June 16, 2010

Ron Ewart
Eli and Associates, Inc.
P.O. Box 16462
Missoula, MT 59808

Dear Mr. Ewart:

Thank you for the opportunity to comment on the proposed Clearwater Meadows Ranch subdivision. Our interest in the development centers on the fact that it contains valuable riparian habitat. Riparian areas, such as those found on the proposed development site are, by their very nature, critical wildlife habitat types. Riparian areas and wetlands occupy less than four percent of Montana's land area, yet they are used by more than 80 percent of the bird species found in the state during all or part of the year. No other habitat in the West supports a greater diversity of breeding birds. In addition, many species that breed in other habitats forage in these areas during their migration. Not surprisingly, the Montana Department of Fish, Wildlife and Parks has identified riparian cottonwoods and wetlands as being *"Community Types of Greatest Conservation Need"*. The high use of these areas by birds, their natural scarcity and the threats to their existence make riparian habitats critical components in the conservation of native birds in Montana and across the West. Importantly, the diversity of bird species inhabiting these ecosystems serves as an important measure of their overall health.

Although impacted by past grazing activity, the riparian habitat encompassed by the proposed Clearwater Meadows Ranch subdivision is a valuable resource supporting a variety of shrub species in scattered patches and an overstory of scattered cottonwood, ponderosa pine and Douglas fir trees. At present, this riparian area along Belmont Creek furnishes desired habitat sought by a variety of neotropic migrant species and water birds. Restoration efforts could substantially improve the habitat and attract a wider diversity of bird species and other wildlife.

During our onsite review of the Clearwater Meadows Ranch development proposal, we observed an important cross section of bird species within the riparian habitat. The species were: Common Merganser (a female that flew into a cottonwood nesting site), Spotted Sandpiper, Belted Kingfisher, Hairy Woodpecker, Northern Flicker, Willow Flycatcher, Warbling Vireo, Lazuli Bunting, Mountain Bluebird, Black-headed Grosbeak, Tree Swallow, Northern Rough-winged Swallow, Chipping Sparrow, American Robin and Common Raven. Two of the species encountered, the Willow Flycatcher and Lazuli Bunting, are species of conservation concern. The Willow Flycatcher is a species of particular concern because its population is known to be declining due to a loss of habitat. Other neotropic migrant species that would likely breed within the riparian area are: Calliope Hummingbird (another species of conservation concern), Western Wood-Pewee, Gray Catbird, Yellow Warbler, MacGillivray's Warbler and Spotted Towhee. Restoration efforts

leading to the development of a denser shrub understory would likely result in the presence of such species as American Redstart, Northern Waterthrush and Nashville Warbler.

Given the value of the riparian habitat within this prospective subdivision, it is important that the plan of development provide for the protection and, ideally, the improvement of that habitat. An important resource protection measure is that of having an adequate open space buffer between the riparian habitat and adjoining land development activity. At this point, we do not see where that will be the case with the Clearwater Meadows Ranch project. Our concern rests in the fact that the greatest lot density with the likelihood of greater human activity lies along the riparian zone. And too, the proposed buffer area is too small for avian species using the riparian habitat. The fact that the buffer area would be included in the lotted area is also troublesome. We would posit that the riparian habitat and associated buffer should be in common ownership and designated and managed as a common resource. The habitat is far too valuable to be treated otherwise.

We would propose that the number of lots adjoining the riparian area be reduced if not eliminated altogether. We also note that, where such lots might exist, a buffer will be needed that is substantially greater than the 50-foot width being proposed for the project. Recently, the Montana Audubon Society compiled results from scientific research aimed at defining the size of stream-vegetated buffers needed to protect wildlife and wildlife habitat. On the basis of those studies, a minimum buffer width of 150 feet would be needed to support the waterfowl and neotropic migrant bird species that would likely use the riparian area in Clearwater Meadows Ranch. The research further concludes that a buffer of 300 feet is necessary to support a broader diversity of wildlife and that some waterfowl and songbird species require a buffer exceeding this width.

A final concern with the project relates to its distance from the essential services and employment available at urban centers. Given that distance, and in contrast with those living near an urban center, Clearwater Meadows Ranch residents would expend greater amounts of fossil fuels. This in turn would result in a greater contribution of heat trapping greenhouse gases to the atmosphere – an acknowledged cause of global warming. Global warming, a focus of attention by the National Audubon Society, is proving particularly troublesome to birds of the world, affecting such things as the geographic range of species as well as migration timing and patterns. The additional amount of greenhouse gases produced by those living at Clearwater Meadows Ranch would be small on a regional or world scale. Yet, it is these series of incremental, and often small, increases that have led to the global warming problems we are now experiencing and to our troublesome dependence on fossil fuels.

We are most appreciative of the opportunity to offer comment at this stage of plan review. If you should wish any further information or clarification regarding our comments, please feel free to contact either Jim Brown or me.

Sincerely,

Gerhard Knudsen
Copy: Tim Worley