

February, 6th, 2025

Anthony Botello, Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Dear Supervisor Botello;

The North Fork Preservation Association (NFPA), a nonprofit conservation organization, greatly appreciates the opportunity to participate in the public comment period for the Comprehensive River Management Plan (CRMP) for the Flathead Wild and Scenic River (WSR) System. As a local grassroots organization, we have a strong investment in, and extensive knowledge of the North Fork of the Flathead area in particular, and general knowledge of the other forks of the Flathead WSR. We applaud the process to date, including public meetings and the opportunity to meet with agency staff from United States Forest Service (USFS), Glacier National Park (GNP), and MT Fish Wildlife and Parks (FWP) as well as the opportunity to have written dialog with agency staff as we analyze the CRMP proposal.

The mission of NFPA is to champion the exceptional biodiversity and wildness of the North Fork of the Flathead River watershed in Northwest Montana. The mission of the U.S. Forest Service is to maintain the health of the nation's forests and grasslands for the benefit of current and future generations. The National Park Service mission is to preserve, unimpaired, the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. Collectively these statements seem to share a common goal which should guide us in our collaboration in developing a CRMP.

The elephant in the room in this process is the difficulty of managing unprecedented recreational pressure on our public lands and their resources, including the Wild and Scenic River System, and the struggle to preserve recreational opportunity without causing irreparable damage to the ecosystem. The challenge is greatly complicated by increasing numbers of recreating public and decreasing corresponding federal funding. Given the current administration, further reductions in federal funding can be expected over the next four years. These competing pressures exacerbate the development of an effective CRMP.

We will address the CRMP proposal section by section following the format of the Proposed Action for the Comprehensive River Management Plan (USDA,

Flathead National Forest, January 6, 2025). NFPA's focus is the North Fork (NF) of the Flathead and the bulk of our comments will pertain to that section of WSR. However we will also address some concerns on the Middle and South Forks.

Proposed User Capacity

We support the division of the NF into 3 management units, MU1, MU2, and MU3. These are very different sections of river in terms of access, technical water and services. Correspondingly, they support different user capacities. The definition of user capacity as stated in the 1982 National Wild and Scenic Rivers System: Final Revised Guidelines for Eligibility, Classification and Management of River Areas is "the quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, quality of the recreation experience, and public health and safety". In keeping with this definition we have the following comments on proposed user capacity:

- North Fork Scenic MU1 - We believe this section should be managed for as remote a visitor experience as possible. This is an extraordinary section of river in terms of Outstandingly Remarkable Values (ORVs) and world class scenery. Parking at the border access is limited and can encroach on private property. Thus parking availability limits increased use. We suggest a user capacity per day below what is proposed and would suggest around **90** people. Anecdotal experience of residents is that this capacity is presently already being approached or reached on some days. The Polebridge access of this reach is shared with MU2 users.
- North Fork Scenic MU2 - We feel the proposed user capacity of 450 is too high. Our experience is that this is a lightly used section of the river at present and currently approaches the daily use of NF MU1. There is increasing shoreline use on this section, particularly at the river access at Coal Creek which now experiences frequent motor vehicle parking and RV camping on the gravel bar. This section parallels GNP's "Inside Road" which is a robust and vital wildlife corridor as detailed in the enclosures submitted herewith. Both GNP's present limitations on vehicle traffic on the Inside Road and the present low use of this parallel section of the river are integral and critical components for sustaining these attributes. We therefore suggest a user capacity of 150.
- North Fork Recreational - We feel that a proposed user capacity of 330 is an overestimate. Roughly, assuming approximately 3 people per boat, that corresponds to 100 boats/day at maximal capacity. The facilities at Big Creek river access and Glacier Rim are not adequate to handle this volume of river traffic.

- User capacities should not be set at levels where degradation is already in evidence. Degradation of the river corridor should be considered a trigger for management action.
- The ability to comment on user capacity is severely hampered by the fact that actual monitoring data has not been shared with the public. It is difficult to consider proposed capacity when current capacity is not defined. We propose considering a flexible schedule for user capacity that can respond to real time data going forward. Ongoing monitoring should be required by the CRMP and can be supported by volunteer groups. Novel approaches to managing user capacity include designating days that commercial trips are not allowed (locals only days) and/or granting permits for specific time slots. These approaches are in use on other rivers in the WSR System. Data on current use by both private and commercial groups must be made public.

Proposed Management Actions

As stated in the Proposed Action for the Comprehensive River Management Plan, the administering agency is required to provide for the protection of river values (Section 3(d)(1)) WSRA), including resource protection related to outstandingly remarkable values (ORV). A number of Proposed Management Actions (Table 4) have been developed.

All Segments

- We applaud the establishment of a mandatory, unlimited and free float permit system. We understand that this would be implemented in phases, initially to be introduced on the South Fork MU1, MU2 and Middle Fork MU1. **However we feel strongly that the North Fork MU1 should be included in this initial implementation.** The North Fork MU1 is the most remote floating experience on the North Fork; we request that all three forks of the Flathead River be represented in the initial permit system. The permit system should help establish current user numbers that can be shared with the public and river managers and allow for monitoring indicators not currently surveyed.
- We applaud the prohibition of motor vehicle camping on gravel bars. This is a use which is rapidly increasing. On the North Fork in particular there has been escalating use of the gravel bar at Coal Creek and, as is well known, at Blankenship. Vehicle camping carries the risk of contamination by fuel, human waste, and garbage, as well as increased noise pollution there by affecting ORVs and diminishing user experience.

- We applaud the containment of human waste (utilizing groovers) within the WSR corridor as is common throughout the WSR system. Multiple resources exist for river users to become acquainted with the proper handling of human waste.
- We applaud the prohibition of drones on sections of the WSR corridor shared with GNP. We feel strongly that the presence of drones significantly diminishes the river user experience.
- We applaud the requirement for a metal fire pan or fire blanket as is common throughout the WSR system.
- We applaud noise restrictions; unreasonable noise detracts significantly from an authentic river experience.
- We support the use of shuttles and livery services (which are already in use) as a way of reducing parking congestion.
- We support a single educational outfitting and guide permit, annually, for each recreational and scenic section as well as the wild segment of the Middle Fork; these permits will be focused on serving veterans, youth, underserved groups or a primary educational purpose.
- We support the prohibiting of dogs between Bear Creek and Essex on the Middle Fork and the expansion of the prohibition from going ashore to protect ORVs.
- We applaud a formal agreement between GNP, USFS, and BNSF to proactively manage spill potential. **However, this agreement should also include MT FWP, FWS, the Blackfoot Tribe, as well as the Flathead County Sheriff's Department.** All types of spills need to be proactively managed, including fossil fuels, not just those that are potential wildlife attractants.
- We find the discussion proposing increased service days on the Middle Fork to be confusing. We have not yet received a reply to an email, dated January 30th, 2025, to USFS staff requesting clarification. However, it appears that total guide and outfitter service days would double under the current proposal from a total of 71,889 to 130,000 combined for Middle Fork MU2 and MU3. Once again, it is hard to evaluate this in terms of user capacity without corresponding data regarding private use. Taken together, these potential uses seem excessive and likely to negatively impact ORV.
- We support a sign for the Mid Creek Takeout on the South Fork to improve floater safety.
- **We encourage adaptation of food storage requirements on all segments of the Flathead WSR System.** Adverse encounters with bears, while relatively uncommon in the WSR corridor have occurred and resulted in injury. Hanging food systems, a certified bear resistant cooler, bear canister or lockable box are all acceptable and there are many options now available on the market.

Monitoring Plan, Indicators, Triggers & Thresholds

Monitoring designated indicators, triggers and thresholds are widely understood as being critical to the protection of the ORVs and to provide opportunities to identify early deterioration in the WSR corridor so that necessary management actions can be implemented before significant damage occurs. **If there is not adequate monitoring then Triggers and Threshold are not recognized. Unless there is documentation of an impact there will be no evidence and consequently no management interventions.** Monitoring practices are challenged by agency capacity issues but can be supplemented by robust volunteer programs. We have multiple concerns with this section of the Proposed Action for the Comprehensive River Management Plan as outlined below.

Fisheries

- Bull trout populations, based on published data, appear to have already reached the suggested threshold for decline (Scott, Tristan. 2024, November, 1) "In Northwest Montana, Recreational Fishing for Bull Trout is a Catch-22". *Hungry Horse News*. <https://flatheadbeacon.com/2024/11/01/in-northwest-montana-recreational-fishing-for-bull-trout-is-a-catch-22/>). FWP management decisions have taken place as a result. This indicates the need for robust yearly monitoring.
- We support a robust monitoring of west slope cutthroat trout as well.

Water Quality

- Little detail was provided as to proposed frequency of monitoring. Science, not politics should direct the frequency and detail of water quality monitoring.
- Water quality monitoring data should be made public on all drainages. This is particularly important as climate change impacts increase over time. This data will be crucial for understanding the future of the river ecosystem and will be invaluable in helping to direct management throughout the river corridor.

Recreation

- The only indicators noted in the proposal for monitoring the recreation experience for floaters and shore users is the number of floaters, type of watercraft and whether parties are private or commercial and whether livery services are in use. In our view, this plan is **grossly inadequate**. A number of other indicators are vitally important and should be monitored as well. These could include invasive weeds, disturbance due to camping,

human waste and garbage, parking issues, wait times to launch, noise pollution, number of dispersed camp sites in use, defacement/destruction of vegetation/geologic resources, correct food storage and others. In addition to river users, other groups (hikers, stock supported parties) using the river corridor should be monitored at the same time as they impact the river recreation experience. Much of this data could be collected via the proposed mandatory permit system.

Wildlife

- Wildlife encounters are one of the most treasured experiences of river corridor users and represent one of the most significant ORVs. Notably the Flathead WSR system is one of few ecosystems globally where users might encounter endangered or threatened species (grizzly bears, lynx, wolverine), large ungulates, uncommon mammals such as marten as well as multiple species of birds. Unfortunately, the current anecdotal report from river users is that wildlife sightings are declining. The **only** wildlife monitoring included in the proposal is in the form of a special order in Middle Fork MU1 and applies only to mountain goats. To say this level of monitoring is completely inadequate is an understatement. We strongly suggest monitoring of multiple species as part of volunteer patrols, a permit system and agency patrols.

History and Ethnography

- Although mentioned as an important ORV in the Proposed Action for the CRMP, there is no further discussion regarding important cultural sites and no statement regarding monitoring of these sites. Public education and interpretive programs should be part of the management plan to further understanding of the importance of these public lands to area tribes.

Proposed Actions during the 2025 floating season to Inform the Development of the CRMP

- Implement a robust monitoring of river use and ORVs utilizing remote cameras (trail cams), volunteers trained in data collection, as well as agency collected data. This data should be shared with all agencies and the public. Expanded use of volunteers would help agencies compensate for capacity challenges. **Without a robust monitoring plan, it will be impossible for the Forest to carry out its mission of stewardship of the Flathead WSR System.**
- Establish mechanisms for public feedback on river conditions. This could include voluntary online forms which could be encouraged via signage at river access sites and part of the proposed permit system.

- Share with the public **current user data** during the scoping period to improve transparency and public input.
- Set user capacity below the “breaking point” in terms of damage to ORVs. As discussed above, **many ORV are not adequately monitored so triggers will not be recognized.**

Thank you for considering our comments in this highly important CRMP which will affect the Flathead WSR System for decades to come. We all cherish our national forests and national park systems and their wealth of ORVs. We look forward to a stronger, more robust collaboration between the agencies, private organizations and public as we care for our public lands.

Sincerely,

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Suzanne Hildner, Secretary
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Enclosures:

Biologist Letter
NPCA/NFPA Letter