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Flathead National Forest

Supervisor's Office

650 Wolfpack Way

Kalispell, MT 59901

Subject: Protect Wilderness and wildlife in the Flathead Wild and Scenic River corridor -- Flathead Comprehensive River Management Plan #56536

To Flathead Forest Supervisor Anthony Botello:

I am pleased to learn that the U.S. Forest Service (USFS) is proposing new regulations and increased monitoring of recreation use on the Flathead River, including the 87 miles that run through Wilderness. However, the USFS's proposed actions fall far short, failing to acknowledge current recreation impacts and failing to address the significant threats to Wilderness already occurring in one of America's preeminent wild places. 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.

On summer weekends, 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 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 USFS 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 USFS needs more scientific data informing user capacity numbers. 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 critical to address wildlife displacement in Wilderness caused by current recreation numbers. Disappointingly, the management plan 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. 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.

I also urge the USFS to ensure that the vast majority of use on the wild rivers to be allocated to public use, and to limit commercial outfitting and guiding to only the level that is "necessary" and "proper" as required by the Wilderness Act.

While I commend the USFS 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. I urge the USFS to take Immediate action to bring the impacts along the South Fork of the Flathead into compliance with the area's Wilderness Management Plan.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA