October 9, 2007

Dick Ainsworth
Water's Edge Properties
P.O. Box 3416
Missoula, MT 59806

Dear Mr. Ainsworth:

Thank you for providing us the opportunity to comment on the proposed Water's Edge subdivision. Our interest in the project stems from the fact that it encompasses a riparian environment along the Clark Fork River. Riparian areas and wetlands occupy less than four percent of the state's land area, yet they are used by more than 80 percent of the bird species found in Montana during the year.

The riparian edge encompassed by the proposed development is in good condition and contains vegetation comprising good avian habitat. Among the species involved are a nice mix of shrubs including chokecherry, serviceberry, hawthorn, and willow. The presence of Rocky Mountain juniper further adds to its habitat value.

During the course of developing the area it will be important to not disturb the riparian zone. In reviewing the preliminary plat for the subdivision, it appears that all development, including the public trail, will take place on the bench area above the river. Of concern, however, is the proximity of the lots and associated housing structures to the riparian environment. At this point, the development plan calls for a riparian buffer zone of 50 feet. We suggest that a desirable buffer would be more on the order of 80 to 100 feet. This would better assure the continued diversity of bird species in the area, particularly those sensitive to human disturbance, including Yellow Warblers, Warbling Vireos, Lazuli Buntings, Song Sparrows and Townsend's Solitaires. Research shows that the following buffer widths are needed to support different species of wildlife (from Ellis, J. H., and J. Richard. 2003. A Planning Guide for Protecting Montana's Wetlands and Riparian Areas. Montana Watercourse, Montana DEQ, and Montana Audubon. Bozeman, MT. 105pp).

Wildlife dependent on wetlands or watercourses	**Desired Width 50-660 feet**
Bald eagle	1,320 feet (1/4 mile)
Nesting heron, cavity nesting ducks	600 feet
Pileated woodpecker	450 feet
Beaver, dabbling ducks, mink	300 feet
Bobcat, red fox, fisher, otter, muskrat	330 feet
Amphibians and reptiles	100-330 feet
Belted kingfisher	100-200 feet
Songbirds (dependent upon species)……..	50-660 feet

A recent review of the scientific literature on riparian buffer strips (see above planning guide) concluded that for protection of water quality, a minimum of 100 feet of native vegetation should be provided as a buffer.

For protection of both wildlife and water quality, we suggest that the public trail be located so that it is further into the buffer than proposed in the development plan in order to avoid excessive disturbance in the narrow riparian zone.

We again thank you for affording us this opportunity for early input into the subdivision review process. If you should wish any further information or clarification regarding our thoughts, please feel free to contact me.

Sincerely,

Jim Brown, President

Copy: Jennie Dixon, OPG