FIVE VALLEYS AUDUBON SOCIETY
P.O. BOX 8425
MISSOULA, MT 59807

July 6, 2011

Nicholas P. Kaufman
WGM Group Inc
1111 East Broadway
Missoula, MT 59802

Dear Mr. Kaufman:

Thank you for the opportunity to comment on the proposed Alexandra Estates subdivision. As you know, Five Valleys Audubon Society has had a long-standing interest in land development activity that may impact valued avian habitat. In establishing the Clark Fork River-Grass Valley Important Bird Area, we identified riparian habitat that is critical to a number of bird species having high conservation priority. We are also interested in protecting grasslands that serve as habitat to a range of important bird species.

It is likely that, at one time, the land comprising Alexandra Estates had value as grassland wildlife habitat. However, as noted in the online application for the development, *"The site has historically been grazed and contains grasses for grazing."* As such, this long-standing grazing activity has eliminated the native grassland and, based on our onsite review, the area does not contain any particularly significant bird habitat. If it were returned to native grassland, it might become habitat for one or two grassland species of concern. But that does not appear to be a likely or reasonable endeavor for the landowner. Thus, we believe that the proposed subdivision will not significantly impact bird populations, especially those of conservation of concern, and would not be in conflict with our resource protection objectives.

We again wish to thank you for providing us the opportunity to comment at this stage of plan review. If you should wish any further information or clarification regarding our comments, please feel free to contact me.

Sincerely,

Jim Brown
Chair, Habitat Protection and Restoration

Copy: Tim Worley