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March 4, 2020

Public Comments Processing, Attn: FWS-HQ-MB-2018-0090  
U.S. Fish and Wildlife Service  
MS: JAO/1N  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

Dear U.S. Fish and Wildlife Service,

Flathead Audubon Society 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.

Flathead Audubon Society strongly opposes the proposed changes to the MBTA for a variety of reasons. To begin with, the proposed rule is inconsistent with the intent of MBTA. Birds provide significant ecological and economic services to us through pollinating native plants and agricultural crops, foraging on costly insect pests in both forests and agricultural areas, help recycle millions of animals that die annually, contribute over a billion dollars to the national economy from both bird watching and hunting, and provide profound cultural benefits through viewing, singing, and nature. The USFWS focused on benefits of new rules to industry/entities (cost them less) but did not compare those benefits to the lost social/economic benefits due to more birds dying as they would under the proposed rule.

Strong incentives are needed for companies, individuals, and industry to avoid or mitigate impacts to migratory birds and penalties are needed to restore the habitat or bird populations that were directly impacted. The proposed rule would remove incentives and penalties to protect birds.

Peer-reviewed research indicates that we have lost 3 billion birds over the last 50 years even with our relatively strong protections in place. The proposed rule would only increase the loss of birds.

Again, Flathead Audubon Society strongly opposes the proposed changes to the MBTA.

Sincerely,

Gael Bissell, President  
Flathead Audubon Society