FIVE VALLEYS AUDUBON SOCIETY
P.O. BOX 8425
MISSOULA, MT 59807

March 30, 2012

Paul Forsting
Territorial Landworks, Inc
620 West Addison
P.O. Box 3851
Missoula, MT 59802

Dear Mr. Forsting:

Thank you for the opportunity to comment on the proposed Triple C Guest Ranch subdivision. As you know, Five Valleys Audubon Society has had a long-standing interest in land development activity that may impact valued avian habitat. The stream that runs through the northern two-thirds of the property is of particular interest because it appears to offer important habitat for neotropical songbirds such as Gray Catbird, Willow Flycatcher, American Redstart, MacGillivray's Warbler, and possibly Northern Waterthrush. We recommend at least a 150-foot vegetated buffer setback from the riparian edge to provide adequate security for songbirds to successfully nest and raise their young. This is based on a number of scientific studies summarized in a publication by J.H. Ellis in 2008 entitled "Scientific Recommendations on the Size of Stream Vegetated Buffers Needed to Protect Wildlife and Wildlife Habitat" (it is available at www.mtaudubon.org). It appears that building sites on some planned lots would not allow for adequate setback. We hope that this can be clarified on future drafts of the plan.

We were unable to locate a riparian plan in the project materials that describes the tree, shrub and herbaceous species found in the riparian zone. Because we were unable to visit the property before the end of the April 6 comment period we are uncertain of the bird values in the riparian areas. But we would be happy to visit the property in May to better assess the bird habitat and bird species using the area.

We again wish to thank you for providing us the opportunity to comment at this 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
Chair, Habitat Protection and Restoration

Copy: Tim Worley