

February 6, 2025

Anthony Botello, Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901 Dear Supervisor Botello;

Overall comments:

My comments are focused on the North Fork stem of Flathead River. This section has seen negative impacts associated with uncontrolled increases in river usage by rafters starting generally in 2008-2010. In the approximately 15 years since then the upper section of the North Fork (above Big Creek) has seen the most deterioration in the its ORV. These negative impacts were not supposed to happen and have occurred due (in large part) to the inaction on the part of the Forest Service to address the surging numbers of users. When the WSR act was in the process of being drafted by the Forest Service in the 1960's and 1970's local residents who attended meetings and filled out surveys (to help with the passage of the WSR Act) were told the act would serve to maintain the use of the river at levels in effect in the 1980's and 1990's. They were told the Act would help preserve the North Forks natural state for future generations to enjoy. Past river management plans also promised to prevent deterioration of the ORV's from the levels during those periods, most notably the number of river users (floaters).

When I was a young man growing up in this area, I was able to enjoy a wilderness like experience while floating the river or fishing its banks. It was rare to encounter more than 1 other party during the entire day and this was typically 2-4 people in a raft. There were no campers, large trailers and other RV's anywhere along the river. It was rare to hear any noise from cars while floating. While fishing from the shore one would hardly ever see more than one raft in 2-3 hours of fishing. There was never any trash in the river. There were no rock "fire rings" at every place you might pull over. This was true (despite some increase in usage) until 2008-2010. This solitude along with all the other ORV's (already documented) is what resulted in the "wilderness" style experience. I always assumed future generations of children (including my own) would have a chance to experience this solitude and sense of wilderness. That is now very much at risk.

Today the crowding on the river results in mayhem. The weekends are especially pathetic. From shore I have counted 50-100 rafts per day. Typically, you can see one pass every 10-15 minutes, often more frequently on weekends. The noise from boom-boxes playing loudly and large groups "partying" and shouting drowns out the small talk from smaller parties. You can hear them coming for 10 minutes or longer. I have seen large groups of rafters "pull over", pull out coolers of alcohol and play games on the shore with lots of shouting and music. The numbers of parties has grown to the point where there are so many of them they fight over the best "camping" spots along the river, stake out their claims with tents early on and then party all night often with loud music and shouting. The scene reminds me of a Jellystone River type of experience. These people do not appear to be there to enjoy the solitude. It is just another party experience, and it makes it impossible for those coming for a quiet "wilderness" experience to find any peace. These types of activities belong in the recreation section of the river and not the scenic portion.

The most frequent transgressions come from large parties (more than 8-10 people and/or two rafts) and sometimes these groups are like a large “flotilla” and have 2-4 rafts, several “paddle boards” a couple of fishing tubes and sometimes some floating inner-tubes. In the last decade the advent of affordable rafting gear along with larger numbers of people seeking water-based recreation has resulted in a significant increase in large groups with outfitter level gear. In addition, the roads into the North Fork have been dramatically improved, which reduces the time needed to access the farther stretches of the river. In addition, investments by the Forest Service in launch sites have served to draw larger crowds. All of these factors have contributed to the number of parties and the size of the parties. It is much more typical now to see large groups than smaller family sized groups. The nature of the larger parties (more of a party crowd) has served to deter the smaller parties as the solitude they seek is not available. One or two encounters with a larger “party” group completely spoils the experience. These large, organized parties would be best accommodated on the recreation portion of the river.

Other impacts of these rapidly escalating numbers of floaters include noise, litter, trespassing on private lands, fishery degradation, trampled grass and brush, human waste and toilet paper litter, parking congestion, and crowded launch sites.

Substantially reducing the number of floaters and the size of the parties is the most important step towards trying to preserve this area and reduce the impact back to levels consistent with the past to recapture and make possible for future generations the wilderness feel of visiting this area. The recreational sections of the river can meet the needs of those who are looking for a party experience. The scenic sections of the North Fork should be preserved for the use of smaller parties.

In order to accomplish this objective, it is vital that a required (not voluntary) permit system be put in place to reduce the number of floaters on the river each day (and especially at the weekends). The stated goal should be to return the river to usage levels of ten years ago or earlier. This should happen without delay for MU1. MU2 should be considered in the next 1-3 years. A modest fee of \$5-10 should be charged to help offset the cost of administration. Without this step it will be difficult to achieve any improvement. Below are more comments on the Proposed Action plan with respect to MU1.

1. The downstream boundary of MU1 should be moved to Coal Creek and should not be terminated at Polebridge. This launch point is already heavily congested. The number of park visitors entering the Park at Polebridge is very high and often large numbers of cars are waiting in this area for the daily permit period to expire or for temporary closures at the park entrance to be lifted. Combined with 40-60 vehicles looking for parking (along with raft trailers) the result is a heavily congested area. Often there is foot traffic and bike traffic (and strollers) along the road which adds to the congestion. Vehicles are often in a hurry and traveling well above the posted speed limit.
2. It would be possible to address this mess if there were a formal permit process in place with each permit being for a specific launch date and group size. This is especially true for overnight floaters so the permit should be different between over night and day use. No amount of “volunteer” permits will fix this problem. Nor will “season” permits mitigate the

impacts especially on weekends. Only specific permits for specific dates gather the needed information to help anticipate and mitigate the impacts of so many users.

3. As the recent fires in Montana (and more recently in southern California) have demonstrated it is critically important that extreme measures be taken to reduce the risk of wildfire. The North Fork area is home to a large number of residents. Along with many government agencies these families have spent thousands of hours (at great cost) implementing Firewise plans to reduce the impact of potential wildfires. It is not appropriate to tolerate potential fires from floaters practicing dispersed camping along the river. Camping should be limited to the many developed campsites and these areas should be equipped with fire rings (and gravel) to reduce the potential for wildfire resulting from campfires which get out of control. These areas include the border, Wurtz, Ford, Sondreson, Polebridge and Coal Creek. There are more than enough campsites (with room for a few more) to accommodate the number of overnight floaters envisioned by the plan in order to maintain the ORVs. Not mitigating the risk of a wildfire burning a large area of the North Fork (including homes) by continuing to allow dispersed camping is dangerous and unnecessary.
4. The ability to provide contained toilets in each of these areas would also address the risk of fecal matter contamination of the rivers. It would also add to the convenience of the floating parties. Floaters (especially day floaters) are not likely to comply with requirements for groover use. Far better to have established toilets at the developed camp grounds that are easy for floaters to use.
5. Shore user: this measurement should be taken at all six of the camping areas mentioned above.
6. If dispersed camping is ended in MU1 this is an opening for the Forest Service to work with private landowners along the river to remove their no trespassing signs. These signs are currently necessary due in large part to the amount of trespassing on private land from floaters looking for dispersed camping sites. Removing the signs would be a step towards improving the “wilderness” feel of the North Fork.
7. Sound from mechanical or electrical devices such as portable speakers (aka boomboxes) should not be permitted on the river or in the camping areas.
8. Restricting Outfitter days from weekend use should be considered to help reduce weekend congestion. This would not be a concern if a mandatory permit system were put in place with daily usage limits.
9. Dogs should not be permitted by overnight parties (day use only)
10. In the camping areas “quiet hours” should be observed from 10 pm to 8am to avoid impacting residents who live nearby
11. Recreation on Shoreline and Development (page 12): Camas Creek needs to be added to this list. It is an easy put in and lots of camping. Weekend surges should be controlled.
12. MU2: Polebridge to Camas: this area is also heavily used by camping floaters
13. Proposed capacity of 180 people per day is too high. That number should be reduced to 80-90 and the number of rafts to 12 in order to move the experience more towards a “wilderness” experience consistent with the approach of GNP in managing that area as wilderness.

14. Eliminate dispersed camping within 300 feet of the river high water bank, along any road or any residence on the river. Many floaters are found camping illegally on private property or on “slivers” of land on the edge of the river directly adjacent to private property. This activity creates conflicts with homeowners due to noise, excrement, garbage, etc.
15. No camping on any gravel bars or “islands” and only on the main shore. This avoids uncertainty of whether the island is on GNP land or Forest Service. It also keeps these islands as a sanctuary for wildlife seeking shelter along the river corridor.
16. Permits should be issued for each overnight use (and not annually) in order to gather the most information on the nature/timing of the use, size of the party, etc. An annual permit for day use might work if the user was required to log their use each week for tracking and data gathering purposes.
17. Group size should be limited to 8-10 and not 20 people (including on the shoreline)
18. Catch and release fishing results in many dead fish despite education. Even with barbless hooks the act of catching the fish and then releasing it results in an astonishing number of dead fish. Limiting the number of people floating is the most effective method of reducing the numbers of dead fish.
19. Question: What is the period of record for fish abundance and length?
20. Thresholds for MU1 recreation. Shore User Experience – lower this to 10 or ensure that it is true on weekends (not just weekdays)
21. Float user experience: This should be clarified to make sure the definition includes encounters with other boats on the shore such that you would not pass more than 4 boats whether floating or seeing them pulled over
22. Polebridge counts should be moved to Coal Creek

I would also like to voice my support for the recommendations contained in the letter dated February 5, 2025 from the North Fork Preservation Association.

Sincerely,

Jack McFarland

Polebridge