February 4, 2025

Anthony B. Botello, Forest Supervisor

Flathead National Forest

650 Wolfpack Way, Kalispell, MT, 59901

Dear Mr. Botello,

Thank you for this opportunity to comment on the proposed Flathead Comprehensive River Management Project (CRMP). This work is long overdue. The forks of the Flathead River provide outstanding fish, wildlife, and bird habitat but has been increasingly stressed with recreational use. Key bird species that use these river corridors and depend on clean shorelines, gravel bars, and water to nest and raise their young include Common Merganser, Mallard, and Canada Goose. The shorelines and gravel bars are particularly important to Spotted and Solitary Sandpipers as well as Killdeer. The American Dipper depends on the clean gravel and rocks of these main channels for insect foraging in the winter. There are also many other songbird species who depend on the low elevation riparian corridors and vegetation for nesting and young-rearing during the busiest months of the recreation season.

There are some immediate actions that we fully support. Curtailing motorized use on gravel bars is an excellent way to protect riparian habitats and would finally address the degradation at Blankenship. We are pleased to read of a proposed noise ordinance. This will reduce disturbance to nesting birds along the river. We also appreciate the new proposed camping regulations and human waste regulations along the river. These actions will help conserve riparian habitats for birds.

At this point, we feel that water quality is an acceptable trigger point for bird conservation and do not propose any additional ones. The proposal is rather vague about how water quality will be monitored and utilized. This needs clarification before we have confidence in this.

We are concerned about a potential derailment of hazardous materials into the Middle Fork Flathead River. This would be a devastating loss. It is the stuff of nightmares. While it is nice to see a promise to work closely with BNSF railroad, we think a spill response plan needs to be developed and shared with the community.

We also want to be sure that the Environmental Assessment takes a hard look at the impacts of increasing User Capacity on birds. Please keep us informed of your analysis and final proposal.

Sincerely,

Darcy Thomas, President

Flathead Audubon Society Board of Director