

March 31, 2025

Horsefly Project

Ranger Helen Smith

White Sulphur Ranger District

Helena-Lewis and Clark National Forest

204 West Folsom

White Sulphur Springs, MT 59644

Dear Ranger Smith,

Thank you for this opportunity to comment. Please accept these additional comments from me on behalf of the Alliance for the Wild Rockies, Council on Wildlife and Fish, and Native Ecosystems Council on the proposed Horsefly Supplemental EA (SEA).

The SEA assumes that there aren't any grizzly bears in the Little Belts or the even the project area. The Montana Department Of Fish Wildlife and Parks disagrees.

Please see the following article:

Grizzly bears in the Little Belt Mountains

<https://www.krtv.com/news/montana-and-regional-news/montana-fwp-warns-about-grizzly-bears-in-the-little-belt-mountains>

GREAT FALLS — Since 2017, there has been an increase in grizzly bear reports in the Little Belts Mountains southeast of Great Falls, and Montana Fish, Wildlife, and Parks wants to make sure that everyone is staying safe.

David Kemp, grizzly bear management specialist with FWP, said, "We've had bears moving off of the Rocky Mountain front out of the Northern Continental Divide ecosystem for several years now. And they're expanding east, more into central Montana."

Kemp wants to make sure the people of the Little Belts are aware that grizzly bears are in the area.

Kemp said, "We want the public to be educated on what they should do when they encounter a grizzly bear. We're particularly interested in preventing human bear conflicts."

He says to make sure there are no attractants on your property for bears, such as unsecured trash or ripe fruit trees.

Kemp said, “We don't want the bear to come by your place, find something it wants to eat there that's available to them, learns that [it] is available there, and then it repeatedly sticks around.”

John Juras has a cabin in the Little Belts, and knows his fair share about bear encounters.

He noted, “In the Little Belts I've had black bear encounters. In the Rocky Mountain Front, I've had numerous grizzly bear encounters.”

Juras stays mindful of the bears, keeping himself hazard-free, and staying calm when he comes across them.

Juras said, “The key is you don't want to panic. You want to act cool and be confident.”

And, if Juras is being honest, he does not mind others being afraid of the animals.

Juras said, “I actually think it's great that there are bears in the Little Belts. Gives me more quiet and peace on the trails.”

In the current conditions, Kemp expects bear populations to continue spreading east, especially as waterways coming off the Rocky Mountain Front flow east themselves.

[Click here to learn more](#) about being "bear aware."

The Forest Service concluded in the Project BA that "[b]ased on the analysis of direct, indirect, and cumulative effects of the Horsefly project on grizzly bears, the project May Affect, but is Not Likely to Adversely Affect the species." AR_C5:0005064. The BA explained that its conclusion was based on several findings including the that the majority of the action area is not suitable for grizzly bear occupancy and that grizzly bears do not regularly occupy the Project area.

Now that it is clear that the Forest Service conclusion was in error, the Forest Service needs to reevaluate it's conclusion and write a new SEA or an EIS for the project and reconsult with the FWS on the impact of the Horsefly project on grizzly bears.

Thank you for your attention to these concerns.

Sincerely yours, Mike Garrity

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