Comments on Flathead Wild and Scenic River System Proposed Action (FWSRSPA) Oct, 2019

Evaluation criteria were defined and used to determine which segments of the three forks of the Flathead River had outstanding remarkable values (ORV) during the initial phase of the revision of the Flathead Wild and Scenic River Plan. One of the categories of ORV was called Wildlife. According to both agencies involved in management of the Flathead Wild and Scenic River (FWSR), ORVs are to be protected and enhanced. Wildlife is the primary category of ORV being addressed by my comments.

Wildlife as an ORV was identified as existing along all forks and all segments of the FWSR. Standards and Guidelines can be used to protect or enhance Wildlife within the ¼ mile River corridor. Visitor use is one of the primary uses of the FWSR system that needs to be examined to ensure protection and enhancement wildlife as an ORV. Currently visitors can camp anywhere along the FWSR on the Forest Service side without a permit for unlimited nights. X-C Motorized travel, campfires, pets running loose, and drone use are all allowed with no standards or guidelines in place along the FWSR on the Forest Service side of the FWSR. Some Standards and guidelines are set for most of these visitor use activities along the GNP side of the FWSR.

As stated in the FWSRSPA “The Wild and Scenic Rivers Act and the interagency guidelines pertaining to its implementation, recent court cases have found that the Comprehensive River Management Plans must discuss the maximum number (capacity) of people that can be received into the river corridors and describe an actual level of visitor use that will not adversely impact or degrade river values (IWSRCC 2002).”

The concept of setting Indicators, Thresholds, and Triggers works for protection of a number of ORV along the FWSR corridor, but is generally inadequate when applied to wildlife. Wildlife is not a static commodity. One of the primary needs of all types of wildlife beyond habitat is security, habitat connectivity, establishment of migration corridors allowing wildlife to move freely across the FWSR corridor, and secure reproductive sites. Security for wildlife can be established by having areas where visitor use is minimized. Along a river corridor this can be accomplished by restrictions to X-C Motorized travel, restrictions to camping sites, restrictions to all visitor use travel except for floating along on the river.

FWSR System Proposed Action states “Habitat connectivity within or between watersheds is maintained and conditions supporting wildlife diversity are maintained.” Unless the Forest Service aggressively monitors where, for what duration, and in how many numbers visitors camp along the FWSR system they do not have data that supports this statement. There is the general sense that this is a big long river system and that people are not yet really disturbing any wildlife. Statements like the number of mountain goats using the river corridor is stable and no detections of bald eagle nesting failures have been attributed to human influence are the extent of documentation presented in the FWSR System Proposed Action.

You cannot document reproductive parameters for raptors without intensive monitoring, much less being able to attribute a nesting abandonment or nest failure to a specific cause. Are you really monitoring all nest sites along the FWSR corridor with that intensity?

As for the mountain goats, where else can these goats go to get the minerals they need? They may be still using the goat lick area, but perhaps the level of stress they endure when going there while having rafters stop their rafts goes up. Maybe the goats are hanging out longer at the lick site because of the rafters. After-all predators tend to avoid people. A general count of animals does not tell the whole story and does not confirm protection and enhance ORV for wildlife.

What I am suggesting is that the level of wildlife monitoring needs to increase, in a well-planned manner, so as to ensure the validity of your management decisions.

If you consider the sheer numbers of people who now float and camp along the FWSR during the spring, summer, and fall, it is somewhat staggering. The FWSR System Proposed Action does not present all the numbers of people using the FWSR corridor. It talks in generalities as if these people are not really out there having an impact to the wildlife. Cars and trucks can regularly be seen parked on River gravels at the edge of the water, people setting up lounge chairs and tables and tents on the rivers edge, people walking along with three or four dogs running loose, people starting camp fires, people wanting to camp in their campers in a natural area rather than a paid campground setting up shop for a week along the river, people who have never been in the “woods” before defecating anywhere and everywhere with no thought to proper disposal of their waste. People are pulling off the road and unloading 4 ATVs that they then proceed to run up and down the river’s edge for fun. Is that really the type of activity that should be allowed along one of the most pristine river environments in our country? Do these activities serve to protect and enhance the ORV for wildlife? I think not.

My comments are intended to point out the number of people using the FWSR corridor is not only exploding, but these people are using the corridor in ways we never could have anticipated even10 years ago. If the visitor use is not regulated more, wildlife use within the corridor will continue to decrease. Because monitoring of wildlife use of the River corridor is challenging and costly, there is really little baseline data for most species. Anyone working in the field could predict a direct correlation that as visitor use has increased, use by wildlife along the corridor will change. Will that change be advantageous to generally to wildlife? I think not.

Beyond these general comments about wildlife, I would like to propose that Buffer Zones be set to protect all known nesting sites along the FWSR corridor in accordance with the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. These Buffer Zones would use standards set by management plans for various species. Buffer Zone would provide at least minimal protection to help ensure reproductive security to various species of birds, large and small. Within these Buffer Zones all shore/ground activity would be strongly discouraged. Boats should not stop within a Buffer Zone. ATV use, camping, walking dogs, setting up a lunch service from a boat of fishing persons, walking along the shoreline, all should be prohibited. All Buffer Zones should be marked on maps of the FWSR corridor. Signage should be considered.

I would propose concept of Buffer Zones be expanded to ensure wildlife security for a greater range of wildlife species to ensure areas along the FWSR corridor maintain habitat and potential migration corridors unfettered by human activity.

Respectfully submitted,

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