

Mr. Chip Weber, Supervisor
Mr. Chris Prew, Project Leader
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

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**Flathead Wild and Scenic River (WSR)
Proposed Action for the Comprehensive River Management Plan (CRMP)**

I am writing on behalf of Flathead Lakes, a membership organization, made up of residents and recreationalists on Flathead Lake and throughout the Flathead Watershed. We utilize scientific research to identify issues and grassroots advocacy to ensure continued high water quality, healthy ecosystems, and a lasting quality of life here in the Flathead. As advocates and protectors of Flathead Lake and its tributaries for over 60 years, and residing downstream of the 3 Forks of the Flathead River, we are uniquely positioned to comment on the proposed CRMP at this stage in the process. The Flathead Lakers are first and foremost concerned with water quality, as our organization works to protect the water quality of the Flathead Watershed in its entirety.

We are concerned with the omission of the following in the scoping document for the 3-Forks CRMP:

Threat of Aquatic Invasive Species (AIS) - Montana is one of just five states currently free from aquatic species, such as the zebra and quagga mussels. While invasive plant species are mentioned in the document, and are certainly a concern, no mention is made of aquatic invasive species, which could be detrimental to all aspects of outstandingly remarkable river values (ORVs) on the 3-Forks of the Flathead. We call for a monitoring and boat inspection program to be included in the CRMP, as we have for our other waterways in Montana.

Oil spills - The potential for a train derailment and subsequent release of hazardous materials is also absent from discussion in the scoping document. With the high frequency of oil trains in particular, and the volatility of oil from the Bakken, (as currently processed for shipment to West Coast terminals), a spill along the Middle Fork would cause irreversible damage. The CRMP needs a plan that protects this valuable area (as exemplified by the Wild and Scenic [WSR] designation), and as vulnerable as the Middle Fork of the Flathead. No response effort would be able to mitigate the immediate and long-term damage that would be done to the Middle Fork and waterways downstream, especially as many areas susceptible to a spill (where BNSF currently runs) are difficult and logistically challenging to access. This plan should be developed with partners from the Flathead National Forest, Glacier National Park, and the Federal Railroad Safety Administration to ensure tracks are inspected regularly, safe and prudent speeds are observed, up-to-date cars utilized, improved braking systems, and adequate avalanche shelters are in place.

Climate change - "Natural variability" as referenced in the document (e.g. page 24) will be redefined by climate change. Declining snowpack and earlier spring runoff will redefine what is "natural," and changing flow conditions will likely have an impact on recreational use and the health of the fishery. Climate change impacts and relevant monitoring should be addressed in the CRMP.

Overall, the scoping document has been written as though this unique, valuable area has remained static since the first iteration of a plan in the 1980s. We ask that the Forest Service consider the above current and on-going threats - AIS, oil spills, and climate change - in moving forward with a CRMP that is relevant

and worthy of the 3-Forks of the Flathead as it stands today. The scoping document spends significant time discussing the recreational values of the 3-Forks - all of which would be greatly diminished, by any of the above mentioned threats.

We look forward to working with you throughout this process to determine the best management plan going forward for the 3-Forks of the Flathead River.

Sincerely,

Kate Sheridan

Executive Director, Flathead Lakers

Tom Cox

President, Board of the Flathead Lakers