May 18, 2007

Nicholas P. Kaufman, Land Planner
WGM Group, Inc.
P.O. Box 16027
Missoula, MT 59808-6027

Dear Mr. Kaufman :

Thank you for the opportunity to comment on the Sunshine Addition residential development proposal. Our interest in the proposed subdivision stems from the fact that it is very near the recently approved Clark Fork River-Grass Valley Important Bird Area (see the enclosed brochure). The Important Bird Area (IBA) program is an international conservation effort aimed at calling attention to areas critical for the conservation of birds and encouraging voluntary conservation efforts. Within the United States, the National Audubon Society administers the program. In Montana, it is the state level organization, Montana Audubon. The IBA encompassing the prospective Sunshine Addition development is a proposal of the local Audubon chapter, the Five Valleys Audubon Society in partnership with Montana Audubon, Five Valleys Land Trust and the Montana Department of Fish, Wildlife and Parks.

The Clark Fork River-Grass Valley IBA has been approved as a continental level IBA under the national program. That acknowledgement was founded on a review by the National Audubon Society and by the Montana IBA Technical Committee, a group of Montana experts from different organizations that assessed scientific data submitted by the Five Valleys Audubon Society. Those data were aimed at showing the area supports habitat used by one or more species of high conservation priority or such colonial nesting species as herons. In this instance, the data demonstrated the breeding occurrence of thirteen species of high conservation priority and four heron rookeries. Critical habitat components of this IBA are cottonwood, willow, and wetlands with such marsh vegetation as cattails and sedges.

Our on-site review of the Sunshine Addition proposal shows the prospective development being outside the IBA as well as lacking the habitat critical to bird species of interest under the IBA program. That being the case, we do not see where the subdivision would be in conflict with the objectives of the Clark Fork River-Grass Valley IBA. At the same time, we are most appreciative of the opportunity to offer comment at this earlier 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, President

Enclosure
Copy: Tim Worley