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Mark Mussman
Flathead County Planning Director
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re: Rolling Acres Subdivision

Dear Mr. Mussman,

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 members are well aware of the incredible values the riparian habitats and adjacent uplands along the main stem Flathead River provide for birds and other wildlife. Our members spend a considerable time birding in this area and have worked with many of the private landowners and public agencies to provide technical expertise.

The proposed 114.9 acre Rolling Acres subdivision would be located on prime agricultural land that lies between two existing significant conservation easements along Flathead River. These two private land voluntary conservation projects total over a thousand acres and were funded to maintain open space and habitat values of these lands for watershed and wildlife. These conservation easements, direct results of efforts by the Flathead River to Lake Initiative, or a long-term collaboration between local state and federal agencies, the Confederated Salish and Kootenai Tribes, and numerous non-profit organizations, represent a major investment by federal and local organizations as well as these private landowners to conserve the Flathead River main stem ecosystem, reduce the risks development on wildlife habitat, maintain a wildlife corridor, and protect water quality in Flathead Lake downstream. FAS has participated in the River to Lake Initiative since 2006.

The national scientific community has recently documented major declines in North American bird populations. Over the last 50 years, we have lost nearly 3 billion birds due to habitat loss and direct mortality associated with human activities with the greatest losses affecting migratory songbirds and grassland species. Many of these declining migratory song birds include our warblers, tanagers, and vireos who nest in riparian habitats greatly benefit from an undeveloped buffer between their nesting areas along riparian zones and human disturbances. In addition, there are many migratory songbird species who nest or forage along the edges of riparian areas and agricultural lands such as the Eastern kingbird, tree swallow, and Savannah sparrows. All these species, who perform many ecosystem

services such as eating undesirable insects, would be negatively affected by conversion of this land to development. These birds are food for many other bird species such as owls, shrikes and sharp-shinned hawks. Nesting raptors who forage on open agricultural lands such as northern harriers or bald eagles but nest along or in riparian/wetlands also require space from development to survive. This area is also used by wild turkeys and other upland game birds who depend on both agricultural lands for seasonal food supply and cover but also riparian areas for winter cover and food.

Homeowners in subdivisions have pets, particularly cats, and these often prey on songbirds while escaping dogs can chase and disturb all wildlife on these or adjacent lands. Subdivisions can increase common (and some non-native) birds at the expense of native populations, introduce new noxious weeds and invasive species that become a major problem to riparian areas as evidenced by the escaped oxeye daisy that is taking over riparian areas up and down the Flathead River. Once these species move into a river corridor, there is no stopping their spread. The costs of managing these noxious species can be significant to other downstream landowners. Their impacts to habitat are immeasurable.

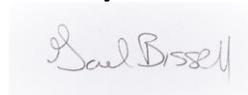
Birds and quality native bird habitat in the Flathead Valley has experienced increasing losses to development and subdivisions. Individually, each subdivision seems like a small acreage, but the overall impacts of increased disturbance to resident and migratory birds, disruption in the ecological ecosystem, and breaks in movement corridors is significant, causing “deaths by a thousand cuts”. These seemingly small impacts have contributed to the loss of 29% of our native bird since 1970. The residents of this county greatly desire to accommodate growth but also to protect water quality, the natural esthetics, and critical wildlife habitat. These objectives can be accomplished by encouraging development closer to existing communities and infrastructure rather than along major rivers and open spaces.

FAS is aware of the MT Fish, Wildlife & Parks comments submitted concerning this proposed subdivision and we endorse their concerns and comments.

We recommend you deny this preliminary plat as it is not consistent with adjacent land uses and will have negative effects on the adjacent protected wildlife habitats.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Gael Bissell". The signature is written in dark ink on a light-colored background.

Gael Bissell, President
Flathead Audubon Society