

Comments to the Kalispell Growth Policy Plan-It 2035
Flathead Audubon Society
April 24, 2025

A. Vision Statement. The document vision statement states:

The commercial and governmental center of the Flathead Valley with a diverse economy, robust employment, and vibrant neighborhoods offering a variety of housing options; where community history and culture are celebrated, parks are abundant and well-maintained, greenways and trails connect the community, and public services provide for the needs of residents and visitors alike, while looking forward to future growth.

This Vision Statement identifies a perfect community, but one that seems to lack rivers, streams, agricultural fields, wetlands, or forests. The statement does not reflect the natural context of the Kalispell planning area. It fails to emphasize the incredible natural environmental values listed in Chapter 5. The Vision statement fails to mention the incredible views from Kalispell of the valley and mountains and the incredible recreational opportunities nearby, factors which draw people here.

We suggest modifying the Vision statement that gives recognition to the natural environment such as adding after the word “community,” ... *“recreational access to public areas, the incredible views, and the important functions of the natural environmental are maintained”* ...to give balance to both growth and the environment. Greenways are not a substitute for conserving the highly unique “sensitive areas” such as floodplains, wetlands, agricultural lands, and forests that also provide wildlife habitat as listed in Chapter 5.

B. Under Introduction

1. Kalispell Growth Policy Planning Area Map

We have concerns about including much of the northwest corner of the Planning Area in West Valley, north of Reserve and west of the annexation boundary. This is an extremely important pothole and agricultural land area that supports thousands of migratory waterfowl, shorebirds, and particularly migrating sandhill cranes, both in spring and fall. This open landscape supports hundreds of wintering raptors such as the rough-legged hawks from the north, bald eagles, falcons, red-tailed hawks, and owls to feed on small mammals. Several landowners have already conserved their land through various conservation easement programs. The city should seek various ways to encourage further conservation while also helping provide various means of compensation to landowners for those actions. It would be ideal to work with the County on this special area.

C. Chapter 1. Economy

1. Policies: Add #7.

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“Maintain or increase resident/public access to outdoor recreational opportunities such as fishing, floating, bicycling as well as wildlife watching” as these are major contributors to the local economy.

Kalispell residents have access to many outdoor activities and enjoyment of natural areas within the city planning area or within walking, biking, and short driving distances from Kalispell. These include places such as Lawrence Park, Woodland Park and the newer nearby trails, Owen Sowerwine, and Old Steel Bridge sites. The value, integrity, and safe access to these parks and areas need to be considered (also in the Transportation section) and maintained. The integrity of the wildlife viewing areas such as Owen Sowerwine and the West Valley Bird Viewing Area should be insulated from extensive development and traffic. Wildlife watching is a large part of our local economy.

D. Chapter 2. Growth Policy Administration

1. **Goal #4** The document states:

“ENSURE DECISIONS ARE FAIR, OPEN AND BASED ON GOOD INFORMATION THAT IS AVAILABLE TO THE PUBLIC AND DECISION MAKERS.”

Please replace “good” with “**reliable** scientific information and professional guidelines or standards that are available or provided from agencies, organizations, local citizens at this time and in the future”. The word good is subjective and could include biased or incomplete information from developers.

Monitor the effectiveness of subdivision plat stipulations or conditions every few years to determine if they are being followed and to see if they resulted in desired outcomes. Implement enforcement as necessary.

E. Chapter 3. Community Growth and Design

1. **Goal # 1.** The document states:

“RESIDENTIAL AND COMMERCIAL DEVELOPMENT SHOULD COMPLEMENT THE COMMUNITY VALUES OF” ...a through c.

This list does not include values of the Environment. This section should include: “d. Maintain our quality natural resources, environmental areas, and/or Sensitive Areas as identified in Section 5.” This section could also include maintaining and improving public access to natural and recreational areas in the community and

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maintaining scenic views from parks, public roads, and from developed areas to the extent possible.

2. Goal #2. The document states:

“IMPLEMENT A COMPREHENSIVE, EFFECTIVE GROWTH MANAGEMENT PROGRAM THAT RECOGNIZES AND UPHOLDS THE GENERAL WELFARE OF THE COMMUNITY AS WELL AS INDIVIDUAL RIGHTS.”

After the word community, “including recognizing and protecting the integrity of the Environment (Chapter 5)”.

3. Goal # 4. The document states:

“COMMERCIAL AND RESIDENTIAL DEVELOPMENT SHOULD BE DESIGNED TO TAKE ADVANTAGE OF AND ENHANCE ADJACENT STREETS, PARKS, AND NATURAL FEATURES.”

“Take advantage of” vs “enhance” is confusing. This sentence suggests we are encouraging development towards natural features rather than away from them or at a reasonable distance. We suggest wording “to take advantage of streets, transportation corridors, parks, greenways and concurrently avoid, limit, reduce or mitigate impacts that might occur to natural features, environmentally important areas and/or sensitive areas.”

4. Under Recommendations: 5. The document states:

“When large-scale development may have significant impacts on the community, studies should be provided to assist in assessing impacts including analysis related to traffic, infrastructure and the cost of providing services.”

These studies also include reliable “assessment of potential impacts to natural resources, environmental areas, and/or sensitive areas as well as to recreational opportunities, public access, and outstanding scenic views”.

5. Add a New Recommendation # 11:

“Develop standards and a monitoring program based on best scientific and available information to monitor and enforce existing dark sky light regulations. Also limit noise pollution from existing and future commercial and residential developments, including noise from traffic.” More information on the impacts of night lights on birds, bats, and insects is below under Chapter 5 comments.

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F. Chapter 4. Land Use

1. Under Housing Goal #1. The document states:

“PROVIDE AN ADEQUATE SUPPLY AND MIX OF HOUSING THAT MEETS THE NEEDS OF PRESENT AND FUTURE RESIDENTS IN TERMS OF COST, TYPE, DESIGN AND LOCATION”.

Qualify this statement to say: “without jeopardizing the integrity of the natural environment (Chapter 5), outdoor recreational opportunities, scenic values, and sensitive areas within the Planning Area.”

2. Policy # 3: It states:

“Encourage the development of urban residential neighborhoods as the primary residential land use pattern in the Growth Policy area. These developments should incorporate design features that are either consistent with or anticipate the changing character of the area.”

Ensure the policy includes guidance for setbacks and buffers and open space requirements for those urban residential areas that adjoin sensitive or natural resource areas such as floodplains, wetlands, rivers, streams, wildlife viewing areas, etc. These same suggestions would also apply to Policy #10.

3. Under Recommendations: We suggest adding:

#12 “Provide bonuses or other incentives to further encourage or require maximum protection of the natural environmental areas/sensitive areas as described and mapped in Section 5.

G. Chapter 5. The Natural Environment

Section 5 touches on the importance of many natural resources such as rivers, streams, floodplains, wetlands, forests, steep slopes, etc. but misses additional sensitive places. It is not **well-integrated** into the other Chapters. This Chapter should lay out natural and substantiated constraints to development (because these areas also provide so many benefits) and encourage development in core areas and where there are fewer environmental issues.

Natural resource/environmental considerations and recommendations **should be paramount with future planning because** they have no voice or standing in this process, other than through agency or public comments. These intrinsic natural values

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make Kalispell special and are one of the reasons we live here. They include natural parks and spaces where we experience trees, water, birds, fish and other wildlife. The values of natural resources/environmental places should be given greater weight now in planning, before proposals are submitted, so that impacts can be anticipated, avoided or largely mitigated. Future limitations on public input may preclude their consideration.

Light and noise pollution within the City are major issues affecting people and wildlife. Drag racing is a common complaint in Kalispell. Zoning should incorporate mitigation to reduce this trend. It becomes more important over time and fails to recognize how close we are to designated Dark Sky places like Glacier National Park and Lost Trail National Wildlife Refuge. Night light that reaches upwards and obscures night skies negatively impact migratory birds, bats, and insects. [How Light Pollution Impacts Wildlife & How You Can Help](#) National Wildlife Federation; [Light pollution harms wildlife and ecosystems | DarkSky International](#); Research also shows that persistent light 24-7 interferes with human health. ([Light pollution affects human health | DarkSky International](#)). Noise from highways, airplanes, helicopters, and possibly drones can interfere with wildlife communication. Constant thrumming of traffic is also a detriment to human health. (Impacts of Noise <https://pmc.ncbi.nlm.nih.gov/articles/PMC9819367/>)

We applaud Kalispell for adopting lighting standards to reduce light pollution in new construction, but these standards may not be up to date with current trends nor enforced. They do not appear to address light reflecting up into the atmosphere from pavement nor from other impervious surfaces. Please incorporate educating the public and encouraging retrofitting older lighting. Light and sound issues will increase as Kalispell grows, further increasing the impacts to birds, bats, and insects. Although this Plan doesn't cover the County, guidelines in the Plan can help influence development outside the city limits.

- 1. Rivers, Streams, Tributaries, Floodplains (why they are so important):** The current Growth Policy recognizes the occurrences of the three major rivers (Whitefish, Stillwater, and Flathead) that cut through the city planning area. We feel the document should expand on these facts:
 - a. We concur that the rivers, streams, floodplains are important, but not just as a development constraint or a federal flood policy, but more importantly, to expand on your list, **because of the way floodplains reduce costly and**

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- devastating impacts of flooding, maintain higher water quality and quantity in the river and groundwater systems, and provide significant fish and wildlife habitat, recreational opportunities, and a reprieve from noise, light, and developments.** Floodplains and riparian areas should not be developed (or filled as stated in the document), but need to be buffered by low density development, setbacks, reduced lighting, land use limitations, and possibly height restrictions. Guidelines to reduce off-site pollution from yard chemicals etc. could be incorporated. Landowners who are willing to restrict development on their properties in or along floodplains and riparian areas should be rewarded for these mitigations.
- b. Most of the riverbanks and floodplains along these rivers, streams, and tributaries support intact natural and often native vegetation such as cottonwood, dense shrubs, or upland forests. These intact areas provide excellent places for wildlife such as white-tailed deer, fox, and coyote; upland birds such as doves, wild turkey, and grouse; and a host of birds ranging from bald eagles, great blue herons (and their nesting sites) and osprey (who nest and forage in the planning area). These riparian areas also support a wide variety of other birds such as pileated woodpeckers, migratory and nesting songbirds, and raptors such as red-tailed hawks and owls.
 - c. Bird diversity is extraordinarily high in riparian habitats, along rivers and along tributaries such as Ashley Creek and the various spring creeks in Evergreen and West Valley. These are all hot spots for birders and wildlife viewers, who make up a key part of our economy.
 - d. One reason to help preserve high bird biodiversity and relative abundance is to recognize that “Over the last 50 years, North American bird populations have declined by an estimated 3 billion birds. This impacts have mostly occurred to smaller migratory species such as sparrows, blackbirds, warblers, juncos, and finches, birds that were once common or came to our feeders (<https://www.science.org/content/article/three-billion-north-american-birds-have-vanished-1970-surveys-show>). Birds are important to humanity for many reasons including pollination, bird songs, cleaning up our environment (e.g. roadkill), spreading seeds, and eating insects (think mosquitoes). Maintaining

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- habitat for birds and other wildlife and connectivity between these areas helps us maintain a healthy environment not only for birds but also for humans.
- e. Flathead Audubon members and others have observed over 160 different bird species at the Owen Sowerwine property located within the planning area along the Flathead and Stillwater Rivers. This high biodiversity is typical of our local rivers and tributary corridors due to riparian area productivity and vegetative diversity. The outer growth boundary should be removed from the Owen Sowerwine Area.
 - f. Fishing, walking outdoors, wildlife watching, and recreating along these major rivers are very popular here. In fact:
 - i. 95% of Montanans say outdoor recreation is important to their quality of life: (Montana Fish, Wildlife & Parks. Montana 2014-2018 Statewide Comprehensive Outdoor Recreation Plan). <http://stateparks.mt.gov/about-us/scorp.html> .
 - ii. 87% of Montanans are outdoor recreationist enthusiasts; 71% of Montanans consider themselves conservationists; 81% of Montanans support conservation of wildlife migration corridors; 68% of Montanans say that loss of wildlife habitat is a serious problem in the state:
 - iii. Montana's outdoor recreation economy generates \$7.1 billion in consumer spending, \$286 million in state and local taxes, and 71,000 jobs: Outdoor Industry Association. 2017. Outdoor Recreation Economy Report. <https://outdoorindustry.org/state>.
 - g. Further, natural areas and associated wildlife in parks or back yards increase property values, decrease the need to drive out of town to see nature, and improve human mental health.
 - h. All the City's waters ultimately flow into Flathead Lake, one of the clearest and cleanest lakes in the world. Maintaining high water quality by protecting riparian areas and floodplains is important to residents of this community and to the fish and wildlife that depends on clean cold water.
- 2. Wetlands, Agricultural Lands, and Spring Creeks:** The current Growth Policy recognizes wetlands as "Sensitive Areas" but not their integral values nor does the Environmental section mention spring creeks.

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- a. Wetlands:** There are many types of wetlands within the Growth Policy Planning Area. The Sensitive Areas map show some of the mappable isolated wetlands but does not explain their values, uniqueness. These potholes tend to be alkaline, exist in a rural agricultural setting, and thereby are a mega attraction for waterfowl, raptors, shorebirds, sandhill cranes, and many species of songbirds and upland bird species. West Valley potholes and the associated mesic agricultural lands support one of the largest staging areas for sandhill cranes in Montana with hundreds to a thousand migrating through in the spring and staging in large groups in the fall. Due to the high intrinsic and wildlife value of these pothole wetlands, several private landowners partnered with Natural Resources and Conservation, Flathead Land Trust, and FWP to protect hundreds of acres of agricultural lands surrounding these pothole wetlands and set aside a public viewing area just off of Spring Creek Road. The project cost millions of dollars and included significant contributions from private citizens and organizations, including FAS, as well as from the landowners which attests to this area's high natural and unique values.
- b. Agricultural Lands:** Agricultural lands provide foraging habitat for a variety of wildlife, including elk, white-tailed deer, coyote; for birds (e.g. Canada goose, mallard); many species of upland birds (gray partridge, ring-necked pheasant); and raptors (red-tailed hawks, kestrel, great horned owls, prairie falcons). There are also many seasonally wet agricultural lands or fields that fill with shallow meltwater in spring providing high quality foraging habitat for spring migratory waterfowl, swans, and sandhill cranes. These stopover areas rich in accessible grain are critical for birds heading to northern nesting areas. These lands can be hard to identify but Montana Fish, Wildlife & Parks (FWP) and knowledgeable citizens have some knowledge of where these flooded fields occur so they could be mapped.
- c. Spring Creeks:** The Growth Policy should also recognize relatively rare spring creeks that arise near the Flathead River in Evergreen and in West Valley. Spring Creeks emanate from groundwater systems and provide unique open water habitats throughout the winter for fish and wildlife. Spring creeks support wintering waterfowl, great blue herons, even species such as the American dipper. They provide oxygen and flow for fish and other aquatic species.

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Summary of Flathead Audubon's Comments

The Kalispell Growth Policy should provide more detailed information to readers about the values and importance of our natural resources/environmental areas to the community. Chapter 5 should be expanded and put at the beginning of the document. These areas play an important role in protecting water resources, wildlife habitat, recreational opportunities, our economy, and human health. This information would better set the stage for integrating the values of our natural environment into other sections so that developers will want to minimize impacts to these environmental resources and sensitive areas.

1. The Growth Policy should include specific policies and recommendations that point to or express a community desire to conserve, protect, and maintain the values and functions of these resources.

1. Light **and noise pollution** within the City is a major issue affecting people and wildlife and should be more clearly addressed in this document.

2. City Planners should continuously obtain reliable scientific information and recommendations from agencies and the public. Monitoring the effectiveness of many subdivision plat stipulations or conditions should occur at least every few years.

3. The outer northwestern portion of West Valley should be considered a special area in need of more planning from landowners, organizations, and city officials as this area has some outstanding natural environmental factors including wetlands and areas very important to birds and wildlife. Lands in Conservation Easements should be protected from development.

4. The Owen Sowerwine property is now fully protected by a conservation easement and is managed by Flathead Audubon at our expense for the benefit of the public and conservation/education. We would like to see this area treated as a sensitive area in the map and document to limit encroachment of high-density development along its boundary.