



PO Box 9192  
Missoula, MT 59807  
packraft.org

February 7, 2025

Re: Flathead Wild and Scenic River CRMP

Dear Planning Team,

The American Packrafting Association (APA) is pleased to provide our scoping comments for the Flathead Comprehensive River Management Plan (#56536). APA is an organization dedicated to promoting responsible packrafting and advocating for the preservation of river ecosystems, comprising over 3,000 supporters, members, and volunteers across all 50 states. Since our founding in 2012, we have worked to conserve the wild places essential to packrafting while promoting safe and responsible river use. The Flathead River is a premier packrafting destination, and we hope to collaborate with the Forest Service on the planning process and to share CRMP updates with the public and encourage sustainable, responsible visitation.

We support the implementation of mandatory but unlimited permits as a valuable step toward data collection without imposing unnecessary restrictions on access. To ensure accessibility, we encourage the Forest Service to make these permits available on-site for all users.

We support the proposed human waste containment requirements and recommend that they apply to all users camping within 200 feet of the river, not just paddlers. Additionally, we encourage the consideration of alternatives beyond groovers to better accommodate packrafters.

We support the requirement for fire pans or blankets for campfires for groups that intend to have fires. However, this requirement should not apply to small boat trips—such as packrafts—for which carrying such equipment is impractical or prohibitive, particularly compared to outfitted or fly-in groups. Groups that do not intend to have fires should have the option to waive this requirement. Furthermore, all river corridors, including those used by horse pack trips and hikers, should be subject to this requirement and waiver, rather than limiting it to paddlers alone.

We support improved signage at the Mid Creek Takeout to enhance safety by providing clear warnings for boaters approaching Meadow Creek Gorge.

We support limiting the number of outfitter and guide service days to address concerns regarding congestion and equitable river access.

We encourage the inclusion of temporary education and guide permits for underserved communities to facilitate structured learning opportunities for new packrafters.

The proposed action overlooks several key factors:

- It does not acknowledge the use of the recreational section of the Middle Fork as a multi-day river trip. We encourage the Forest Service to recognize and support this use in capacity allotments.
- The proposed camping closures on the Middle Fork overlook its value in providing accessible, reservation-free riverside camping. We encourage the Forest Service to explore alternative dispersed camping options to support this need.
- The current user capacity allotments have the potential to be entirely occupied by commercial outfitters, potentially restricting access for private paddlers. We request clarification on how these capacities were determined, including details on how input from private users was incorporated and what data sources were used to assess private river use. It is essential that the experiences and needs of private paddlers are fully considered.
- Some triggers seem unrelated/illogical and often too low in certain instances. We seek transparency regarding the methodology used to establish these capacities. Given the potential impact on recreation quality, and overall visitor experience, we strongly urge the Forest Service to provide a more comprehensive explanation of the rationale behind these proposed capacities and to establish robust, ongoing monitoring to protect river values.
- The CRMP does not address tributary paddling or corridor acquisitions. It should explicitly recognize that paddlers often run tributaries to the Flathead forks, frequently ending their trips on one of the main rivers. These tributaries provide exceptional wilderness and backcountry experiences, and paddlers should not be restricted by any of the proposed requirements. Additionally, the proposed action and CRMP should affirm a commitment to corridor acquisition through clearly articulated goals and desired conditions.

We appreciate the efforts to manage and protect the Flathead River and encourage the Forest Service to refine these proposals with the concerns of all river users in mind. We welcome the opportunity to discuss these issues further and provide additional input as needed.

Sincerely,

Sarah Kilbourne  
Executive Director  
American Packrafting Association  
sarah.kilbourne@packraft.org