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Anthony Botello Flathead

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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>

Supervisor Botello,

The Flathead River system is a fragile watershed and ecosystem of clear mountain streams, intact forests, and wetlands. The area is essential for the recovery of threatened grizzly bears and bull trout. Much of the river flows through the Bob Marshall Wilderness and the Great Bear Wilderness and into Glacier National Park. 219 miles of the Flathead are designated as wild and scenic which is the majority of designated river miles (368) in Montana. It is a treasure that must be protected from overuse. Sadly, the Comprehensive River Management Plan Proposed Action (Proposal) increases use and will damage this ecosystem and its role in providing clean free-flowing water, wildlife habitat, and a refuge of outstanding remarkable values and Wilderness quality. The Proposal quadruples use and favors commercial outfitters over private users, wildlife, Wilderness, and the river itself.

According to the Proposal, the "Wild and Scenic Rivers Act requires the administering agency to protect and enhance the river's free-flowing condition, water quality, and its outstanding remarkable values (p 3)." Yet, the Proposal increases use without a thorough analysis of effects not only on the river itself, but at least a ¼ mile on each side of the entire river corridor and the wildlife and fish that rely on its waters. It is not just about recreation; it is about a precious national resource that is spinning out of control towards overuse and irreparable damage.

Uncrowded recreational opportunities have been degraded by commercial use. Permitted service days have been exceeded every year from 2015-2023 on the Lower North Fork and the Lower Middle Fork. The Proposal admits that "average actual use for the combined [Middle Fork] reach over the past five years is 71,889 service days (p 20)." The current amount of authorized service days is 35,713. This overallocation must be fixed, but the Proposal fails to do so. Instead, it proposes increasing authorized commercial service days almost fourfold to 136,000. These extra days will be in priority and temporary use pools, but the Proposal does not limit priority days which can be permanently transferred to permits without analysis. Nor does it limit use. It increases commercial use which damages the river and leaves the public out of the mix unless they can afford a commercial trip.

What is the capacity of the river? How does the Proposal comply with proposed user capacity and how was that capacity derived? At one point, 35,713 authorized service days was considered the upper limit of river capacity. How is the river magically able to withstand 136,000 authorized service days? The Forest Service needs more extensive scientific data and analysis to inform user capacity. The majority of new authorized user days, if thorough analysis allows them, should be allocated to private parties otherwise, this increase will essentially shut the public out of its public lands. Service days must be limited to protect outstanding remarkable values of this river system and commercial user days must be limited to what is "necessary" and "proper" as stipulated in the Wilderness Act.

It is difficult to fathom 60 boats a day on the recreational portion of the North Fork and group sizes of up to 50 people on and off the river for the other Wild and Scenic River segments. It sounds more like Disneyland than a Wild and Scenic River or Wilderness. The fourfold increase in authorized user days, large group sizes and daily boat allocations must be thoroughly analyzed in an Environmental Impact Statement (EIS). Its implementation will greatly affect the human environment not to mention the habitat of endangered species and ecosystem function.

It is great that the Proposal puts triggers in place, but they are too lenient and there is too much lag time with 3-5 year averages. Averages don't monitor excessive daily use during popular times of year. Corrective actions will not be triggered until it is too late. Triggers and actions to correct the issues must be more immediate, otherwise the watershed might not recover. It is also difficult to take away commercial permits, so private users will lose user days. A more detailed and immediate, daily monitoring system must be in place with triggers and designated actions to protect the river and prevent it from declining below set thresholds.

The Proposal must seriously consider eliminating priority pools and restricting user days rather than increasing them.

The Proposal must also include actions to bring the damaging impacts on the South Fork into compliance with the Wilderness Management Plan. It must propose actions that will prevent such impacts in the future and it must demonstrate compliance with the Wilderness Management Plan. The proposal must take action to reduce the impacts of flights in and out of Schafer airstrip in the Great Bear Wilderness.

There are some good points in the Proposal. Mandatory free float permits are a great idea for private parties, but they must be easily accessible from home and are used to collect user data to inform analysis of use and impacts. It is good that the Proposal prohibits vehicle camping or parking on gravel bars, requires fire pans or blankets for campfires in the Wild and Scenic River portions, manages noise levels, prohibits dogs and camping in sensitive areas. Stopping boats at the Essex Goat Lick is also an excellent restriction. The Proposal should also prohibit the use of drones in the Wild and Scenic corridors.

The Proposal includes monitoring of mountain goats, but it must also include monitoring and protection of other wildlife that utilize the river corridors. The Proposal must include more management actions to protect wildlife. For instance, a food storage order must be in place for the entire corridor and this should be monitored and enforced. The Bob Marshall Wilderness Complex is a treasure trove of habitat that must be preserved. It cannot wait for lagging triggers without specific, mandated management actions. It is one of our largest and last truly wild places in the nation and Montana. The Proposal must reflect urgency in protecting this habitat. Data must be acquired concerning the current amount of wildlife displacement caused by current recreation and that must be considered before increasing user days.

Commercial overallocation of user days in the past should not be answered with a huge increase in commercial user days. The use on the Flathead is already excessive, there is no reason to expand it. Limits on use and party size must be created and monitored. All infractions must be addressed immediately through specific management actions outlined in the Proposal. All new allocations must follow the Wilderness Management Plan, Wild and Scenic River mandates, and capacity limits. Less is more.