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Comments: While the Flathead Comprehensive River Management Plan proposes a number of good actions, (i.e. 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), it falls far short in preserving the health of the Flathead River system

For example, while the agency lists user capacity numbers, it 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; for instance, 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. Another instance is the impact on wildlife due to the multiple daily flights over the Middle Fork of the Flathead in the Great Bear Wilderness from the airstrip in Schafer Meadows.

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, in order to truly preserve the wilderness and wildlife, the agency should take this opportunity to research the current impact that recreation is already having on wilderness and wildlife, and act quickly to address the problems.

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. Therefore, the Forest Service needs more scientific data informing user capacity numbers in order to address the wildlife displacement causes 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.

Commercial outfitting and guide services should be restricted to the level that is "necessary and "proper" as required by the Wilderness Act, leaving the vast majority of use on the wild rivers allocated to the public only.

Data collection and analysis needs to include the entirety of the Flathead River corridor, one-quarter mile to either side of the river, in order to effectively address wildlife displacement in Wilderness caused by current recreation numbers..

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. As such, immediate action is needed to bring the impacts along the South Fork of the Flathead into compliance with the area's Wilderness Management Plan. Therefore, I urge the Forest Service to expand their current research and plans in order to address these problems and preserve the Wilderness as the Wilderness Act requires.

