

Comments Submitted Via Electronic Submission

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**RE: Flathead WSR Proposed Action for the CRMP**

Dear Mr. Weber

Please accept these comments on the Flathead WSR Proposed Action for the CRMP (CRMP).

I am a resident of Columbia Falls. I am an avid river enthusiast recreating on all three forks of the Flathead River system using a variety of watercraft. I venture into the more remote wilderness sections of the Flathead River system annually to hike and to paddle. I am fortunate to have made a career in the natural resource field with a focus on management of rivers across the country as well as other continents.

I appreciate that the Flathead National Forest (FNF) is taking the time to draft a new CRMP for the three forks of the Flathead. The current plan worked well for its time but is now quite dated given the population growth in Montana, growth of the outdoor recreation nationally and the advent of social media increasing exposure to outdoor opportunities. The new CRMP should be drafted in a manner that allows it to adapt to changes in the future none of us can predict. This is no small task. Before charging down the path of drafting a new CRMP, the FNF should contemplate the purpose of the CRMP how staff will use it as a tool in their short and long-term-management of the Flathead River system. Taking a moment to consider how the CRMP will be used on each fork of the Flathead will help the FNF make the CRMP a more durable and adaptable management tool.

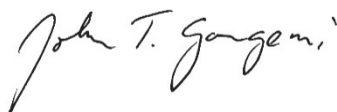
My comments on the Flathead WSR Proposed Action for the CRMP are brief primarily because there is not a lot of substance to comment on in this document. Much of the Proposed Action consists of old material or explanations of regulations and national frameworks. There is a lack of quality descriptions about the three forks of the Flathead and a complete absence of data on recreation use trends. The document should include analysis of visitor use on each segment of the three forks so the public can get a sense of trends over time. I also recommend you provide graphic analysis of the number of outfitters permitted for each river segment and annual number of user days vs. those allocated per outfitter. This data will help the public better understand past, current and projected future visitor use per river segment. Without this substantive data analysis, the public has no context to support or oppose the proposed actions in the CRMP>

**Proposed Triggers and Thresholds:** The CRMP thresholds and triggers proposed for the wild segments on the Middle Fork and South Fork as well as the Scenic section of the North Fork are nearly impossible to validate through monitoring. The FNF has struggled in the past and currently to conduct monitoring of the recreation use on the river segments as required in the current CRMP. FNF has not had the staff in the past to meet the monitoring requirements for thresholds and triggers nor will you have the staff in the future with budget cuts. As a result, past efforts by the FNF to collect visitor use data on the river segments has not been statistically valid.

The FNF should evaluate implementing a requirement for all river users on the wild segments of the Middle Fork and the South Fork to register prior to their trip. River users could register online. This type of system is used successfully on public lands elsewhere for backcountry hiking. The registration system provides FNF with the tool to collect quantitative data on group size, types of boats, transport methods to the river, demographics, etc. This information would be obtained much more easily than trying to count the number of parties exceeded 60% of the time. More importantly, the FNF has an opportunity to educate floaters on leave no trace practices before their trip. This educational opportunity can go a long way to protect those ORVs this CRMP is intended to protect in the first place.

**Range of Management Actions:** The CRMP lists the range of potential management actions that might be implemented in tables for respective river segments but fails to include a detailed description for the actions. These should be thoroughly described in this document for the public to evaluate. The elephant in the room no one wants to discuss is a permit system for one of more of the river segments. This CRMP should describe what a permit system might look like and why. This CRMP should provide a review of different types of permit systems currently in use on public lands across the U.S.. Public review of this information might generate additional creative ideas better adapted to segments of the Flathead. The public should have the opportunity to provide their input.

Sincerely,



John Gangemi

