



Broadwater County – Planning Department
515 Broadway St.
Townsend, MT 59644

October 27, 2021

RE: Horse Creek Hills Subdivision – Proposed Major Subdivision, Broadwater County

Dear Broadwater County Planning Department:

Thank you for the opportunity to comment on the proposed Horse Creek Hills major subdivision in Broadwater County (Sec 31, T9N, R2E). The area of the proposed subdivision provides seasonal or year-round habitat for antelope, mule deer, white-tailed deer and elk, and provides habitat for game and non-game birds and wildlife as well. All the above species could potentially be impacted if the proposed subdivision is approved and developed. The area is near the lower end of Confederate Creek. Confederate Creek additionally provides habitat for moose, mountain lions, and black bears.

Based upon our experience with subdivisions located in comparable habitat, homeowners are likely to experience conflict with wildlife. To prevent these conflicts, subdivision homeowners should expect to take steps such as fencing gardens, trees and shrubbery; and removing, eliminating, or bear-proofing any attractants (garbage, outdoor pet food and bird feeders, fruit trees, barbecue grills, etc.) We suggest that if the subdivision is approved, the developer provide wildlife-proof storage and disposal facilities for trash. This is particularly important to reduce potential conflicts with black bears that could threaten property and human safety. The presence of small domestic agricultural animals and pets are known to attract mountain lions. Confederate Creek is occupied mountain lion habitat. If uncontrolled, roaming dogs and cats often adversely impact native wildlife. Covenants with specific language to address these concerns can help protect human safety and wildlife.

The primary tool available to FWP to address big game populations is hunting. Hunter harvest is more challenging with such subdivisions because of human safety concerns and loss of hunter access. In this case the proposed subdivision is adjacent to two parcels of state school trust land (DNRC). Impacts to big game management and access would occur not only within the subdivision but extend beyond to portions of those state sections. DNRC restricts discharging firearms within one-quarter mile of an inhabited residence. The DNRC has gone further in some circumstances, implementing recreational closures or weapons restrictions on DNRC parcels adjacent to subdivisions. These closures and restrictions, if they prove necessary, negatively impact hunter opportunity and game management.

FWP recommends the following mitigation measures if the subdivision is approved: maximize to the degree possible connected open space--include connectivity to adjacent open space--to facilitate wildlife movement; cluster houses to minimize the development footprint; allow only wildlife friendly property fences; minimize subdivision roads to the extent possible; install new utility lines underground; and design development as far away from Confederate Creek as is reasonably possible.

Wildlife habitat and ecological health are also compromised by noxious weeds. Subdivisions often become another source for noxious weeds, such as spotted knapweed, toadflax, etc. Landowners in Montana are required by state law to control noxious weeds on their properties. We recommend the

development of a weed control plan for the subdivision, in conjunction with and approved by the local county weed district. This plan should address both initial ground disturbance (roads, homesites, and utilities) and responsibility for ongoing weed control by residents on their lots and in common areas.

For further information on subdivision design and mitigating impacts to wildlife, please see the department's subdivision recommendations linked below or feel free to contact local staff.

<https://fwp.mt.gov/conservation/living-with-wildlife/subdivision-recommendations>

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Ron Spoon, Fisheries Biologist (phone: 266-4237, email: rspoon@mt.gov)

Nicole Throop, Comment Coordinator (phone: 577-7862, email: Nicole.throop@mt.gov)

FWP appreciates the opportunity to provide comments on this proposed subdivision.

Sincerely,



Marina Yoshioka
Region Three Supervisor