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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.

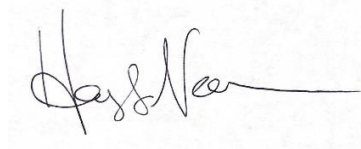
Because of the connectivity importance of the Great Burn, we ask you to consider connectivity needs between the NCDE Recovery Zone, Ninemile DCA and the Bitterroot Ecosystem. We support the use of the release sites north of the Blackfoot River and to the west. In particular, sites 123, 124, 125, 126, 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 be '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 be 'Hayley Newman', with a long horizontal line extending to the right.

Hayley Newman  
Co-Executive Director  
Great Burn Conservation Alliance