Saint Lawrence Estates subdivision Sufficiency Review, Gerhard Knudsen 3-3-2020

Thank you for the opportunity to offer comment on the proposed St. Lawrence Estates Subdivision. Mindful that native plants and animals are a vital part of the living landscape, Five Valleys Audubon has had a long-standing interest in protecting valued bird habitat. An important focus of those efforts is the physical change associated with land development activity such as that intended for the proposed subdivision.

Predicting the impact of an undertaking requires knowledge of what species tend to use an area being proposed for development. The application contains considerable information from the Montana Natural Heritage Program about a variety of wildlife species. Those data, however, are not site-specific; they pertain to critical species that might be found within a broad geographical area. By and large, they are of little value in describing wildlife use on a particular land area such as that being proposed for St Lawrence Estates.

We can accept that the Heritage Program data are useful to the point of raising the potential that species of concern use a site. We might also conclude that there is a limited likelihood that any bird species of concern are reliant on habitat found on the St Lawrence Estates property. What the Heritage Program data do not provide is information concerning other species using the site during the year, particularly neotropic migrants. These too are species that should be considered during planning for the development. Documenting wildlife use of a site should involve more than noting that *"Common birds and mammals utilize the site at times."* This is particularly important given there is riparian habitat within the prospective development.

Across the west, riparian habitats support the greatest diversity of breeding birds. Within Montana these areas comprise a very small portion of the state, yet they are used by a large majority of the bird species we see throughout the year. Although the riparian area encompassed by the proposed development is small, the incremental loss of such areas due to development has a critical impact on a range of wildlife species. We are pleased the applicant recognizes the need to protect that valued habitat. Given the development that has occurred along the creek, we feel the proposed 50-foot riparian resource buffer is sufficient. The buffer should be designated a no-build, no-improvement zone extending from the high-water mark on both sides of St. Lawrence Creek.

Finally, the planned development is within the Seeley-Gold Creek Terrestrial Focal Area, a landscape defined by the Department of Fish, Wildlife and Parks (DFWP) as affording connectivity and habitat for such key species as Canada Lynx, Bighorn Sheep and Grizzly Bears. The subdivision application even notes that DFWP has classified the Blackfoot River corridor as being crucial wildlife habitat. Significantly, an effort to preserve those habitat values was the establishment of a conservation easement on 300 acres of land

immediately across the river from the St. Lawrence property. The purpose of the easement was to preserve valued Bighorn Sheep habitat and a corridor for wildlife movement across the Blackfoot Valley. However, even though the planned subdivision lies within important wildlife habitat, there is no real examination of the potential implications of the development on key species that are known to utilize the area. Given the wildlife values involved, we would recommend that DFWP biologists be consulted with the aim of identifying impacts to wildlife that may arise from developing the subdivision and, where necessary, devising mitigating actions.

We again wish to thank you for providing this opportunity for us to comment at this early 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.