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July 20, 2020

U.S. Fish and Wildlife Service
Attn: Ben Gilles
922 Bootlegger Trail
Great Falls, MT 59404
benjamin_gilles@fws.gov

Dear Mr. Gilles,

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.

We have reviewed the scoping notice for the proposed Conservation Area around Lost Trail National Wildlife Refuge that would enable the USFWS acquire working lands conservation easements. FAS strongly supports the creation of this significant Conservation Area for many reasons. Landscape scale conservation projects such as this are necessary to maintain the character of the Salish region. The forest, wetland, and grassland ecosystems around Lost Trail Refuge are relatively intact, connected to other large conservation projects, and are critical for maintaining high habitat values within the Refuge. The conservation easements would help conserve a significant wildlife connection between the Salish and the Cabinet Mountains at a time when large scale landscape connection opportunities are being lost through development at an alarming rate. These connections will become even more important in the future with climate change. Further, the proposed voluntary conservation easements would maintain private ownership, allow for sustainable logging and other uses of the land, and maintain tax base while still securing important conservation values and public access.

The proposed Conservation Area includes forested riparian areas, massive rock faces, and forested uplands with openings of native grasses, shrubs, and forbs providing habitat for both game and nongame species such as golden eagles, northern goshawks, bats, songbirds, and significant populations of elk, mule deer, white-tailed deer, small mammals, and their associated predators. The conservation area also currently supports many days of public hunting/trapping/wildlife viewing generating significant associated economic benefits.

The unique open landscape of Lost Trail Refuge with its grasslands, lakes, wetlands, and abundant viewable wildlife, is at risk of development (should Southern Pine Plantations or other private landowners begin to sell parcels) from cabins, hunting lodges, or subdivisions. Such development would create management and ecological problems for the USFWS and others by increasing habitat fragmentation; roads and road use; costs for road maintenance; and human conflicts with bears, elk, and deer. Development carries risks from invasive species or altered hydrology that could directly impact the carefully restored prairie/foothill/wetland ecosystems of Lost Trail Refuge.

Again, FAS strongly supports the creation of the Lost Trail Conservation Area and we look forward to learning more as you develop your alternatives and environmental review.

Sincerely,

Gael Bissell, President
Flathead Audubon Society