August 25, 2008

Dale McCormick
Professional Consultants, Inc.
P.O. Box 1750
Missoula, MT 59806

Dear Mr. McCormick:

Re: Bison Collines Subdivision

Thank you for providing us the opportunity to comment on the proposed Bison Collines Subdivision. Our interest in the project stems from our concern that it encompasses important wildlife habitat especially for birds. I recently was able to visit the area and examine the impacts it would pose to wildlife. The area is vegetated with the two most threatened and vital habitats in Montana, native grasslands and riparian areas. In Montana, wetland and riparian areas comprise less than 4 percent of the landscape yet 52 percent of the breeding birds utilize this habitat for nesting and approximately 80 percent of species occurring in Montana utilize this habitat during some phase of their life. Unfortunately, the grassland here is dominated by exotics particularly cheatgrass and knapweed. But this situation could be greatly improved by aggressively controlling weeds and seeding with native grasses, which we strongly recommend. Populations of species such as Vesper Sparrow, Western Meadowlark and perhaps the Grasshopper Sparrow would be expected to respond well to this treatment.

The northerly riparian draw supports a mixture of native shrubs including hawthorn, service berry, and chokecherry; aspen trees; cattails and sedges that provide excellent habitat. It also is highly vulnerable to disturbance because of the open terrain surrounding it, which makes human activity readily visible. Narrow riparian buffers provide adequate security for some species but most bird species depend on large buffers to sustain their use of an area.

A recent publication that summarizes 83 studies dealing with riparian buffers to protect wildlife provides a scientific basis for determining appropriate buffers (Scientific Recommendations on the Size of Stream Vegetated Buffers Needed to Protect Wildlife and Wildlife Habitat by Janet Ellis, Montana Audubon, prepared for Montana Department of Environmental Quality, June 2008). Buffer widths vary from 50 to 1000 feet for various wildlife species. The recommended buffer for a variety of wildlife is 300 feet and 400 feet for a full compliment of birds. Species that can be expected to inhabit the northerly riparian area at Bison Collines include songbirds such as Clay-colored Sparrow, Spotted Towhee, Yellow Warbler, Gray Catbird, Warbling Vireo,

Lazuli Bunting, Calliope Hummingbird and Willow Flycatcher. The latter two are National Audubon Society Watchlist Species (Watchlist species comprise America's most imperiled birds and are in need of immediate conservation help). Raptors including Swainson's Hawk, also a Watchlist Species, and Long-eared Owl also seek this kind of habitat. Considering these species, which likely occur in this riparian area, and the scientific recommendations, a buffer of 300 to 400 feet is needed to provide adequate habitat protection.

The subdivision plan shows that lots 20, 21, 67 and 68, in particular, do not provide adequate buffer and should be redesigned or incorporated into the common area. Please let me know if I can clarify or further explain anything. My phone number is 549-8052.

Sincerely,

Jim Brown, Chair Habitat Protection and Restoration

Copy: Jennie Dixon, OPG