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Flathead County Planning Board  
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Dear Flathead County Planning Board Members,

We appreciate the opportunity to provide input to the Flathead County Planning Board on the proposed zone change on 113 acres of land, 7200 and 7240 Highway 2 East near Columbia Falls. The proposed zone change is from agricultural 10-acres to R-1 residential, allowing 1 house per acre. We are very familiar with this area as we are active partners in the Flathead River to Lake Initiative, a collaborative of state, federal, tribal, and non-profit organizations working together to identify and protect critical lands along the Flathead River and north shore of Flathead Lake. Flathead Audubon members also provide important expertise on birds and bird habitat for proposed or completed conservation projects. Our area of expertise also includes conservation education.

Flathead Audubon Society (FAS) represents over 400 members from the Flathead Valley and 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 has been an active member along with many other state, federal, tribal, and local organizations in the Flathead River to Lake Initiative ([flatheadrivertolake.org](http://flatheadrivertolake.org)) for over 20 years. The Initiative has conserved over 12,000 acres since 2003 (Attachment A). One of the successful efforts resulted in Montana Fish, Wildlife & Parks recent purchase of the Columbia Falls Aluminum Co. land along the Flathead River to create the 772-acre Bad Rock Wildlife Management Area (WMA) at a cost of public and private funding of approximately \$7.1 million.

The Bad Rock WMA project received strong public support from the local community including Flathead County officials because of its location near town, it's incredible fish and wildlife habitat values, and the opportunities for public access and youth hunting. The WMA will eventually include a seasonally open Gateway to Glacier trail that will provide public access for hiking and biking but also wildlife viewing and K-12 conservation education. Having such places for student and family outdoor enjoyment and conservation education is more important than ever given development pressures and growing influence of digital entertainment.

Bird species and populations are declining across North America. Professionals report in peer-reviewed journals that we have lost more than 3 billion birds since the 1970s including many migratory grassland and songbirds. We cannot overstate the value of this WMA and the

adjacent river and Spring Creek/wetland corridor (roughly about 30 acres of the proposed rezoned property may be designated wetland) for wildlife and especially for sustaining migratory and resident bird populations such as:

- a. 91 birds that have been detected and recorded in just the last in last 2 years (Attachment B), many are migratory song birds.
- b. Use by raptors such as bald eagles and osprey or great blue herons and pileated woodpeckers who require an area much larger than just the WMA for survival;
- c. Use by wading birds such as great blue herons and possibly secretive American Bittern as well as a variety of waterfowl who may nest in the wetland habitats;
- d. Dependence on both the upland and wetland habitats by tiny songbirds such as warblers and flycatchers that migrate thousands of miles to nest here.

The recent and forthcoming proposals to rezone and develop the lands adjacent to the WMA will likely over time seriously undermine the wildlife habitat and recreational values of the Bad Rock WMA for which the public just spent \$ 7.1 million to protect. The creation of the WMA and the community's broad public support for that project appears to **reflect a change in how the local community views the area east of Columbia Falls** since the last updates the nearby Columbia Falls Growth Policy boundary and the County's applicable Growth Policy. Many things have changed in and around Columbia Falls and the Flathead Valley since these Growth Policies were adopted. Development is needed but protections of unique wetlands, rare spring creeks, and riparian lands are also needed.

The proposed zone change and ultimate high density residential development will likely greatly impact birds and wildlife on the WMA and the adjacent areas, particularly if the proposed zone changes and other proposed or planned developments take place along its borders:

- a. Encroachment of development, runoff, and illegal trespass of people and their pets into the wetlands and spring creek and potentially onto WMA could directly degrade the area's habitat values and impact nesting success particularly for ground nesting birds and other sensitive species.
- b. Encroachment of human activity would likely eventually displace many bird species that use this area such as raptors and wading birds that cannot be mitigated.
- c. Birding and related conservation education opportunities could be diminished by the presence of humans, pets, and the associated activities on the border of the WMA.
- d. Hunting and other recreational pursuits may be excluded due to the encroachment of homes and people.
- e. In time, the WMA will likely become **an island of disconnected habitat** supporting primarily habituated wildlife and species that thrive in human environments.
- f. Wildlife management would change from an ecosystem approach with animals coming and going to one that focuses on wildlife reduction to address adjacent wildlife-human conflicts.

There is tremendous value of this WMA and the adjacent wetlands, Spring Creek, and Flathead River corridor for its incredible wildlife values and public access so close to local schools and Columbia Falls. Once you walk onto the WMA, you become unaware of any development along the highway or in the city. There is a feeling of wildness, quiet, and seclusion. But if all the adjacent currently undeveloped properties are developed with hundreds of units as proposed by this and other submitted or anticipated projects, these values will be significantly degraded or lost.

We encourage you to protect the public's \$7.1 million investment into this unique wildlife area by retaining current zoning and perhaps encourage the community to revisit the applicable Growth Policies that may reflect a different community future vision for this area.

We invite all of you and other officials to come visit this area and learn about its values and significance. It is a very special place. Thank you for the opportunity to comment on this important matter.

Sincerely,

Flathead Audubon Society Board of Directors

(2 attachments)