

From: [Susan Reneau](#)
To: [scoping_pablo_ninemile@fw.gov](#); [bernie_petersen@fws.gov](#); [bernardo_garze@fws.gov](#); "Griffin, Toni"; [kelly_hogan@fws.gov](#); "Noreen Walsh"; "Will Meeks"
Cc: [charles_robison@daines.senate.gov](#); "Roddy, Russell"; [aaron_flint@mail.house.gov](#); [sam_sweeney@daines.senate.gov](#); "Flint, Jessica"
Subject: Comments regarding the CCP at the National Bison Range Complex
Date: Sunday, June 18, 2017 7:12:15 PM

Dear Secretary of Interior Ryan Zinke and the U.S. Fish and Wildlife Service:

I attended two meetings on June 6 and 7 in Polson and Kalispell by traveling in excess of 250 miles to start the scoping process for the comprehensive conservation plans (CCPs) at the National Bison Range Complex that has never been done since the 1997 National Wildlife Refuge System Improvement Act was passed by Congress requiring CCPs all national wildlife refuges. I understand the most, if not all, other national wildlife refuges in the United States have CCPs in place, including Lost Trail National Wildlife Refuge, which is a part of the National Bison Range Complex, but not the National Bison Range itself, which is a violation of the 1997 federal law. This is because since 1994 efforts have been underway to force this premiere national wildlife refuge to give away its inherently federal positions and federal money to a sovereign Indian government that has no desire to keep this iconic national wildlife refuge under the management of the National Wildlife Refuge System. This Indian government, the Confederates Salish Kootenai Tribes (CSKT) has stated in public hearings that if they are given the land that is the National Bison Range they will use the land for other purposes.

If the National Bison Range is destroyed, so will all national wildlife refuges, all national parks and all other federal lands, so it is critical to respect federal laws that are in place and respect the National Bison Range Complex.

Federal workers stationed at this national wildlife refuge, many of whom are actually registered members of this Indian reservation and are also federal workers, have been left in limbo and turmoil because the Indian government wants total control over the National Bison Range, which is contrary to many levels of federal law. All of these federal workers are qualified and excellent and should remain in place without the threat of being replaced by contract workers under an annual funding agreement with workers that are not federal workers.

I heard from the five regional staff members sent from the Denver regional office to run the meetings that the project leader of the National Bison Range Complex will not be the leader of the CCP process as is the standard operating procedure of all the other CCPs that have been completed at all the other national wildlife refuges and that regional staff people unfamiliar with the National Bison Range will run the CCP process. Furthermore, retired and long-time U.S. Fish and Wildlife Service employees wishing to

participating in the CCP planning process will not be allowed to attend meetings and can only submit their comments like the general public. My understanding from many U.S. Fish and Wildlife Service employees and retirees is that CCPs always have the refuge manager or the complex project leader as the head of the CCP process but not at the National Bison Range Complex where everything is in trauma. Why has the regional office in Denver under the leadership of Noreen Walsh taken the leadership away from Jeff King and given it to regional planners that have no knowledge of the National Bison Range? This makes no sense and is not what is best for the National Bison Range.

Mr. Zinke indicated that he wanted local managers of national wildlife refuges to have direct control over their refuges but the process for this CCP is the exact opposite and I object to this procedure. The person hired to write and manage the CCP for the National Bison Range Complex was excluded from the process and the complex project leader, Jeff King, is not the prime leader. All meetings and day to day activities to complete the CCP will be performed by the regional staff planners that have no specific knowledge of the National Bison Range Complex and the National Bison Range.

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As I understand the CCP process, a national wildlife refuge needs a full staff of professionals and at this time, the National Bison Range Complex is seriously understaffed because of the turmoil caused from the pressure of this sovereign Indian government wanting control over inherently federal tasks and positions so all aspects of jobs go unfilled.

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Weed control, management of wildlife, maintenance of fences and buildings, and overall law enforcement are all of concern to me and without a minimum of 10 professional staff at the National Bison Range Complex, work cannot be accomplished.

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needs to be updated in 2020. You need to figure out how much money has been wasted since 1994 as this sovereign Indian government has tried to force themselves on this premiere national wildlife refuge and take away federal jobs and federal money from a national wildlife refuge that belongs to all Americans.

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Susan Campbell Reneau

(b) (6)

bluemountain@montana.com

From: [Susan Reneau](#)
To: scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; "Roddy, Russell"; charles_robison@daines.senate.gov; "Matt Hogan"; "Noreen Walsh"; "Cynthia Martinez"; bernie_petersen@fws.gov; "Will Meeks"
Subject: Comments regarding the scoping process for a CCP at the National Bison Range
Date: Wednesday, June 21, 2017 11:38:42 AM

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Susan Campbell Reneau

(b) (6)

[Redacted]

bluemountain@montana.com

From: [Bernie Petersen](#)
To: [Maureen Gallagher](#)
Cc: [Matthew McCollister](#)
Subject: FW: Comments regarding the CCP at the National Bison Range Complex
Date: Monday, June 19, 2017 7:08:56 AM

Maureen,

AS I mentioned this morning.

Bernard J Petersen
Refuge Supervisor for Colorado, Montana, Utah, Wyoming
US Fish and Wildlife Service Region 6
National Wildlife Refuge System

303-236-4310 W
720-708-8026 Cell

From: Susan Reneau [mailto:bluemountain@montana.com]
Sent: Sunday, June 18, 2017 7:12 PM
To: scoping_pablo_ninemile@fw.gov; bernie_petersen@fws.gov; bernardo_garze@fws.gov; 'Griffin, Toni'; kelly_hogan@fws.gov; 'Noreen Walsh'; 'Will Meeks'
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Susan Campbell Reneau

(b) (6)

bluemountain@montana.com

From: [Noreen Walsh](#)
To: [Will Meeks](#); [Maureen Gallagher](#); [Bernie Petersen](#); toni_griffin@fws.gov
Cc: [Matt Hogan](#); brady_mcgee@fws.gov
Subject: Fwd: Comments regarding the scoping process for a CCP at the National Bison Range
Date: Wednesday, June 21, 2017 11:49:55 AM

Hello all,

Can you all check if we do have an email address problem and if so correct it? Either way will you please let me know?

Thank you so much

Noreen

Begin forwarded message:

From: Susan Reneau <bluemountain@montana.com>
Date: June 21, 2017 at 11:37:21 AM MDT
To: <scoping_NBR@fws.gov>, <toni_griffin@fws.gov>, <kelly_hogan@fws.gov>, "Roddy, Russell" <russell_rodny@ios.doi.gov>, <charles_robison@daines.senate.gov>, 'Matt Hogan' <matt_hogan@fws.gov>, 'Noreen Walsh' <noreen_walsh@fws.gov>, 'Cynthia Martinez' <cynthia_martinez@fws.gov>, <bernie_petersen@fws.gov>, 'Will Meeks' <Will_Meeks@fws.gov>
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(b) (6)

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From: [Susan Reneau](mailto:Susan.Reneau@fws.gov)
To: "[William Reffalt](mailto:William.Reffalt@comcast.net)"; scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; "[Roddy, Russell](mailto:Roddy.Russell@ios.doi.gov)"; charles_robison@daines.senate.gov; "[Matt Hogan](mailto:Matt.Hogan@fws.gov)"; "[Noreen Walsh](mailto:Noreen.Walsh@fws.gov)"; "[Cynthia Martinez](mailto:Cynthia.Martinez@fws.gov)"; bernie_petersen@fws.gov; "[Will Meeks](mailto:Will.Meeks@fws.gov)"
Subject: RE: Comments regarding the scoping process for a CCP at the National Bison Range
Date: Wednesday, June 21, 2017 1:35:03 PM

Aaaaa.

From: William Reffalt [<mailto:w.c.reffalt@comcast.net>]
Sent: Wednesday, June 21, 2017 12:45 PM
To: 'Susan Reneau'; scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; 'Roddy, Russell'; charles_robison@daines.senate.gov; 'Matt Hogan'; 'Noreen Walsh'; 'Cynthia Martinez'; bernie_petersen@fws.gov; 'Will Meeks'
Subject: RE: Comments regarding the scoping process for a CCP at the National Bison Range

Susan: the proper email is: scoping_pablo_ninepipe@fws.gov . You have added an "s" at the end of ninepipe and that is the reason your email bounced.

Bill

From: Susan Reneau [<mailto:bluemountain@montana.com>]
Sent: Wednesday, June 21, 2017 11:37 AM
To: scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; 'Roddy, Russell' <russell_rodny@ios.doi.gov>; charles_robison@daines.senate.gov; 'Matt Hogan' <matt_hogan@fws.gov>; 'Noreen Walsh' <noreen_walsh@fws.gov>; 'Cynthia Martinez' <cynthia_martinez@fws.gov>; bernie_petersen@fws.gov; 'Will Meeks' <Will_Meeks@fws.gov>
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Furthermore, the two meetings on June 6 and 7 were very poorly attended by the public and very poorly advertised. If the local refuge leaders had been allowed to speak to the local media I know there would have been a better turnout.

As I understand the CCP process, a national wildlife refuge needs a full staff of professionals and at this time, the National Bison Range Complex is seriously understaffed because of the turmoil caused from the pressure of this sovereign Indian government wanting control over inherently federal tasks and positions so all aspects of jobs go unfilled.

No discussion of an annual funding agreement should be mentioned or considered during the CCP process, yet the AFA with this sovereign Indian government was brought up during these meetings, which put a further damper over the CCP process. The highly paid attorney for this sovereign Indian government was the only person I saw attend these two days of meetings except for one tribal leader.

Weed control, management of wildlife, maintenance of fences and buildings, and overall law enforcement are all of concern to me and without a minimum of 10 professional staff at the National Bison Range Complex, work cannot be accomplished.

The five regional office staff people cost the taxpayers thousands of dollars to fly from Denver for those two days, stay at hotels, and return to Denver. Project Leader Jeff King lives in the area and should have run the meetings.

One CCP is all that is needed, not two. Lost Trail already has a CCP and just needs to be updated in 2020. You need to figure out how much money has been wasted since 1994 as this sovereign Indian government has tried to force themselves on this premiere national wildlife refuge and take away federal jobs and federal money from a national wildlife refuge that belongs to all Americans.

In the spirit of Theodore Roosevelt, Ding Darling, and the Flying Blue Goose, I say, the wildlife and its habitat cannot speak, so I must. Please listen to

the direction of Mr. Ryan Zinke.

Susan Campbell Reneau

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bluemountain@montana.com

From: [William Reffalt](#)
To: ["Susan Reneau"](#); scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; ["Roddy, Russell"](#); charles_robison@daines.senate.gov; ["Matt Hogan"](#); ["Noreen Walsh"](#); ["Cynthia Martinez"](#); bernie_petersen@fws.gov; ["Will Meeks"](#)
Subject: RE: Comments regarding the scoping process for a CCP at the National Bison Range
Date: Wednesday, June 21, 2017 12:44:42 PM

Susan: the proper email is: scoping_pablo_ninepipe@fws.gov . You have added an "s" at the end of ninepipe and that is the reason your email bounced.

Bill

From: Susan Reneau [mailto:bluemountain@montana.com]
Sent: Wednesday, June 21, 2017 11:37 AM
To: scoping_NBR@fws.gov; toni_griffin@fws.gov; kelly_hogan@fws.gov; 'Roddy, Russell' <russell_rodny@ios.doi.gov>; charles_robison@daines.senate.gov; 'Matt Hogan' <matt_hogan@fws.gov>; 'Noreen Walsh' <noreen_walsh@fws.gov>; 'Cynthia Martinez' <cynthia_martinez@fws.gov>; bernie_petersen@fws.gov; 'Will Meeks' <Will_Meeks@fws.gov>
Subject: Comments regarding the scoping process for a CCP at the National Bison Range

Dear Secretary of Interior Ryan Zinke and the U.S. Fish and Wildlife Service:

Your official newsletter given to me at the June 6 and 7 meetings in Polson and Kalispell lists the scoping email for filing comments for the CCP process at the National Bison Range as scoping_pablo_ninepipes@fws.gov, but that email bounces and I discovered that to file comments to you I need to send comments to scoping_nbr@fws.gov. Thankfully, I also filed my comments to the regional staff that attended the meetings and to other FWS staff I know but it disturbs me that your official newsletter published a non-functional email for contacting anyone related to the CCP process. This further illustrates my frustration that local control of the CCP process is the best way to organize the information, not from a regional process, as was the order of Mr. Ryan Zinke. The regional leaders in the Denver office of the FWS need to follow the instructions of Mr. Ryan Zinke. They also need to use the experienced CCP planner, Laura King, who is stationed at the National Bison Range and would cost the taxpayers much less than to have people from Denver traveling back and forth to the National Bison Range for CCP meetings, especially since they are unfamiliar with the National Bison Range.

I attended two meetings on June 6 and 7 in Polson and Kalispell by traveling in excess of 250 miles to start the scoping process for the comprehensive conservation plans (CCPs) at the National Bison Range Complex that has never been done since the 1997 National Wildlife Refuge System Improvement Act was passed by Congress requiring CCPs all national wildlife refuges. I understand the most, if not all, other national wildlife refuges in the United States have CCPs in place, including Lost Trail National Wildlife Refuge, which is a part of the National Bison Range Complex, but not the

National Bison Range itself, which is a violation of the 1997 federal law. This is because since 1994 efforts have been underway to force this premiere national wildlife refuge to give away its inherently federal positions and federal money to a sovereign Indian government that has no desire to keep this iconic national wildlife refuge under the management of the National Wildlife Refuge System. This Indian government, the Confederates Salish Kootenai Tribes (CSKT) has stated in public hearings that if they are given the land that is the National Bison Range they will use the land for other purposes.

If the National Bison Range is destroyed, so will all national wildlife refuges, all national parks and all other federal lands, so it is critical to respect federal laws that are in place and respect the National Bison Range Complex.

Federal workers stationed at this national wildlife refuge, many of whom are actually registered members of this Indian reservation and are also federal workers, have been left in limbo and turmoil because the Indian government wants total control over the National Bison Range, which is contrary to many levels of federal law. All of these federal workers are qualified and excellent and should remain in place without the threat of being replaced by contract workers under an annual funding agreement with workers that are not federal workers.

I heard from the five regional staff members sent from the Denver regional office to run the meetings that the project leader of the National Bison Range Complex will not be the leader of the CCP process as is the standard operating procedure of all the other CCPs that have been completed at all the other national wildlife refuges and that regional staff people unfamiliar with the National Bison Range will run the CCP process. Furthermore, retired and long-time U.S. Fish and Wildlife Service employees wishing to participating in the CCP planning process will not be allowed to attend meetings and can only submit their comments like the general public. My understanding from many U.S. Fish and Wildlife Service employees and retirees is that CCPs always have the refuge manager or the complex project leader as the head of the CCP process but not at the National Bison Range Complex where everything is in trauma. Why has the regional office in Denver under the leadership of Noreen Walsh taken the leadership away from Jeff King and given it to regional planners that have no knowledge of the National Bison Range? This makes no sense and is not what is best for the National Bison Range. This is a repeat of what I said above but I want to emphasize this point.

Mr. Zinke indicated that he wanted local managers of national wildlife refuges to have direct control over their refuges but the process for this CCP is the exact opposite and I object to this procedure. The person hired to write and manage the CCP for the National Bison Range Complex was excluded from the process and the complex project leader, Jeff King, is not the prime

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Susan Campbell Reneau

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bluemountain@montana.com

From: [Bernie Petersen](#)
To: [Maureen Gallagher](#); [Michelle Hizon](#)
Subject: information for tomorrows meeting
Date: Wednesday, September 27, 2017 4:18:23 PM
Attachments: [OIG.docx](#)

Attached is the revised questions and answers for the meeting in the morning.

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Maureen – I will have the rest of my notes and information for you in the morning as requested.

Bernard J Petersen
Refuge Supervisor for Colorado, Montana, Utah, Wyoming
US Fish and Wildlife Service Region 6
National Wildlife Refuge System

303-236-4310 W
720-708-8026 Cell

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Is there a lack of internal controls?

What are the financial policies applicable to refuge resource management?

212 FW 8 - Donation Receipt Accounts - there is clear guidance on the policy for depositing donated funds and the use of donation boxes.

Collections handbook (Incorporated into Fish and Wildlife Service Manual Part 261 outlines procedures for the collection of donated funds (page E8), process for depositing the donated funds (page 12 and E4) and sets forth who is accountable for lost or missing funds collected (page 32). This also sets forth the designation of the Collections Officer for the station and the requirements that follow that appointment (chapter 2)

260 FW 1 – Cash Accountability outlines process for depositing funds received by the refuge.

121 FW 1 – Audio Visual Production and Printing - Outlines guidance on using funds to print materials for public distribution.

What internal controls are in place for refuge management?

Field stations are supervised by a Refuge Supervisor stationed in Regional Office

Policies and guidance are in place to direct the actions of the operations of the field stations covering financial, performance, conduct etc.

What paper trails are available to track the money?

Bison Range network drive, (K-drive) that they use to track all deposits and disbursements from a restricted account, which appears to be detailing only the funds received as donations. (This account is held by the Glacier National Park Conservancy (Glacier Conservancy) which runs the book store for the refuge. We have copies of the transactions for deposits and disbursements from this account and what the disbursements were for. Starting in 2017 the donation account had a carryover balance of 12,177.49 dollars with deposits starting in February of 2017 thru September 05, 2017 of 7,065.75 dollars. Disbursements totaled 10,411.97 dollars.) **Copies of the records are in our possession.** Statements have been obtained that only Jeff and Laura King have access to this account.

Are financial audits conducted for refuges?

Audits are conducted on a random basis for receipts from collection accounts such as the Rec Fee program.

Cash donations are supposed to be reported in collection accounts as contributed funds; however it does not appear that the refuge has been depositing these funds in this manner, rather they are depositing with the cooperating book store operator, the Glacier Conservancy.

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Who are the witnesses?

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Allegations reported to Refuge Supervisor Bernie Petersen

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