



February 6, 2025

Anthony B. Botello
Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Re: 2025 Flathead River CRMP Scoping Comments

Dear Mr. Botello,

Montana Trout Unlimited (MTU) appreciates the opportunity to comment on the proposed Flathead Comprehensive River Management Project (CRMP). Founded in 1964, Montana Trout Unlimited is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries and their watersheds. On behalf of MTU's more than 5,000 members and supporters in Montana, including local chapters that prize the forks of the Flathead River, its fishery and recreation opportunities, we offer the following thoughts and concerns on the CRMP's attention to fisheries.

We are pleased that the current, 40-year old river management plan for the Flathead is being revised. Times, uses of the river, and our understanding of resource management have changed since the old plan was written. MTU also appreciates the time and effort that USFS staff has put into the CRMP and public engagement about it, including the open houses held in Kalispell in late January.

Big picture, MTU is very interested to see the process by which ORVs in the CRMP have been ranked for their sensitivity to river use. Survey after survey clearly indicate that on Montana's coldwater rivers, recreational angling (both commercial and private) constitutes the lion's share of the use. Because angling is the primary use, fisheries, especially the native fishery of the forks of the Flathead should rank top among the most sensitive ORVs in the CRMP. Montana Fish, Wildlife & Parks (FWP) has a good and increasing body of

evidence showing that angling – both float and wade – are the most popular uses of most Montana ‘trout’ rivers. MTU would be happy to provide more specific information about this. Yet, the CRMP lists Recreation, not Bull Trout, native fish or fisheries as the most sensitive ORV in places, including the South Fork Wild & Scenic section (pg 17).

Along these same lines, the monitoring and triggers for compelling adaptive management in the CRMP remain quite vague in regards to the fishery ORV. The CRMP needs to better articulate how the fishery will be monitored, including how USFS will engage or add capacity to Montana Fish, Wildlife & Parks fishery staff for monitoring. As the CRMP now reads, it seems that FWP will continue its current monitoring without any set triggers for adaptive management spelled out in the CRMP and in spite of the fact that the CRMP anticipates varying levels of increase in User Capacity, aka more use, most of which will be angling.

Because native westslope cutthroat and bull trout fisheries are arguably the most sensitive ORV in the Flathead system, we applaud the CRMP’s plan to curtail motorized use on gravel bars, especially in places like the heavily used Blankenship Bridge area. Protections for sensitive areas, like Blankenship Bridge should be expanded in the CRMP. Thus, we strongly encourage the addition in the CRMP of closures of tributary mouths or other areas that are high habitat value for native fish AND highly accessible to motorized use or overuse by river recreationalists. These closures could perhaps be established during fish spawning and staging periods, as well as during times of low, warm water such as Hoot Owl triggers. Numerous fishing access or river access sites are adjacent to or too close to tributaries that are critical for westslope cutthroat and, especially ESA-listed bull trout. Both species are highly sensitive to temperature and disturbance (during all life stages) and disproportionately concentrate in the cold water tributary mouths and the immediate downstream reach of the mainstem river. These areas are also high use for float angler launching and taking out of the forks of the Flathead. We highly recommend adding additional protections for these places, especially with the CRMP’s projections for increasing User Capacity. These sites include but are not limited to: Blankenship Bridge; Coal Creek and Big Creek on the North Fork; Schafer Meadows, Bear Creek and Walton Creek on the Middle Fork; and Spotted Bear on the South Fork. Eliminating these access sites in favor of new ones that avoid piling floaters atop critical fish habitat should be a high priority for the CRMP. There is good precedent of closing tributary mouths in Montana to better protect fisheries, including joint efforts by FWP and USFS on the Smith River, for example.

Returning to the South Fork Wild & Scenic stretch, in the last year FWP determined that angling pressure was contributing to slumping bull trout redd

count numbers to such a degree that the agency further restricted angling targeting bull trout, yet the CRMP, as it stands, allows for a significant increase in user numbers, many if not most of whom will be anglers potentially targeting bull trout. Given the bull trout declines in the South Fork and the new FWP regulations that recognize the need to protect that fishery, we highly recommend that the CRMP take a “do no more harm” approach to this section of river for this ESA-listed fish. Use levels should be kept at the current levels or reduced until the data and creel surveys being proposed in the CRMP are done and result in a science-based trigger point for management actions or User Capacity numbers to be tweaked.

MTU is aware that the Flathead Valley Trout Unlimited chapter has submitted comments on the CRMP. So we would simply reiterate a few of those comments and concerns, especially “B” regarding westslope cutthroat trout trigger points needing to be more sensitive to abundance, length/size distribution and PIBO habitat. Monitoring for the proportion of catchable westslope cutthroat would allow for more protective and data-based trigger points. This point brings us back to our concern that the current FWP monitoring could be enhanced by added USFS capacity and gathering more angler data through creel surveys or emerging ‘citizen science’ opportunities such as real-time creel apps. This has been done effectively and in partnership with FWP on the Bighorn River and should be explored explicitly in the CRMP for better monitoring the native fishery of the forks of the Flathead. On the Bighorn, guides and outfitters were trained and committed to using a fish reporting/monitoring app. The app was only available to those committed guides or users. For the Flathead, the CRMP could require reporting fish data via an app as part of commercial use permits. We highly recommend exploring these alternative ways to gather more data on the native fisheries because, as articulated by the Flathead TU chapter comment letter, there are significant difficulties with increasing more traditional coldwater fishery monitoring in the mainstem Flathead forks.

Again, MTU very much appreciates the work going into this important plan for the Flathead system and for considering our comments. If you have questions or thoughts to share on MTU’s perspectives, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Brooks".

David Brooks

Executive Director

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