As a former park ranger, Wild and Scenic River Coordinator who has worked on this plan, NPS employee who participated in the joint ORV workshop for the Three Forks of the Flathead, and as a private river user, portions of this plan are very alarming. Some of my comments will be general, and some will be page by page of the draft plan.

This draft plan does not follow the Interagency Technical Guide “Steps to Address User Capacities for WSRs”. It also fails to protect ORVs.

It does not establish baseline and current conditions and uses for the Three Forks, nor does it show what has changed since the first plan came out in the 1980s. There has been inadequate monitoring of river values and ORVs since inception. There is no way for the agencies to make informed scientific decisions when no monitoring of ORV conditions has been attempted.

It does not state what has been protected and enhanced since inception. This plan also is heavily biased towards recreation, emphasizing recreation as the most important ORV.

This plan does not establish that current use and current existing facilities protect ORVs or will lead to enhancement of river values. It does not state what has degraded.

Are Botanical resources better or good condition since inception? They have suffered due to spreading invasive weed infestations. This ORV is already degraded, but this plan does not suggest restoration let alone enhancement.

Are Historical and Ethnographic resources in better or worse condition?

Are Fisheries in better or worse shape? Fishing use has increased over the last several decades. What are the impacts to fish from the increases in floating traffic?

Wildlife viewing is common to three ORVs – Wildlife, Scenery, and Recreation. Many people feel they do not see as much wildlife as they once did along many stretches of river segments. Is there any data to suggest otherwise? River use is much higher than it was 10, 20, or 30 years ago. What data have you gathered to show that current river use has not impacted wildlife viewing opportunities or wildlife habitat? There is more research showing the impacts to wildlife from recreational activities. Yet this plan does little to no monitoring of wildlife monitoring, as is the case since the Three Forks became a WSR.

While having more people float the Three Forks could be interpreted as enhancing the Recreation ORV, I would argue that current congestion at launch sites, trash in fire rings, high levels of human noise along the river, pressure on private groups from the enormous use of outfitter at launches, and other impacts has degraded the Recreation ORV since I have started floating the Three Forks as a private user and what I have seen as a park ranger.

Without adequate data, the agencies cannot make scientific decisions for capacity numbers, of which the proposed capacity numbers are an exceptionally large and disturbing increase from current use. I would argue (as I did in numerous river planning meetings to no avail) that lower interim capacity numbers should be established (as is suggested on page 16 of the Steps to Address User Capacities For WSRs) until adequate data is gathered and confidence is gained that increased user numbers aren’t impacting ORVs.

Page by page comments.

Page 6 – as stated before you have not addressed current conditions or any of these bullet points in the proposed action and tied them back to how they will protect river values and ORVs.

Page 7 – How are you monitoring wildlife and fisheries and the changes? Wildlife viewing opportunities are not being protected. You need to address this somewhere.

Also, outfitters have monopolized the Moccasin Creek launch site. I would argue here that outfitter and commercial use in MU2 and MU3 on the Middle Fork have degraded the recreation ORV and are not meeting the desired condition statement.

Page 8 – Should add that data gathered in any of the ORV monitoring is used to make informed decisions about river management – since there is extraordinarily little to no data existing, you really can’t make informed decisions now. As it now stands, there is evidence that floaters have been stopping in the exclusions zone at the Goat Lick for years, violating the closure. There was also a study conducted in 1986, as well as other observations conducted in the 1980s about disturbance to goats from floaters. Why was this never addressed? What will be different now as opposed to the past? How will this be enforced?

Also, invasive weeds are widespread and directly contradict desired conditions in many river segments. You should address somewhere how you plan to restore this degraded ORV.

Page 9 – Historic and ethnographic resources should be monitored.

Page 9 – I would state that the North Fork plan is a Glacier National Park Plan.

Page 10 – Why was the solitude experience taken out of this segment (MU1) for the NF? I can show you documents of when it was included here in previous drafts. It is an important experience that is hard to get and should be valued and protected. It is one of the few segments that are more accessible where solitude can be experienced.

The statement that “however self-guided parties make up most of the users” should be on every segment of the NF, and on MF Rec MU1 and the upper part of MF rec MU2 when mentioning outfitters and guides. On the North Fork, having more commercial use through livery contradicts the Parks NF plan. Also, anywhere you add more commercial and livery service will take away opportunities for private boaters and impact their experiences, further increasing the commercial impact on all of the Three Forks. Any livery service will become a de facto reservation system as shuttle companies will need to know how many drivers and shuttles, they will need each day. Your goal of maintaining the freedom to float when and where you want will not be realized. You should just go to a lottery instead of a livery. Also, this will be a very expensive service especially for the NF shuttles, which will favor the rich. It will also lead to congestion at more launch sites when the shuttle arrives there, impacting private floaters. Now existing facilities somewhat dictate river capacities. If you allow those numbers to be increased due to livery services you will see greater impacts to ORVs and river values. The same thing happened in Glacier when the Park went to a shuttle system. You need to set limits on this service if you choose to allow it but the argument can be made that it will lead to further river degradation.

Page 12, MU1, same as I commented on page 8.

At bottom of page 12, it is not the Essex Ranger Station, it is the Walton Ranger Station.

Page 13, you state there is already frequent congestion on MU2 at access points. You admit that the rec ORV is already degraded here, as is anywhere in the document frequent congestion is mentioned.

Page 14, MU3, you state a minimum of 2 developed sites are provided. Are you planning more here? State it if you are. Any new sites would impact Glacier NP in this segment negatively.

Also, the statement about outfitters/ guides/ livery is misleading. On Henry’s Fork of the Snake, segments of river have been ruined by almost unlimited livery service.

Page 17 – Are these proposed numbers all river use, or is floating, shore use, and admin use included? You should break this down.

These numbers are outrageous and are a large increase to current use. You do not have the data to say that this increase in use will not negatively impact ORVs. You should state what the percentage increase from 2019 numbers will be so the public is informed. The numbers from camera data show the following proposed increase: NF MU1 186% increase. NF MU2 923% increase. NF Rec 633% increase. MF Rec MU1 92% increase. MF Rec MU2 24% increase. MF Rec MU3 247% increase. How can you say that these numbers will protect ORVs? You cannot even say that now, and do not have data or personnel to support these numbers.

Without adequate data, the agencies cannot make scientific decisions for capacity numbers, of which the proposed capacity numbers are an exceptionally large and disturbing increase from current use. I would argue (as I did in numerous river planning meetings to no avail) that lower interim capacity numbers should be established (as is suggested on page 16 of the Steps to Address User Capacities For WSRs) until adequate data is gathered and confidence is gained that increased user numbers aren’t impacting ORVs.

Specifically, the numbers for all segments of the NF and some of the MF will require a tremendous amount of livery as existing infrastructure will not support these numbers and will not even come close. I highly doubt any Park or USFS biologist actually support these numbers and have been given freedom to speak openly about them.

Also, I disagree that recreation is the only limiting attribute on any of these segments, I think fisheries and wildlife are very important limiting attributes on most segments.

Additionally, these numbers are very flawed in that, with climate change, lower stream flows will result in shorter floating seasons, which is already occurring. In other words, these numbers will result in daily allowances even higher in the future as the floating season becomes shorter. There is no way these huge increase in numbers will not result in damage to ORVs, especially when you haven’t been addressing degradation to ORVs up to this point.

We are undeniably entering an era of declining or stagnant agency budgets. Your ability to monitor resources will be worse than it is now, so you will have an even harder time monitoring ORV conditions. Getting universities to help with monitoring will be crucial.

Page 19 – Requiring solid waste containment within 200 feet of the river is inadequate – people who float will just poop further away. Floaters day and overnight should have to carry human waste receptacles or methods like most major rivers in the west. Treat the water like you care about its protection. *Enhance* the water quality.

Also, see other comments prior about livery services – if offered, they need to be strictly limited, but will result in a rich floater vs poor floater situation. Livery will allow too many people to impact the Upper NF.

Page 20 – too many commercial users for a cap on MF MU2 – ORVs are already impacted here.

Also commercial use too high on MF MU3 – you can’t justify these numbers with any data.

On page 21 for all monitoring indicators, triggers and thresholds, proposed wildlife monitoring is woefully inadequate. With wildlife being an important part of 3 ORVs, there is no way you can say this plan and the increases you propose in capacities will not damage those ORVs without monitoring. I would love to be present in court when someone from the agencies had to testify in front of a judge that they felt they had enough data to justify current floater numbers let alone proposed increase in numbers if a lawsuit is filed. How are high capacity numbers going to enhance wildlife viewing opportunities when current research indicates higher recreation use negatively impacts wildlife?

On page 22 – NF Scenic MU1 – What is the justification for increasing # of float parties encountered from 3 in the current plan to 4 now? As it is with existing use, the number at 3 has been exceeded with no management action taken. What gives the public the confidence that will happen now?

Page 23 – NF rec – 60 boats a day passing Great Northern Flats is a large number of boats, much more than now. This will have an impact to the wildlife ORV and lead to more degradation than is already occurring.

Page 24 – MU1 – 5 encounters a day is an increase from current numbers in a very sensitive wildlife area. Please show me the data that this increase will not impact goat numbers. I know that this is a floater experience metric but if floaters encounter 5 parties a day here this means there are many more boats floating or shore parties stopped and passed than there are now, with probable impacts to goats already existing. I am attaching the 1986 study that found goats were already being disturbed.

This plan in general leaves no confidence that river values and ORVs will be protected let alone enhanced. As agencies you can do better and are required to by law.