February 7, 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

Thank you for providing the opportunity to comment on the Flathead Wild and Scenic River CRMP proposed actions. I am writing as a private citizen that has lived, worked, recreated, fished and floated in the Flathead Wild and Scenic River system for nearly 50 years. I made my first backpack trip into the South Fork of the Flathead in the Bob Marshall Wilderness Area in 1976. I made my first wilderness float trip on the Middle Fork of the Flathead floating out of Schafer Meadows in 1996. And, since my knees don’t do so well with backpacking any more, I have been floating the South Fork of the Flathead from the headwaters at Youngs and Dannaher creeks since 2008. Along with, and interspersed between, the expedition type trips, I have enjoyed countless day and 2-day (overnight) trips on all 3 forks of the Flathead system. As a regular though admittedly casual user of these rivers, I have seen many changes over the decades I have spent fishing and floating these waters.

Because I am an avid user of this very precious resource, the 3 forks of the Flathead, I have tried to give back and be a good steward of the resource through community involvement. I am a life member of Trout Unlimited, a 2-time past chair of the local Flathead Valley Chapter of Trout Unlimited, past chair of Montana Trout Unlimited, former representative from Montana to the National Leadership Council of Trout Unlimited as well as a former member of the Flathead RAC.

As a current member of the Board of Directors of the Flathead Valley Chapter of Trout Unlimited, I am familiar with the comments that the chapter and Montana Trout Unlimited have submitted concerning the Proposed Action for the Comprehensive River Management Plan. I fully endorse and support these comments and sincerely hope they have an impact on your final actions.

In addition to my support of the comments from FVTU and MTU, I would like to make some additional personal comments on the process, one of the ORVs, proposed actions and the monitoring plan, indicators, triggers, and thresholds.

**Process-** I participated in the earlier CRMP process between 2017 and 2019 as a private citizen and on behalf of the local TU chapter. At that time, I was the chapter president and submitted the chapters comments in October 2019 on the Proposed Action for the Comprehensive River Management Plan released in July 2019. There was a tremendous amount of public energy, enthusiasm and passion from many individuals and constituent groups that went into the meetings discussing the Outstanding Remarkable Values in the Flathead River Wild and Scenic River System. From the outside looking in, it seemed the process just stopped and died within the Forest Supervisors Office in early 2020. I realize that many things changed due to Covid and other factors, but I feel like those efforts from 5-7 years ago were cast aside and effectively wasted. Most of us attending those meetings were there as private citizens with a strong interest in this resource that makes the Flathead a very special place to live. To not have any meaningful communication from the Flathead National Forest about the status of the 2019 proposed action plan and next steps made many of us feel that there was no sincere interest in our input or participation in the process. I sincerely hope I never have to feel like this about a public process ever again.

**Water Quality ORV**- I strongly urge you be more specific in scientific terms concerning water quality. Montana DEQ standards are fine as far as minimum standards are concerned but the water, especially the headwaters of the Middle and South Forks, are much more pristine than the average Montana stream and DEQ requirements. I urge you, if you do not already have it, to obtain the baseline water quality chemistry data and continuously compare that to current conditions to alert us all to any degradation from their current pristine status. I feel that water quality is a keystone quality that is a precondition to several of the other ORVs.

**Proposed Estimated User Capacity table**- Several people at the public meeting I attended on January 22, 2025 had questions about where these numbers came from. I am concerned that, except for the Middle Fork Recreation section MU1, the limiting factor for the other sections was recreation and not water quality. I do not know, generally or specifically, how the proposed capacity numbers were arrived at. The scoping document doesn’t address much about what went into the numbers. I would be curious what a matrix of the proposed user capacities would look like for all of the ORVs, especially water quality and fisheries.

**Proposed Management Action-General** - Mandatory permits, solid waste containment, prohibition of drones, fire pan requirement, noise level limits, prohibition of dogs in the Goat Lick area. Amen. About time. Data from the permit issuance should be made available on an ongoing basis. These other commonsense conditions should have been put in place years ago. Please make sure you provide at least 2 years for education about these issues. After that, please vigorously enforce on a regular basis.

A specific comment about solid waste containment: I urge you to be specific in requirements that all users, including day users, be required to contain all solid waste. Most of the rest of the western US rivers require containment such as groovers, wag bags, etc and the river user community has accepted these requirements. Even the Smith River, Montana’s only permitted river, now requires solid waste containment. A SCAT machine at the Hungry Horse ranger station would provide a convenient and central location for appropriate waste disposal.

**Proposed Management Action re prohibition of motor vehicle camping or parking on gravel bars except for travel to launch and retrieve boats.** I enthusiastically support this proposed action and look forward to its implementation. Especially the prohibition on overnight camping. I support the prohibition on parking on gravel bars, but I am concerned about the lack of parking at 3 of the more popular boat launches where this is an issue. At Blankenship Bridge, West Glacier, and Paola access sites on the Middle Fork and Coal Creek on the N Fork, gravel bar parking has been the de facto overflow parking when the designated parking places are full. This is an especially critical issue at the Paola Creek site. I urge you to combine the prohibition on parking on gravel bars with proposals for additional parking at these affected sites.

**Proposed Management Action re group size North Fork Scenic**- I urge you to reconsider this and adjust down to the more appropriate 15 person party size. I understand that the 15 person party size is the current standard for the wild sections and this is a scenic section, but the general character and the ORVs of this stretch of river calls for smaller party sizes than the proposed action.

**Proposed Management Action re BNSF oil train spill potentia**l- The possibility of an oil spill in the Middle Fork Recreational segments is the single issue that keeps me awake at night. An agreement with BNSF, GNP and the Flathead National Forest is not only long overdue, it doesn’t go far enough. This group needs, at a minimum, to include members of the public and affected stakeholders like the commercial raft companies. A response to an accident like this needs to be well thought out, discussed, and vetted among all of us that would be affected. The time to ask questions about the efficacy of BNSFs response is now, not in hindsight after the unspeakable has already occurred. One accident would take 5 ORVs (Recreation, Fisheries, Water Quality, Wildlife and Botany) completely out of the picture for this incredible stretch of the river.

**Monitoring Plan, Indicators, Triggers and Thresholds- Fisheries and Water Quality**- I am not a scientist but I feel that waiting for the 5 and 10 year numbers to show sufficient declines in abundance or quality are way too long. I would urge you to consider shorter time frames or annual decline/degradation indicators to trigger action. You may have a higher degree of certainty concerning the trend over your longer time periods, but you run a risk that you are waiting too long to address the problem.

**Monitoring Plan, Indicators, Triggers and Thresholds- Recreation**- One comment regarding “Encounters with no more than x watercraft per day…” I am wondering why you are counting watercraft and not people? I can tell you from personal experience that three 14’ rafts with a bachelor party of 12 people can be way more annoying and negatively affecting my user experience than 12 people in pack rafts on the South Fork or kayakers on the upper Middle Fork. In my example, the packrafters and kayakers counts more in your metrics than the 3 rafts do even though it is the same number of people.

Again, I wish to thank you for the opportunity to provide comments concerning this most important issue.

Sincerely,

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