



Flathead Audubon Society

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Toni Griffin
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Dear Mr. Garza and Ms Griffin:

Flathead Audubon Society, a 501 c (3) non-profit organization dedicated to conserving birds, wildlife habitat, and ecosystem diversity is based in Kalispell, MT. Our 400+ members greatly appreciate the extended public comment period for public scoping for the development of the CCPs for the National Bison Range Complex, particularly for Pablo, Ninepipe, and Lost Trail NWRs and the diverse properties within the Northwest Montana Waterfowl Management District in both Lake and Flathead Counties.

Flathead Audubon has been a key supporter of many of your agency's land acquisitions over the last few decades that make up this outstanding portfolio of wildlife habitats. We are also frequent visitors to your public lands through our many annual field trips to the Mission Valley (Ninepipes NWR, various WPS, Bison Range); Lower Valley Flathead (Flathead Lake and Blasdel WPAs) and Smith Valley (Batavia and Smith Lake WPAs). We have also organized annual field trips to Lost Trail NWR and many other places west of Kalispell with stops at McGregor Lake WPA. Additionally, our members and the public at large enjoy hundreds of visitor days hunting and wildlife viewing on all of them.

As you know, these strategically located USFWS properties were purchased using various sources of public funds for the purpose of protecting wildlife and wildlife habitat. Although to you these lands may seem somewhat disconnected and isolated because they are scattered across two large counties, **these lands are becoming increasingly vital to sustaining migratory and resident birds, many species of threatened and endangered plants and animals, and healthy populations of both game and nongame species in light of rapid population growth and development in northwest Montana.**

The quality wetland and grassland habitats that make up much of this part of your refuge system are important not only as stand-alone exemplary valley floor habitats for wildlife that are under intense pressures for development or agriculture; but also, **they are part of a larger mosaic of protected lands.** This mosaic of adjacent or nearby protected lands includes numerous Montana Fish, Wildlife & Parks Wildlife Management Areas (WMAs) such as the Ninepipe WMA complex that surrounds the Ninepipe NWR and the state's North Shore WMA and Osprey View Fish Conservation Area that buffer the Flathead Lake WPA. Many other MFWP protected lands include Foy's Bend and Otter Island Fish Conservation Areas along the Flathead River, and over 200,000 acres of state-held landscape scale conservation easements in the Swan, Whitefish, Thompson, and Fisher River Valleys. In addition to state protected lands, many your WPAs are bordered by lands protected by conservation easements held by private land

trusts. Further, on a regional scale, the lands that make up the Northwest Montana Wetland District plus the National Wildlife Refuges lie within counties that are largely protected by the National Forest Service or National Park Service.

The value of your lands will become increasingly important as development threats and climate change continue to pressure ecosystems and as strategic conservation in this region (part of several landscape scale efforts including Yellowstone to Yukon, Crown of the Continent, Great Northern LCC, and other landscape scale Initiatives) move forward. **These lands are critically important to our ongoing high priority local conservation efforts, to our members who visit these places often, and to our future generations who we hope will see greater land protection and habitat improvement over time.**

Below are our more specific suggestions for consideration in developing these important CCPs:

Manage in Context with Local, Regional, International Conservation Efforts. The Bison Range Complex including all associated northwest Montana refuges and WPAs (Complex) lie within the internationally recognized Yellowstone to Yukon (Y2Y) connection corridor and Great Northern Landscape Conservation Cooperative (<http://greatnorthernlcc.org>). The maintenance and enhancement of your grasslands, wetlands, and migratory bird habitat and movement within the Complex will continue to ensure that migratory and resident birds and other wildlife, plants and ecological processes can continue to function at the geographic and landscape scale. The Y2Y area map, overview, and progress to date can be found here: <https://y2y.net/vision/our-progress>. **We ask that the individual and collective CCPs consider their place in the context of the surrounding conservation plans and programs and the specific values/contributions that each of these USFWS lands adds to local, regional, and international conservation efforts.**

Consider All Migratory Bird Habitat Needs. Due to invasive species, climate change, and development pressures, migratory bird habitat is decreasing internationally on all lands, including federally-managed lands. The USFWS has clearly emphasized creation and protection of bird breeding habitat because breeding and rearing are obviously important elements to wildlife conservation. **However, seasonal migratory habitat** provides critical resting and feeding areas needed by birds moving to and from those breeding areas and can be equally important. During the development of each CCP, consider what the best or multiple values of your properties may be; these might be other than just bird breeding/rearing habitat. On many properties, the agency may want to emphasize migratory habitat by providing specific types of food plots or gathering/resting areas for large numbers of migratory birds/species. A diversity of habitat or management objectives over the parcel or parcels (rather than just nesting cover, for example) should be evaluated in context of the landscape, future changing conditions, status of bird populations, and public input. Considering multiple habitat objectives may provide more migratory bird or other wildlife benefits, could help buffer impacts of climate change and impacts of invasive species; help migratory birds meet their caloric requirements for breeding and migration in a changing environment; and offers some degree of predictability for migratory species.

From 2010-2014, a cooperative project between Montana Fish, Wildlife & Parks, USFWS staff, and Flathead Audubon was initiated to quantify the size and composition of the spring waterfowl migration through the Flathead and Smith Valleys near Kalispell. Although the results have yet to be published, the data clearly documented tens of thousands of migratory waterfowl, comprised of about 20 different species, moving through these northwest MT valleys following snow-melt. Waterfowl used both public and private lands as a foraging/resting stopover from the end of February through April each year. The public lands and waters provided important resting and foraging habitat for diving species but the adjacent open and often protected farmlands, often temporarily flooded, provided a significant food resource for many upland nesting migratory waterfowl species such as tundra swan, Canada goose, mallard, Northern pintail, gadwall, and American wigeon. These farmlands are being rapidly converted to development and will be lost if efforts are not made to conserve them. Future CCPs in both the Mission and Flathead Valleys should consider the context of the land, the value of the region's agricultural lands to migratory birds as well as their value in buffering development on

USFWS lands and work cooperatively with adjoining landowners, local land trusts, and agencies to preserve and enhance agricultural soils and farmlands. Additionally, periodic managing of retired federal agricultural lands (through plowing, creating food plots, and diversifying species) that make up most of the WPAs in northwest Montana can address negative impacts of invasive species (e.g. reed canary grass) and noxious weeds, provide secure foraging opportunities should adjacent lands be converted to development. Finally, both Flathead Lake WPA and Ninepipe NWR are bordered by MFWP Wildlife Management Areas. Clearly developing complementary management plans and potentially sharing/coordinating in land management activities and costs such as weed control and fences, makes sense.

Climate Change. In the CCP, propose to manage with climate change in mind so that there is a degree of flexibility. Consider adding land to the federal system, cooperation with adjoining landowners, and other activities to extend the area of influence over a larger landscape. Large scale connections of native/non-native prairie and wetland habitats are essential to providing safe movement for animals, plants and processes responding over larger landscapes in response to changing climate regimes. We can't always anticipate how and where changing temperatures and weather patterns will occur, but by providing some undeveloped natural habitat that allows animals and processes to move across habitat can be essential to their resiliency and sustainability in unpredictable change. Consider future passage for native amphibians and reptiles where they occur, since roads can be a significant barrier to them.

Boundaries/Expand. Consider the influence of all the above factors that affect land ownership and management and the optimum size and configuration of each parcel in the Bison Range Complex that is needed to meet your objectives and wildlife needs. We recognize federal budget limitations, but overall goals and objectives should be primarily based on science and wildlife needs (in all contexts), rather than current budgets. What is the ideal area of Lost Trail NWR if you want to protect the complex restored wetland and grassland ecosystems as well as habitat connectivity between mountain ecosystems and Northern Continental Divide and Cabinet-Yaak Ecosystems? Should not the Smith Lake or Flathead Lake WPAs take in more buffer lands to insure habitat values and water quality are protected? Lands are currently for sale adjacent to your Smith Lake WPA. Weyerhaeuser has been trying to market timberlands around Lost Trail NWR to developers for many years. The USFWS needs to be ready before these lands actually begin to sell. **Each CCP needs to identify needs, locations, and opportunities to expand its boundaries.** Current bureaucratic limitations that may currently exist, may need to be changed. Through working with partners and creative fund-raising, additional parcels can be incorporated into the federal system or at least be protected.

Fire. Work with neighbors to establish/re-establish a more historical fire regime, by planning and implementing controlled burns or other limited vegetation management to encourage the habitat conditions that were in synch with historic fire regimes. Ideally, schedule burning to the season of the year when fire would normally occur (late summer/fall), not spring when essential breeding and feeding are occurring. If treatments must occur during sensitive periods, keep the acreage small, try to provide untreated pockets within the treatment area to allow refugia for wildlife affected by the treatment, and make edges irregular to the extent possible. (Volunteers and cooperative agreements with local fire agencies working together during these treatments can help reduce impacts).

Invasive Species. The threat of invasive species will only increase in a global economy, climate change, and continued land uses/disturbances on adjacent lands. These species threaten natural ecological processes and should be prevented first and then controlled or managed consistent with best management practices and minimal impacts to native plants and animals. Control the invasive species that have the greatest impact on native species, such as those that change the ecosystem to preclude recovery (especially important in fire-responsive species such as cheat grass. Due to historic introductions, other invasive species such as reed canary grass and Garrison creeping foxtail are prevalent or dominant on many northwest Montana wetland WPAs. The CCPs need to identify these species, their extent and distribution, their impacts or values to the land and wildlife species, and the agency's proposed management strategies to reduce or minimize detrimental impacts of

these species to the ecosystem and wildlife. Example of a management tool might be grass banking; sharing limited grazing or haying of non-native stands in exchange for cover/forage on adjoining properties.

Noxious Weeds. The CCPs must address an increasing need to identify, manage, and reduce noxious weeds on all federal properties. Each CCP should have a solid integrated noxious weed plan (and include funding) that is developed in conjunction with adjoining landowners and other interested parties. These plans could include cooperative agreements with adjoining landowners/farmers and/or state and private partners to patrol and address specific serious weed problems inside federal lands and also along borders. A key example of working in partnership with others for a common goal was demonstrated for purple loosestrife in the Mission Valley. Partnerships with Lake County, Confederated Salish and Kootenai Tribes, and many conservation organizations/volunteers were very successful in limiting the spread of purple loosestrife throughout Mission Valley wetlands.

Wise use of targeted pesticides by properly-trained personnel at the proper time of the year can be extremely effective, vs hand treatments, pulling roots etc. Educate the public on the benefits of these herbicides and the many ways their use can be constrained to avoid adverse effects to wildlife and natural systems. The trade-offs of “protection” vs permanent loss of habitat to invasive should be evaluated, and short-term impacts of the pesticides may be prudent in some cases, even if there are adverse effects when compared to not using pesticides and allowing invasive species to become permanently established and the native habitat lost for the long term. Once some invasives become established, the ecosystem is permanently altered, and restoration may not be possible.

Staffing. Ensure proper staffing to allow professional level management of the land, ensure compliance with regulations, provide oversight and coordination with scientific studies, and conduct positive outreach with the public. Consider implementing broad-scale cooperative management agreements with neighboring landowners to help meet mutually beneficial goals (weed control, wildlife fences, access, fire, etc.). Increase staffing to closer to historical levels so that the CCPs can be properly implemented.

Public Outreach. Federal public outreach is a paramount need for the Bison Range Complex to ensure success and long-term survival of this program and its lands. For example, most of the public has no idea who manages the Flathead County WPAs (is it the Creston Fish Hatchery or MFWP?) and who to contact. Few members of the public understand the history or ecological roles of these lands nor recognize current funding and budget limitations. As part of the CCP process, bring a cross-section of the community out to these lands for learning, appreciation, understanding, wildlife observations, photography, etc. and to develop and implement useful projects. The Outreach Program should be designed to increase local support for the lands, volunteer base, and ideas for future improvements such as walkways, bird observation towers or blinds, species lists, etc. Encourage a discussion and activities that help protect and restore habitat. Celebrate 10-year anniversaries with field trips and events. Encourage school programs that emphasize wildlife species and the local importance to wildlife, hunting, open space. Send out newsletters, use social media to share what it is you have. The long-term benefits of public outreach to your agency will pay back in major dividends when you need help with specific projects or threats like fire, invasive species, droughts, storms, land sales, development proposals etc.

Education/Research. Through staff resources or perhaps volunteer coordinator or intern, develop an educational and research program unique to each area. This program should be designed for the next generation of managers and biologists. Staff can tap into the Flathead and Mission Valley’s exemplary science programs at high schools, Flathead Valley Community College, and Salish and Kootenai College. Create/publicize rules that restrict wildlife collection for recreational or scientific study. Reach out for educational and research ideas during the CCP process.

Recreation/Hunting. Each of your lands has unique and often highly desired public recreational opportunities based on its distance from population centers, type of hunting or other recreational

opportunities that exist there, and adjacent land issues. Developing Public Access plans will never meet everyone's needs; but, we think that allowing people to observe wildlife safely (not just along public roads), by accessing (foot or vehicle) small portions of primarily closed areas or seeing historic places (Blasdel barn, Lost Trail's buildings) gives them more ownership and appreciation of the land and its history. This can be done by creating strategically located self-guided trails, boardwalks, viewing towers, field trips, classes, etc. Partners and foundations are often willing to fund these kinds of projects.

Montana wildlife viewers are also highly supportive of hunting. Explore new wildlife watching and hunting opportunities for each property that will still maintain critical habitats and wildlife protections (e.g. closures) but allows for some other uses. For example, trespass at the Flathead Lake WPA is significant during the spring as the lake level drop over winter creates about a mile-wide beach that becomes irresistible to the public by late April or May. Some of this area is used by resting Canada geese and other waterfowl as well as eagles and gulls all winter and into spring; but as migratory bird numbers naturally decrease, perhaps one or more beaches could be opened up to walking below the high water mark while other areas remain closed. This might help relieve public pressure but also give folks the opportunity to see birds from certain sites (observation platforms) as well as Flathead Lake's incredible 6 mile protected shoreline. Consider what adjacent public land managers' access rules are and consider how to mesh them.

Water Rights. If applicable, establish a means to ensure each property has water rights in perpetuity, even if the laws need to be revisited to provide water rights for wildlife, fish and natural processes.

Infrastructure. Ensure that all roads, fences, power lines, power poles, wind and solar generators, wildlife/plant/natural barriers, and traffic speeds are wildlife friendly or that there is adequate means for wildlife to avoid collisions with traffic and other physical barriers. Ensure that pipes, vents, and other structures are screened or capped to prevent entrapment of cavity seeking birds and animals.

Lighting and Noise. Control any lights under federal control in the area by: a) not using lights; or b) if using lights, use minimum lumens, buffer the lights to the sky and point the lights away from any wetlands or riparian areas whenever possible. Reduce noise or use vegetation and other means to reduce influence of noise to the Complex lands to the extent possible. Contact the FAA to ensure no low-level flights will regularly occur over the lands in the Complex, at least during sensitive periods of the year. Restrict amplified noise in campgrounds and recreational areas.

We thank you for the opportunity to comment and we look forward to working with regional and local planning staff as you begin to put your plans together.

Sincerely,

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