



Montana DNRC
2705 Spurgin Road
Missoula, MT 59804-3199
Helena, Montana

October 9, 2009

Dear Sirs;

The Flathead Audubon Society wishes to submit comments for your consideration concerning the Draft EIS/HCP.

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. Although birds and their habitat are often our focus, Flathead Audubon is also very interested and involved in all our natural resources.

Comments and/or points of concern:

Readability of the document and plan—It is very difficult to understand what is actually proposed and where all the details are located for given species or subjects. An effort is needed to rewrite and reorganize the documents to be more easily understood so that informed and relevant comments can be prepared.

Length of permit—All alternatives propose a 50 year term. This is far too long. Experience with grizzly bears and other species has shown that many significant changes in habitat, populations, and scientific knowledge occur in a much shorter period. The effects of climate change are not discussed at all in the document and these effects will also contribute to needed reevaluation of the HCP in a much shorter time frame than proposed. A 20 year term permit is more realistic.

Allowances—It seems that most of the DNRC commitments contain allowances or exceptions with the end result that there is little or no real commitment required. One example is for grizzly bear commitment GB-SC2 described on page 2-37, although the commitment is for an 8 year rest after a 4 year active management period, there is a long list of activities that are allowable during the “rest” period thus mostly negating the effectiveness of a rest period. Another example is on page 2-10 in GB NR3 Spring Management Restrictions. Although the commitment is purported to prohibit activities in spring habitat during the spring season, there is a long list of activities that are specifically allowed thereby negating the purpose of the commitment. The DNRC “commitments” need to be strengthened to the point they actually meet the stated intent of the “commitment.” This applies to all species.

Riparian setbacks—The riparian areas management needs improved to provide for greater protection of aquatic species.

Time allowed to repair non-functional road closures—Under the Preferred Alternative up to 1 year is allowed to repair non-functional road closures after they are discovered. This is far too long as the non-functional closures adversely affect grizzly bear security. For the road closures to function as intended and provide the level of security claimed in the analyses in the EIS, the non-functioning road closures must be detected and repaired quickly.

Monitoring—The 5 year interval for a monitoring report is too long and the USFWS should be a partner in the actual monitoring.

Alternative 3-Increased Conservation HCP—Alternative 3 is identified as the most environmentally preferred and it is stated on page ES-5 that all alternatives meet DNRC's mandate. Therefore there appears to be no reason not to adopt Alternative 3. Flathead Audubon Society could support Alternative 3 if our concerns described above are adequately addressed.

/s/Lewis Young
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