DATE: March 21, 2025

SUBJECT: Paisley Park Subdivision Sufficiency Review – Five Valleys Audubon Comment

Our concern with the Paisley Park project is not with its scope and location. It's in an area where substantial land development exists and where the community has expressed support for future residential development. This type of project was expected. Rather, our concern lies in how the application addresses impacts to wildlife and their habitat. Regardless of whether the development is likely to be approved, a fair and thorough accounting of its environmental effects should be made. We do not see where that is the circumstance with this application.

Assessing a project's impact to wildlife requires knowledge of the species that actually use the area. The species list from the Montana Department of Fish, Wildlife and Parks (DFWP) serves no real purpose in this situation, as it reflects critical species across a broad geographical area rather than site-specific wildlife use. Most of the bird species listed, such as black-backed woodpeckers, canyon wrens and barred owls, would not inhabit the proposed development site.

The wildlife impact assessment in the application acknowledges that some species on the DFWP listing are not relevant to the Paisley Park property. It then states that the land *"… likely only directly serves as habitat for white-tailed deer, small mammals, and some bird species"* and that development will result in habitat loss. It is a brief and simplistic assessment, exemplifying the minimal consideration that is all-too-often given to wildlife impacts in subdivision applications. Like

other aspects of the subdivision review process, these impacts warrant a thorough on-site habitat evaluation by qualified biologists.

Property comprising the Paisley Park Subdivision was once a grassland that supported a range of grassland birds. As a hay meadow, it served as important habitat for such grassland songbirds as western meadowlarks, savannah sparrows and vesper sparrows who used the area primarily for insect foraging during the summer. After each mowing, exposed soil and plant debris attracted a surge of insects, creating prime feeding conditions. Though not ideal for nesting, the area served as a valuable seasonal foraging area, particularly during the breeding and migration periods. Winter use was minimal, as snow and reduced insect activity limited foraging opportunities.

Farmland like that being proposed for the Paisley Park development also provides seasonal foraging opportunities for raptors. During the summer, the presence of voles and their periodic exposure as prey after mowing attract such species as red-tailed hawks, Swainson's hawks, northern harriers, and American kestrels. In the fall and early winter, these raptors hunt the fields as long as prey remains accessible. In early spring, before vegetation regrowth, exposed rodents provide a food source for returning migratory raptors.

Since the proposed development will eliminate habitat that was provided by the farming activity, another parcel of land essential to foraging birds will be lost. In response, they will inevitably seek food in remaining undeveloped areas and the impact may seem minor. Yet, in the broader context of habitat loss across the Missoula Valley, the impact is consequential. It is a loss of land that adds to the slow and

persistent shrinking of our remaining open space habitats. What was once abundant, quietly disappears.