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Title:

Comments: I am concerned that the actions outlined in the for the Comprehensive River Management Plan will not adequately sustain the outstanding remarkable values of the Flathead Wild and Scenic River System. As a user of this river system, I have noticed a significant degradation of the "outstanding remarkable values" over a short period of the last 20 years. Northwest Montana has experienced an unprecedented increase in recreational users, with Glacier Park experiencing such popularity that the Park Service has had to limit access to the Park during the summer months to protect the Park's natural qualities. This has resulted in a significant overflow demand for recreational use on adjacent lands and rivers. I would maintain that such demand will continue to increase. Active management is needed to protect this incredible resource.

My criticism of the proposals presented in the Proposed Management Plan is that they do not provide meaningful management strategies. For example, the current amount of authorized service days for the Middle Fork Recreational MU2 are 35,713. I do not comprehend how we have gone from 35,713 authorized service days to an average actual use over the past five years of 71,889 service days. If there is no mechanism or desire to control use, what is the purpose of a management plan? The proposal is to increase total outfitter and service days to 86,000. What is the justification for this increase? Many of the "outstanding remarkable values" of this section of river have already been compromised. For example: the infrequency of wildlife sightings, the loss of the sense of remoteness and tranquility of being on a wild river. Rather, we currently have an endless line of rafts navigating a relatively constrained section of river, ever watchful of other rafters rather than being immersed in the beauty of the place. This section of river has been taken over by commercial activities to the detriment of other users and the place. This is just one example of the impacts of a river system not actively managed for the present or future.

Similar situations exist throughout the river system, such as overuse of some dispersed camping areas, potential incompatibility of boating and fishing use, and others. My point: the management plan lacks meaningful mechanisms for managing or directing use so that the outstanding remarkable values of this place can maintained.

I understand the difficulty in funding rangers needed to work with and educate users. To this end, I would propose expanding the volunteer pool to assist with monitoring and education throughout the river system. But none of this works unless some teeth are put into the plan to actively manage and limit and/or redirect users of the river system. Put "management" into the plan - set some limits that are consistent with the intent of Wild and Scenic Rivers. This river system is being loved to death. Allowing overuse is contrary to the legislation designed to maintain its natural attributes. "Sliding" limits are not effective management tools.