

January 30, 2025

Anthony B. Botello
Forest Supervisor
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650 Wolfpack Way
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Re: 2025 Flathead River CRMP Comments

Dear Mr. Botello:

A wise man once told me, *“You can create and follow a flawed plan just as well as you create and follow a well-thought out and competent one; but, you'll just end up in vastly different places with vastly different results”*.

The January 6, 2025 Proposed Action for the Comprehensive River Management Plan for the three forks of the Flathead River system is proof-positive of this wise man's guidance. Thanks, Dad!

I attended the January 22, 2025 information session hosted by the Flathead National Forest staff. The information session clarified very little. It only served to amplify the critical deficiencies and flawed mechanics used to create the proposed CMRP. The session exacerbated those flaws in graphic and descriptive detail. More so, the explanations and rationale presented in formal presentation were further muddied by the answers I received to simple questions I asked of the subject matter experts during the breakout session. Finally, the answers given during the public questions portion were more specious, confusing and less than convincing.

Permit me to amplify. By doing so, I will list some of its fatal flaws, critical oversights, and, seemingly, intentionally-avoided needed components in the CRMP and the information session.

1. Water Quality: This critical component is not defined. Period. Given the nine(9) Outstanding Remarkable Values(ORV's) listed in Table 2 of the CMRP, it is acutely obvious that each of the nine ORV's(recreation, fisheries, **water quality**, wildlife, botany, geology, scenic, historical and ethnological) generate vastly-different metrics, often with competing viabilities and vulnerabilities. For example, “water quality” for fisheries and its endangered Bulltrout species, threatened Westslope Cutthroat species habitat and spawning grounds and the other inhabitants of the three forks of the Flathead River stand in stark contrast to water quality metrics for the recreational ORV. Neither sets of metrics are identified or baselined. It is perplexing that none of the subject matter experts that I queried could define beginning baseline metrics(beyond the Clean Water Act or the State of Montana regulations), nor could/did they define trigger requirements for action or a timetable to identify a schedule of measurements or tests to determine if metrics were improving or declining. This is serious fatal flaw dooms the future and effectiveness of the proposed CMRP.
2. A Spill Into The River: While neither specified, implied, commented upon nor opined in the CMRP proposal(except for one acknowledging sentence: page 20) or in the information session there was zero, yes zero, comment about the threat from, consequences of, or response envisioned from a train derailment that dumped carloads of petroleum or other toxic

contaminants into the Middle Fork of the Flathead River—particularly, the upper two segments that may not be accessible. This omission is a fatal flaw beyond comprehension. It is an omission that is so obvious, egregious, threatening, predictable, consequential and unconscionable that one can only conclude that its omission was not accidental. It was intentional. Full stop. I inquired of several of the subject matter experts from the various groups present as to why. Not surprisingly, the responses that I received varied from, “*It's outside our scope...*” to “*The railroad has its own plan...*” to “*I don't know...*”. I did get one revealing answer among them though: “*We know we can take them to court afterward...*”. Given the East Palestine derailment, its woefully-inadequate responses by Southern Railway and substandard government oversight, I remain unconvinced that any emergency response, clean-up or restoration by BNSF or the assigned federal governmental agencies can not be counted on as being a solution. That this obvious train car derailment threat has been ignored, overlooked, avoided or discounted in the compilation of the CRMP is such a fatal flaw, it calls into question the scope, credibility, efficacy and documentation of the whole plan as well as the methodology used and processes that published it.

3. Metrics and Measurements: There is a palatable lack of provenance, content, documentation and factual baseline provided. Period. There is a half-hearted display of “user capacities”, with no definitive citation, rationale or study results pointing to from which they were drawn. No fish biology baseline study or historical citation of impacts. No animal impact study cited to create trigger actions. No water quality baselines, or definitions for that matter, measurement protocols, trigger conditions for responses, and almost unbelievably, no stated management processes or enforcement actions outlined. Another fatal flaw unaddressed.

In closing, I'm compelled to point out two positives in this 2025 CRMP document.: (1) creating noise limits on boomboxes from floaters and (2) closing down already unlawful overnight camping at Blankenship Bridge campground. Congratulations!

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