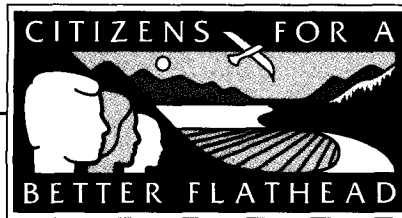


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March 26, 2008

Flathead County Planning Board
Earl Bennett Building
1035 1st Ave West
Kalispell, MT 59901

Dear Planning Board members,

Thank you for the opportunity to comment on the proposed North Shore Ranch subdivision. Citizens for a Better Flathead, as you are well aware, works to inform and empower residents of Flathead County with information about the land use planning process and best practices and innovations that similar communities are using to address comparable growth related issues. We encourage all residents to actively participate in land use decisions and to encourage the stewardship of the Flathead Valley's natural beauty and resources. Citizens for a Better Flathead was founded in 1992 and has over 1400 members.

Our comments for this hearing will consist of an oral presentation and written technical report on the preliminary plat application by our consultant, Chris Cerquone of Geomatrix. Mr. Chris Cerquone, senior scientist and Montana Registered Sanitarian and Mr. Cam Stringer, senior hydrogeologist in Geomatrix's Missoula office reviewed the application. Mr. Cerquone has more than 18 years of diverse environmental consulting and regulatory oversight experience. As an Environmental Health and Water Quality Specialist for the Missoula City-County Health Department, he routinely evaluated projects involving groundwater and surface water quantity and quality issues, from basin-wide water resource studies to review of proposed subdivision projects. Mr. Stringer has more than 18 years of groundwater and surface water hydrologic experience. He has managed numerous groundwater characterizations, including projects involving complex groundwater modeling and interactions between groundwater and surface water.

We will follow their report with some additional information on flood easements affecting this proposed subdivision with additional comments by Attorney Katherine Maxwell who has reviewed this easement issue. Finally, we will provide you a summary of proposed changes to your findings of facts based on the information we are presenting and on other information in the public record. The handout we have provided you provides a copies of two. Geomatrix reports, a sample of one of the flood easements on the property, and our comments on the findings of fact. Additionally we are submitting for the hearing record a notebook including past public comments at previous hearings on this subdivision, a CD of relevant water quality studies, and copies of all flood easements on this property and adjoining property that we have found in our search of the public records to date.

Sincerely,

Mayre Flowers, Executive Director

A Summary of Proposed Changes to the Findings of Fact that were prepared by the Flathead County Planning Office and contained in Staff Report

#FPP-07-32 NORTH SHORE RANCH SUBDIVISION FEBRUARY 01, 2008.

Submitted by Citizens for a Better Flathead 3/26/08

The following comments cite the original finding wording and suggest text changes and supporting rationale for amending selected findings. We have listed suggested findings in numerical order for easy reference.

Finding #1 The impact of the proposed subdivision to agriculture in Flathead County in general is acceptable because conversion of the subject property from agricultural use to 1 unit per 1.37 acre gross density residential use is unlikely to impact commodity prices or the general economic conditions of agriculture on which others in Flathead County rely.

Under Flathead County Subdivision regulation, 4.4.11 Major Subdivision Public Hearing, Consideration and Recommendation, the planning board shall base its review and recommendations on ... "i. These Regulations, including but not limited to, the design standards set forth in Section 4.7 (Subdivision Design Standards). ii. Applicable zoning regulations. iii. Other applicable regulations. iv. The subdivision application and preliminary plat. v. The environmental assessment.

The Environmental Assessment section requires findings based on the following:

Section 2 - Impact Criteria Report

a. Impacts on Agriculture:

- i. Proposed subdivisions that are contiguous to urbanized areas are presumed to have a minimal impact on agriculture.
- ii. Proposed subdivisions located on prime farmland are presumed to have an impact on agriculture. Describe the impact(s) and measures to mitigate the impact(s) or a statement of why no impact is anticipated and provide documentation to support the statement.

A finding based on the impact of the conversion of this land on commodity prices does not meet the intent of the Environmental Assessment. To properly analyze the impacts of this subdivision on the agriculture industry, one must look at the cumulative effects of allowing unmitigated subdivision on sensitive prime agricultural land, when the County has enough unbuilt developable lots to last for the next 25 years.

The price of wheat has risen dramatically in the past year because of global demand, a **shortage of supply**, and a weak dollar. According to the United Nations, world food supplies are shrinking. Worldwide, wheat supplies declined 11% last year to their lowest level since 1980. According to the USDA, wheat stockpiles in the US have fallen to their lowest level in 60 years. Some countries are even imposing export restrictions to ensure enough domestic supply. For example, Argentina, the world's fourth largest exporter, has imposed a ban on shipments until April 2008.