

From: [Cooley, Hilary](#)
To: [Jeff Juel](#)
Subject: Re: [EXTERNAL] grizzly relocation in the Bitterroot NF
Date: Wednesday, November 23, 2022 7:05:39 AM

Thanks Jeff.

You're right; it's a difficult time for bears in the Bitterroot. But please do not misinterpret Jamie Jonkel's comment to mean he doesn't believe bears belong there. Jamie was heading the charge to find a site on the west side of 93.

-Hilary

From: Jeff Juel <jeffjuel@wildrockies.org>
Sent: Tuesday, November 22, 2022 3:40 PM
To: Cooley, Hilary <hilary_cooley@fws.gov>
Subject: Re: [EXTERNAL] grizzly relocation in the Bitterroot NF

Hilary,

Thank you for sharing those Guidelines. From 1986, it appears the agreements could use some updating.

As far as relocation sites, your email says "We are working with USFS and ID to set up a relocation site or 2 on the west side." Yesterday's IGBC Bitterroot Ecosystem Subcommittee clearly revealed that there is almost nothing but opposition to that idea from the State of Montana, Idaho Fish and Game, and the Forest Service. If they wanted that to happen, by now--two decades after the BE Recovery FEIS and ROD--there would have been real progress to report. All you were able to divulge is that you/USFWS are working on that, over the winter, etc. and there's no target date.

Regarding Jamie Jonkel, as much as I respect most of his perspective on grizzly bears, it was extremely disappointing to hear him report the two relocated subadult grizzly bears traveled to Montana's Rocky Mountain Front after release, with him saying they "decided to **go back home**" which to me is code for agreeing that they don't belong in the Bitterroot.

So when your email says, "believe me when I say that the BE is a recovery zone that we want bears to reach!" I interpret that to mean USFWS alone. In recognition of the States' and Forest Service noncooperation on relocation sites, Friends of the Clearwater urges USFWS to not authorize any more specious reactionary relocations, in cases such as when those two subadult grizzly bears were shouldering the bulk of the BE recovery work on their own, without creating any conflicts with humans.

Have a good Thanksgiving,

Jeff Juel

On 11/18/22 8:16 AM, Cooley, Hilary wrote:

Hi Jeff,
The Guidelines are attached.

Had they gotten into conflict, we would have likely had fewer options. Long-time bear biologist, Jamie Jonkel, recommended the pre-emptive move. If anyone has a feel for what a bear might do, the likelihood of conflict, etc., it's Jamie. We had hoped to find a relocation site on the west side of Hwy 93, but that was not supported by all agencies. We are working with USFS and ID to set up a relocation site or 2 on the west side.

Please believe me when I say that the BE is a recovery zone that we want bears to reach!

Thanks again for your concern,
Hilary

From: Jeff Juel <jeffjuel@wildrockies.org>
Sent: Thursday, November 17, 2022 12:45 PM
To: Cooley, Hilary <hilary_cooley@fws.gov>
Subject: Re: [EXTERNAL] grizzly relocation in the Bitterroot NF

Hilary, Thank you for the reply.

I went to the IGBC website to look for those IGBC Guidelines you mention. I see an MOU, a Charter, and other documents but nothing specifically entitled IGBC Guidelines. Can you please help me to find those IGBC Guidelines?

As you are aware, a big part of Friends of the Clearwater's interest in the incident at hand is the recovery of the grizzly bear in the Bitterroot Ecosystem (BE). With the population in the BE currently being so small and fleeting, we fail to understand why the USFWS and/or the IGBC could not have accepted more of a risk, identified any potential conflict you feared as human caused to deflect any potentially bad PR away from the specific bears the agencies were already monitoring. I surely don't know as many details as you do, but it appears that the conflict situations the bears were falling into prior to crossing U.S. Hwy 93 were more serious than the Florence, MT situation.

ANY grizzly bears successfully making their way into the BE are inevitably going to negotiate such hazards. To me it appears the bears were being punished for their location, not for their behavior at the time. I welcome a telephone discussion with you about this. Please let me know when would be a good time for you.

Thank you for your time.

Jeff Juel, Montana Policy Director
Friends of the Clearwater
509-688-5956
jeffjuel@wildrockies.org

On 11/14/22 9:49 PM, Cooley, Hilary wrote:

Hi jeff,

Thanks for the question

We authorize states to do relocations through the grizzly bear 4(d) rule (50 CFR 17.40), through section 10 of the ESA, and through the IGBC Guidelines, which describe a joint conversation between agencies and a final decision by USFWS. Pre-emptive relocations are not uncommon when we feel that a bear is likely to get into conflict. We chose to do it in this situation because there were many unsecure attractants in the area if these bears had gotten into conflict, local stakeholders would likely not have been supportive of any relocation south of I-90. By relocating them, we were hoping to get them away from the unsecure attractants, while keeping them south of I-90.

-Hilary

From: Jeff Juel <jeffjuel@wildrockies.org>

Sent: Tuesday, November 8, 2022 11:34:40 AM

To: Fortin-Noreus, Jennifer K <jennifer_fortin-noreus@fws.gov>

Subject: [EXTERNAL] grizzly relocation in the Bitterroot NF

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Jennifer, I'm inquiring about the recent relocation of two grizzly bears from west of US Highway 93 near the Bitterroot National Forest to the Sapphire Mountains. This is written up in a Missoulain article: https://missoulain.com/news/local/grizzlies-captured-in-bitterroot-relocated/article_75335e43-110a-51ba-849d-af2af0ab3667.html

The most recent Species Status Assessment states:

Management removals are allowed under the Act through a section 4(d) rule (50 CFR 17.40(b)). These types of removals encompass grizzly bear mortalities

resulting from conflicts at developed sites (e.g., bears attracted to anthropogenic food sources), livestock depredation, and other situations where human life or property is considered threatened by bear presence. While lethal to the individual grizzly bears involved, management removals can promote conservation grizzly bears by reducing illegal killing of bears, providing an opportunity to educate the public about avoiding conflicts, and promoting tolerance of grizzly bears by responding promptly and effectively when bears pose a threat to public safety or repeatedly depredate livestock. Without the support of the people that live, work, and recreate in grizzly bear country, grizzly bear conservation will not be successful.

When I go online to read those regulations at 50 CFR 17.40(b), I don't find much that specifically directs or authorizes actions such as that particular relocation. Logically, it seems there would be some limits to what the US Fish and Wildlife Service allows Montana Fish, Wildlife and Parks to do with grizzly bears. So I'm wondering how authorization for Montana Fish, Wildlife and Parks to do such relocations is made by the USFWS. Agreements? MOUs? Other permit(s)?

Thank you for your time.

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