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Comments on Flathead River CRMP Proposed Action January 6, 2025

I live on the North Fork along the Recreational section in the designated corridor, so am deeply interested in all aspects of protecting and enhancing the outstandingly remarkable values of my home river!

I wish I could be optimistic that anything that I say will have any effect on the outcomes of this plan. Having spent countless hours observing, researching and commenting on this and other activities being carried out on the Forks of the Flathead without observing any resulting actions that actually “protect and enhance” the “outstandingly remarkable values” of this unique river system, there exists plenty of reasons for my pessimism.

However, the degree of interest and the size of the crowds at the recent meetings give me hope that the management direction will bend toward “protection and enhancement” rather than “exploitation and economic development”.

Below are my specific comments that hopefully will guide decision makers along the right path:

1. Paragraph 3 of the Background narrative of the proposed action refers to the existing plans and makes the statement about “continuous monitoring” informing management decisions of the last 40 years. My observation is that the monitoring has been haphazard and inconsistent, and the link between monitoring conditions and management actions have been thusly very tenuous. Specifically, the 1986 plan talks of monitoring indicators, standards and thresholds and speaks of an annual report to show the status of each indicator. Has such a report been prepared? And if so, was it made available to the public?
2. Because of the lack of monitoring and reporting, management decisions made over the last 40 years have been suspect. Perhaps this explains the movement from “protecting and enhancing” the conditions that existed upon designation in 1976 to commercializing and exploiting the Recreation “value” at the expense of the other equally if not more important values. I object to the change in emphasis at the expense of the other values.
3. I object to the emphasis on Recreation, as if it were the most important ORV. The Recreation ORV flows from and is highly dependent upon all the other ORVs. Viewing Recreation as a River Value on its own results in the exploiting, publicizing and over-commercialization of the river to the detriment of all other ORVs.
4. Obviously, the water quality ORV is the most important and what makes the River system so special. It is also the ORV that is most susceptible to deterioration. And yet in an early meeting, the water quality was characterized as “pretty good” and compared to the Missouri! The only baseline study I am aware of was conducted 30+ years after designation on the North Fork by Mills, Schweiger, Mast and Clow, and referenced previous studies. This data should be the basis of any measurement of a change in water quality, and should be monitored vigorously to make certain that the important value of water quality is in fact “protected and enhanced”.
5. I believe in the 1980 Plan, it was noted that fecal coliform and other pollutants were present at administrative, launch and camping areas, and promised annual monitoring of the situation. I see no evidence that this has occurred. This should be immediately rectified, and any potential deterioration in water quality immediately corrected.
6. I do agree with the permitting process laid out, but it should be coupled with a river ethics guide, and extended throughout the river system.
7. I believe the Forest Service has been remise in emphasizing outfitter and guide services to the detriment of private, self-guided users. Many river users I know, myself and my family included, have had to adjust their historic use of the river in light of the ever-increasing crowding and displacement by commercial outfitters. While I acknowledge some outfitter use is appropriate, it has been allowed to get out of hand in both range and scope. Consequently, I object with and disagree with the statement of desired conditions that “Levels of outfitter and guide use are consistent with desired conditions…” . In that regard, any restriction of use via permitting or other means needs to come first from the outfitters, as the forest has allowed far too many companies and launches, and has created the overuse problem in the first place.
8. As a layman, the Proposed Estimated User Capacities cited on page 17 make no sense to me. To me, the more users, the more the effect on the ORV’s such as water quality, fisheries and wildlife. Therefore, it seems to me that the limiting attributes must be those that an increase in use most affect. Disruption of wildlife along the corridor is clearly affected by more floaters, particularly ones that are boisterous and noisy and allow their dogs to run freely. Increased lines in the water clearly affect fisheries and abundance of bull trout and cutthroat. More users, less water quality, etc. etc.
9. While I appreciate the increased monitoring and restrictions on the Middle Fork in the Goat Haunt area, wildlife disturbance is happening throughout the system. Specifically, where I reside on the lower North Fork, we observe almost daily the presence and use of the river area by Grizzly Bear, Wolves, Mountain Lions, Deer, Elk, Moose, Snow and Canada Geese, Ducks of all types, Golden and Bald Eagles, Osprey, and so on. All are susceptible to disturbance by floaters, in particular noisy and boisterous ones with mutts in tow.
10. The monitoring plan beginning on page 21, Table 5 seems incomplete. The narrative above the table states “For each indicator, potential management action(s) are identified, that would be taken, if a particular trigger is reached.” Those potential actions do not appear in the table. I believe the EA, if done properly, will show the most, if not all the thresholds on page 21 for fisheries and water quality values have been exceeded, and thus require immediate management action rather than waiting 5 or 10 years for further deterioration.

Thank you for this opportunity to comment, and I am looking forward to being involved in the development of a workable CRMP.

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