Friends of the Wild Swan
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Hungry Horse-Glacier View Ranger District
PO Box 190340
Hungry Horse, MT 59919
Attn: Anthony Botello, Forest Supervisor
Sent via: https://cara.fs2c.usda.gov/Public/CommentInput?project=56536

Mr. Botello,

Please accept the following comments on the comprehensive river management plan (CRMP) for the Flathead Wild and Scenic River on behalf of Friends of the Wild Swan. We incorporate by reference the comments submitted by Swan View Coalition.

"The Wild and Scenic River Act requires the administering agency to prepare a CRMP "to provide for the protection of the river values" (Section 3(d)(1)). This includes resource protection related to the WSR's free-flowing condition, water quality, and outstandingly remarkable values." (Proposed Action page 18)

Section 10(a) of the Wild and Scenic Rivers Wild & Scenic Rivers Act directs that: Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values.

In its technical report on managing wild and scenic rivers (*Wild and Scenic River Management Responsibilities* (2002)) the [Wild and Scenic Rivers] Council interprets Section 10(a) as: "Protect rivers by documenting and eliminating adverse impacts on values (free-flow, water quality, Outstandingly remarkable values), including activities that were occurring on the date of designation. Enhance rivers by seeking opportunities to improve conditions."

While the term "protect" is interpreted by the Council above as "eliminating adverse impacts," it is not interpreted as an **absence** of impacts. Rather, each wild and scenic river-administering agency must, based on best available scientific information and reasoned professional judgment, ensure that existing values are protected and, to the extent practical, enhanced. The river-administering agency must also establish a positive trajectory for any value that was in a degraded condition on or after the date of the river's designation.

This direction by Congress, which has been affirmed in several court cases,* is why defining baseline conditions of the values for which the river was designated (free-flow, water quality, and outstandingly remarkable values) is critically important. This baseline serves as the basis from which the degree/intensity of existing and future impacts can be measured. All future activities are to be measured from this baseline to ensure continued high quality conditions and to eliminate adverse impacts (*protect*)

or improve conditions (*enhance*) within the river corridor. If a thorough resource assessment that includes a baseline description of the Outstandingly remarkable values is not completed at the time of designation, this assessment should be included in the river management plan. The river management plan then establishes the baseline conditions at the time of designation—including a description of any degradation—and proposes management actions that will be taken to improve conditions until they meet the requirement to protect and enhance the river's values, including free flowing condition, water quality, and outstandingly remarkable values. [*See* https://www.rivers.gov/question/what-meant-terms-protect-and-enhance-section-10a-wild-scenic-rivers-act]

It is imperative and necessary that the Flathead river management plan contain the baseline conditions at the time of designation, the current conditions, analysis of whether conditions have improved or been degraded, and remedies for maintaining and/or improving river conditions.

Given the threatened species that use the aquatic and terrestrial environment of the Flathead wild and scenic rivers and the outstandingly remarkable values at risk an Environmental Impact Statement must be prepared to fully analyze a suite of alternatives, baseline, user capacity and cumulative impacts.

• The Monitoring Plan, Indicators, Triggers and Thresholds lack actions to be taken when triggers and thresholds are reached. Will use be reduced? What happens?

A five year sustained decline in bull and westslope cutthroat trout is the wrong threshold when both species have already declined. Can they sustain any more decline and recover? Bull trout redds are not monitored annually in the South Fork wilderness tributaries but they saw a steep decline between the 2019 redd counts and the 2023 redd counts and even further decline in 2024. [See attached redd count data] FWP adjusted the fishing season downward due to this trend. This is not a good metric because it allows for even further, unsustainable declines in redd counts before any unspecified action is taken. The EIS should reflect that current conditions in the South Fork have declined due to climate change and overfishing compared to the baseline. North Fork redd counts are also in decline. [See attached redd count data] Measures should be taken now, not 5 years into the future, to halt the decline and methods developed to bring the conditions back to the baseline at time of designation.

Similarly, a sustained 10 year decline in stream habitat metrics is too long to allow habitat degradation. This must be shortened so that immediate actions can be taken to remedy any damage. The EIS must identify the PIBO monitoring sites, as well as disclose and analyze the PIBO monitoring data. This information must be readily available to the public on the Flathead's website through monitoring reports -- currently this information seems to only be available through a Freedom of Information Act request. Is PIBO monitoring currently, and will it continue to be, funded?

Likewise, the Vital Signs Monitoring for changes in the macroinvertebrate community and algae terrestrial, riparian, aquatic and invasive vegetation, temperature, discharge, stream/bank morphology, sediment, substrate, water chemistry, human disturbance, and aquatic invasive species needs to be posted on the Flathead's website so the public can track changed conditions. Baseline conditions at designation need to be disclosed and changes analyzed in the EIS. What methods will be used to correlate "major changes" in the measured metrics with human use? Who will be conducting the monitoring? How often will it be done? Is funding available now and into the future?

Please note that the Flathead Forest Plan monitoring report 2019 - 2020 has not been finalized since 2022. What steps will be taken to ensure that the required monitoring will be completed in a timely

manner and distributed to the public? When will the Flathead Forest Plan monitoring report be finalized?

• The state of fisheries in the Flathead river system is given a backseat to recreation. Page 9 of the proposed action states, "Nonnative fish populations are prevented from entering the system, removed, or managed to protect native fish species." This is blatantly false. Lake trout have been allowed to proliferate in Flathead lake and have infested the entire North Fork Flathead into Glacier National Park, unless there is a barrier. Northern pike eat native fish as they migrate in and out of Flathead Lake. Bull trout and other native fish should be given priority in the Flathead river system.

• Float triggers and thresholds do not have actions or consequences if they are exceeded.

• Drones should not be launched or landed throughout the Flathead Wild and Scenic River System.

• Group sizes of 50 people on the river or 20 people on the river and 50 people on the shore is excessive and will result in shoreline erosion and degradation.

• The total outfitter and guide service day calculations are arbitrary. The current authorized service days is already exceeded by 36,176 (apparently without any penalty) yet the Flathead is now wanting to increase the service days to 86,000. User capacity levels need to be set based on ensuring there is no harm to water quality, fish habitat, riparian vegetation, bank stability, wildlife and other natural resources at the time of designation. The EIS must consider a range of alternatives and analyze the impacts to the natural surroundings.

• Human and dog waste must be packed out and properly disposed of.

• What is the role of Glacier National Park and MT Fish, Wildlife and Parks in the EIS and CRMP?

We expect the concerns and issues we raise be addressed in the Environmental Impact Statement and CRMP.

/s/Arlene Montgomery
Program Director

Table 2. South Fork Drainage bull trout spawning site inventories from 1993 – 2023 in reservoir annual index stream sections and wilderness tributaries monitored regularly.

	Reservoir Tributaries											
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004
Wounded Buck	22	29	34	41	14	5	3	3	9	5	10	3
Wheeler	12	10	1	3	1	4	12	23	25	12	17	15
Sullivan	25	8	--	52	50	54	55	45	51	18	45	62
Quintonkin	5	3	7	4	0[b/]	11	15	15	17	21	4[c/]	18
Totals	64	50	42	100	65[b/]	74	85	86	102	56	76	98
	Wilderness Tributaries											
Youngs	40	24	34	74	43	--	85	--	61	--	--	100
Gordon	35	44	46	58	30	--	99	--	120	--	--	140
Little Salmon	56	47	43	134	100	--	138	--	111	--	--	71
White River	39	60	45	86	31	--	76	--	76	--	--	70
Total	170	175	168	353	204	--	398	--	368	--	--	381
Combined Total	234	225	210[a/]	453	269[b/]	74[a/]	483	86[a/]	470	56[a/]	76[ac/]	479[b/]

	Reservoir Tributaries											
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Wounded Buck	5	47	40	31	14	26	28	19	3[b/]	13	29	6
Wheeler	14	23	27	4	12	8	11	13	5[b/]	9	2	7
Sullivan	24	56	74	27	26[c/]	28[b/]	54	20	46	--	6	--
Quintonkin	21	48	20	12	14	33	31	35	12	13	15	--
Totals	64	174	161	74	66	95[b/]	124	87	66[b/]	35[a/]	52	IC
	Wilderness Tributaries											
Youngs	--	132	--	--	--	--	111	--	--	71	--	--
Gordon	--	142	--	--	--	--	118	--	--	60	--	--
Little Salmon	--	50[a/]	--	--	--	--	99[a/]	--	--	72	--	--
White River	--	90	--	--	--	--	77[a/]	--	--	62	--	--
Total	--	414	--	--	--	--	405	--	--	265	--	--
Combined Total	64[ac/]	588[a/]	161[a/]	74[a/]	66[ab/]	95[ab/]	529	87[a/]	66[b/]	300[a/]	52[a/]	IC

a/ Counts may be low due to incomplete survey.
b/ High flows may have obliterated some redds.
c/ Minimum count due to poor conditions during survey.
IC – Incomplete Count

	Reservoir Tributaries											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Wounded Buck	18	21	19	17	14	13	14	14				
Wheeler	18	13	16	8	8	12	7	8				
Sullivan	25	9	7	16	30	57	33	26				
Quintonkin	4	8	14	13	32	21	45	23				
Totals	65	51	56	54	84	103	99	71				
	Wilderness Tributaries											
Youngs	--	--	74	--	--	--	68	38				
Gordon	--	--	78	--	--	--	26	27				
Little Salmon	--	--	64	--	--	--	16	7				
White River	--	--	38	--	--	--	31	28				
Total	--	--	254	--	--	--	141	100				
Combined Total	65	51	310	54	84	103	240	171				

Table 2. Summary of basin-wide bull trout spawning site inventories for tributaries to the North and Middle forks of the Flathead River.

North Fork	1980	1981	1982	1986	1992	1997	2000	2003	2008	2012	2016
Big	20	24	45	12	16	13	32	12	21	6	4
Hallowat	8	14	31	3	2	0	32	8	16	10	0
Coal	48	30	95	35	7	5	6	4	7	20	NS
South Coal	2	24	9	4	5	4	1	1	2	10	NS
Mathias	10	10	17	10	4	0	1	0	2	0	NS
Red Meadow	6	19	10	8	0	3	1	3	5	0	NS
Whale	47	101	236	90	12	17	72	34	35	29	27
Shorty	4	17	56	35	3	2	12	0	7	7	1
Trail	31	82	101	69	26	9	42	14	51	12	11
Cauldrey	15	24	18	7	9	5	6	9	5	0	14
Cabin	2	2	3	0	3	2	2	1	0	1	0
Howell	47	72	103	22	31	7	11	15	13	8	23
Starvation	1	1	--	--	--	0	0	--	--	--	--
Sage	6	5	4	5	--	2	1	0	1	1	0
Kishenehn	16	13	23	18	12	10	23	4	11	15	1
No Name	--	--	--	--	--	--	--	--	3	--	4
N. Fork River	10	34	17	12	14	19	53	60	71	101	184
Total	273	472	768	330	144	98	295	165	250	220	IC
Middle Fork	1980	1981	1982	1986	1992	1997	2000	2003	2008	2012	2016
Nyack	14	14	23	27	12	9	13	14	16	14	NS
Park	--	13	0	87	1	2	10	0	23	15	NS
Ole	19	23	51	36	16	14	34	21	44	53	31
Bear	9	12	23	21	9	2	15	0	11	13	7
Long	8	--	--	--	1	15	11	17	14	26	NS
Granite	34	14	34	37	16	12	28	17	27	45	38
Morrison	75	32	86	52	17	39	50	22	46	58	63
Lodgepole	14	18	23	42	13	5	3	10	4	15	9
Schafer	10	12	17	30	12	5	19	4	13	0	8
Dolly Varden	21	31	36	42	13	9	40	5	22	22	22
Clack	10	7	7	16	6	1	4	13	5	1	2
Bowl	29	10	19	36	8	6	6	0	6	4	0
Strawberry	17	21	39	41	14	13	9	9	1	8	9
Trail	31	26	30	53	9	6	18	0	21	6	1
Total	291	233	388	520	147	138	260	132	253	280	IC
Basin Total	564	705	1,156	850	291	236	555	297	503	500	IC

NS Not Surveyed
IC Incomplete Count

North Fork	2018	2022
Big	16	29
Hallowat	4	5
Coal	5	28
South Coal	2	16
Mathias	0	0
Red Meadow	0	0
Whale	36	43
Shorty	1	0
Trail	11	23
Cauldrey	21	27
Cabin	1	1
Howell	16	11
Starvation	--	--
Sage	--	0
Kishenehn	6	0
No Name	2	0
N. Fork River	275	135
Total	396	318
Middle Fork	2018	2022
Nyack	14	5
Park	10	3
Ole	20	21
Bear	6	2
Long	27	26
Granite	31	30
Morrison	34	34
Lodgepole	9	9
Schafer	0	2
Dolly Varden	39	20
Clack	0	0
Bowl	0	0
Strawberry	2	0
Trail	27	23
Total	219	175
Basin Total	615	493

Flathead bull trout spawning site inventories from 1980 – 2019 in index stream sections monitored annually. Identical sections of these eight index streams are counted each year and represent a portion of the total bull trout spawning in the drainage.

Drainage: Stream	Redd Numbers										
	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990
North Fork:											
Big	20	18	41	22	9	9	12	22	19	24	25
Coal	34	23	60	61	53	40	13	48	52	50	29
Whale	45	98	211	141	133	94	90	143	136	119	109
Trail	31[a/]	78	94	56	32	25	69	64	62	51	65
Total	130	217	406	280	227	168[b/]	184	277	269	244	228
Middle Fork:											
Morrison	75	32[a/]	86	67	38	99	52	49	50	63	24
Granite	34	14[a/]	34	31	47	24	37	34	32	31	21
Lodgepole	14	18	23	23	23	20	42	21	19	43	12
Ole	19	19	51	35	26	30	36	45	59	21	20
Total	142	83	194	156	134	173[b/]	167	149	160	158	77
Flathead Drainage Monitoring Count	272[a/]	300[a/]	600	436	361	341[b/]	351	426	429	402	305

Drainage: Stream	Redd Numbers										
	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
North Fork:											
Big	24	16	2	11	14	6	13	30	34	32	22
Coal	34	7	10	6	13	3	5	14	7	3	0
Whale	61	12	46	32	28	35	17	40	49	68	77
Trail	27	26	13	15	28	8	9	17	21	42	27
Total	146	61	71	64	83	52	44	101	111	145	126
Middle Fork:											
Morrison	45	17	14	21	28	9	39	35	30	44	40
Granite	20	16	9	18	25	4	12	22	37	26	18
Lodgepole	9	13	9	6	9	8	5	7	11	3	17
Ole	23	16	19	6	16	10	14	22	26	33	29
Total	97	62	51	51	78	31	70	86	104	106	104
Flathead Drainage Monitoring Count	243	123	122	115	161	83	114	187	215	251	230

Drainage: Stream	Redd Numbers										
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
North Fork:											
Big	12	12	11	15	37	40	21	23	8	9[c/]	6
Coal	0	1	3	4	17	4	2	0	4	6	11
Whale	71	34	41	39	56	27	34	43	31	42	29
Trail	26	14	34	30	34	51	49	19	11	8	12
Total	109	61	89[b/]	88[c/]	144	122	106	85	54[b/]	65	58
Middle Fork:											
Morrison	30	21	10	16	11	21	46	34	43	39	58
Granite	18	17	17	8	16	14	27	24	41	33	45
Lodgepole	12	10	6	16	19	17	4	10	20	12	15
Ole	21	21	14	16	31	29	42	34	32	40	53
Total	81	69	47[b/]	56[c/]	77	81	119	102	136[b/]	124	171
Flathead Drainage Monitoring Count	190	130	136[b/]	144[c/]	221	203	225	187	190[b/]	189[c/]	229

Drainage: Stream	Redd Numbers										
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
North Fork:											
Big	8	7	1[d/]	4[c/ d/]	9	13	18	4	14	28	30
Coal	23	4	9	NS	4	5	8	12	5	28	22
Whale	34	35	31	27	29	35	30	56	32	43	35
Trail	23	5	9	11	17	18	7	19	34	23	23
Total	88	51	50	IC	59	71	63	91	85	122	110
Middle Fork:											
Morrison	54	52	54	63	32	34	40	39	21	26	33
Granite	27	37	29	38	24	31	28	28	14	30	9
Lodgepole	12	11	14	9	8	9	--	7	15	9	19
Ole	44	32	35	31	18	20	3[b/,c/]	26	11	21	21
Total	137	132	132	141	82	94	71	100	61	86	82
Flathead Drainage Monitoring Count	225	183	182[d]	IC	141	165	134[IC]	191	146	208	192

[a/] Counts may be low due to incomplete survey
[b/] High flows may have obliterated some redds
[c/] Minimum count due to poor conditions during survey
[d/] Count is low due to impaired access to the index reach
[IC] Incomplete Count