



February 7, 2025

Flathead National Forest
Attn: Anthony Botello, Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Re: Comments on the Flathead River Comprehensive River Management Plan (CRMP) Proposed Action

Dear Forest Supervisor Botello,

American Rivers appreciates the opportunity to submit the following comments on the Flathead Wild and Scenic River CRMP Proposed Action (2025 version).

About American Rivers

Since 1973, American Rivers has protected wild rivers, restored damaged rivers, and conserved clean water for people and nature. With headquarters in Washington, D.C. and 355,000 supporters, members, and volunteers across the country, we are the most trusted and influential river conservation organization in the United States, delivering solutions to reduce pollution in rivers, improve clean water access, and safeguard public drinking water supplies. We have offices in every region of the country, including in Montana, where many our members live, work, and recreate on the three forks of the Flathead Wild and Scenic River. The Flathead is one of only three Wild and Scenic Rivers in Montana and is notable for having the cleanest, clearest water in the state.

Summary of Concerns

Overall, American Rivers is concerned that the 2025 proposed action does not take a forward-looking, proactive approach to managing the Flathead Wild and Scenic River. The Flathead National Forest is proposing dramatic increases in visitation and commercial service days coupled with abandoning essential social and ecological monitoring due to temporary capacity and financial constraints under the current administration. Presidential administrations will come and go, but the Flathead CRMP will likely govern river management for the next several decades. The 2025 proposed action lacks a sincere, long-term commitment by the Forest to make conservative decisions that protect and enhance the river. Here is a summary of our concerns:

- User capacity estimates that propose two-to-tenfold increases in use across different segments are unjustified, lack clarity, are inconsistent between adjacent segments, and are inconsistent with thresholds and triggers – especially where triggers and thresholds are already being surpassed.
- Additional proposed actions are needed regarding food storage and vegetative management; certain existing actions require strengthening and clarity include those regarding permits, outfitter/guide service days, fire pans/blankets, human waste, and train spill prevention.

- All indicators, triggers, and thresholds require addition of specific menus of management actions that the agency may undertake should triggers be reached.
- Additional indicators, including those from the 2019 proposed action, are needed to ensure adequate monitoring for maintenance and enhancement of recreational, wildlife, and botany outstandingly remarkable values (ORVs).

In the following pages, we provide additional detail regarding these concerns.

User Capacity Estimates

American Rivers has several concerns regarding the user capacity estimates and related management actions in the proposed action:

1. The proposed action lacks clarity with regard to the methodology used to calculate user capacity estimates. It defines user capacity as “the maximum amounts and kinds of public use that a WSR along its length or by analysis area can accommodate without degrading river values.” Additional guidance is given in the Interagency Wild and Scenic Rivers Coordinating Council’s technical paper¹, which directs river managers to clearly state assumptions and provide transparency as to how figures are calculated. The Snake River Headwaters CRMP² serves as a useful example of how user capacities can be clearly derived and justified from metrics such as number of parking spots and campsites, average launch times for private/commercial parties at boat ramps, season length, average people/watercraft etc., to estimate use maximums tolerated by the resource. In contrast, the Flathead 2025 proposed action gives user capacity figures that are, at minimum, double current use, and, at maximum, ten times current use without revealing any of the calculations behind these figures or describing what types of: 1) facility expansions (e.g. parking lots, new access sites, toilet facilities) will facilitate this use; or 2) the monitoring that has occurred to justify such dramatic increases. Since the Flathead National Forest does not currently have sufficient monitoring in place to give accurate current use numbers, it is imprudent to assume, without strong evidence, that the Flathead River can accommodate such dramatic increases without degrading river values, especially when community consensus suggests that thresholds are already exceeded for many indicators. One example is Montana Fish, Wildlife & Parks new 2024 angling restrictions on the South Fork due to declining bull trout redd counts. In cases where thresholds are already being exceeded, increased user capacity cannot be justified. Further, since percentages of commercial vs. private use are derived using capacity use estimates, these numbers can have real consequences for both outfitters and public river users, as well as for future possible limits on use.
2. The user capacity estimates also do not appear to be congruent or have an understandable relationship with amounts of use defined within triggers and thresholds that will result in management actions. There is incongruence between the user capacity estimates given in Table 3 of the proposed action and those given in Table 5, which would trigger management actions to bring triggers back under thresholds. See the table below that compares these two sets of numbers for on water encounters.

¹ Interagency Wild and Scenic Rivers Coordinating Council. 2018. [Steps to Address User Capacities for Wild and Scenic Rivers](https://rivers.gov/rivers/sites/rivers/files/2023-02/user-capacities.pdf). <https://rivers.gov/rivers/sites/rivers/files/2023-02/user-capacities.pdf>

² Bridger-Teton National Forest. 2014. [Snake River Headwaters Comprehensive River Management Plan](https://rivers.gov/rivers/sites/rivers/files/documents/plans/snake-headwaters-plan-usfs.pdf). <https://rivers.gov/rivers/sites/rivers/files/documents/plans/snake-headwaters-plan-usfs.pdf>

River Segment	Proposed User Capacity	Use Derived from Triggers/Thresholds (use from proposed action Table 5, column 4&5, multiplied by proposed group size limit from proposed action Table 4)
North Fork Scenic - MU1	180 people	80 people/day floating
North Fork Scenic - MU2	450 people	120 people/day floating
North Fork Recreation	330 people	500 people/day floating
Middle Fork Recreation - MU1	100 people	250 people/day floating
Middle Fork Recreation - MU2	1,100 people	500 people/day floating
Middle Fork Recreation - MU3	1,280 people	1000 people/day floating
South Fork Wild - MU1	90 people	10 watercraft/day (est. 6 people/boat) = 60 people/day
South Fork Wild - MU2	30 people	10 watercraft/day (est. 6 people/boat) = 60 people/day floating
South Fork Recreation	70 people	20 watercraft/day (est. 6 people/boat) = 120 people/day floating

In many cases, the proposed user capacity numbers (number of people the resource should be able to tolerate without impact) are more than just the amount of float use (let alone shore use) needed to trigger management actions. Overall, the relationship between user capacity and triggers/thresholds appears arbitrary and unsupported, and requires additional clarity, consistency, and congruence. We recommend including a crosswalk illustrating how person/day equates to indicators of parties per day or boats per day.

3. Additional clarity and rationale are needed between different adjacent segments where user capacity numbers are dramatically different—North Fork Scenic MU1, MU2; South Fork Wild MU1, MU2—and between wilderness sections of the Middle and South Forks.

Overall, American Rivers is concerned with the proposed action to significantly increase user capacity, especially if/where triggers and thresholds are already being surpassed.

Proposed Management Actions

American Rivers supports the proposed management actions that:

- Break the North Fork Scenic segment into two management units
- Prohibit motor vehicle camping or parking on gravel bars
- Consistently prohibit drones across National Forest and National Park lands
- Accommodate livery services to address parking congestion
- Control noise
- Require group size limits (20 scenic/50 recreational)

- Prohibit dogs between Bear Creek and Essex
- Prohibit camping from Belton Bridge to McDonald Creek
- Install signage about Meadow Creek Gorge at Mid-Creek Takeout

We strongly recommend strengthening and/or providing additional clarity for the proposed management actions that:

1. Establish a mandatory, unlimited float permit to measure use levels.

In general, we strongly recommend implementation of a mandatory, unlimited float permit system to gather actual recreation use data. We recommend including the Middle Fork Wild section in the list of initial priority segments, given that current use on that segment is unknown.

2. Set total outfitter and guide service days—priority and temporary use pools.

Additional clarity and transparency, by river segment, are needed to provide adequate information to the public on: 1) differences/uses/access to priority vs. temporary use pools; 2) why total service days are increasing in the absence of accurate measurements of private use and sufficient monitoring to ensure ORVs are not being impacted; 3) how commercial and private shares of overall user capacity will change if/when triggers are reached to ensure commercial and private users share the effects of proposed management actions to bring triggers within thresholds.

3. Require fire pans/blankets on the North and Middle Forks.

We strongly recommend also requiring metal fire pans or fire blankets on the South Fork Wild sections, since these are well-known overnight use segments.

4. Contain human waste within 200 feet of the river's edge.

As written, this management action is vague and does not support preventing human waste-related water quality issues within the river corridor, especially in the headwaters sections where human waste impacts are already problematic. In the South Fork River corridor, for example, Big Prairie rangers daily move/remove improperly disposed of human waste, which already violates: 1) the fourth trigger in Table 5: Observations of potential water quality issues including human waste; and 2) the natural quality of wilderness character (applicable to the South and Middle Fork Wild sections within the Bob Marshall Wilderness). We disagree with the Forest Service's sensitivity around: 1) not wanting to apply management actions in the wilderness to regulate recreation impacts; and 2) not wanting to apply different management actions to different user groups, especially within the wilderness, when such differences already exist on wilderness rivers like the Selway and Middle/Main Salmon Rivers, and human waste packout is already an accepted cultural norm within the river recreation community. As such, we strongly recommend installing a SCAT machine in Columbia Falls and adopting one of the following approaches that takes a pro-active approach to human waste management, especially in headwaters sections:

- Approach #1: Add specificity to this proposed management action to require waste pack-out using groover or Wag Bag technologies for all floaters within the North Fork Scenic - MU1, Middle Fork Wild, and South Fork Wild (both) segments. The Forest Service must then

monitor human waste within the river corridor and expand this management action to include all parties travelling within the river corridor, if monitoring reveals that the occurrence of waste does not drop below the trigger.

- Approach #2: Require waste pack-out using groover or Wag Bag technologies for all parties, regardless of user group, within the North Fork Scenic - MU1, Middle Fork Wild, and South Fork Wild (both) segments.

5. Establish an agreement with Burlington Northern Santa Fe Railroad to prevent and respond to spills from trains.

While we agree with the need to establish greater coordination and agreement between land management agencies and Burlington Northern Santa Fe Railroad (BNSF), we strongly recommend greater specificity under a habitat conservation plan for bull trout, similar to BNSF's ongoing efforts under a habitat conservation plan to reduce train-caused grizzly mortalities in the region.

Recommendations to proactively reduce the likelihood of spills include, but are not limited to: regular track inspections and proper gauging, installing/maintaining track monitoring sensors, requiring reduced speeds along sections of track closest to the river, thoroughly training operators, installing track pans and/or other absorbent materials, and proactively designing spill containment plans.

We strongly encourage adding proposed management actions that:

- Provide direction for vegetative management and wildfire mitigation activities within the river corridor.
- Require that bear food storage regulations apply to all day and overnight floaters within the river corridor, including commercial outfitters, to prevent bear habituation.

Monitoring Plan, Indicators, and Thresholds

In general, all indicators, triggers, and thresholds lack association with a specific menu of management actions that the agency may undertake, should triggers be reached. This information was included in the 2019 proposed action, but was removed from the 2025 proposed action and is a critical part of the public's ability to evaluate how proposed management actions may be implemented. We challenge the Forest Service to think creatively about how to apply proposed management actions, such as considering staggered time slots and/or days of the week for commercial vs. private boaters to spread out use over time and ensure equitable access by both types of users, developing new access sites and/or separate boat ramps for commercial/private access, applying different party sizes by segment, requiring overnight permits where camping is limited, prohibiting motors on recreational sections, conducting a creel survey to better understand angler behaviors etc.

Also, in contrast to the 2019 proposed action, a variety of indicators were removed from the 2025 version. These removed indicators include a variety of actions that have profound impacts to visitor experiences such as parking lot/access site capacity/congestion, launches, campsite condition and availability, litter etc. For river users, experiences at put-ins, take-outs, and campsites color the overall on-water experience as much as, if not more so, than the number of on-water encounters, which the Forest Service is inappropriately assuming will somehow suffice to both monitor the recreational ORV and to justify two-to-tenfold increases in user capacity. Further, monitoring for non-recreational ORVs such as botany and wildlife

are omitted and include noxious weeds, bank trampling, social trails, riparian conditions, and wildlife crossings and encounters. The reduced budget forecasts under the current administration alone do not constitute adequate justification to abandon necessary monitoring for to ensure maintenance and enhancement of all ORVs, as is legally required under the Wild and Scenic Rivers Act. Instead of simply abandoning essential monitoring due to anticipated constraints in the short-term, the agency must find creative ways to accomplish needed monitoring including working with partners, outfitters and guides, and the community. This requires committing to the full suite of necessary monitoring for all ORVs.

Thank you for the opportunity to submit comments on this important public process.

Warm regards,

A handwritten signature in cursive script that reads "Lisa A. K. Ronald".

Lisa Ronald
Western Montana Associate Conservation Director
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