

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

Re: Flathead National Forest CRMP

February 4, 2025

Dear Supervisor Botello,

Thank you for the opportunity to submit my comments on the 2025 Draft Proposed Action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River:

The 3 Forks of the Flathead are an incredible ecological, cultural, and recreational opportunity for not only local Flathead valley residents, but for visitors to the Glacier National Park area from around the country and the world. With increased use and enjoyment of the river system, it is more important than ever to ensure that this opportunity be available for future generations in the same way we have enjoyed it.

I refer to my comments submitted in September 2019 during the previous CRMP draft, and they hold just as true if not more today.

"I do not in any way argue with the intent to preserve Outstandably Remarkable Values. It is important that these resources not be "loved to death" and biologic/geologic/aquatic resources should be protected from over-use. Only a few unethical river users can spoil the experience for many others. Rather than limiting the total number of users, better Enforcement should be utilized to limit the impact of unethical users." In the past 6 years, the Flathead NF has not done much for enforcement of regulations under the current plan, and I challenge the Forest to enforce their own regulations before the 3 Forks ORVs are lost forever." - Shawn Baker

ORV's

The Outstandably Remarkable Values are the very reasons we visit the river system, and the entire reason for the updated River Plan. I will address the ORV's in the same order they are presented in the draft:

Recreation

Recreation, particularly on the Lower Middle Fork (MF MU2 and MF MU3) is clearly the area that has garnered the most focus, both from commercial outfitters, the public, and the Flathead NF. It is important to reflect back on the original Wild and Scenic River Study Reports which outlined the Outstanding Remarkable Values that outlined the superb qualities of the North

Fork, Middle Fork, and South Fork Flathead rivers and qualified them for Wild and Scenic River Designations.

The 1975 WSR Study Report - Management Guidelines provided for:

- Recreational development appropriate if designed to maintain a pleasant view and not diminish qualities that led to WSR designation.
- Recreation development planning would provide emphasis on opportunities that related users to the environment.
- All commercial services would be administered to serve the public needs commensurate with providing quality recreation.

The Flathead NF found these points important enough to share with the public in the October 2018 public meetings. **These Guidelines should be touched on in this CRMP update, and carried through subsequent river plan updates through perpetuity.**

Capacity

I appreciate that the Flathead NF has taken an effort to set capacities for the 3 Forks Flathead. I'm sure this detail will generate more comments than any other, so I'll share mine:

When the 2019 draft of the CRMP was published, Commercial use was a concern, and is no less concern today. However, Commercial use has increased, and present Triggers/Thresholds exceeded, but this 2025 draft plan merely increases User Capacity? There is also a conspicuous absence of data on non-commercial use.

In 2019 John Gangemi commented, "There is 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"

In the Oct 2018 River Monitoring and Trends slideshow (Colter Pence, et al) the Percent of Days Meeting Standard for Float Parties Encountered was already exceeding more than 10 parties/day on over 80% of days on the lower Middle Fork. **How will this not exceed 10 parties/day with increased capacity justified in this draft document?**

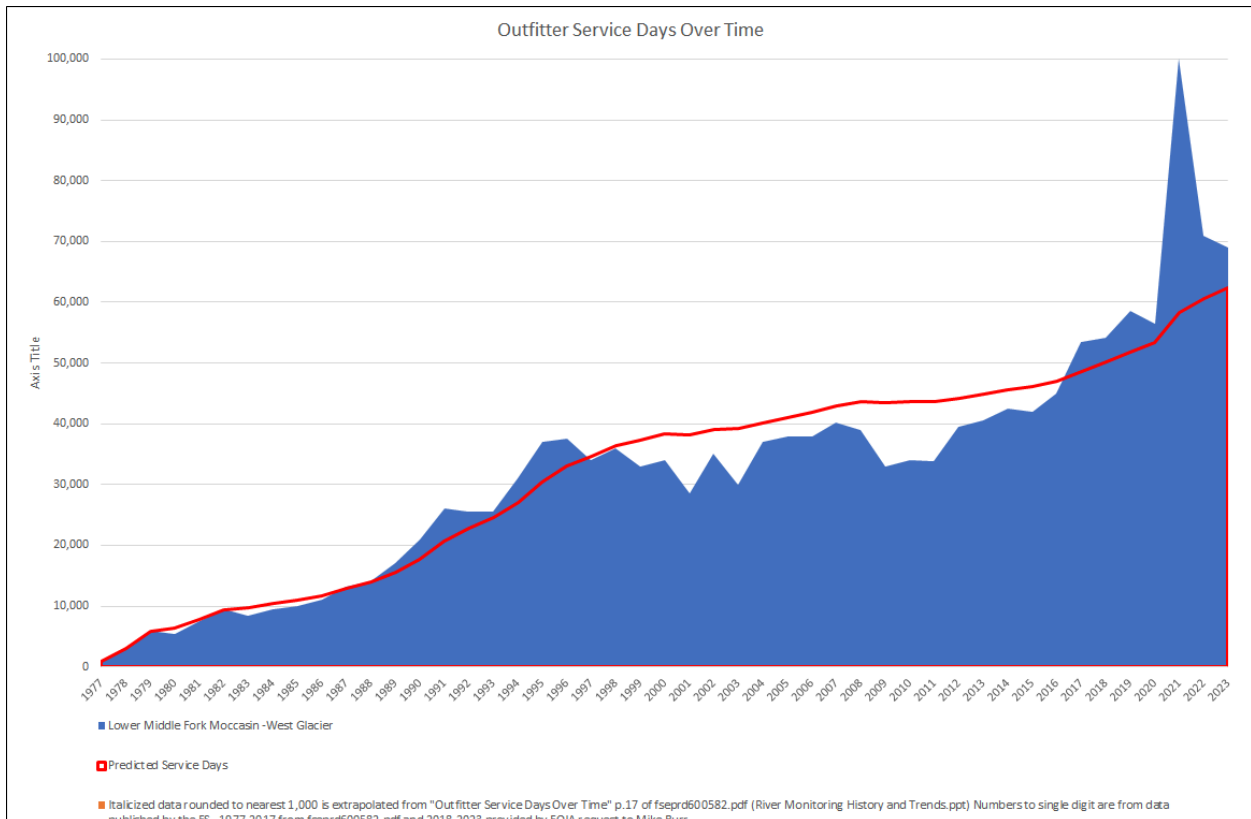
The high average for Shore Party encounters was approximately 10.5 per day on the Lower Middle Fork. This was near the current management plan standard of 10 parties (80% Probability) This data isn't even considered, nor noted as a Trigger or Threshold value in this 2025 Scoping document. Why?

The Flathead NF has not acknowledged recent launch wait times at the busiest access sites - Polebridge, Glacier Rim, Blankenship, Moccasin, West Glacier. In the Oct 2018 River Monitoring and Trends slideshow, wait time was exceeding 10 minutes on 33 days of 72 days reported 1997-2017 at these sites (10+ minutes on 45.8% of days). What are wait times from 2018-2024 reports?

A very important metric from the River Monitoring and Trends slideshow was the Outfitter Service Days Over Time graph. The Flathead NF has not published this graph including recent busy years 2018-2023. Data for Outfitter Service Days on the Lower Middle Fork (now MU2+MU3) obtained by FOIA requests by Mike Burr:

2018	54,158
2019	58,539
2020	56,477
2021	100,037
2022	70,867
2023	68,943

Including FOIA data provided by the Flathead NF, the graph is hereby expanded:



This graph shows fairly stable use for over 20 years from 1195-2015, and moderate increase from 2015-2023 (except 2021).

Hungry Horse/Glacier View District Ranger Rob Davies has acknowledged that the 2021 Priority Days + Pool Days allocated to the Outfitters was specific to 2021 and was primarily an emergency reaction to increased visitor pressure from COVID-19 and Glacier NP's newly allocated timed entry vehicle reservations which forced pressure onto the Adjacent Forest. **This count MUST NOT be utilized for a 5-year average to determine commercial use days.** Using this year in the average for long-term management decisions could subject the Forest to litigation. When the CRMP was first drafted in 2019, MF Flathead capacity was already a concern, and in the order of 58,000 user-days. Rolling the average higher when there was little to no constraint in the past 5 years is not good science or stewardship.

The Average actual use for the combined Middle Fork Flathead Recreation MU1-MU2-MU3 reach should be the average of 2018, 2019, 2020, 2022, and 2023, or **61,796 Service days**.

I would also echo Bob Jordan's excellent 2019 remark (with regard to MF MU2): *"To alleviate increased encounters, I think the Forest service needs to work closely with the outfitters to make sure that companies maintain their staggered launch system.*

If commercial companies choose to launch at 15 minute intervals when they have party sizes larger than 50, make sure they are not bumping up against another commercial launch in the process. Also ensure that the 15 minute gap is maintained throughout the trip; in other words, make sure both groups do not come together throughout the trip or at the takeout."

The National Forest needs to be more transparent about commercial use and provide accurate information on non-commercial use so the public can make an informed comment.

That's a lot to say about a single ORV, so I'll end my comment there and focus on the others, which are also very important.

Water Quality

It should be noted that large forest fires and the resultant destruction of plants and destabilization of soils represent a SIGNIFICANT impact to water quality when the equivalent of a freight train load is dumped in the river after a wildfire.

Fire is a natural activity, but through 20th century management and mismanagement, the large scale wildfires that have occurred are anything but natural. The CRMP should address water quality impacts of large wildfires and at least attempt to mitigate heavy fires near the river corridor to preserve vegetation and soils that can prevent the dumping of mass quantities of sediment into the watershed. **The Forest Service cannot set Management Action Indicators**

based on the impacts of river users, shore visitors, and adjacent residents while ignoring the impact of wildfire sedimentation.

Scenery

The October 2018 public meeting featured an excellent slideshow from Autumn Ela, NF Landscape Architect. In it, she noted the WSR Act permits obtaining scenic easements with the river boundary zone to protect river values i.e. ORVs, and noted CRMP language for required monitoring of these easements and a monitoring standard for the Upper North Fork Section.

Scenery is a value to both the public using the river corridor as well as the residents of the North Fork and Middle Fork. Neither an adjacent landowner nor a river floater wants to see a cabin with a bright red roof in the viewshed. However there are zero requirements for monitoring of this ORV, no triggers, thresholds, or indicators noted, and the **Flathead NF needs to include in the CRMP a Management Action as a tool to protect the important Scenery ORV.**

Wildlife

Wildlife have been important as far back as the 1975 Wild and Scenic River Study Report - Management Guidelines - Recreational Designation.

- Viewing wildlife would be a recreational value that would be favored over recreational development where conflict exist.

This draft Plan states, “Wildlife displacement, food conditioning, or habituation to human presence is minimized through floater education.” but there are no Indicators that focus on Wildlife and their impact from human presence, nor any Management Action to be taken to protect the Wildlife ORV.

Wildlife are undeniably displaced human presence, evidenced by the presence of beavers, otters, osprey, deer and bears in the fall/winter/spring seasons, and absence in the heavier summer use months. Wildlife displacement is absolutely a factor of current large user days, and increasing User Days WILL have a detrimental impact on Wildlife.

The Forest needs to coordinate with the Montana Fish, Wildlife and Parks (MFWP) or Montana Natural Heritage Program (MNHP) to set accurate Wildlife Indicators/Triggers/Thresholds and coordinate for monitoring/implementation by MFWP, MNHP, The Forest, and Glacier National Park (as suggested in the 2019 draft).

Additionally, all three Forks of the Flathead are prime Grizzly Bear (*Ursus arctos horribilis*) habitat. It is both important both to monitor human impact on grizzly bears, and equally important to ensure that both day users and particularly camping users adhere to bear safe camping practices.

The Montana Fish, Wildlife and Parks (MFWP) in particular has developed excellent Bear safety and Food Storage education and enforcement program, which should be

implemented in whole or similar to educate and inform floaters.

<https://fwp.mt.gov/binaries/content/assets/fwp/stateparks/food-storage-regulation--definitions.pdf>

Biological/Botanical Resources

This CRMP draft offers little discussion on the monitoring and protection of native plant species, even though Biological Resources are listed as an ORV.

The 2019 draft noted “An indicator would be abundance and size of non-native plant populations specifically in the WSR corridor.” and this is a good start.

Additionally, the Montana Fish, Wildlife and Parks (MFWP) in particular has developed an excellent Aquatic Invasive Species (AIS) education and enforcement program, and the Flathead NF needs to acknowledge this partner for education/enforcement to keep our pristine 3 Forks rivers AIS-free.

Geology

“The river bottoms of the Three Forks contain brightly colored pebbles, cobbles, and boulders.”

The discussion on the Geology ORV seems like an after-thought and a missed education opportunity. I would refer the Forest to the Glacier National Park website which offers a significant wealth of information on the Geology of the “Crown of the Continent”.

<https://www.nps.gov/glac/learn/education/geology.htm>

It is important that the Forest Service acknowledge the important and impressive geology of this area, including the unbelievably ancient sediments (argillite/mudstones) that make up the North Fork, Middle Fork and lower South Fork river beds, the occasional igneous intrusions, the coal banks of the North Fork, the limestones that make up the Bob Marshall Wilderness and the headwaters of the Middle Fork and South Fork rivers. Your Federal partners have already done the research—partner with them for educational kiosks at the river access site.

Fisheries

Table 5: Monitoring Plan, Indicators, and Thresholds lists Westslope cutthroat and bull trout Abundance as an Indicator, with a decline in abundance a Trigger and sustained decline a Threshold.

Bull Trout abundance has been in decline for DECADES and requires no further monitoring, it requires action. The Flathead NF needs to work closely with the US Fish and Wildlife Service, Glacier NP, and the MT Fish Wildlife & Parks to **include specific Management Actions in this CRMP to protect this important native fish.**

History and Ethnology

The 2019 draft had a reasonable start for Proposed Monitoring and Indicators:

“Heritage site inventory of the Flathead WSR corridor has been minimal, and completion of additional non-project related cultural resource surveys as well as preparation of historic overviews, thematic studies, and traditional cultural property investigations are encouraged to increase knowledge and appreciation for heritage resources and their inherent values. A process for identifying heritage sites that are susceptible to imminent risk should be implemented through inventory and monitoring efforts, and historic property management planning, to preserve site integrity and protect ethnographic and historic ORVs.”

The Forest must partner with the Pikuni (Blackfeet), Ktunaxa (Kootenai) and Séliš (Salish) to encourage appreciation of their culture and historic uses of the 3 Forks rivers. Additionally, significant post-colonial history has occurred on the rivers with trapping, mining, limited prospecting, railroad construction, homesteading and moonshining activities predominating. These are opportunities for additional educational signage and kiosks at river accesses.

Comments on the Proposed Action, Table 3: Proposed Estimated User Capacity

1. Why are all “Limiting Attributes” Recreation except MU1 Wildlife?

Comments on the Proposed Action, Table 4: Proposed Management Actions

1. While I am in favor of mandatory/unlimited/self-issue permits to ensure floaters acknowledge receiving information/education, I am not in favor of these permits to be seen as an opportunity further study of patterns of use. The Flathead NF has 47 years of commercial use data, UM River Use Reports from 2012-2014, 2017, and 2019. The use data is as complete as it will ever be, and has already told you the Management actions to take.

The UM 2012-2014 River User Study (Figure 24, pp 10) found that 299 of 308 users polled—97.1%—were Neutral to Strongly Favored the forest Providing More Information Regarding Appropriate Behavior. This survey occurred over 10 years ago, and even then had a majority of importance scores related to the behavior of others—with *litter*, *poor wilderness ethics* and *encountering human waste* chief among them. **It is time to move beyond studying, continue to educate and if necessary focus on enforcement and impose penalties on individuals or companies who ignore the current let alone new regulations.**

2. Prohibiting motor vehicle camping on gravel bars is an excellent action, particularly to protect Water Quality, Scenery, Wildlife, Botanical and Fisheries - Outstanding Remarkable Values
3. However, **prohibiting motor vehicle *parking* on gravel bars will be exceptionally problematic**, especially at Paola, Cascadilla, West Glacier, and Blankenship access sites, where *current* user numbers require parking on the gravel bar as their gravel parking areas are extremely limited. The Flathead NF needs to expand developed gravel

parking capacity at these river access sites to allow for eliminating parking on the gravel bars. Additional parking capacity needs to be a Management Action in conjunction with increased user capacities.

4. Current Rules and Regulations require Human Waste Containment for camping areas which do not have an outhouse on both the North Fork and Middle Fork. Setting a 200' boundary from the river represents a step *backwards* from current regulations. People will not follow this and can't even estimate a 200' distance. Further, people tromping 200' above the high water line is a further impediment to trampling of Biological Resources and the security of Wildlife who tend to hide from river recreation in the brush/grass/trees adjacent to the river corridor.

Solid human waste is gross and is one of the biggest threats to Water Quality, Scenery, Wildlife, Fisheries and Recreation ORV's. Its sheer volume near the river needs to be eliminated. In the public meeting it was noted that regulations under this new CRMP would be promulgated for parity with other river regulations—and if the Smith River, Middle Fork Salmon, Main Salmon, Colorado/Grand Canyon, and all other popular recreation Wild and Scenic Rivers require packing out of solid human waste, the Flathead NF should implement the same requirement.

Solid Human Waste Containment (pack-in/pack-out) should be required for the entirety of the North Fork and Middle Fork, and a 200' distance from the South Fork for both day trip and overnight/camping groups (noting this generally overlaps the area where hikers and horses will also deposit solid waste along the trail corridor)

5. "Authorize one temporary education and outfitting and guide permit, annually, for each recreational and scenic segment, and the wild segment of the Middle Fork. The permit will be focused on providers serving youth, veterans, and other underserved communities or education-based programming. Each temporary permit is limited to a maximum of 50 user days. Permits can only be issued to the same entity once every 3 years."

This sounds good on paper, but nine total segments for 450 underserved participants per year, compared to a combined user capacity of over 150,000 people? This is 0.3%--what a joke when the percentage of people residing below the poverty line are 9.27% in nearby Flathead County and 29.4% in Glacier County (including people residing on the Blackfeet Reservation and for whom Ethnography is not just a historical interest but their family lineage). If this education permit process is to be something the Flathead NF and outfitters want to be proud of, and actually serve those communities, it needs to be a significantly more meaningful number than this.

6. It's high time the Forest REQUIRE metal fire pan or fire blanket for campfires above and below the high-water mark, within the WSR corridor on the North Fork and the Middle

Fork. Fire rings were noted as a concern as early as 1984 (1986 Amendment, McLoughlin Uofl 1984).

Every popular permitted river in the country requires users to use an elevated firepan/fire blanket rather than building a fire on the beach or building a rock ring. These measures protect the outstandingly remarkable values of our river corridors and allow subsequent users to experience untarnished beaches and campsites, to feel an experience of discovery like they're the first person finding that campsite or beach, and not a mess of ashes and fire cracked rocks left by dozens of prior users. Even though popular *forest* camping ethics include making a fire ring of stones to keep embers out of the forest duff, *river* ethics need to be taught and enforced to use a fire pan and not a ring of stones. Our local argillite mudstone is horrible with heat as it splinters into sharp shards that are a risk to subsequent users and wildlife.

Enforce the current requirement for no fires on the gravel bars at river access sites, and start writing warnings for river users at dispersed camping sites who are not using a fire pan or fire blanket. Also consider what is to be done with the resultant ash and charcoal—consult with biologists and determine the best practice for our river system (this differs on other permitted rivers) whether it should be dumped above the high water line or dumped in the river, or packed out in a metal container.

7. I HIGHLY appreciate that the Flathead NF has set forth in the Comprehensive River Management Plan to “Establish agreement between GNP, the Forest, and Burlington Northern Santa Fe Railroad (BNSF) to proactively address spill potential and prevention through train operations along the Middle Fork of the Flathead WSR.” Thank you. This is a very important consideration to protect our Wild and Scenic River and all its ORV’s.
8. The stated Triggers and Thresholds of encounters with a given number of float parties per day do not seem to be commensurate with the projected user day capacities on MU2 and MU3.
9. The 1980 Plan/1986 Amendment identifies 282 designated and undesignated campsites on the 3 Forks system (Cole 1984), and directs the Forest Service to inventory and monitor their condition. The results of this monitoring nor further Indicators/Triggers/Thresholds/Management Actions have not been acknowledged in this draft Plan.
10. This draft 2025 CRMP Proposed Action ignores the criteria that were important in the 1986 Plan Amendment and are still important today. These should be included:
 - a. Encounters per day with Shore Parties
 - b. Occurrences of Litter
 - c. Campsite and day-use site condition
 - d. Defacement of Natural Features
 - e. Experience Quality Index

- f. Km of Shoreline with permanent human-made modifications in foreground
 - g. Mechanical Sounds heard from Watercraft
11. This draft 2025 CRMP Proposed Action also ignores the criteria that were important in the 2019 draft and are still important today, including:
- a. Sedimentation at use sites
 - b. Human waste deposits and fecal bacteria contamination
 - c. Human waste/leakage/malfunction monitoring at designated/improved latrine facilities
 - d. Availability of Dispersed camping sites accessed by vehicles.
 - e. Float encounters with Shore Parties per day outside of portal areas
 - f. Campsite Condition - Forest and park side excluding portal and concentrated use areas with direct road access.

Time for Action

It has required FIVE YEARS since 2019 to get a new scope/draft for this CRMP, and additional study time has been identified prior to the draft plan, and additional study time before regulations are promulgated. 5-6-8 years is too long with the sheer number of users the river resource is experiencing.

The Flathead National Forest admittedly has limited personnel resources to finish this plan, which implies:

- Limited resources for study/monitoring
- Limited resources to promulgate more regulations.
- Limited resources for enforcement

Sheer numbers of users and lack of enforcement are endangering if not destroying our ORV's. **Current regulations under the current old Plan are not being enforced; what guarantee do we the public have that the Flathead National Forest will enforce new regulations promulgated under this plan??**

Best regards,
/Shawn/
Shawn Baker
Kalispell, MT