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Re: Flathead Wild and Scenic River CRMP

Dear Planning Team,

American Whitewater is a 501(c)3 nonprofit organization that has been working on whitewater river stewardship projects since 1954. We represent everyday canoers, kayakers, and rafters that like to spend time on whitewater rivers. We are a founding member of the Wild and Scenic Rivers Coalition, and have been supporters of the Wild and Scenic River System ever since our members played a role in creating and advocating for the passage of the Wild and Scenic Rivers Act. Many American Whitewater members regularly enjoy and care about the forks of the Flathead River, and our staff has significant experience on all three forks and numerous tributaries. The rivers, their protection, and their enjoyment are important to our organization. We feature the rivers on our website, and would like to partner with the Forest Service to share elements of the CRMP with the public to encourage sustainable and responsible visitation. We would like to voice our appreciation for the Forest Service working on this comprehensive river management planning process and offer the following comments on the proposed action.

- Elevate multi-day use of frontcountry sections.

The proposed action discusses the various frontcountry sections of the Middle (MU 1-3) and North (MU1 & MU2) forks as though they are distinct day runs. While day use is certainly common, so too is multi-day use. Multi-day paddlers will traverse all of the frontcountry sections of the Middle Fork of North Fork, and therefore there should be sufficient alignment of desired conditions and capacities to support multi-day use.

- Emphasize and value the freedom and safety benefits of not requiring limited permits.

One of the great and increasingly special things about all sections of the Flathead River forks is that the public does not have to win a lottery or reserve a slot to paddle the river. This allows the public to enjoy the river with the relative freedom and ease that people seek out on Wilderness and frontcountry rivers alike. It also allows last-minute changes in plans due to weather, flows and personal or group factors without the pressure and penalties of forfeiting a hard-to-get permit. This can lead to better and safer trips, especially on hydrologically flashy rivers with dynamic weather like the forks of the Flathead. The proposed action should disclose and celebrate that providing reservation-free experiences on these rivers is a very good thing for the public.

- Mitigate camping closures.

Prohibiting camping on cobble bars at certain Middle Fork access areas will reduce excellent reservation-free low-key riverside camping opportunities for river visitors. We recommend that the Forest Service seek to identify new opportunities nearby that could fill this niche, and that provide some scenic or recreational experience of the river away from the road.

- User capacities seem low in some cases and may be met entirely by commercial paddling, hiking, and horsepacking trips.

We are very interested in learning more about the information used to generate the user capacities. It is unclear if these capacities were based on biophysical capacities or social capacities, what the mix of shore-based versus river-based use is, and to what extent commercially guided trips could utilize the capacities. This seems especially true on the Wilderness sections of the South and Middle Forks, as well as the frontcountry sections of the Middle Fork.

- Capacities and triggers/indicators do not seem to relate to one another in any logical manner.

It is unclear how capacities and triggers relate. For example, the Wild Section of the Middle Fork has a capacity of 170 people, but has a trigger of no more than three boats per day exiting the reach during 60% of the days monitored, in 3 out of 5 years. If there are 3 boats exiting the river per day, and a rough average trip is 4 days, and average people per boat is 2, then the trigger would be met when there are only 24 boaters on the whole reach. That is nowhere near the 170 person capacity. Is it intended that the remaining capacity is allotted to hikers and horse packers? How would the Forest know if capacities are met since it seems that while capacities include all visitors the monitoring only includes boats? For consistency, indicators, triggers, and thresholds should be based on the number of people rather than the number of boats, and be applied to all visitors. This would align these monitoring tools with capacities, and also apply equally well across all users. We look forward to more information on how triggers and thresholds were developed to inform whether or not capacities are being approached.

- Triggers and thresholds are too low in some instances.

The proposed action states a proposed trigger for the Wild Middle Fork section of no more than five parties a season floating the headwaters above Schafer Meadows. This is a vanishingly low trigger, as is the threshold of eight trips per season for this reach. We see no reason why more trips than this would cause issues, and we look forward to learning more during the planning process. Likewise, the trigger of only three boats exiting the Wild Middle Fork per day on 60% of monitoring days feels low, since three boats is most likely a single trip. This means the Forest Service will be concerned if there are not at least 40% of days when there are no groups exiting the river. While these are examples, we want to learn more about the basis for all triggers and thresholds in the plan.

- Capacities, triggers, and thresholds should be revisited prior to future limits.

We feel that capacities, triggers, and thresholds should all be revisited prior to any limiting of the number of public permits in the future, and that indirect limits be exhausted prior to the imposition of direct limits. The public should be able to weigh the impacts of reductions in their ability to get on the rivers with their encounter tolerances and other factors based on recent and current conditions. Predictions of how a certain number of encounters will feel to visitors are not always consistent with the actual experience of that number of encounters. And, the very real impact of being denied the chance to paddle a river for one or many years can shift encounter tolerances. We ask that the Forest Service build this check-in with the public into the CRMP, and conduct it prior to limiting permits in the future.

- Equitably consider trail and camping capacities, and effects of non-boaters.

The proposed action by and large reads like a paddling management plan rather than a comprehensive river management plan, and it should be expanded to encompass other activities in the corridors. Most notably, while the capacities include all visitors, indicators, triggers, and thresholds in the proposed action are solely focused on the number of boats descending rivers rather than also including the number of hikers, horses, anglers, campers, picnickers, etc. The proposed action seems blind to biophysical impacts of other visitors, and those visitors' contribution to social or physical capacities of the corridors. This is a concern in part because with boaters as the only user group with permits and subject to management based triggers, boaters would likely become the only use that is limited to remedy any future issues, regardless of which group or combination of groups is causing the issues. The Forest Service should reconsider the approach to monitoring use levels, and consider monitoring all visitors through counting people, and/or cars at trailheads and access areas, rather than counting boats. The CRMP should include a robust monitoring plan.

- We support mandatory permits.

We support the idea of requiring mandatory unlimited permits. This will be helpful for understanding usage, and should apply to hikers and other visitors as well as paddlers. Because cell service is poor along these rivers, physical permits should be available at access areas and trailheads. Permits also offer the Forest an opportunity to share Leave No Trace and other information about how to visit the rivers sustainably and with relative safety.

- We support human waste management.

We support the requirement to control human waste within 200 feet of the river for all visitors. A human waste system (wag bags, groover, etc) should be required on all sections of all three forks for anyone camping within 200 feet of the river, regardless of the form of travel those visitors are engaged in. We look forward to learning more in the planning process about how this requirement will be implemented.

- We support fire pan requirements.

We support the requirement that firepans or blankets be required for fires along the North and Middle forks. However, we request that firepans not be required as mandatory trip equipment for groups that do not have an interest in having fires. This caveat would in particular support packraft and kayak trips for which firepans are unwieldy or prohibitive.

- We support a train spill agreement.

Thank you for naming the threat that a train derailment could pose to the Middle Fork, and proposing a dialog and agreement focused on how to reduce the likelihood of a spill and how to respond to such a spill. This is very important.

- We support group size limits.

Instituting some group size limits makes sense and is a standard management approach.

- Tributary paddling should be acknowledged and supported in the CRMP.

The CRMP should acknowledge positively that paddlers will occasionally run tributaries to these rivers, often ending their trips on one of the Flathead forks. These trips offer outstanding solitude, whitewater quality, water quality, and scenery. These backcountry trips exemplify the kind of use that should be supported by the CRMP.

- Address corridor acquisition.

We hope and assume that it is a goal of the Forest Service to acquire private land parcels in the Wild and Scenic River corridors from willing sellers if those parcels become available. We feel that the proposed action and CRMP should affirm this commitment through desired conditions and stated goals.

Thank you for considering these comments.

Sincerely,



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