FIVE VALLEYS AUDUBON SOCIETY
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We wish to comment on the proposed rule changes for recreational use on the Clark Fork and Bitterroot Rivers. Five Valleys Audubon Society is an organization of approximately 600 members who are concerned about protecting birds and other wildlife. Less than 4 percent of Montana is occupied by wetlands, riparian areas, rivers and lakes, yet 80 percent of birds found in Montana utilize these areas at some point during their life. Thus, we are very concerned about impacts to birds and other wildlife due to recreational use of Montana's rivers especially the Clark Fork, Bitterroot and Blackfoot Rivers close to Missoula. We were surprised and perplexed to find that an agency responsible for managing Montana's wildlife did not consider impacts to wildlife in the Environmental Assessment addressing recreational activities on these rivers. We believe that impacts to wildlife should receive significant consideration in regulating recreational use on our rivers.

We are particularly concerned about the Clark Fork River III and Bitterroot River III river sections described in the EA because they constitute a major part of the Clark Fork River-Grass Valley Important Bird Area (IBA). The IBA program is a global initiative to identify sites that are critical for conservation of birds. To qualify as an IBA, areas must support species of conservation concern according to criteria developed by the National Audubon Society and American Bird Conservancy. The Clark Fork River-Grass Valley IBA is rated as having Continental significance due to supporting key species of conservation concern such as the Lewis's Woodpecker. Our bird surveys show that it supports breeding populations of 13 species of conservation concern including 6 Bald Eagle nesting sites and 4 Great Blue Heron rookeries.

Motorized watercraft are a major source of disturbance due to their physical disruption, noise and frequency of travel. This disturbance can cause displacement of foraging and resting activity (Rogers and Schwikert 2002． Conservation Biology 16(1): 216-224), abandonment of nesting opportunities and loss of security from predators. Disturbance of Hooded Mergansers and Barrow's Goldeneyes, which are species of conservation concern, and Wood Ducks is of considerable concern along the rivers in the Clark Fork River-Grass Valley IBA. Disturbance of cavity nesting woodpeckers that rely largely on cottonwood trees including Lewis's Woodpecker, Red-naped Sapsucker and Pileated Woodpecker is also a significant concern because these species often nest close to the rivers. The distance away from disturbance needed to avoid disruption of nesting activity and rearing of young varies but is usually a minimum of 150 feet for neotropical migrant songbirds and more than that for the ducks and woodpeckers we have mentioned. For example, scientific recommendations for buffers needed to protect the Pileated Woodpecker and Wood Duck range from 260 to 600 feet (Ellis 2008. Report to Montana Department of Environmental Quality, EPA/DEQ Wetland Development Grant).

It is particularly important to limit motorized recreational use on the Clark Fork and Bitterroot Rivers during the nesting season. For the most part the proposed regulations that limit motors to 20 hp or less on the Clark Fork River III and float only on the Bitterroot River III during the nesting season seem reasonable as a way to control motorized disturbance. In addition, however, we recommend a no-wake rule on the Clark Fork River and the entire Bitterroot River during the nesting period from May to mid August.

Sincerely,

Paul Loehnen, President