1.9 million acres of roadless lands along the Idaho/Montana stateline. GBCA field staff and volunteers spend thousands of hours each year in the backcountry restoring recreation impacts and improving wildlife habitat.

The Proposed Great Burn Wilderness is a vital biological core area for far-ranging wildlife in the northern Rockies. Like other large swaths of undeveloped roadless country, the Great Burn permits migration and genetic interchange for wide-ranging species, and provides connectivity between the Northern Continental Divide, the Selkirk, the Cabinet-Yaak, and the Bitterroot Ecosystems.

In 2007, a male grizzly was shot and killed in the Great Burn. DNA samples determined that the bear had traveled over 140 miles from the Selkirk Range. In 2019, a GPS collared male grizzly travelled from the Cabinet-Yaak area and spent several weeks in the Great Burn before making its way to the Selway-Bitterroot Wilderness. These journeys point to the importance of considering connectivity beyond administrative boundaries. The Ninemile Demographic Connectivity Area supports grizzly bears that are frequently sighted along the Reservation Divide and occasionally noted in the lower valley as documented by photos and radio telemetry. And Ethel, the famous travelling grizzly, visited the Ninemile DCA, the edge of the Bitterroot Mountains and more than a few other places during her wanderings.



The Ninemile Demographic Connectivity Area was created in part to support occupancy by female bears and allow movement to the Bitterroot recovery zone. The bridges between the Ninemile and Petty Creek exits on I-90 allow for easier passage for large animals such as grizzly bears to cross from one side of the interstate to the other without the risk or fear of crossing the four lanes of the interstate. Bridges, even though not necessarily designed for wildlife passage can facilitate movement such as was demonstrated with grizzly bear 11072874 near Drummond in 2020—2021 who finally crossed the interstate by going under a bridge after many apparent futile attempts to go south over the interstate.

Multiple wildlife passage structures built over and under highway 93 north of Evaro Hill allows easier passage for grizzly bears and enhances permeability between the Ninemile DCA and the Rattlesnake Wilderness and the boundary of the Northern Continental Divide Ecosystem (NCDE) recovery zone.

Citizens in the Ninemile and Sixmile Valleys value wildlife connectivity and have been working to improve habitat and conditions favoring wildlife movement. Looking at an ownership map, you will see that contiguous Federal, State and Tribal lands come closer together in the Sixmile/Ninemile area than anywhere else in Missoula County. This provides wildlife the best opportunity to move between the Northern Continental Divide Ecosystem and the Bitterroot Ecosystem, and two of the largest wilderness areas in the continental United States, with minimal threat of future development that would lessen connectivity potential. The Ninemile DCA is centrally located between the Northern Continental Divide, the Selkirk, the Cabinet-Yaak, and the Bitterroot Ecosystems.

We see an opportunity with using relocation sites near or in the Ninemile DCA to enable the DCA to function as it was designed which would enhance the ability of grizzly bears to move between the Northern Continental Divide, the Selkirk, the Cabinet-Yaak, and the Bitterroot Ecosystems. Already much work has been done to enhance connectivity near the Ninemile DCA. What was once private industrial forest land has been turned over to the Forest Service and Fish Wildlife and Parks management. Within the DCA, much of the private land is protected by conservation easements.

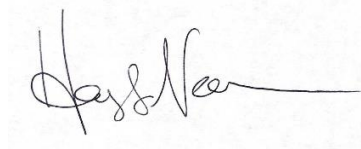
Because of the connectivity importance of the Great Burn, we ask you to consider connectivity needs between the NCDE Recovery Zone, Ninemile DCA and the Bitterroot Ecosystem. We support the use of the release sites north of the Blackfoot River and to the west. In particular, sites 123, 124, 125, 126, 67, and 69 would move bears close to the DCA. Sites 188 and 208 are both within the DCA. Use of any of these sites would increase the possibility of genetic exchange between ecosystems that may be critical for grizzly bear long term survival. If considering other sites that may be appropriate for release, we would suggest some sites west of Missoula and south of I-90, such as upper Fish Creek, that could facilitate movement towards the Great Burn, and near Siegel Pass at the head of the Ninemile Drainage for the above stated reasons.

We appreciate your consideration on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Skye Borden', with a long horizontal line extending to the right.

Skye Borden  
Co-Executive Director  
Great Burn Conservation Alliance

A handwritten signature in black ink, appearing to read 'Hayley Newman', with a long horizontal line extending to the right.

Hayley Newman  
Co-Executive Director  
Great Burn Conservation Alliance

**From:** [linda alkire](#)  
**To:** [FWP Wildlife](#)  
**Cc:** [Steve.gunderson@mtleg.gov](mailto:Steve.gunderson@mtleg.gov)  
**Subject:** [EXTERNAL] Grizzly bear public comment to FWP  
**Date:** Saturday, November 6, 2021 6:20:20 PM

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I trust that you know the struggle to manage the Grizzly bear is real. If you are forced by the feds to "manage" their bears at least keep them confined to the upper cabinet wilderness. GB's should not be tolerated on private property except occasionally passing through with zero conflict(s) especially residential property including wandering around other human populations including our town(s) God forbid loss of human life. Stay safe out there.

Linda Alkire  
Libby, Montana  
resident x 60 years/Landowner  
CC Steve Gunderson Montana state rep.

**From:** [Marion McCleary](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly Bear Relocation comment  
**Date:** Friday, November 5, 2021 4:35:39 PM

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Hi, I think you should work with the States of California and Colorado and relocate some there. They have room and they proclaim to be pro wild animals and into protecting their habitats so why not share our bears and wolves? Also reinstate them to the northern New England States like Maine, New Hampshire, Vermont, upstate New York and Massachusetts. I love our bears and wolves and don't believe they should be trapped or hunted but I notice that a lot of environmentalists that speak on this kind of thing don't actually live with the animals they so fervently try to protect. Maybe if they did they would have a more balanced perspective and be able to negotiate policy that would work more effectively for both sides. In other words, if a rancher loses livestock to the paws and claws of a wolf or grizzly then let them shoot it. These other asshole great white hunters that are NOT a true hunter or sportsman should be trapped and hunted themselves. If you don't eat it-don't kill it-plus they're so ignorant they don't realize the value of each individual species to the ecosystem. Anyway-I think I made my point. California should be first to get their grizzlies back-after all, isn't that a grizzly in their State Flag???? Thanks for listening. Marion McCleary. 140 Browns Rd., Kalispell, MT 59901.

Sent from my iPhone

**From:** [Eric Clewis](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly Bear Relocation Sites  
**Date:** Thursday, November 18, 2021 12:44:34 PM  
**Attachments:** [MWF Proposed Grizzly Relocation Sites Comments \(1\).pdf](#)

---

Dear Montana Fish & Wildlife Commission:

Please consider the attached document as the Montana Wildlife Federation's comments regarding the proposed grizzly bear relocation sites.

Thank you,

**Eric Clewis** (he/him)  
Connectivity & Wildlife Campaigns Manager  
Montana Wildlife Federation  
P.O. Box 1175  
Helena, MT 59624  
cell: (406) 417-9977  
[eclewis@mtwf.org](mailto:eclewis@mtwf.org)  
[www.montanawildlife.org](http://www.montanawildlife.org) [\[montanawildlife.org\]](http://montanawildlife.org) [\[montanawildlife.org\]](http://montanawildlife.org)



*I gratefully acknowledge that I live, work, hunt, fish, and grow on the homeland of the Niitsítapiis-stahkoi and Salish Kootenai.*



Protecting Montana's wildlife,  
land, waters and hunting & fishing  
heritage for future generations.

November 15, 2021

FWP Wildlife Comments  
P.O. Box 200701  
Helena, MT 59620

Re: Proposed Grizzly Bear Relocation Sites

Dear Fish & Wildlife Commission:

The Montana Wildlife Federation (MWF) advocates for the scientific management of wildlife, public access to public lands, and the protection of wildlife habitat. We are Montana's oldest wildlife conservation organization and we represent the values of hunters, anglers, and other wildlife conservationists across Montana.

FWP bear managers care deeply about the conservation of grizzly bears. When a decision is made to relocate a bear that has gotten into trouble or has the potential to get into trouble, FWP bear managers are focused on trying to prevent additional conflicts with people. During the discussions that always take place when a human-bear conflict occurs, foremost amongst considerations is how to avoid a recurrence.

Release sites on public land outside of designated Recovery Zones will increase the potential for successful relocations because such sites have a lower chance of placing the released bear in close proximity to another grizzly. This improves the probability that the relocated bear will remain in the new area longer thereby helping to minimize the chance that these bears will return to the original conflict area and resume troublesome behaviors. A blanket ban on release sites outside Recovery Zones could have the unintended consequence of actually increasing future bear/human conflicts.

FWP should not euthanize more bears as an alternative to relocation. Bears selected for relocation often are ones that biologists believe are capable of resuming natural behavior. Euthanizing even more grizzlies cannot be done without likely exceeding grizzly bear mortality thresholds to which FWP has already committed. Exceeding mortality limits would make future delisting unlikely. The net effect of preventing relocations into occupied grizzly habitat outside recovery zones would be to increase human-bear conflicts and move grizzly management in Montana backward.

If there are specific sites of concern, we would encourage you to discuss these sites with professional bear management staff to assess that site in detail. Thank you for the opportunity to comment on this issue.

Sincerely,

A handwritten signature in black ink that reads "Eric Clewis". The signature is written in a cursive, flowing style.

Eric Clewis  
Connectivity & Wildlife Campaigns Manager  
Montana Wildlife Federation

**From:** [Steve Osgood](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly bear relocation sites  
**Date:** Friday, November 5, 2021 4:33:26 PM

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Dear FWP,

Seriously, we should relocate these bears to their historic ranges in wilderness areas of California. The grizzly bear is on their flags and state emblems. They should welcome the opportunity to restore their iconic bear to their environment.

Sincerely,  
Steven Osgood  
PO Box 641  
Sunburst MT 59482

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Arthur Daniel](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] grizzly bear relocation  
**Date:** Tuesday, November 2, 2021 9:29:33 AM

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There are no relocation sites in Yellowstone Park. This means that a problem bear in Yellowstone will now be thrust upon the population outside the park. Not a good solution. A problem bear is a problem bear wherever it is, and it's a problem because it does not fear

[https://urldefense.com/v3/\\_\\_http://humans.Do\\_!!GaaboA!70PIS766\\_nGpRQhcdhcS0719Q-ghL3YQeUvJ4XkAXT9sQVO\\_2E7gv1NcK2kru6o\\$](https://urldefense.com/v3/__http://humans.Do_!!GaaboA!70PIS766_nGpRQhcdhcS0719Q-ghL3YQeUvJ4XkAXT9sQVO_2E7gv1NcK2kru6o$) the obvious. Eliminate the bear.



109.

**From:** [Karen Helmrick](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly relocation  
**Date:** Friday, November 12, 2021 7:45:34 PM

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Hello , To whom this may concern. I am a resident of the Troy MT area. While reading your plans of relocating Grizzlies in my area , the plan is way to close to The City of Troy surrounding area! You are just asking for another bear attack like what happened to that poor girl taken out of her tent in a city park and killed. Why do we have to live in fear of this.

The way I am looking at this you all must have way to many Grizzlies that you have to plant them next to town, How about opening up a hunting season for them, it seem to me there is way to many , that they can not even live together!! I do not want them dropped off in my back yard! Take them back to the open fields of the parries where they originally came from.

No drop off of Grizzlies in the Troy Area!!

Thank you.

Sent from [Mail \[go.microsoft.com\]](mailto:go.microsoft.com) for Windows

110.

**From:** [erh.holycross](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly relocation sites  
**Date:** Friday, November 12, 2021 1:02:31 PM

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I have lived for 30 years in the North Fork area of the northern continental divide ecosystem. Over the years we have been the recipient of many relocated bears. Overwhelmingly, they thrive up here and I urge you to retain all designated relocation sites in this recovery zone. They are all needed! The North Fork population density is extremely low and we are well accustomed to living in prime bear habitat as is illustrated by the very few incidences we have had up here over the decades.

Thank you for the opportunity to comment

Elizabeth Holycross  
13455 North Fork Rd  
Polebridge MT

Sent from my iPhone

111.

**From:** [Martin Price](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Grizzly relocation  
**Date:** Monday, November 8, 2021 6:41:20 PM

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This 40 year experiment has gone on long enough. Relocating bears is a waste of money.

As in all government regulated activities, there is never enough. It was stated in the 80s if we reach 40 to 45 bears that would be a successful endeavor. Now we have probably exceeded 70 bears and no proven genetic cross breeding with the few existing bears, (cause they were probably killed).

Grizzly bears are a plains animal forced by man to live in an area with little feed, feed shortage that is worsened when we have summers such as the last. If all you Climate change nuts are correct this trend will only get worse in terms of the bears finding food.

You've mostly stopped logging in our area to the point to where there's almost as much dead timber as living trees. Another wonderful piece of management by our government.

Like I started out saying, its time to end your failed Grizzly bear science experiment by removing grizzly from the endangered species list and allow hunting, hunting would certainly relocate the bears....

FW shouldn't have illegally planted the wolves (these new Frankinwolves killed the smaller native wolves) that eat everything the grizzlies could eat. One disastrous decision after another and the people of Lincoln county, not out of staters, are left to suffer these terrible science experiments.

Admit you egregious failures.

Delist the bears and stop this insanity.

Martin Price  
6th generation Montanian

*Sent from my Verizon LG Smartphone*

**From:** [linda alkire](#)  
**To:** [FWP Wildlife](#); [Gunderson, Steve](#)  
**Subject:** [EXTERNAL] Grizzly  
**Date:** Saturday, November 6, 2021 9:13:39 AM

---

I trust that you know the struggle to manage the Grizzly bear is real. If you are forced by the feds to "manage" their bears at least keep them confined to the upper cabinet wilderness. We should not want them in private especially residential property or walking into town getting fed/habituated, God forbid loss of life. Stay safe out there.

**From:** [cmhprogramming](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Proposed Grizzly Bear Recovery Sites  
**Date:** Monday, November 8, 2021 1:11:22 PM

---

Hi,

I would like to inform you that I am 100% against the proposed new grizzly bear relocation sites.

I do not believe that any grizzly bear relocation site needs to be outside of the established grizzly bear recovery zone. And I am also against the proposed sites that would be so near to Troy.

Bob Hosea  
775 Parmenter Creek Road  
Libby, Montana 59923

**From:** [Bryan and Crystal Denton](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] Proposes grizzly zones around Troy Montana  
**Date:** Monday, November 8, 2021 2:54:06 PM

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Of the 59 proposed new location sites, at least 25 of them would be located outside of the already established grizzly bear recovery zone, with two of the new sites very near Troy.

The way that I see it, if the bear biologist get these new locations passed and then they start using them, they would eventually just ask to expand the recovery zone to the new location sites. Which would mean even more closed public roads in the area.

I don't believe we need any relocation sites outside of the established recovery zone. And we certainly don't need any sites that close to Troy. Remember the grizzly bear incident at Ovando Montana this Summer?

PLEASE DO NOT PASS THESE PROPOSED LOCATIONS !!

Sincerely,

*Crystal Denton*  
*Troy resident and Troy City Counsel member*

**From:** [McDonald, Ken](#)  
**To:** [McClain, Kammi](#)  
**Subject:** FW: [EXTERNAL] Bear relocation  
**Date:** Monday, November 8, 2021 8:07:11 AM  
**Attachments:** [image001.png](#)

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Will you please add this to the public comment on the grizzly bear relocation sites.

Thanks,

Ken McDonald  
 Wildlife Division Administrator  
[Montana Fish, Wildlife & Parks](#)  
 P.O. Box 200701  
 Helena, MT 59620-0701  
 Ph: (406) 444-5645  
 Email: [kmcdonald@mt.gov](mailto:kmcdonald@mt.gov)




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**From:** uslamb uslamb <uslamb@northerntel.net>  
**Sent:** Saturday, November 6, 2021 8:08 AM  
**To:** Leah Johnson <leah@mtsheep.org>; Edwards, George <GEdwards@mt.gov>; Nina Baucus <nina@siebenranch.com>; Kujala, Quentin <qkujala@mt.gov>; McDonald, Ken <kmcdonald@mt.gov>; Leslie Robinson <threelazyj@yahoo.com>  
**Subject:** [EXTERNAL] Bear relocation

As pointed out by a vague statement from Mt FWP, the Grizzly Bear program is Not funded by the managing agency which would be USFWS. Relocation of bears has nothing to do with genetic Diversity nor augmentation of an already sprawling population. This population is so spread across Mt that USFWS refuses to count bears outside their comfort zone and even then they use computer modeling to count. Sportsman dollars used by FWP to preform management of Bears for USFWS is a gross misuse of those dollars and can only lead to mistrust by the sportsmen that pay into the program.

As the USFWS has no direction toward delisting there should be no obligation for the state to perform a task that is costly and potentially a liability risk that can only end up costing the department a lot of money and more importantly someone's life.

There is NO suitable site for bear relocation except possibly inside the two Federal parks and only if the USFWS performs the moves and monitors the movement of the Bear to keep those bears inside the Park boundaries.

The result of FWP's continued relocation program will lead to further intolerance by the public that has to live with the bear and a reduction of the overall population of the Grizzly Bear.

Dave McEwen



**From:** [FWP General](#)  
**To:** [FWP Wildlife](#)  
**Subject:** FW: [EXTERNAL] Relocate Griz to Libby and Troy  
**Date:** Wednesday, November 10, 2021 4:22:27 PM

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**From:** MSOHOSHOT <ms\_ohsohot@yahoo.com>  
**Sent:** Wednesday, November 10, 2021 3:53 PM  
**To:** FWP General <fwpgen@mt.gov>  
**Subject:** [EXTERNAL] Relocate Griz to Libby and Troy

We don't need any more Griz in these areas, there are enough of them as is. Locate them where ppl don't go! Way up in the cabnet mountains. We have to many kids to worry about with all the bears running around here now. No Griz Thank you Jessica Powers  
[Sent from Yahoo Mail on Android \[go.onelink.me\]](#)

Allen Schallenberger  
 53 Elser Lane  
 Sheridan, MT 59749-9604  
 Nov. 6, 2021  
 406-842-5134

**RECEIVED**  
**NOV 15 2021**  
**FISH, WILDLIFE PARKS**  
**DIRECTOR'S OFFICE**

Ken McDonald  
 Chief of Wildlife Management  
 MT FWP Dept.  
 P.O. Box 200701  
 Helena, MT 59620-0701

Dear Mr. McDonald:

I am commenting on the grizzly bear relocation program and want to expand on points not covered well in your information to the FW Commission on Oct. 28<sup>th</sup>.

A common complaint by environmental groups who sue to block delisting is that there is no genetic connectivity between the Northern Continental Divide Ecosystem (NCDE) and the Yellowstone Ecosystem (YES). Move a few male grizzly bears from the NCDE to the YES in Montana. Even better help the Governors of MT, WY and ID to work together to move a few male grizzly bears from Montana NCDE to YES in WY and ID near Yellowstone National Park (YNP). That needs to be done on pressing issue time rather than usual government action time extending years or even decades. A genetic study about 20 years ago when the YES population was only 400 grizzlies stated 2 grizzly bears moving per grizzly generation, (about 10 years) from NCDE to the YES would take care of any genetic isolation problems. Craig R. Miller and Lisette P. Waits. The history of effective population size and genetic diversity in the Yellowstone grizzly (*Ursus arctos*): Implications for conservation 4334-4339, PNAS, April 1, 2003, Vol. 100 No. 7.

More recent studies by the Interagency Grizzly Bear Study Team utilizing genetic data from 700 grizzly bears determined that the rate of inbreeding from 1985-2007 was only 0.2 percent.

The Montana FWP Dept. website is greatly harming the delisting process by putting out inaccurate grizzly bear population numbers. On October 28, 2021, under Montana Species of Interest the following low numbers were shown:

**..."it is generally agreed there are more than 500 (grizzly bears) in the northwest Montana Rockies, about 600 in and around Yellowstone National Park, about 50 in the Selkirk Mountains of northern Idaho and Washington and 30-40 in the Cabinet-Yaak area of northern Idaho and Montana."**

Actual estimated number for the NCDE in 2021 is 1,114. That number is in the Northern Continental Divide Ecosystem: Grizzly Bear Population Monitoring Team Annual report 2020 of 30 pages. In April 2021 an 85-page report by the Interagency Grizzly Bear Study Team provided a more accurate way to estimate the YES grizzly bear population. The population in 2021 under the old system was 727. Under the newer more accurate system it is at least 1,000 grizzly bears.

Quit feeding the public inaccurate grizzly bear population data on your FWP Dept. website.

For those who don't know me, I have been involved with grizzly bears since 1963 in Montana. I did five years of grizzly bear research on the Rocky Mountain Front and adjacent areas in the late 1970's. In my final 200 page-grizzly bear research report to the MT FG Dept. in 1980, I made the first recommendation for bear management specialists who were well trained and equipped to handle bear problems for better bear management in Montana. The current bear specialists have the ability to safely trap and relocate grizzly bears for purposes of enhancing genetics and grizzly bear delisting.

I have lived in the Sheridan, MT vicinity since 1990. Federal bear researchers are still denying the presence of grizzly bears in the Tobacco Root Mountains. I have recorded many reliable reports from others of grizzly bear sightings, grizzly bear tracks, charges by grizzly bears, a few people who have grizzly pictures and two kills of grizzly bears in the Tobacco Root Mountains in 1965 and 1978.

The most recent observation of grizzly bear connectivity was recorded Oct. 19, 2021. A FWP Dept. Parks maintenance worker at Lewis and Clark Caverns State Park told my wife and me that he lived on Whitetail Creek north of Whitehall and south of Boulder. He said he had recent pictures of grizzly bears on a trail camera on upper Whitetail Creek. You may recall two grizzly bears were killed in Elk Park just to the west a few years ago. Their origins were apparently from the NCDE.

Please let me know how you plan to resolve the issues I have mentioned.

Sincerely,

A handwritten signature in cursive script that reads "Allen Schallenberger".

Allen Schallenberger

c. Governor Greg Gianforte

FWP Dept. Director Henry "Hank" Worscek

FWP Dept. Chief of Staff Quentin Kujala