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Flathead Lakers:
*Working for clean water, a healthy
ecosystem, and lasting quality of life in
the Flathead Watershed*

National Bison Range Complex Comprehensive Conservation Plans Comments

September 27, 2017

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Please accept the following comments submitted by the Flathead Lakers for the U.S. Fish and Wildlife Service (USFWS) Bison Range Complex Comprehensive Conservation Plan (CCP) development.

The Flathead Lakers is a nonprofit, grassroots organization. Our organization was founded in 1958 and currently has over 1,500 members. We work to protect water quality in Flathead Lake and its watershed through education, advocacy and stewardship projects.

Our beautiful lakes, rivers and streams, and the fish and wildlife that depend on them are part of what makes the Flathead such a special place and are a large part of its identity. The quality of the environment contributes to our quality of life and our economy. In fact, our quality natural environment has become a competitive advantage and a major force driving economic growth in Flathead County.

The Flathead Lakers initiated the collaborative Critical Lands Project in 1999 to address concerns that rapid growth and development would damage lands and waters critical to maintaining the quality of Flathead Lake and its tributaries and the area's quality of life. The Flathead Lakers coordinate the resulting partnership, the Flathead River to Lake Initiative (R2L), which includes representatives from federal, tribal, state, and local resource management agencies, land trusts, conservation groups and landowners. R2L partners have protected close to 6,000 acres of critical lands and waters through conservation easements and land acquisitions, and restored several miles of riparian areas. Protection efforts focus on wetlands, riparian areas, floodplains, and shallow alluvial aquifers essential to maintaining clean water in Flathead Lake and its watershed, and that also provide important waterfowl and wildlife habitat, outstanding scenic vistas, and recreation opportunities. Many of these efforts help protect existing USFWS Complex properties and expand protection of bird and wildlife habitat by conserving adjacent private lands.

The USFWS National Wildlife Refuges and Waterfowl Production Areas have unique qualities worth preserving and maintaining for the local, regional, and national benefits they provide for current and future generations.

Recommendations for conservation plans

Staffing: We recommend that staffing priorities and structure be revisited to ensure proper staffing of all refuges and waterfowl production areas, including those north of Flathead Lake. Staffing needs for the refuges under jurisdiction of the Lost Trail NWR management unit should be addressed and positions filled in a timely manner in order to achieve their missions. Minimum staff positions required to manage and protect these USF&WS properties were not filled despite the availability of funding for the positions. We understand that hiring was put on hold due to management uncertainties for the Bison Range NWR and giving hiring priority to this refuge over the Lost Trail NWR management unit. This created a bottleneck for these important WPAs and NWRs.

Staff positions should be **increased** to manage, monitor, and protect the USFWS Lost Trail manage unit properties to ensure the agency is in accordance with the region's needs and challenges, and to ensure public use is compatible with the Lost Trail NWR management unit goals. Population growth and demand for outdoor recreation opportunities has increased, while growth and development also reduce neighboring habitat on private land. The public benefits of these refuges and waterfowl production areas are significant and require a commensurate level of management, research, and public education. Current staff levels far from sufficient to meet the needs and pressures placed on those properties in northwest Montana.

Conservation and Management Planning: We encourage USFWS to partner with local, state, and tribal natural resource management agencies, conservation organizations, and other groups to identify management needs and develop comprehensive plans for each property that take into account the regional landscape and conservation needs and opportunities to protect the region's unique wildlife, recreational, scenic, and other important values. Working with partners could help identify strategies and solutions that increase efficiency in use of government resources, creatively use local skills and resources, and improve management within the context of the surrounding landscapes.

Monitoring and Research: Monitoring is important to ensure management is responding appropriately to stressors and challenges. The Flathead Lake, Blasdel, and Smith Lake WPA bird and wildlife values are significant and well known. Yet, in the past, USFWS staff indicated a lack of available data. Surveys by American Bird Conservancy staff validated and recorded those values in the Flathead Lake and Smith Lake WPAs. We recommend that research and monitoring be conducted collaboratively to collect needed information and ensure that the public resources are understood and managed to protect the unique values of each area and within a larger landscape context, including wetlands, surface and ground water, fish and wildlife, recreation, and scenic beauty.

Management Within a Larger Landscape Context: CCP goals should consider the refuge and WPAs within the larger landscapes, landscape stressors, and other area conservation programs and plans to assess how USFWS properties complement and strengthen local, regional, and transboundary conservation efforts. The importance and public benefits the Bison Range Complex units and other protected areas provide have increased, not diminished, as the Flathead Valley grows and develops. Scenic areas around wetlands, lakes, and along rivers and streams, such as those near the Flathead Lake, Blasdel, and Smith Lake WPAs are prime areas for

development. Development and recreation in and around these WPAs may pose increasing challenges and may require increased management, public outreach and education, and policing to maintain conservation values, reduce stressors, and find creative management strategies that allow the public to enjoy as well as conserve their values.

Changing weather patterns, including extended summer droughts and increased temperatures, further elevate the significant role the USFWS properties play in preserving the natural values and benefits they provide. The value of the bird and wildlife habitat and water quality and quantity provided by wetlands, shallow groundwater, and associated farmland will only increase. Management solutions may require, for instance, engaging with adjacent agricultural producers to enhance wildlife benefits, partnering with neighboring landowners to provide wildlife viewing opportunities or shoreline access, in addition to increasing policing and invasive species control and management.

Conservation Goals: We recommend that the conservation values and associated management strategies discussed below for various USFWS properties be included in the CCP.

The Flathead Lake and Blasdel WPAs: The north shore of Flathead Lake stuns new visitors and long-time residents alike with its dramatic beauty. The north shore comprises a special combination of beautiful scenery, farm lands, lakeshore, wetlands and riparian habitat. It is a hot spot for waterfowl and other birds and for bird hunting. These natural assets contribute to the area’s quality of life and economy, and our hunting and fishing heritage.

The USFWS Waterfowl Production Area on the north shore contains the most significant wetland acreage around Flathead Lake. The WPA and adjacent north shore lands support a high number and diversity of birds. Over 229 bird species have been recorded for the general north shore area. Bird surveys collected by the American Bird Conservancy and Montana Audubon designated the north shore as an Important Bird Area in 2009.

Waterfowl hunting is an important part of the Flathead Valley’s outdoor heritage. This area is important both for hunting in the fall and nesting habitat in the spring and summer. Adjacent agricultural areas also provide important habitat and forage areas for waterfowl. Waterfowl travel between the Flathead Lake and Blasdel WPAs and other wetlands, the Flathead River, and farm fields, for feeding and resting. Farm fields often flood in the spring and provide an important food resource to thousands of migratory waterfowl such as tundra and trumpeter swans, Canada geese, northern pintails, mallards, and American widgeon. Spring migratory birds need high quality forage during migration to arrive in nesting areas in good shape for reproduction.

University of Montana researchers describe Flathead Lake as one of the cleanest lakes in populated areas around the world. Clean water is a priceless natural resource that for us all. The Flathead Lake WPA’s wetlands and vegetated riparian buffers help protect water quality in Flathead Lake.

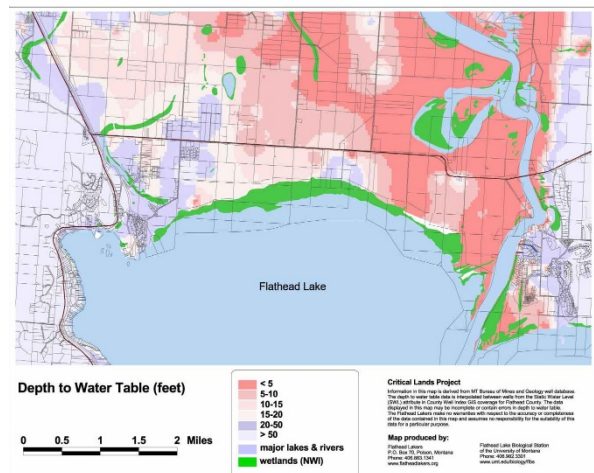


Figure 1. Depth to water table

Groundwater throughout much of the north shore area is less than 20 feet from the surface, and as little as two feet deep (see Figure 1). The high ground water contributes to seasonal spring flooding which provides bird habitat.

Natural beauty is a priceless asset to the Flathead Valley, for the economic benefits provided by the tourism industry and for quality of life. The breathtaking views the Flathead Lake WPA and adjacent lands offer to visitors and local residents is important to the cultural identity of the area. The value the Flathead Lake WPA plays in providing and maintaining iconic scenic beauty should not be underestimated.

Ashley Creek watershed WPAs: The Ashley Creek watershed includes the Smith Lake, Batavia, and Blasdel Waterfowl Production Areas. The Smith Lake WPA is a magnet for birds as well as bird watchers and fishermen. Several species of special concern are found in the drainage, including westslope cutthroat trout, northern leopard frog, bald eagle and common loon. Common loon pairs nest in the Ashley Creek drainage and loons forage in Smith and Foy's Lake. The rare northern leopard frog, once common throughout Montana, is found in Foy's Lake, Lower Foy's Lake, and the Fire Station pond. Several wetland and riparian areas in this watershed provide significant habitat for regionally significant birds, including Black Terns, red-necked grebes and wood ducks, among others.

Conservation Efforts: R2L partners have been working to protect ecologically significant areas near the USFWS WPAs to provide buffers for the WPAs and expand conservation of critical areas to protect additional habitat and associated resources and to ensure that the WPAs do not become islands in a sea of development. R2L partners have been exploring ideas for a practical conservation strategy for the north shore area and implementing conservation projects that protect its special attributes. In recent years, MT Fish, Wildlife and Parks (MFWP), a key partner, purchased over 400 acres of wetlands and farmlands, which are now the North Shore Wildlife Management Area (WMA). The North Shore WMA borders the Flathead Lake WPA and is managed by MFWP to complement the values and management plan of the Flathead Lake WPA (see Figure 2). MFWP is also working to restore wetlands and improve crop rotation to benefit foraging for birds. MFWP staff consulted with USFWS staff on wetland restoration project plans, designs, and implementation to ensure they complement USFWS management goals.

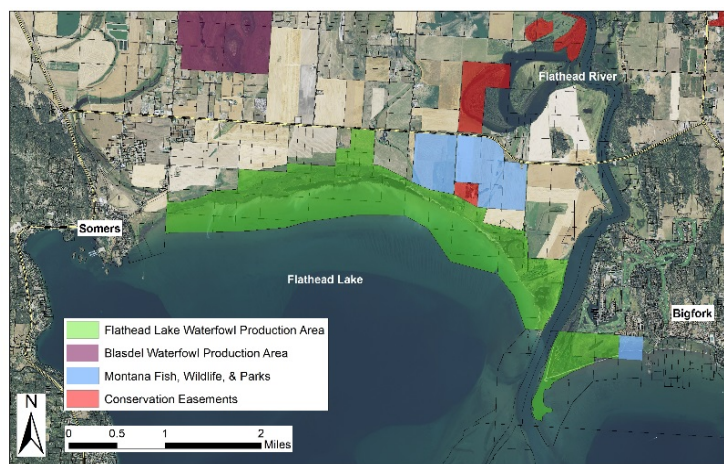


Figure 2. Flathead Lake North Shore

R2L partners have protected several properties near the Blasdel WPA, around Weaver (also known as Wiley) Slough, and bordering the Flathead River and Ashley Creek, which include significant wetland sloughs, riparian areas, and farmland (see Figure 3). These areas provide important habitat continuity for wildlife and open space. The riparian corridor along Ashley Creek, between Weaver Slough and the Flathead River, is in good condition and is widely used


by a variety of wildlife species, including grizzly bears, mountain lions, migratory waterfowl and songbirds. R2L partners are working with landowners on both the river and creek to restore riparian habitat and improve water quality and fish and wildlife habitat.

The wetlands are stop-over and foraging sites for shorebirds and waterfowl, as well as habitat for numerous amphibians, insects, fish, and mammals. They provide alternative stop-over sites when disturbance drives birds and other wildlife out of an area. They are also critical for the uptake and long-term storage of nutrients in the wetland vegetation. They are all within the FEMA floodplain boundaries and likely to provide important floodplain functions for the river.

R2L partners have also protected significant wetland habitat associated with the Smith Lake WPA and Ashley Creek (see Figure 4) through land acquisitions and donated and purchased conservation easements to protect and reduce disturbance on adjacent wetlands and farmland. Over the years, R2L partners transferred two protected areas to USFWS to expand the Smith Lake WPA, for consistent management and efficiency and efficacy of government resources.

The USFWS WPAs in the Flathead Valley are truly deserving of thoughtful consideration to ensure that the environmental quality, natural amenities, and public benefits they provide endure.

Thank you for the opportunity to comment.



Constanza von der Pahlen
 Critical Lands Program Director
 Flathead Lakers

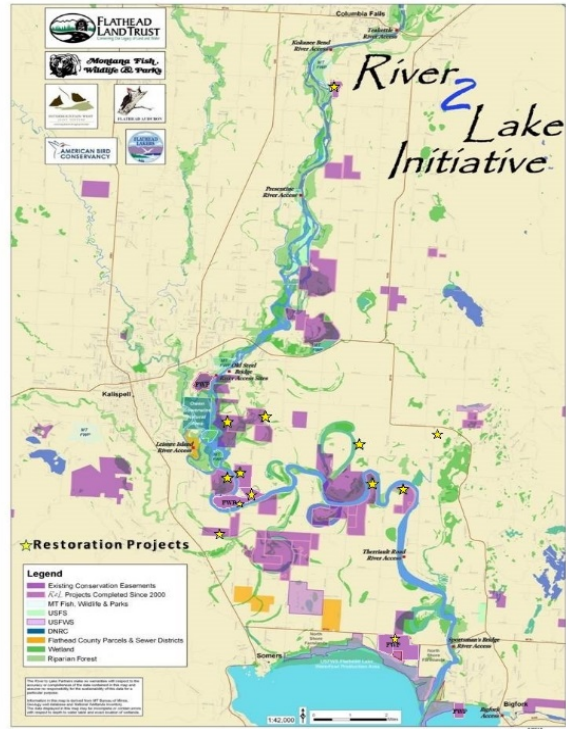


Figure 3. R2L accomplishments

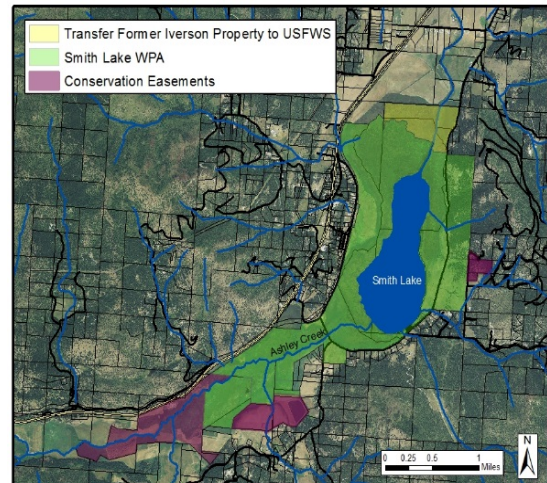


Figure 4. Smith Lake WPA