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Anthony Botello
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Re: Comments on the Comprehensive River Management Plan Proposed Action
Submitted via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=56536>

Dear Supervisor Botello,

The following comments are submitted by Wilderness Watch on the Flathead Comprehensive River Management Plan (CRMP) Proposed Action (PA). Wilderness Watch is a national wilderness conservation organization focused on the protection and proper stewardship of all units of the National Wilderness Preservation System, including the Great Bear and Bob Marshall Wildernesses, collectively part of the Bob Marshall Wilderness Complex, which would be impacted by the PA.

Roughly 87 miles of the Flathead Wild and Scenic River System run through the Bob Marshall Wilderness Complex. While Wilderness Watch commends the Forest Service's acknowledgment of the growing issues of overuse and excessive recreation, including their efforts to collect data with regards to recreation on the Flathead Wild and Scenic River System, this does little to address the negative impacts already degrading habitat, "outstanding remarkable values", and wilderness character throughout the river system. Fish, wildlife, and flora should be acknowledged when addressing the impacts of overuse, and used as a guide for informing triggers and thresholds. Research already shows that river recreation is causing displacement of wildlife such as raptors, bears, and wolves, and that protected bull trout are further threatened by overfishing. Additionally, the 1987 Bob Marshall Wilderness Recreation Management Direction previously laid out directives for management regarding standards and limits, which appear to have been unacknowledged in the PA. Further, the PA is limited in its consideration of impacts as it does not look at the increased use of the Schafer airstrip, which has resulted in regular aircraft landings over the Middle Fork of the Flathead in the Great Bear Wilderness. This information should be considered when formulating the future management plan, and should inform immediate action to reduce the impact that overrecreation is having on the Flathead River system.

Over 1/3 of the Flathead Wild and Scenic River System runs through the Bob Marshall Wilderness Complex, yet there is no mention of the 1987 Bob Marshall Wilderness Recreation Direction. The Recreation Management Direction previously laid out guidelines for river management in the Wilderness

areas that will be impacted by the PA. This should be rectified before the release of the full management plan. Additionally, there are details in the PA that actively contradict the management direction of the Bob Marshall Wilderness Recreation Direction. The recreation direction clearly states that:

Several indicators were selected in the river action plan to reflect the recreation opportunities described above.

1. Encounters per day with other float parties on the river: Probability of sighting no more than 2 other float parties or individual boats on the river.
2. Encounters per day with other shore parties or camps. Probability of sighting no more than 4 shore parties or camps per day.¹

Instead the PA opts to disregard these numbers in the triggers and thresholds applied to the wild stretches of river, listing the acceptable threshold as 3, 10, and 16 encounters per day, depending on the stretch of the river and the applicable management unit.² Clearly, this far exceeds the numbers formerly set by the agency. Additionally, if there is indication that the numbers put forth in the original wilderness management plan are currently being exceeded, the Forest Service needs to take immediate action to address this, so they are not out of step with the management directives of the Recreation Management Direction adopted in 1987. These numbers were previously set, and should be followed rather than kicking the can through five years of monitoring as suggested in the PA.

According to the 1987 management plan “Prior to completing a decision on outfitter service levels through an environmental assessment, no additional outfitter and guide permits will be issued nor will approval be granted to expand operations beyond use levels authorized in 1978-1980 special use permits.”³ It is apparent that, should the Forest Service go through with the actions outlined in the PA, outfitter user days would be greatly expanded throughout the Flathead Wild and Scenic River System, but the PA does not provide information on the plan for outfitter permits inside wilderness. Are they capped or will the current permitted user days be increased in wilderness areas, as well?

The CRMP needs to assess how current use levels from public and commercial recreation use and the impacts from that use have altered conditions in the Bob Marshall and Great Bear Wildernesses since their designation, and how current levels of use and impacts compare to the direction in the Recreation Management Direction of 1987. The Wilderness Act and Forest Service policy require a non-degradation standard in Wilderness. The CRMP must show how the current situation and the PA meet that standard.

The Forest Service must consider the well-being of fish, wildlife, and flora along with the enjoyment of recreationists when setting capacity limits for recreation on the river. More and more research is showing the impacts of overuse in areas that see excessive recreation, whether that be hiking, angling, or floating. The PA largely fails to include considerations of wildlife and fisheries, when discussing “outstanding remarkable values” and the establishment of triggers and thresholds.

¹ Recreation Management Direction at 56.

² PA at 24-25.

³ Recreation Management Direction at 11.

Ospreys have been observed building nests farther from river banks likely due to increased watercraft activity. Additionally, studies of eagle flushing on the Boise river showed that the highest frequency of eagle flushing was associated with walkers (46%) followed by anglers (34%).⁴ Recreation use (floating and angling) have been identified as potential major impacts on harlequin ducks in mountain rivers.⁵ New research shows that important large mammals such as wolves and grizzlies are more sensitive to human-caused displacement than previously thought. In what are called “zones of influence” grizzlies avoid areas with significant human presence, resulting in a displacement effect of 50% up to 267 meters from high-use trails. For wolves the results were even more stark—the impacts of displacement in areas with heavy use extends 600 meters.⁶ When species are driven from their preferred habitat, they often end up in ecologically inferior habitat leading to higher rates of disease and lower reproductive success.

These findings are particularly important when considering how much of the Flathead Wild and Scenic River System runs through protected Wilderness where wildlife is meant to have maximum protection from the encroachment of human industrialisation, mechanization and recreation—this is the primary directive of the Wilderness Act which in section 2(c) defines Wilderness as follows: “A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man.”

Displacement and habituation due to overrecreation in a wilderness area constitutes an act of trammeling. The area must be managed to ensure that such impacts do not result from the ceaseless presence of human beings, as “man”, understood collectively as humankind, is meant to be “a visitor who does not remain.” The wording here states clearly that it is not one specific “man” that should not remain, but rather the presence of humanity as a whole. Therefore, Wilderness should be managed in such a way that these areas, which are critical to wildlife, see some reprieve from human presence even in months of peak recreation.

For this reason, an immediate limited permitting system needs to be put in place for stretches of the river system that are running through wilderness and experiencing user numbers exceeding, at a minimum, that which was listed in the 1987 Recreation Management Direction in order to ensure that the wilderness character is not being impacted due to higher levels of use.

By centering the impact of river recreation on wildlife, the agency can come to conclusions on capacity limits that benefit both recreationists seeking solitude in wilderness and the wildlife that depends on it.

While the document sets capacity limits on recreation, there’s very little information on how the agency settled on these numbers, or the efficacy of the data. As seen above, the triggers and threshold already far exceed those within the original wilderness management plan, so it begs the question—how were these numbers reached?

⁴ Hammitt, William E., et al. *Wildland Recreation: Ecology and Management*. Wiley, 2015, 73.

⁵ Wiggins, D. (2005, October 17). Harlequin Duck (*Histrionicus histrionicus*): a technical conservation assessment.[Online]. USDA Forest Service, Rocky Mountain Region. Available: <http://www.fs.fed.us/r2/projects/scp/assessments/harlequinduck.pdf>

⁶ Thompson, P. R., Paczkowski, J., Whittington, J., & St. Clair, C. C. (2025). Integrating human trail use in montane landscapes reveals larger zones of human influence for wary carnivores. *Journal of Applied Ecology*, 00, 1–16. <https://doi.org/10.1111/1365-2664.14837>

While the PAs list both the trigger and the threshold for overuse on wild stretches of river, defining them as follows:

A threshold is defined for each key indicator and determines the amount of change that would be accepted before river management objectives are no longer being met. The triggers identify when a management action(s) would be taken.⁷

Further, there is no indication within the PA of what management actions would be taken should the trigger be reached. All of the management actions listed in Table 4 of the PA are general, and aimed at the overall health of the Flathead Wild and Scenic River System, rather than actions meant to ensure that impacts do not exceed the threshold. The public needs to know what actions are triggered and how the mitigating response will be implemented in a manner that is both timely and effective.

The Schafer airstrip in the Great Bear Wilderness, leads aircraft directly over the Middle Fork of the Flathead resulting in negative impacts to both wildlife and recreationists seeking solitude. While the airstrip was grandfathered in, the Bob Marshall Wilderness Recreation Direction gave specific management directives for the airstrip should use greatly increase:

“The question of the level of use was also discussed by the committee, recognizing that the area may become increasingly popular for aviation use in the future. In general, the committee directs that the existing level of aviation use by the public (including commercial outfitters) be allowed to continue, but that greatly expanded use may be reasonably regulated by the Forest Service to protect wilderness values. At some future date this may entail restricting the number of flights per day, and the prohibition of ‘touch and go’ landings for training purposes.”⁸

Further the the Bob Marshall Wilderness Management Directions outlines the following indicators and standards for management of Schafer airstrip:

Indicator:

- 1) The number of aircraft landings per day. A landing includes touch-and-go approaches for training or practice as well as landings where the plane remains on the ground for any length of time.
- 2) The total number of landings per year.

Standard:

- 1) A ninety-percent probability of having no more than a total of 5 aircraft landings per day.
- 2) No more than a total of 550 landings per year of which no more than 6% will be administrative landings.⁹

⁷ PA at 21.

⁸ Recreation Management Direction at 12.

⁹ Recreation Management Direction at 43.

While the exact number of landings in Schafer Meadows is hard to find, there is currently no limit on the number of landings allowed daily or yearly. The increasing regularity of aircraft landings is directly linked to river recreation, as the heaviest use of the airstrip occurs in May and June from flights carrying floaters to put in on the Middle Fork of the Flathead. During this time, it is said that as many as 12 flights land in the area per day. When wildlife becomes an impediment to access, some aviators simply buzz the animals to spook them from the airstrip.¹⁰

While rangers report that airstrip use has increased dramatically since the publication of the Bob Marshall Wilderness Recreation Direction, there appears to be no plan to limit access or assess the impact this is having on both wildlife displacement and the opportunity for solitude within the Wilderness. We were unable to track down public information regarding the annual use of the airstrip in order to understand how the current rate of use compares to the standards set in the Recreation Management Direction which set the standard at no more than 550 landings per year.

In conclusion, while acknowledgement that recreation is having an impact on the “outstanding remarkable values” and wilderness character of the Flathead Wild and Scenic River System is an important first step, the damage that is already occurring along the Flathead River cannot wait five years for monitoring and assessment to simply have data that reinforces what is already known. We encourage the agency to look more holistically at the conservation of this important river system, as well as the wilderness character of the Bob Marshall Wilderness Complex—one of America’s flagship Wilderness areas.

Thank you for the opportunity to comment. Please keep us informed on the status of this project.

Sincerely,



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¹⁰ Reese, David. “A Trip to Nowhere: Schafer Ranger Station.” montanaliving.com, 21 November 2017, https://www.montanaliving.com/blogs/outdoors-adventure-in-montana/112903877-trip-to-nowhere-schafer-ranger-station?srsId=AfmBOoo_C2AVYfGyFdJ0-UcGf5q3ch_0-n2EQTe1IZG1As6hBRkYc-UC. Accessed 4 February 2025.