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April 1, 2020

Angie Grove  
Montana State Parks  
490 North Meridian Rd.  
Kalispell, MT 59901

Dear Ms. Grove,

Thank you for the opportunity to comment on the proposal for Montana State Parks to potentially acquire the Sliter family property in Somers, MT.

Flathead Audubon Society (FAS) represents about 400 members from northwest Montana. Our mission is to conserve birds, wildlife habitat and ecosystem diversity; promote awareness and appreciation of the natural world through education and advocacy; work with diverse groups and agencies to achieve sound decisions on natural resource issues; provide community services such as school programs, work projects, and field trips.

FAS has many members that live, enjoy birds, and/or recreate along the north shore of Flathead Lake so we are familiar with the area that has been proposed to become a state park. For the past two decades, FAS has also been actively working with members of the Flathead River to Lake Initiative to help conserve land and important riparian and wetland habitats along the Flathead River and north shore of Flathead Lake.

The north shore was designated as an Important Bird Area Montana Audubon due to the incredible number of migratory birds and the year-round diversity of birds that use the north shore of Flathead Lake, both on land and water between Flathead River and Somers.. Details about this Important Bird Area status can be found <https://www.audubon.org/important-bird-areas/north-shore-flathead-lake>.

FAS supports the protection of important wildlife habitats of northwest Montana, particularly the wetlands and open spaces of the Sliter ownership. We also recognize the Flathead Valley's need for public access to special places such as the north shore so that folks can appreciate these scenic, recreational, as well as wildlife and habitat values. We wanted to highlight some of this area's unique habitat and wildlife values early in the planning process.

Nearly 2000 acres along seven miles of Flathead Lake's north shore are managed by the U.S. Fish and Wildlife Service as the Flathead Lake Waterfowl Production Area. Montana Fish, Wildlife and Parks using BPA fisheries funds, private funds, and other federal/state programs has acquired over 450 additional upland and shoreline acres to protect important agricultural land and wetlands and increase the buffer around the unique and productive federal lands. The purposes of these various conservation efforts are to protect water quality in Flathead Lake, maintain habitat for migratory and resident birds and other wildlife, protect bird nesting habitat, and allow for public access for hunting, bird watching, and outdoor recreation. Wetlands and riparian areas are particularly valuable to birds and other wildlife, help mitigate floods and shoreline erosion, and are a diminishing resource in Montana and worldwide. Each spring as the snow melts, thousands of migratory waterfowl and shorebirds use the seasonally flooded

agricultural and other wetlands along the north shore. The area also important wintering area for raptors and nesting area for bald eagles, northern harriers, and other birds of prey.

The Sliter parcel wetlands and agricultural lands are adjacent to the west end of the Flathead Waterfowl Production Area and act as an important buffer between the north shore public lands and the town of Somers. The Flathead Lake Waterfowl Production Area, as well as most of the Fish, Wildlife & Parks lands along the north shore, are closed from March 15 to July 15 each year to protect nesting habitat for a variety of species. Trespass onto closed lands during the closed season is already occurring. Creating a state park could result in continued or greater trespass or be an excellent way to limit seasonal trespass through education and signage.

We suggest that Montana State Parks consider various strategies to reduce potential habitat impacts such as clustering development(s) such as camping or parking near the county road and away from the wetlands and federal boundary (while also considering impacts to neighbors). We would encourage you to minimize the size of the paved/hardened surfaces to reduce runoff and disturbance to wetlands and maintain their ecological function. The park concept could include an elevated boardwalk and bird viewing platform to reduce trail impacts and provide interpretive opportunities. Planting additional native species in and around the park and shoreline might also improve habitat for birds and wildlife and serve as additional buffer to human activities. Noise and lights from users is a concern for wildlife during sensitive periods such as nesting or when large concentrations of waterfowl occur on the land or in the water. Planning should consider seasonal restrictions and noise and light abatement strategies.

Planning a new state park near Somers that takes into consideration this areas' unique and important values to migratory birds and wildlife as well as public recreation is a positive step and a better alternative to home site or commercial development. FAS would be willing to assist Montana State Parks in planning and possibly implementing some of these recommendations. Lastly, as the Sliter property surrounds Burlington Northern property that is part of a superfund project area and includes a "mitigation wetland", we are wondering if and how these Burlington Northern lands would be incorporated into the state park concept.

We appreciate the opportunity to provide some early input into this potential acquisition and look forward to working with the state and community on this project.

Sincerely,

Gael Bissell, President  
Flathead Audubon Society

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