



Jean Ramer
U.S. Army Corps of Engineers
10 West 15th Street, Suite 2200
Helena, MT 59626

March 19, 2005

Dear Ms Ramer,

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. It has come to our attention that the proposed Eagle Cove Subdivision (application number: 2003-90-010) is still being considered for permitting under provisions of Section 404 of the Clean Water Act.

We wish to go on record as being strongly opposed to the permitting for a variety of reasons. The entire shoreline east of the mouth of the Flathead River provides a very fragile, limited type of marshy shoreline habitat that is already being threatened by erosion due to artificially maintained high lake levels. There is little doubt that impacts that would result from this proposed filling and subdivision would not be limited to the subdivision since the entire shoreline acts as one unit of habitat. Those impacts would also spill over into the Flathead Waterfowl Production Area managed by the U.S. Fish and Wildlife Service and reduce its capability to provide high quality waterfowl and wildlife habitat. Other private lands on either side of the proposed subdivision would also suffer from the impacts of filling. Permitting the filling of these wetlands would set a dangerous precedent to allow additional filling and loss of this critical north shore wetland habitat.

The types of wetlands being proposed as mitigation are not the same as would be destroyed by the proposed filling. Upland wetlands with only 0.3 acres of open water neither resemble nor provide equivalent habitats as the marshy shoreline habitat with 1.5 acres within the ordinary high water mark of Flathead Lake.

For all of the above reasons, the Flathead Audubon Society requests that permits for filling and dredging be denied.

Yours truly,

Lewis Young
Conservation Committee Chair
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Eureka, MT 59917
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