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January 23, 2019

Franz Ingelfinger, Restoration Ecologist
Montana Fish, Wildlife and Parks
490 N. Meridian Rd
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RE: North Shore WMA Draft Management Plan

Dear Franz,

On behalf of Flathead Audubon Society, composed of over 400 members from the Flathead Valley, we are writing to provide our comments to the draft North Shore Management Plan. We greatly appreciate the opportunity to review this document. Our membership is very interested in the future management of these north shore acres and realize that it will take a bit of time for FWP to reach many of these goals. We have provided comments about the overall management goals as well as on specific management activities.

We are greatly impressed by the technical information in this document and the overall general direction and intent of this plan. The north shore is not an easy area to manage due to nexus of highways, federal and private land patterns, and ownership size limitations. We strongly support FWP expanding its ownership along the north shore adjacent to federal and state public lands but can see that there are direct benefits in protecting important adjoining lands north of the WMA across Highway 82. Flathead River and Flathead Lake comprise an ecologically important and rich wildlife area and we applaud the efforts of FWP and many others to acquire and protect key portions of this important landscape.

Management Plan Approach/Purpose/Goals

1. Agriculture vs Native Vegetation to Meet Purposes

It is our experience in the Flathead that waste or leave grain does provide food/fuel for migratory waterfowl during the spring, particularly for thousands of tundra/trumpeter swans, Canada geese, mallards, Northern pintails, and American wigeon that move through the valley from February through April. However, it would be helpful if FWP could also discuss this choice of management direction in comparison to restoring more of native habitat on much of these lands. Maybe more native species would attract different bird or wildlife species or more at risk species? Could long-term establishment of more native vegetation provide for a greater variety of wildlife and be more self-sustaining? Perhaps it is just too difficult to restore native meadow/wetlands/uplands on some of these lands due to alterations in hydrology and topography or that costs of doing so would be extraordinary. We think it would help to discuss this issue at the start of the proposed Management Plan to explain the various trade-offs and issues associated with native restoration vs farming.

2. Monitoring and Measures of Success

Although this Plan proposes many management recommendations such as the wier system and native shrub restoration to meet the various goals stated on page 4, it is not clear how FWP will monitor these activities to see if they meet the desired objectives or desired outcomes. Some degree of evaluation should be incorporated into the plan along with appropriate timelines and new/revised recommendations provided to the public on a periodic basis.

3. North Shore WMA Purposes

- a. **Recreation vs Habitat:** There are many important yet potentially conflicting habitat and recreation goals blended in the Goal for the North Shore WMA paragraph (pg 4). We suggest that FWP consider clarifying these goals so that public recreation strategies/actions will not jeopardize the overall habitat/species goals of the North Shore WMA or of the federal WPA. Perhaps clarify that the public access/recreation and habitat strategies would be designed to complement habitat goals and be implemented in a manner that they can be compatible through use of closures, screening, buffers, geography, and use of existing roads and structures.
- b. **Shorebirds:** FAS supports that the immediate primary purpose of the North Shore WMA should be as stated on page 4, but we think it is important to also consider habitat needs of migratory shorebirds. Unfortunately, little information is available on shorebirds, but their numbers are thought to be declining range wide. The Intermountain Shorebird Plan provides some excellent coordination objectives. The Montana All Bird Status Survey, (MTFWP)(2006) <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.625.2364&rep=rep1&type=pdf> provides some potential partners and funding possibilities.

As the state gains greater control over water management, opportunities could arise for FWP to be able to improve/create/maintain shallow productive mudflats for many shorebird species and experiment with planting and harvesting of various native or agricultural species in seasonally flooded areas. FAS members have observed many shorebird species using the flooded areas later in the spring (April, May). These species include American avocet, black-necked stilt, greater yellowlegs, willet, long-billed dowitcher, and killdeer as well as Wilson's and red-necked phalarope.

- c. **Upland Game Birds/Nongame Wildlife:** We support FWP's secondary goal of "promoting habitat for upland game birds, migratory songbirds, and other nongame bird species." Although the plan proposes to convert about 30 acres of meadow/grassland and cropland to high quality permanent cover, it isn't clear whether these relatively small patches will be designed to provide adequate winter and nesting cover for specific species and if these patches are of optimal size. Dense nesting cover and winter cover seem to be limiting factors to reproduction/survival of for our most common game/waterfowl nesters including Canada geese, mallard, pheasant, and Hungarian partridge. This plan states that FWP would gradually convert about 30 acres of grassland/cropland to quality permanent cover but this will increase permanent cover from 15% to only 25% cover once the plan is implemented. We would like the percentage of dense and more native cover to be moved out more to a 50% cropland/50% cover over the long-term, recognizing it could take longer time to get there.

4. Specific Management Recommendations:

- a. **Public Viewing:** We do support having some type of spring/early summer bird viewing site ideally located somewhere along the North Shore to allow the viewing of both the lake/lakeshore and FWP lands, as long as such a viewing site does not significantly impact bird and wildlife uses of the area. The proposal to provide a public observation point during the normal closure period in the spring should be very carefully evaluated before any development. Input from partners and the USFWS would help in that decision-making. We know that public viewing/hunting access needs must be balanced against meeting the wildlife goals of this relatively small area. We suggest that you include more criteria in this section to insure habitat values are maintained if new access is provided, such as considering screening, providing new access only from existing buildings or open roads, and monitoring impacts of any new or potential public access sites.

Some possible new observation sites could include a platform along the second story of the historic barn or a slightly elevated screened structure under the FWP hay shed. Other possible sites might include a slightly elevated screened site along the FWS road that serves the Flathead Lake WPA and private landowner near the WPA boundary or nearer the highway. This road is heavily used by bird viewers (and dog walkers) in the spring when flocks are present (so birds already tend to be 100 yards off the road).

- b. **Public Uses/Closures:** We support opening up the barn area to year-round use as long as there is no property damage and the site is regularly monitored. This could be done by partners and volunteers. We would like to be part of the discussion for a public viewing area so that we can reduce our concerns about wildlife disturbances and undermining habitat goals and objectives.
- c. **Fencing:** We applaud the conversion of many state and federal boundary fences to wildlife friendly and suggest that all fencing be made wildlife friendly if fencing is needed at all. It would be ideal to engage the USFWS in future fencing discussions, particularly as it relates to their access road and fences along FWP boundaries. If continuous fences cannot be removed, perhaps they can be replaced by smooth wire and/or walkover or walk through areas can be inserted so that one can hunt or walk east west across the FWS access road. Or, if that is not desirable for habitat/wildlife reasons, provide a clear path along other boundaries (Highway 82, north of private land, etc.).
- d. **Weed Control:** Weed control by the tenant farmer should be specified and agreed to by farmer and FWP using techniques and methods that would most successfully control/remove the noxious weeds and reed canary grass. As written, the effectiveness of weed control could be insignificant and still comply with the agreement.
- e. **Grazing/Haying:** Grazing is mentioned but not quantified. Depending on the AUMs and class/season of livestock, there can be significant impacts to the wildlife values of the area. Grazing can be an effective management tool, but current range condition, wide use of the area, and soil conditions should be evaluated before generic grazing is considered a



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management tool. <https://www.sciencedirect.com/science/article/abs/pii/S0006320703002933>
Short term intensive grazing can be a technique, but you really need to have the baseline data and management options in place to use that. Grazing is a technique that's often misused and counterproductive. Define objectives clearly, if you use this technique. If nesting habitat is created by planting native or native-like grasses, specify if and when haying would take place to minimize impacts to nesting birds.

- f. **Pond/Reservoir:** Prior to restoring native vegetation around the pond perimeter, consider making the slopes of the existing small pond/reservoir shallower to allow for more shallow water/riparian habitat and more buffer/nesting habitat. Consider installing an island nesting platform or two to provide some protected breeding structures in the pond.

5. Coordination/Collaboration/Education

- a. **Partnerships:** We would like to see a goal in the Management Plan about reaching out to partners to discuss concepts but also for help in accomplishing important wildlife habitat and public access or education goals. The USFWS will soon be releasing their draft CCP plans for their Flathead Lake and other WPAs in this area. There could be opportunities during and after these management plan comment periods for both USFWS and FWP to recognize each other's management plan goals, objectives, or strategies and perhaps jointly address some of these overarching habitat and public use needs and priorities on these protected lands along Flathead Lake. Other potential partners who may want to contribute time and/or funding for specific projects may include Ducks Unlimited, Pheasants Forever, Flathead Wildlife, Inc., interested individuals, and Flathead Audubon Society.
- b. **Education:** Include a goal to ultimately reach out to local educators on the best way that students could access this area to learn about birds, habitat, and restoration.

Thank you for the opportunity to comment on the proposed draft North Shore Management Plan. Please let me know if we can answer any questions or provide any additional information.

Sincerely,

*Kay Mitchell, President
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