Cost-Share Proposal Form for NorthWestern Energy Project 2188 TAC Funds

Project 2188 (Madison-Missouri River) License proposed Protection, Mitigation and Enhancement (PM&E) projects should relate to an effect from the continued operation of one or more of NorthWestern Energy's (NorthWestern) nine hydro developments (Hebgen, Madison, Hauser, Holter, Black Eagle, Rainbow, Cochrane, Ryan and Morony Dams). PM&E projects are required to reduce or offset impacts to river resources from the continued operation of the hydro developments. PM&E projects need to be prioritized toward in-river or on-the-ground measures that directly benefit fisheries and/or wildlife populations and their habitats:

Priority 1: 2188 License projects which meet License Article requirements and PM&E for fisheries or wildlife populations or their habitats within the main stem Madison River (Hebgen Reservoir to Three Forks) or Missouri River (Hauser Reservoir to Fort Peck Reservoir)

Priority 2: 2188 License projects which meet License Article requirements and PM&E for fisheries or wildlife populations or their habitats in primary tributaries or on adjacent lands and, in doing so, provide PM&E for Madison River (Hebgen Reservoir to Three Forks) or Missouri River (Hauser Reservoir to Fort Peck Reservoir) resources.

Priority 3: 2188 License PM&E projects which meet License Article requirements by providing scientific or other tangible PM&E benefits to Madison-Missouri River fisheries or wildlife populations or their habitats. These projects must be located in the greater Missouri River drainage upstream from Fort Peck Reservoir, but not necessarily located on the main stem Madison River or Missouri River or their adjacent lands or primary tributaries.

All TAC project proposals must include the following information:

Project Title: **Trumpeter Swan breeding flock restoration in the Middle Madison Valley**

Date: 11-3-2026

Explain how this Project addresses a specific Project 2188 License Article(s):
Article 423 Wildlife/habitat PM&E on Madison-Missouri Rivers, specifically "… wildlife enhancement plan that includes specific goals, objectives, and standards to enhance native plants and wildlife populations on the lands and waters associated with the project; including identification of specific protection, mitigation, and enhancement strategies for avian species."

Provide justification for Priority 1, 2 or 3 (above) that you selected: Priority 2

Our project addresses License Article 423 by restoring native trumpeter swans to their historic range. The primary objective of this restoration work is to release trumpeter swans into suitable habitat in the O'Dell Creek Headwaters area, in hopes that they will pioneer wetlands throughout Madison Valley where suitable nest areas are available. More specifically, in 2011 MFWP Region 3, collaborated with the Montana Wetlands Legacy Partnership (MWLP), through its wetland restoration efforts in the Madison Valley, to propose increasing the geographic extent of the Montana trumpeter swan restoration program by beginning to release captive-reared swans in the middle Madison, starting in 2012. This broad partnership of Madison Valley landowners, industry, federal, state, and private partners has been nationally recognized for providing quality wetland habitat that offers the potential to increase swan production in the region and to enhance connectivity between flocks breeding in the Centennial Valley, Blackfoot, and Flathead Valleys in Montana.

Project Sponsor (submitted by):

Claire Gower, Wildlife Biologist
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Location of Proposed Project: Madison Valley, Montana

Narrative: Trumpeter swans will be released in the Madison Valley at four primary release locations. We will conduct a flight the week prior to release to see if swans are occupying these areas to determine where the 2027 release birds should go. Locations include O'Dell Creek Wetlands (Granger Ranch) Ennis lake and/or other locations close to the Ennis lake Channels, Three-Dollar Bridge Ranch, and Cliff Lake (or the chain of lakes nearby). These waterbodies are close by and/or associated with the Madison River. These southern sites adjacent to the Madison River have the potential to link to the Centennial Valley, the Idaho release locations in the Teton Basin, Henry's Lake, ID, and potentially to Yellowstone National Park. The goal is to have release birds intermingle with wild birds, and/or connect with other restoration projects.

Lat;	45.253054	Lon: -111.730375 (Granger Ranch/O'Dell creek)
Lat;	45.4106	Lon; -111.67406 (Ennis Lake)
Lat;	44.83303	Lon; -111.52216 (Three Dollar Bridge Ranch)
Lat;	44.76488	Lon; -111.53897 (Cliff Lake)

Total Project Cost: $12,500

TAC Funds (Cost-Share) Requested for Project: $12,500

I. Introduction; brief statement of project to be completed with pertinent background information.
Since its inception, Northwestern Energy has been a funding partner for restoration of the O'Dell Creek Headwaters wetlands and has been the primary funding partner with FWP for the accompanying restoration of breeding trumpeter swans in the middle Madison. Restoration of wetland habitats in this area has now provided essential breeding areas for reestablishment of trumpeter swans to this portion of their historic breeding range. Releases of hand-reared, wild stock trumpeter swans have occurred for 13 of the last 15 years (no swans were released in 2018 and 2019), with 2026 being the 13th year of releases. Ten cygnets were released on September 9th, 2026 (four on Three-dollar bridge ranch and six on Cliff Lake-Horn creek arm). Based on experience in the Blackfoot Valley and other parts of the Rocky Mountain trumpeters' breeding range, approximately ten years of releases are needed to establish the first nesting pairs in the area. Last year, we observed an established pair at the KOA pond north of Ennis, and 6 subadult birds (possibly this pair's young from the year before), close by on Ennis Lake. We are also getting an increasing number of reports of observed adult swans with yearling birds in spring indicating that there is successful breeding occurring up and down the valley. In 2017 we observed two adult birds (one banded as part of these efforts) with two yearlings just south of Ennis, and in 2019 and 2020 we observed an adult swan with five yearling birds on Ennis Lake. In 2020 we saw an adult white bird with three yearlings on O'Dell. This would indicate production in the valley. The fall 2025 and 2026 survey saw numerous swans up and down the valley, and landowners reported the released cygnets joining with adult white birds shortly after they were released. To date the released birds of 2026 are still being observed at their release pond vicinity.

In spring 2022 MFWP sent an EA and proposal to the Commission for approval for five more years of swan releases. This was approved for 2022-2026 releases. It was met with very positive public comments and support. A new EA for 2027-2031 will be sent for commission approval.

II. Objectives; explicit statement(s) of what is intended to be accomplished.
Continued wetland restoration projects in the Madison serves as the basis for establishing a breeding flock of trumpeter swans in the area. The objective of this restoration effort, is to restore a breeding flock of at least five established nesting pairs in the middle Madison from Quake Lake to Ennis Lake. Other goals are to incorporate this project into larger Flyway wide goals of connecting swans in the tri-state area and growing the small tri-state - GYE population. We would also like to see US segment birds connecting with the more abundant Canadian trumpeter swan segment. At a local level we have the goal of increasing awareness of the importance of wetlands and wetland species; trumpeter swan being an iconic species showing wetland health. Non consumptive viewing of this iconic species is very much enjoyed by birders and community members up and down the valley. Finally working with industry, private landowners, nonprofits, state and federal partners is a very important indirect goal for this work.

III. Methods; description of how Project objectives will be accomplished.
MFWP will work with Wyoming Wetlands Society to obtain approved Rocky Mountain Population (RMP) genetic strain birds, work with them to conduct health checks, and ensure healthy birds are released as part of this program. MFWP staff is providing support for the Madison trumpeter swan effort through existing positions within MFWP. MFWP's Region 3 Wildlife Biologist, who also serves as the MT Pacific Flyway Study Committee Representative and the Greater Yellowstone Trumpeter Swan Working Group (GYTSWG) chair, is providing support for this program by obtaining neck collars and other banding materials, reporting banding data/recoveries to the USGS Banding Lab in Patuxent, Maryland, working with landowners and the public to capture and salvage injured, sick, or dead birds, giving presentations to the public, and attending swan conferences. The Region 3 nongame technician will be leading the post release monitoring efforts and keeping a database of marked and unmarked observations.

Northwestern Energy (NWE) has provided between $6,000 -$9,000 per year depending on projects needs and funding from other sources. These funds are generally used to obtain birds for release from Wyoming Wetlands Society ($800/bird ~$6,000-$8,000), as well as providing additional operations support for releases. We also conduct a spring flight in early June (~$1,000) to evaluate possible nesting and we plan to increase monitoring efforts to gauge the success of the program. We are now at a critical time in this work where nesting is possible and we would like to be able to report possible nesting attempts, and if possible, the number of young produced.

Also, in 2019, 2020, 2021 and 2025 we deployed GPS/GSM collars on trumpeter swans in the Middle Madison each year. These birds are caught during molting in the summer and implemented with a device which allows us to describe habitat use, migration paths, and will be used to facilitate future restoration work. These devices store locations and download to cell towers every 10-30 minutes. They are solar paneled so will hopefully last the life of the bird. In 2019, 2020 and 2025 these devices were funded by Wyoming Wetlands Society, but in 2021 they were funded as part of a larger USGS / USFWS project, with in-kind support from MFWP to locate molting birds prior to capture efforts. In 2025 we implemented two release birds with GSM collars; they provided valuable data on localized habitat use, longer range migration, mortality, and cross continental data as we documented for the first time one of the release birds migrating and remaining in Canada. Our goal is to deploy more collars in the coming years. Collars are ~$1500 each and we hope to deploy two collars 2027.

Every time we handle a wild bird; we take feathers and send them to our collaborators within the Pacific Flyway so that isotope analyses can be done to determine their origin. This work is being conducted by the USFWS – USGS with in-kind support from MFWP and biologists from Freezout Lake WMA. This is also

being done in OR, ID, UT and NV. While this is not directly funded through the NWE Tac program, it further exemplifies the breadth of this work and what we can learn from releasing trumpeter swans. We consider this a Flyway level opportunity to learn from these birds. As discussed at the NWE TAC team meeting last winter, the efforts of the Middle Madison project stretch beyond just Montana.

Because the project has expanded since its inception, we are seeking additional funds which will be used to facilitate more monitoring and travel for the different components. With more birds on the ground, MFWP is conducting more monitoring to look for bands of birds anywhere from Henry's Lake, ID to Ennis Lake, and the Ruby valley to determine if these birds are dispersing birds from the restoration flock. We would use these funds to assist with technician time and mileage, and to purchase GSM collars. MFWP has hired a new Region 3 nongame technician. This technician will invest time and travel to grow the swan reporting component of this work and develop an observation database. Several years ago, we purchased better-quality optics for this increased monitoring work and locating birds.

MFWP will continue to work with funding partners to solicit donations for obtaining swans for the 2027 release and beyond as needed.

IV. Schedule; when the Project work will begin and end.
Project planning, coordination, authorization from Pacific Flyway Council and others is ongoing. Develop a new EA and present to the FWP commission spring 2027. Release birds 2027-2031 under this new EA.

V. Personnel; who will do the work ? Identify Project leader or principal investigator.

Proposal Sponsor: Claire Gower, Wildlife Biologist
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VI. Project budget must include amounts for the following:

Direct Labor	0
Travel and Living	500 (mileage)
Materials	1000 (flight), 3000 (GSM collars)
Other Direct Expenses	8000 (Swans)
Direct Overhead	0

All cost-share sources and amounts, including estimation of "in-kind" contributions

$2,000 FWP staff time contributions to the project – Nongame Program – Region 3*
$1,000 In-Kind contribution - Bill Long, Wyoming Wetlands Society**

*~ 16 days (~128 hours) full time biologist and technician salary dedicated to swan restoration – meetings for restoration approval, collecting and releasing swans, follow up monitoring and database management, project reporting and project product/presentation development and delivery. EA preparation and approval (2027). Also, Pacific Flyway and Greater Yellowstone Trumpeter Swan working Group attendance and coordination.

** ~4 days to conduct disease testing and time to transport swans; Bill Long and 2 technicians (WWS).

** expenses associated with disease testing prior to releasing swans incurred by the WWS

*/ **Travel time to and from field site, transport of birds up, disease testing, project coordination and facilitation, project reporting, meetings and Pacific Flyway involvement.

***NorthWestern Energy TAC funds will not be used for agency overhead on projects that do not fund personnel. Applications for materials and equipment should not contain overhead.**

I. Deliverables; describe work product (reports, habitat restoration, etc.) which will result from this Project. How will "success" for this project be monitored or demonstrated?

Continued release of trumpeter swans in 2027, tracking birds and recording locations/maintaining data records, securing markers and reported bandings to Bird Banding Lab by the end of the year. MFWP will also provide an annual report and PowerPoint presentation at the annual TAC team meeting. Presentations have been given to the Ruby Watershed Group and Sacajawea Chapter Montana Audubon. We will use the spring flights to gauge project success.

II. Cultural Resources. Cultural Resource Management (CRM) requirements for any activity related to this Project must be completed and documented to NorthWestern as a condition of any TAC grant. TAC funds may not be used for any land-disturbing activity, or the modification, renovation, or removal of any buildings or structures until the CRM consultation process has been completed. Agency applicants must submit a copy of the proposed project to a designated Cultural Resource Specialist for their agency. Private parties or non-governmental organizations are encouraged to submit a copy of their proposed project to a CRM consultant they may have employed. Private parties and non-governmental organizations may also contact the NorthWestern representative for further information or assistance from NorthWestern's staff archeologist. Applications submitted without this section completed, will be held by the TAC, without any action, until the information has been submitted.

Summarize here how you will complete requirements for Cultural Resource Management:

Due diligence, including MEPA and NEPA compliance, requires consulting cultural resource professionals for all projects involving public funds. Cultural resource professionals within the sponsoring agencies or with the MT SHPO office will conduct cultural resource inventories on this project. Sponsoring entities will ensure that these surveys are conducted and results reported in advance of initiating this project. Northwestern Energy's cultural resource consultants will also be involved as required by the company.

III. Water Rights. For projects that involve development, restoration or enhancement of streams or wetlands, please describe how the project will comply with the Montana DNRC's "Guidance for Landowners and Practitioners Engaged in Stream and Wetland Restoration Activities", issued by the Water Resources Division on 9 March 2016.

Summarize here how you will comply with Montana water rights laws, policies and guidelines:

Not applicable

All TAC Project proposals should be 7 pages or less and emailed (as a WORD file) to each of:

- Andrew.Welch@NorthWestern.com

- Jon.Hanson@Northwestern.com

Further questions about TAC proposals or Project 2188 license requirements or related issues may be addressed to:

Andy Welch
Manager, Hydro License Compliance
Andrew.Welch@NorthWestern.com
O 406-444-8115
C 406-565-7549