

Anthony Botello
Flathead Forest Supervisor
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Re: Comments on the Comprehensive River Management Plan Proposed Action
Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=56536>

Dear Supervisor Botello;

Please accept these comments on your Comprehensive River Management Plan (CRMP) Proposed Action (PA) into the public record.

In 2018 I traveled into the headwaters of the **South Fork of the Flathead River** for the first time with my two trusty horses and my physical therapist. After dropping her and her friends off with their pack rafts I spent my first night (of which many would follow) alone in the Bob Marshall Wilderness. I was exhausted, but with my two horses in this vast wilderness I was **free**, something few get to truly experience but know so when they do.

I am lucky enough to have friends who have traveled thousands of miles in ‘the Bob’ over the last 60 years. I’ve heard about the changes from the years before wilderness (designated in 1964) and the struggle to keep it wild to the present day. I’ve heard the stories first hand about how the most beautiful spot below the Chinese Wall was decimated by overuse, and seen the pristine condition it is in now after regulations were adopted.

In contrast to my first trip in 2018, the last time I was in the South Fork just years later, the trail was deep powdery dust, compacted and hard to the point that I changed the route of my trip to come out a different way to save the hooves of my critters. The campsites (extensive and widespread) were littered with toilet paper, human waste, and small bits of plastic. The trail was busy with outfitters moving rafts and people in long conga lines of stock as quickly as they could. A friend of mine gave a report from a trip in 2024 that he counted over 70 people multiple days in a row, camped clustered together, midway through the wilderness section.

The CRMP is needed and although it does make a few points that I support, it does little to address the actual problems with overcrowding and resource degradation in the three forks of the Flathead.

Proposals:

- There is currently no space in the CRMP designated for the input of tribal nations who historically lived on and used this land. I would like to see greater effort made to engage with the CSKT and Blackfoot nations for monitoring of their cultural resources.
 - The National Environmental Policy Act of 1969 (NEPA) affirms America’s commitment to **"preserve important historic, cultural, and natural aspects** of our national heritage."
 - “The Confederated Tribes of the Flathead Reservation – Salish, Pend d’Oreille and Kootenai -- claim the Flathead River headwaters as part of their aboriginal territories, and these claims have been upheld by U.S. law through the Indian Claims Commission.” (Thompson, 2015) - Flathead Headwaters Ethnographic Resources Review and Assessment
 - The Blackfeet have utilized this area for many generations pre 1800s, according to Thompson’s research.
- There needs to be **transparency in the data** that has already been collected and the plans for more collection.
 - The plan itself needs data citations and references.
 - Future data collection plans need to include dates and locations to provide context.

- Wildlife; There should be more in this management plan about monitoring for the habitat quality of all animals on or in consideration for the endangered species act.
 - For example in the case of Grizzly Bear, in instances of habituation the area should be closed for camping. If there are impacts, including noise and trammeling, that are impacting vital habitat then the area should be closed, as per Limits of Acceptable Change.
 - Bull Trout, in particular, need active monitoring and actionable plans of protection.

- Due to degradation of the ORVs, livery outfitting (also known as “drops”) should be limited.
 - To quote the CRMP; “The number of outfitter-guide and livery/shuttle service permits ensures access within the river corridor [...] **without compromising desired conditions** for this section.” And; “Numbers and types of outfitters and service permits are **managed** to maintain the wilderness character including solitude.”
 - Due to the current degradation of the ORVs, permitted outfitting trips need to be reduced on the South Fork and the Middle Fork drainages.

- In the interim, management must be willing to close areas for camping due to overuse along the river.
 - This management plan takes note that the only sections that have Outstanding Remarkable Value in the Botany category are the headwaters and least traveled areas, meaning that the amount of use correlates with the loss of this ORV.
 - To quote the proposed plan;”The Three Forks corridor support many complex and diverse native plant communities [...]. It also contains high-quality habitat for plant species of conservation concern and plants for traditional collection by tribes.”
 - This lends itself to the first point, that indigenous voices are instrumental in the protection of their resources.
 - Range management, specifically in the South Fork (MU1) and Middle Fork (Wild), needs to be brought into target guidelines outlined in the the BMWC Rec Management Direction.

- With the lack of action in this “action plan” the Forest Service must be willing to close access to the river while they create implementable measures when thresholds are exceeded, if no plan is made in advance.

Here are a few points that I like in the CRMP:

- 1) Mandatory, free float permit for private parties for data acquisition.
- 2) Prohibiting motor vehicle camping or parking on gravel bars in areas that can be accessed by them.
- 3) Requiring metal fire pans or fire blankets for campfires.
- 4) Noise levels that cannot exceed 60 decibels at 50 feet.

To summarize, in order to protect the ORV’s action must be taken immediately to protect the resources.

Eleanore Eberts-Robocker
 5th Generation Flathead Valley Resident in family to live alongside Flathead River