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Comments: Flathead Comprehensive River Management Plan #56536

I have written at this time to provide you with my comments regarding the Flathead Comprehensive River Management Plan #56536.

Notably, the Flathead Comprehensive River Management Plan proposes a number of good actions, including prohibiting parking and car camping on gravel bars; requiring containment of human waste within 200 feet of the river's edge; prohibiting drones; requiring a fire pan or blanket for campfires within or above the highwater mark; and noise level and group size limits.

However, while it lists user capacity numbers, it provides no information on how these numbers were reached nor data to show the actual user limit when considering the well-being of fish and wildlife and the experiences of other wilderness visitors. Therefore, more scientific data is needed to accurately assess user capacity numbers.

It also fails to provide information on impacts to Wilderness due to current recreation use, including the displacement of wildlife and waterfowl caused by rampant overuse, such as the endless stream of outfitting and guide services profiting from tours through the river corridor, and low-flying aircraft overhead. Therefore, immediate action is critical to address wildlife displacement in Wilderness caused by current recreation numbers and recreation use.

As an example, the airstrip in Schafer Meadows results in multiple daily flights over the Middle Fork of the Flathead in the Great Bear Wilderness. I can only imagine the impact a busy flight pattern is having on wildlife in the Great Bear Wilderness. Therefore, as a specific item, immediate action is needed to reduce impacts to the Middle Fork of the Flathead caused by flights in and out of Schafer airstrip in the Great Bear Wilderness. Additionally, immediate action is needed to bring the impacts along the South Fork of the Flathead into compliance with the area's Wilderness Management Plan.

As far as recreational use, most of the use on the wild rivers should be allocated to public use, not to commercial outfitting and guiding. Usage for commercial outfitting and guiding should be limited to only the level that is "necessary and proper" as required by the Wilderness Act.

As you are well aware, the Bob Marshall Wilderness Complex stands as one of the flagship Wilderness areas in the National Wilderness Preservation System. It is the very small slice of land in the Lower 48 where native wildlife can still find refuge from the pressures of ever-expanding human civilization. The Bob Marshall Wilderness Complex deserves immediate action in order to preserve the wild - its Wilderness land and its wildlife.

In summary, while I commend the Forest Service for taking steps toward limiting impacts and gathering data regarding recreation overuse, if it is truly interested in preserving the health of the Flathead River system, the agency should take this opportunity to more thoroughly research the impact that recreation is already having on Wilderness and wildlife, and act quickly to address the problems. Whether it is boats, planes, pack stock, or hikers, excessive recreation use will inevitably harm habitat and displace animals that rely on Wilderness in a world growing increasingly claustrophobic.

Habitat protection on the Flathead River is not something that can wait, and the Bob Marshall Wilderness Complex deserves immediate action to preserve the wild.

Thank you for this opportunity to provide you with my comments on this issue of great importance to me.