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October 14, 2020

Mr. Rick Northrup  
Montana Fish, Wildlife & Parks  
P.O. Box 200701  
Helena, MT 59620

Dear Mr. Northrup,

Thank you for the opportunity to comment on the draft Forest Legacy Program Assessment of Need (AON). The Forest Legacy Program has become an incredibly valuable tool for your agency's work and mission to conserve important fish and wildlife habitats, maintain public access, create habitat connectivity for many species including migratory and resident birds, and support for working landscapes since it was first authorized in 2000. The 261,000 acres of working forestlands that have been conserved over the last two decades primarily in NW Montana have protected much of the Thompson and Fisher River watersheds, significant portions of the upper Swan River watershed, forested habitats that abut public lands throughout Lincoln county, and important community forestlands surrounding Whitefish, Columbia Falls, and Whitefish Lake. Not only have these major conservation projects protected key wildlife winter ranges and migration corridors, they have conserved important forested and riparian ecosystems that support hundreds of resident and migratory birds such as songbirds and nesting habitats for many forest raptor species such as Northern Goshawks at a landscape scale. These projects have also helped maintain public uses of private lands, protected water quality for fish and humans, and a sustained a viable forest products industry. This assessment identifies current priorities for continued forest conservation in Montana and a framework for how the program will operate into the future.

Our organization strongly supports your continued efforts. 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 appreciate that you used the Crucial Areas Planning System to prioritize important wildlife habitats. These data are based in part on important habitats for 24 bird species of concern. Your continued efforts to conserve the forestlands that you have identified in this draft assessment will benefit these and a variety of other bird species, many of whom have seen declines over the last 50 years, that are a priority for our organization. Birds are a critical part of any forest environment and long-term protection of these lands help reduce risks to birds from human development impacts, habitat conversions, and human-wildlife conflicts.

These protections are even more essential given recent evaluation of bird and wildlife population changes in the U.S. (Pennings et al. 2019) <https://science.sciencemag.org/content/365/6459/1228.summary> documented “Since the 1970s, the continent has lost 3 billion birds, nearly 30% of the total, and even common birds such as sparrows and blackbirds are in decline”.

A similar evaluation of world wildlife by the World Wildlife Federation documented a similar trend for wildlife (<https://f.hubspotusercontent20.net/hubfs/4783129/LPR/PDFs/ENGLISH-FULL.pdf>). According to that report, “an average 68% decrease in population sizes of mammals, birds, amphibians, reptiles and fish between 1970 and 2016”. Even in the US, biodiversity declined 33%, according to the report. The situation in Montana, the “last best place” is better than the world situation, largely due to programs like the Montana Forest Legacy Program and proactive management of our forests and other habitats.

We offer a few suggestions to the document and have added some additional references for your use.

The AON does not mention climate change as a rationale for areas to be considered. “Montana has warmed more than most of the contiguous United States. Source: EPA, Climate Change Indicators in the United States. “  
<https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-mt.pdf>

Climate change in Montana is likely to reduce extent of important wetlands and ponds that are important for native plants, birds, fish and other wildlife.

Trees, especially western red cedar, white bark pine and Douglas fir may be adversely affected by higher temperatures and changed (likely reduced) precipitation levels to the extent that the forest type occurring at a site now may not be regenerated if that stand is lost to fire/wind or decadence. Consideration of seed sources and alternate forest species should be incorporated into decision criteria of what areas are most important to maintain forested stands. Stressed forests are more susceptible to insect and plant invasions and wildfire. Forest stands that are “healthy” today, may not be in the future and as such, conservation areas should be evaluated with climate change factors as additional criterion. Any conservation agreements should incorporate recommendations for maintaining future healthy forest habitat. We recommend incorporating the guidance listed below to help select areas for conservation easements, agreements or treatments: ([https://www.fs.fed.us/rm/pubs\\_series/rmrs/gtr/rmrs\\_gtr374\\_1.pdf](https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr374_1.pdf); <http://deq.mt.gov/Energy/climatechange/naturalresources/Forestry/ForestryClimateChangeERA>)

These documents note the importance of beaver ponds, open-grown ponderosa pine forests; open aspen stands and cottonwood retention.

This AON also recognizes the following Montana program eligibility requirements:

- Based on definitions in the Glossary of Terms, forestlands must be environmentally important and threatened and managed under compatible uses.
- Participating lands must be a minimum of five acres.

We recommend adding an eligibility requirement that allows for the conservation of small but important or unique/rare plant or animal habitats (such as a fen) or unique connectivity areas that might not meet the 5-acre minimum. For example: an area that is an ideal location for a wildlife crossing over/under a highway that might allow animal migration; or a small habitat with essential breeding area (nest site, amphibian wetland, or strutting ground); or an essential food/habitat source for breeding, nesting or migrating birds that occurs in a small patch or along a riparian area.

The AON mentions threats to forest lands: Threatened Forest Area – forestlands that are potentially vulnerable to conversion to non-forest uses which would eliminate or substantially change natural forest functions, character, and values. Threats might include residential developments, golf courses, small grain or forage croplands, various industrial developments, landfills, gravel pits, and surface mining.

We recommend adding the threat of invasive species that can increase with human disturbances, uses, and management. Invasive grasses and shrubs across much of the Pacific Northwest and have changed the ecosystems of forests to the extent that normal forest and shrub conditions are permanently affected. Invasive weeds or other species can significantly increase fire return intervals; fire intensity can increase, and native vegetation can be lost if invasive species are not curtailed/controlled. Properties evaluated for conservation agreements or purchase should be relatively intact and amenable to weed/invasive species control and prescribed fire management, as appropriate, to avoid the area serving as a source for invasive plants.

It is assured that current situations will change over time. Conservation agreements should include discussions and commitments defining the costs and responsibility of ongoing management to ensure forest objectives will be maintained for perpetuity. (*Gen. Tech. Rep. RMRS-GTR- 42-vol. 2. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky. by JK Brown*).

Thank you for considering these suggestions to the Forest Legacy AON. We appreciate the exemplary actions of FWP to conserve our valuable habitats and ensure our forests will be wisely managed for species and habitat diversity and Montana's needs. Thank you for your continued efforts to conserve wildlife habitat through the Forest Legacy Program and all the other habitat conservation work that your agency does in northwest Montana. Flathead

Audubon looks forward to continued conservation successes and any opportunities where we may partner with you to accomplish even more great conservation work in the future.

Sincerely,

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

Gael Bissell  
President  
Flathead Audubon Society