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Comments: Roughly 87 miles of the 219-mile Flathead Wild and Scenic River System runs through the gorges and valleys of one of America's most celebrated wilderness areas, the more than 1.5 million-acre Bob Marshall Wilderness Complex in northwest Montana. The "Bob," as it's known, consists of the Bob Marshall, Scapegoat, and Great Bear Wildernesses. All of its native wildlife including iconic native species like grizzlies and wolves still live here.

On a summer weekend, the Flathead is flooded with anglers and floaters, often accompanied by guides and outfitters, drifting on the water or camping and fishing along the banks.

The Forest Service is proposing new regulations and increased monitoring of recreation use on the Flathead River, including the 87 miles that run through wilderness. However, the agency's proposed actions fall far short, failing to acknowledge current recreation impacts or address the significant threats to Wilderness already occurring in one of America's preeminent wild places.

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, the agency lists user capacity numbers, but provides no information on how these numbers were reached or data to show the actual user limit when considering the well-being of fish and wildlife and the experiences of other wilderness visitors.

The document 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. In just one example, the airstrip in Schafer Meadows results in multiple daily flights over the Middle Fork of the Flathead in the Great Bear Wilderness. One can only imagine the impact a busy flight pattern is having on wildlife in the Great Bear Wilderness.

The Bob Marshall Wilderness Complex stands as one of the flagship wilderness areas in the National Wilderness Preservation System, the 3% of land in the Lower 48 where native wildlife can still find refuge from the pressures of ever-expanding human civilization. For the sake of the Wilderness and its wildlife, limitations on current uses should be considered, and an analysis of impacts should expand beyond the river to include the entire corridor a quarter-mile on both sides of the river.

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 research the impacts 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.

Before finalizing the Flathead Comprehensive River Management Plan please consider raising the following points:

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

\*The Forest Service needs more scientific data informing user capacity numbers.

Immediate action is critical to address wildlife displacement in Wilderness caused by current recreation numbers.

\* 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.

\* The vast majority of use on the wild rivers should be allocated to public use, and commercial outfitting and guiding should be limited to only the level that is "necessary and "proper" as required by the Wilderness Act.

\* Data collection and analysis needs to include the entirety of the Flathead River corridor, one-quarter mile to either side of the river.

\* Immediate action is needed to bring the impacts along the South Fork of the Flathead into compliance with the area's Wilderness Management Plan.