**Comments Submitted Via Electronic Submission February 7, 2025**

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**RE Flathead River Wild and Scenic Comprehensive River Management Plan**

Dear Planning Team

I am a long-time resident of Flathead County and an avid user of all three forks of the Flathead River including multi-day backpacking trips into the Middle Fork and South Fork of the Flathead River as well as day trips on the North Fork Flathead River. Professionally, I work as a river ecologist and river recreation planner. As a result, I am very interested in the development and implementation of a new Comprehensive River Management Plan (CRMP) for the three forks of the Flathead River. I appreciate the Flathead National Forest’s (FNF) efforts to develop a new CRMP for the Flathead River. Below are my comments on the CRMP Scoping Document.

**NEPA Process:** I am pleased the Flathead National Forest is starting a new scoping process for the CRMP. The previous CRMP scoping document was released in August 2019. In the six-years since publication of that scoping document a global pandemic occurred resulting in dramatic changes in the way the public recreates on public lands. Restarting the NEPA process for the Flathead River CRMP is necessary given all the changes that have occurred. Thank you for recognizing these changes and taking the initiative to restart the process.

**Mandatory Permits:** I support mandatory permits for all three forks of the Flathead River. Mandatory permits provides FNF with tools to collect quantitative data on group size, types of boats, transport methods to the river, demographics, etc. I recommend online permitting only so that all data is archived in a central database for annual analysis. Allowing parties to complete analog permits requires data entry by FNF staff and loss of the carbon copies at various trailheads. Requiring online permitting is not a burden in the 21st century.

The mandatory permit also provides an excellent opportunity to educate users about the regulations for recreating in each fork of the river as well as leave no trace practices. Along these lines, I recommend the FNF include a list of the regulations in the permit application process and require permittee to acknowledge they have read the regulations prior to issuing the permit. In addition, the permit application process should also include the summary of leave no trace practices for western rivers requiring the permittee to acknowledge they have read these practices. This educational opportunity can go a long way to protect the ORVs the CRMP is intended to protect.

**Human Waste Management:** I support the requirement to control human waste within 200 feet of the river for all visitors camping regardless of recreation activity. Water quality is an Outstandingly Remarkable Value (ORV) for all three forks to the Flathead. The FNF has a duty to protect this ORV. Lightweight human waste systems (wag bags, groovers, etc.) are available and practical for the wilderness sections on the Middle and South Forks of the Flathead.

Monitoring: The scoping document does not provide a great deal of detail regarding monitoring of ORVs. I would like to see more information in the EA about the scientific methods that will be implemented to monitor the health of each ORV listed for the respective forks of the Flathead River. The monitoring plans should be quantifiable, have measurable criteria and be repeatable.

**Capacities and Triggers**: The section on capacities and triggers focuses on boat counts rather than people. A raft with six people should not be counted the same as a single person in a kayak, packraft or paddle board because the social impact is not equal. FNF should count people not boats for monitoring capacities and triggers. Forest Service regulations use group size thresholds for managing recreation activities nationally. The Flathead CRMP should do the same. Boats are inanimate objects which by themselves do not impact the social experience.

The scoping document proposes to monitor capacities and triggers based on a combination of shore based monitoring and encounters while traveling longitudinally down river. This type of monitoring is labor intensive requiring substantial time commitment by FNF staff. Previous implementation of this monitoring technique by FNF has been problematic and data quality suspect and statistically invalid. Furthermore, This type of monitoring is no longer necessary with the mandatory permit system. FNF can simply analyze the data to assess thresholds and capacities for individual river segments on a given date.

For the frontcountry river segments I recommend FNF consider monitoring the parking capacity and condition of river access sites using a stratified random sampling technique for weekdays, weekends and holidays. This type of stratified sampling is routinely carried out for other recreation studies trying to quantify dispersed recreation users. The methods are quantifiable and repeatable and can be completed efficiently.

**South Fork River Segments:** The boundary between MU1 and MU2 on the South Fork Flathead leaves an undesignated gap in Meadow Creek Gorge between the Mid Creek take-out and the Bob Marshall Wilderness boundary. Please clarify how this short segment in Meadow Creek Gorge will be managed.

**Motorized Use:** The CRMP scoping document states that motorized use (up to 10 hp) is allowed on the following river segments: South Fork Flathead between Hungry Horse Reservoir and confluence with Upper Twin Creek, and Middle Fork Flathead from Blankenship Bridge to the South Fork Flathead confluence. I recommend the CRMP clearly state that all other segments of the three forks of the Flathead are non-motorized use only. The CRMP should prohibit motorized use on all other river segments outside the wilderness boundary.

Thank you for the opportunity to review the scoping document and participate in the public meeting. Please add me to the stakeholder distribution list for Flathead River CRMP.

Sincerely



John T. Gangemi