

**BEFORE THE USDA FOREST SERVICE
Objection Reviewing Officer**

SWAN VIEW COALITION)
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) Objector)
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v.)
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ANTHONY B. BOTELLO)
)
FLATHAD FOREST SUPERVISOR)
)
Responsible Official)

**NOTICE OF OBJECTION
PURSUANT TO
36 CFR 218**

DECISION OBJECTED TO:

Wild and Scenic River Comprehensive River Management Plan for the Flathead Wild and Scenic River Draft Decision Notice/FONSI and Updated EA (May 2026)
(hereafter CRMP, DDN and EA; collectively known as Project)
Anthony Botello, Flathead Forest Supervisor

Objector: (via <https://cara.fs2c.usda.gov/Public/CommentInput?project=292351>)



Keith J. Hammer
Chair
Swan View Coalition
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Kalispell, MT 59901
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July 9, 2026

Prior Participation and Standing to Object

Swan View Coalition (SVC) is a non-profit conservation organization dedicated to conserving water quality and quiet, secure habitats for fish, wildlife and people on the Flathead National Forest and greater Flathead River Basin. Our members use these areas, including the Project area, for recreation, employment, wildlife viewing, photography, research, education, aesthetic enjoyment, spiritual rejuvenation, and other activities.

On January 30, 2025, SVC submitted written comments on the CRMP Proposed Action (PA), which attached our January 27, 2025 comments on the North and Middle Fork Flathead River Outfitter and Guide Permits Renewal Project. Those letters are attached

to this Objection and are to be read and considered a part of this Objection and its rationale. SVC also submitted written comments on the CRMP EA on February 25, 2026. That letter is attached to this Objection and is to be read and considered a part of this Objection and its rationale.

Executive Summary

The revised CRMP, UEA and DDN do not adequately address our previous comments.

Simply put, the Project continues to ignore or find acceptable existing problems, including those that already compromise the Outstandingly Remarkable Values (ORVs) as they existed when these Wild and Scenic Rivers were designated. The Project then sets User Capacity at levels above the Estimated Existing Use for every River Segment (EA at 10), which can only make matters worse and further compromise ORVs.

The token reduction in User Capacity for Middle Fork MU-3 to 1,430 persons / days still represents a three-fold increase over the 476 persons / days Estimated Existing Use (EA at 8 and 10)! This is how the Project responds to public comment while refusing to include an alternative in the EA that would cap User Capacity at Estimated Existing Use (EA at 17)!

Moreover, the Project then promises to address problems as they arise and are identified through monitoring, while simultaneously acknowledging that adequate monitoring is unlikely to occur. The CRMP is simply a plan to remain in denial while ORVs are unlawfully damaged rather than protected and enhanced.

The CRMP states “Freedom of access” is treated as a desired condition and social setting to be balanced against solitude, not as an ORV.” (CRMP App. E – iv). Our review of the Project shows that “freedom of access” is in fact used to trump the maintenance and restoration of ORVs, not to provide balance.

The Project is arbitrary and capricious. It violates the NEPA, the ESA, the Wild and Scenic Rivers Act, the NFMA, the Clean Water Act, and the Administrative Procedures Act, among others.

“Freedom of Access” and Increased User Capacity

“Freedom of Access” is used to sacrifice one area over another, while the Wild and Scenic Rivers Act requires that all ORVs be protected and enhanced. The CRMP, at App. E – vi for example, states “The full recreation report discloses that solitude and shore fishing opportunities would likely be diminished over time in MF MU3, particularly under the higher use trend scenarios. However, the CRMP seeks to protect these types of experiences elsewhere in the river system.”

The CRMP, at App. E – viii, states “Currently the section [above Schafer Meadows] has seen 1 or 2 parties per season so a cap of 8 is more than quadruple current use.”

The CRMP, at App. E – x, states “The fisheries section of the DA discusses the cumulative impacts of continued climate change and increasing angling pressure. These cumulative impacts would occur where proposed user capacities are greater than existing levels” – meaning in every river segment! The Wild and Scenic Rivers Act is not just about procedure. Simply discussing cumulative effects is not enough – the agencies must limit those cumulative effects to protect and enhance all ORVs.

The CRMP, at App. E - xii, states “Bull trout populations have declined by 63% in the Wilderness portion of the South Fork since 2014 (see page 20 of the EA). As stated in the fisheries section of the EA, bull trout populations have declined in all three forks, and one local population (Red Meadow Creek) has likely been lost. It is also stated that many local bull trout populations are near or below the conservation threshold of 15 redds. . . Increasing trends in angling pressure are well documented in the EA. These trends are expected to continue, and proposed user capacities allow for this growth. As a result, bull trout mortality from bycatch and legal catch is expected to increase. The primary potential action in Forest Service jurisdiction would be adjustment of user capacities during the life of the CRMP and data collection through the free permit system. As stated in the EA, the proposed action is expected to add cumulative stress on bull trout populations.” Yet the CRMP takes no immediate action to decrease angling pressure or keep it from increasing.

Instead, the CRMP increases User Capacities and, at App. E – xi, admits “the Forest Service could take management actions such as reducing party size, restrict number of boats per party, or potentially implementing a lottery permit system” but doesn’t. It instead proposes waiting until “the trigger is reached and before use numbers reach the threshold,” knowing full well that those triggers and thresholds are set way too high to avoid damaging ORVs and threatened species like Bull Trout. This is a violation of the ESA, not just the Wild and Scenic Rivers Act.

The CRMP, rather than not allowing growth in commercial recreation in river segments, actually plans for continued growth and at best only curbs the rate of growth: “In recent years river managers have curbed the rate of growth for all companies in the Lower Middle Fork. Under the CRMP, growth is limited to 3% annually in MF MU2 and 5% annually in MF MU3 and NF Rec. The allocations each permit holder has received is consistent with river management direction and Forest Service policy.” Here again, Freedom of Access, User Capacities, and a policy of ever-continuing growth is trumping the required protection and enhancement of ORVs.

Inadequate Monitoring

The CRMP provides inadequate monitoring and inadequate guarantees that monitoring will be carried out, as evidenced in these App. E responses to public comment:

“There is no guarantee of future funding for any monitoring program.” (Page xxiii).

“Forest Service capacity to track native fish populations and stressors is extremely limited, which is why MFWP is the primary source of data. The Forest Service also recognizes that MFWP has limited resources as well.” (Page xxiv).

“However, this data does not capture the genetic status of these fish and the degree of hybridization. More sample sites are needed, but this monitoring is limited by FWP’s capacity.” (Page xxv).

Moreover, the CRMP proposes to address fish declines with more monitoring rather than corrective action. The response to public comments on page xxii totally misses commenter’s point that “A five-year sustained decline in bull and westslope cutthroat trout is the wrong threshold when both species have already declined. Federal agencies are charged with recovering threatened species, not facilitating their decline.”

It is nothing short of pathetic, in light of the above fisheries trends, that the CRMP concludes “Although there is data that points to concerns around angling impacts to native fisheries, it currently isn’t detailed enough to consider fisheries as a limiting resource on any of the WSR segments.” This is a harbinger of denial of future monitoring results as well.

Inadequate Range of Alternatives

The EA violates NEPA by failing to assess a wide range of alternatives in detail, a range that must especially include an alternative that caps User Capacity at Estimated Existing Use levels and would further reduce User Capacity in order to restore all ORVs to levels/qualities that existed at the time of WSR designation.

Conclusion

The CRMP fails to address the hard truths of the existing situation and foreseeable trends, let alone rein in the levels of human use that are harming WSR ORVs. Instead, it proposes to increase human uses in every WSR segment and proposes a farce of a monitoring program that will, at best, document the continuing decline in ORVs and native fish populations. We provide more details in our attached prior comments, which remain unaddressed in any substantive fashion in the Project documents.

Relief Sought

For the reasons summarized above and detailed in our companion documents, we ask that you:

1. Declare the CRMP and UEA inadequate and withdraw them.
2. Require that a DEIS be prepared and that it includes a wide range of alternatives, as described above.
3. Require that the relevant biological assessments be redone and undergo formal consultation with FWS on the effects of the CRMP to all listed species.

Swan View Coalition

Nature and Human Nature on the Same Path



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January 30, 2025

Anthony Botello
Flathead Forest Supervisor
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Re: Comments on the Comprehensive River Management Plan Proposed Action
Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=56536>

Dear Supervisor Botello;

Please accept these comments on your Comprehensive River Management Plan (CRMP) Proposed Action (PA) into the public record. They are submitted on behalf of Swan View Coalition. We incorporate by reference the comments being submitted by Friends of the Wild Swan.

We find that your PA violates the primary purpose of the CRMP, which is to “protect AND enhance the values for which a river was designated [Wild and Scenic].” (River_Plan_ScopingPresentation_Jan 2025.pdf) Indeed, the “Wild and Scenic Rivers Act requires the administering agency to protect and enhance the river’s free-flowing condition, water quality, and its outstanding remarkable values.” (PA at 3).

The PA fails to acknowledge that “outstanding remarkable values,” such as uncrowded recreational opportunities, have already been degraded. This is especially true of degradation by commercial use wherein service days on the Lower North Fork and Lower Middle Fork exceeded the permitted service days for all years from 2015-2023, at times by as much as 275%! (See our corrected 10/28/24 letter in this matter, included in this pdf, and “20241009 North and Middle Fork Flathead River Permit Information.pdf” found at <https://www.fs.usda.gov/project/flathead/?project=66916>).

Indeed, the PA at 20 acknowledges that the “average actual use for the combined [Middle Fork] reach over the past five years is 71,889 service days,” which is more than twice the 35,713 “current amount of authorized service days”! This overuse and overallocation of commercial use apparently was allowed via extra allocations from a “priority use pool” that is currently “variable and uncapped” (PA at 20).

Rather than reduce authorized service days, the CRMP PA proposes to nearly quadruple the current amount of authorized service days on portions of the Middle Fork by increasing authorized commercial service days from the current 35,713 to

136,000! It apparently intends to do so by holding the increased amount “in priority and temporary use pools.” (Id.) These pools appear to be functioning as a shadowy slush fund, making it difficult to impossible for the agencies and the public to identify and strictly limit the amount of commercial service days.

Rather than set strict limits and stick to them, the PA proposes to kick that can down the road (while concealing the actual use increase) by allowing increases in commercial service days to be made piecemeal via a “slush fund / pool” when use levels meet the limits set in the commercial permits. This in no way protects or enhances recreational “outstanding remarkable values.” Quite the contrary, the CRMP PA would protect and enhance the financial bottom line of the commercial outfitters instead. The vast majority of use should be allocated to private parties, not commercial outfitting and guiding!

The PA does not contain provisions to correct the problems outlined above:

1. The Triggers are too lenient and too slow to trigger meaningful and timely corrective action. The “3 out of every 5 years” time frame for exceeding a trigger on boats passing by per day not only masks actual excessive boat traffic, it requires years to even trigger corrective action. Triggers should be immediate so that corrective action is taken immediately. The percentages of the days monitored should be eliminated because they also remove the immediacy of the trigger and corrective action and mask the actual impacts that occur.
2. Table 5 of the PA, pages 21-25, states that “For each indicator, potential management action(s) are identified, that would be taken, if a particular trigger is reached.” In fact, no potential management actions are listed, nor is there even a column for them to be listed in Table 5. The management actions listed in Table 4 of the PA appear aimed at overall CRMP implementation, not corrective actions to be taken when Triggers are exceeded in order for conditions to not decline to or below the Threshold.
3. As stated above, the planned increases in commercial service days and the priority pools should be eliminated from the CRMP and service days must be strictly limited to protect and enhance outstanding remarkable values.
4. Page 17 of the PA essentially states that user capacities, expressed in numbers of people, were derived from past data on “actual user estimates.” The PA, however, does not explain how past actual use has anything to do with acceptable user capacities that protect and enhance outstanding remarkable values. The reader is left with the suspicion that user capacities are being developed to accommodate current and unacceptable amounts of use, rather than to protect and enhance outstanding remarkable values. The PA also fails to explain how it conforms its proposed use levels, especially commercial service days, to the Proposed User Capacity.
5. Tables 4 and 5 of the PA list user amounts that simply don’t pass the straight-face test for acceptable levels of use that protect and enhance outstanding remarkable values – listing “60 boats per day” for the North Fork Recreational and group size limits of 50 on and off the river for other WSR segments.

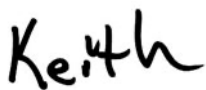
Members of Swan View Coalition have worked as river guides on the Flathead's Wild and Scenic Rivers and many are avid river runners. They have seen these issues from both the private and commercial sides, enjoying kayak surfing a wave in a rapid while also being run off that wave by large commercial groups of rafts not-so-affectionately called "erasers." Use on these rivers was failing to protect and enhance outstanding remarkable values back in the 1980s and it has only gotten worse, way worse, since. That said, we support some of the management actions outlined in the PA:

1. We support the mandatory, free float permit for private parties, but only if it is readily accessible at home or on the way to the river – and that the intent is for collecting user data to inform better management.
2. Prohibit motor vehicle camping or parking on gravel bars.
3. Requiring metal fire pans or fire blankets for campfires in the WSR corridor.
4. Noise levels cannot exceed 60 decibels at 50 feet or make noise that is unreasonable. This should automatically prohibit, but you should expressly prohibit, the use of drones in the Wild and Scenic corridor.
5. Prohibit dogs between Bear Creek and Essex and require continues downriver travel in the vicinity of the Walton Goat Lick.
6. Camping prohibited from Belton Bridge to McDonald Creek.
7. Install a sign for the Mid Creek Takeout to warn float parties about Meadow Creek Gorge.

In addition to the management actions listed above, we want to see more monitoring and management actions to protect wildlife in addition to mountain goats. The PA offers little in terms of concrete protections for all wildlife species, not even a food storage order. As mentioned in the attached letter, an EA may be the minimum level of NEPA documentation necessary to update this CRMP and to issue commercial river permits. Now that we've seen the degree to which the PA would increase impacts and fail to protect and enhance outstanding remarkable values, an EIS is likely in order.

Thank you for this opportunity to comment and please keep us informed.

Sincerely,

A handwritten signature in black ink that reads "Keith".

Keith J. Hammer
Chair

Attachment: 10/28/24 (corrected) SVC letter commenting on the Flathead River O&G Permits

Swan View Coalition

Nature and Human Nature on the Same Path



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October 28, 2024 (*Corrected 1/27/25*)

Robert Davies
District Ranger
PO Box 190340
Hungry Horse, MT 59919

Re: North and Middle Fork Flathead River O&G Permits Renewal Project

Sent as a pdf to comments-northern-flathead-hungry-horse-glacier-view@usda.gov

Dear Ranger Davies;

We have read your 9/16/24 letter in the above matter and the "Permit Information" that was posted to the project website. These comments are submitted on behalf of Swan View Coalition and Friends of the Wild Swan.

Those documents unreasonably constrain the scope of the problem and proposal by not allowing consideration of "changes to the current allocation system." Page 3 of the Permit Information states:

Since 2021, river encounter monitoring indicates the Lower Middle Fork was approaching a threshold for encounters with other floating parties on the river, per standards established in the current river management plan. In response to these monitoring data, the authorized official did not approve all of permittees' requests for priority use pool service days from 2022-2024.

Tables 2 and 4 show clearly that service days on the Lower North Fork and Lower Middle Fork exceeded the permitted service days for all years presented (2015-2023), at times by as much as 275%. Table 2, however, simply lists the Available Priority Use Pool Service Days as "variable." (*Corrected 1/27/25 to read 275%, not 50%*).

Actual commercial use service days are obviously greatly exceeding the permitted service days in an arbitrary and capricious fashion not fully disclosed to the public. The number of permitted service days and the size of the priority use pool service days is most certainly at the top of the public mind and must be included within the scope of this project.

Instead, you are trying to ignore the problems at hand and limit the scope of the project in order to then authorize another round of permits with a Categorical Exclusion. The increasing demand for river recreation and the demand for more priority use pool

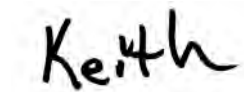
service days are precisely the type of “extraordinary circumstances” which preclude the use of a Categorical Exclusion, not to mention the impacts to threatened wildlife that include bull trout, grizzly bear, wolverine, and lynx.

Because you have yet to complete your new Comprehensive River Management Plan (CRMP), you have no attendant EA or EIS to which to tier this project analysis. We therefore ask that you prepare at least an EA for this permit renewal project and that, as a matter of applying conservative principles to the management of these precious resources, that you limit any renewed permits to the current permitted service days or fewer and do away with the priority use pool service days – at least until the new CRMP is completed.

It makes no sense to simply continue with business as usual, which is what this project proposes, in the face of rapid growth in both non-commercial public use and outfitted commercial use. Until you’ve set adequate maximum capacities for both types of use, you’ve no business permitting what largely amounts to unquantified and undisclosed levels of impact to the environment and recreating public.

Thank you for this opportunity to comment and please keep us posted.

Sincerely,

A handwritten signature in black ink that reads "Keith".

Keith J. Hammer and for
Chair
keith@swanview.org

Arlene Montgomery
Program Director
Friends of the Wild Swan
arlene@wildswan.org

Swan View Coalition

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February 25, 2026

Rob Davies – Ranger
Hungry Horse Ranger Station
PO Box 190340
Hungry Horse, MT 59919

Re: Comments on Draft CRMP and its associated Environmental Assessment
Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=56536>

Dear Ranger Davies;

Please accept these comments in the above matter into the public record. They are submitted on behalf of Swan View Coalition and Friends of the Wild Swan. We incorporate by reference further comments being submitted by Friends of the Wild Swan. We also incorporate by reference our 1/30/25 comments on the CRMP Proposed Action.

In short, the CRMP and EA are fatally flawed by assuming that User Capacity can be set at or above existing use levels on all stretches of these rivers, which assumes that no harm is currently being done to the Outstandingly Remarkable Values (ORVs) you are charged with protecting and enhancing under the Wild and Scenic Rivers Act. Moreover, the EA is fatally flawed by not considering a wide range of reasonable alternatives as required by the National Environmental Policy Act (NEPA) given the numerous “unresolved conflicts” inherent in management of these rivers. In fact, given the high degree of public controversy and disagreement about essential data and science, the preparation of an EIS is required.

We alerted you that river use levels in the 1980s were degrading ORVs in our 1/30/25 scoping letter, based on the experience of our members. We are not alone in finding that river use levels are most certainly degrading ORVs now and are already beyond sustainable user capacity. The 2/19/26 Flathead Beacon reports on your 2/17/26 public CRMP meeting:

Joe Basirico, a former commercial outfitter who’s been floating the Flathead River system since before the Wild and Scenic Act was written, said he’s concerned about the degree to which the conditions of the three forks have deteriorated in the past 20 years. Specifically, he said commercial use has reached unsustainable levels, and the plan doesn’t provide any consequential guardrails.

"My concerns are with the capacity numbers. I started one of the first two commercial river companies in Glacier Park the year before the Flathead was declared a Wild and Scenic River," Basirico said Feb. 17 during a public information meeting. "So when one talks about outstanding remarkable values I know what they are and they do not exist anymore, not anywhere near what they were back then."

... For Basirico, the user capacities on the Middle Fork, especially, are already too high; allowing for a 300% increase makes it "impossible to think that isn't degrading the outstanding remarkable values that we're talking about."

... "The new CRMP gives the commercial outfitters a 70% increase in their user days between Paola Creek and Blankenship," Mike Burr, a Columbia Falls resident and longtime river runner. "That's quite a bonus to the raft companies."

... "If we start to see a decline in conditions, we see more complaints, we start to have problems, we might have to institute some management actions," Davies said.

In other words, the public has been telling the agencies that use levels are already exceeding levels that would sustain ORVs, but the agencies aren't hearing it, let alone acting on it. Instead, the agencies assume they can increase existing use levels by 11-299% on every single stretch of these rivers! And they think they can increase commercially permitted service days by 71% overall and by up to 1259% on some Recreation segments! (See our attached Table 1). The whole CRMP process is based on a flawed assumption, after admitting that existing user and resource conflict data is essentially inadequate:

For the Three Forks of the Flathead River, the agencies have determined that current visitor use is not presently degrading any river values, but on many segments may be getting close.

Resource specialists estimated user capacities on the various reaches of the Three Forks by first estimating existing use and considering how much more use the stretch could absorb before the limiting attribute would be degraded.

(CRMP Appendix B, pages xix and iv, respectively). To make matters worse, the agencies invent a new limiting attribute, "freedom of access," to argue for increased river use - even though "freedom of access" is not an ORV, let alone an ORV that must be protected and enhanced under the Wild and Scenic Rivers Act! "Freedom of access" is then used to not look at an alternative in the EA that would set user capacity at current use levels:

The first alternative considered and dismissed was to set user capacity at current use levels rather than at the estimated user capacity proposed in this EA. This alternative was developed from scoping comments requesting use levels capped to protect/enhance recreation experience, as well as potentially reducing impacts to bull trout populations by users. This alternative was dismissed as setting capacity at current levels would likely have significant effects on freedom of

access, a critical component of the recreation outstandingly remarkable values "wide range of recreational opportunities."

(EA at 14). The phrases "freedom of access" and "wide range of recreational opportunities," however, appear nowhere in the agencies' January 2013 "Outstandingly Remarkable Values Assessment of the Flathead River System." Nor do they appear in the Wild and Scenic Rivers Act. It appears the agencies are making stuff up.

Another indication that the agencies are not listening to the non-commercial public is the fact that they increased commercially permitted service days by up to 72% on 6 of the 10 river segments as they revised their Proposed Action between January 2025 and February 2026! (See our attached Table 2). Simply put, our review of the CRMP and EA indicates the agencies have no intention of restoring ORVs to preexisting conditions nor of recognizing problems and correcting them before ORVs are further degraded.

What the agencies propose instead is to continue to deny any serious problems exist, to spend a bunch of time collecting more data, and then taking years to take any corrective actions should the facts finally pierce the agencies' denial. The CRMP is a plan to greatly increase human impacts to the rivers and not trim back user levels and service days where they are already excessive, regardless of the impacts to ORVs.

The CRMP totally kicks the can down the road by denying that current uses exceed user capacity. It unreasonably expects the public to believe the agencies will take corrective action in the future when it is unwilling to take such actions now, all the while demonstrating that the agencies will instead increase use levels under the banner of "freedom of access."

For example, capacities are much higher than the current use in some management units where the limiting attribute is the recreational experience. Under the proposed action in these areas, the desired condition emphasizes maintaining access to the river with a minimum amount of use restrictions rather than managing for low densities of use.

(CRMP Appendix B, page iii). And the public is supposed to believe that greatly increased user density will not harm the quality of the recreation experience, something the CRMP conflates with "range of recreation opportunities?"

The interdisciplinary team . . . determined that the Recreation ORV, the range of recreation opportunities, was the limiting attribute on all but one management unit . . .

(CRMP Appendix B, page v). One can clearly maintain a broad range of recreation opportunities without increasing user densities. In fact, increasing user densities greatly decreases opportunities to experience these rivers in less crowded conditions.

The CRMP is also a gift to commercial river outfitters at the expense of maintaining and restoring Outstandingly Remarkable Values. It is another unfortunate, typical bow to big business at the expense of the recreational experience itself, scenery, fish, and wildlife – the very ORVs the law is supposed to protect.

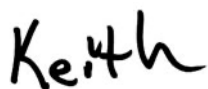
The NEPA, even as newly interpreted by the Trump administration, requires that an EA or EIS include a broad range of alternatives to the Proposed Action, including a No Action alternative against which to compare the impacts of the various alternatives, when there are “unresolved conflicts” about uses of resources. The CRMP and its draft EA clearly indicate that unresolved conflicts remain, yet the EA includes no alternatives to an apparently modified Proposed Action (see the attached Table 2), not even a No Action alternative. This violates NEPA.

Moreover, the CRMP and EA also show that substantial uncertainty and controversy exist regarding both existing data and how data will be collected in the future. Indeed, significant uncertainty is displayed in the CRMPs denial of current excessive impacts and its reliance on the “adaptive management” described therein, as though the agencies will be more responsive to future data than they are now. In the face of this significant uncertainty and controversy, the preparation of an EIS is required.

The breadth of some of this uncertainty and controversy could be better understood if the public were able to review the comments being submitted currently and the comments submitted on the PA during scoping. You continue, however, to keep the Public Reading Room for this project closed, as you did with the Granite Moccasin Project until after the close of the comment period. (See the attached screenshot of the Reading Room). We can understand this behavior as nothing short of an effort to hamper public understanding and informed public comments.

We ask that you open the Public Reading Room ASAP and prepare a draft EIS in this matter.

Sincerely,



Keith J. Hammer
Chair
Swan View Coalition
keith@swanview.org

and for

Arlene Montgomery
Program Director
Friends of the Wild Swan
arlene@wildswan.org

Attachments:

Table 1: Changes in Overall Use Days and Changes in Permitted Service Days

Table 2: Change in Total User Capacity; Scoping Proposed Action v. Draft CRMP

2/24/26 Screenshot show the CRMP Public Reading Room still closed/not active

Table 1: Changes in Overall Use Days (persons per day) and Changes in Permitted Service Days

Segment	Existing Use	User Capacity	Change	Existing Permit SD	Proposed Permit SD	Change
NF SCE MU1	235	310	32%	814	814	0%
NF SCE MU2	185	480	159%			
NF REC	160	360	125%	641	8712	1259%
MF WILD	55	150	173%	436	436	0%
MF REC MU1	95	105	11%	1031	1031	0%
MF REC MU2	947	1220	29%	63347	73810	17%
MF REC MU3	476	1900	299%	9688	45980	375%
SF WILD MU1	80	90	13%	557	557	0%
SF WILD MU2	15	30	100%	283	283	0%
SF REC	35	70	100%	354	354	0%
EDUCATIONAL*				0	150	
TOTAL	2283	4715	107%	77151	132127	71%

Sources:

Draft CRMP Existing Use and User Capacity taken from February CRMP EA, Table 3, page 9.

Draft CRMP Service Days taken from February 2026 draft CRMP, Table 10, pages 103-104.

* Proposed "additional Education and Special Groups outfitting and guide permit for no more than 150 user days." February 2026 draft CRMP, Table 10, page 103.

Source documents are available at <https://www.fs.usda.gov/r01/flathead/projects/56536>

Prepared by Keith Hammer on 2/18/26.

Table 2: Change in Total User Capacity (persons per day); Scoping Proposed Action v Draft CRMP

Segment	Scoping Capacity	DCRMP Capacity	% Change
NF SCE MU1	180	310	72%
NF SCE MU2	450	480	7%
NF REC	330	360	9%
MF WILD	170	150	-12%
MF REC MU1	100	105	5%
MF REC MU2	1100	1220	11%
MF REC MU3	1280	1900	48%
SF WILD MU1	90	90	0%
SF WILD MU2	30	30	0%
SF REC	70	70	0%
TOTAL	3800	4715	24%

Sources:

Scoping Capacity taken from 1/6/25 Proposed Action, Table 3, page 17.

Draft CRMP Capacity taken from February 2026 draft CRMP, Table 10, pages 103-104.

Source documents available at <https://www.fs.usda.gov/r01/flathead/projects/56536>

Prepared by Keith Hammer on 2/18/26.

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Flathead Comprehensive River Management Plan #56536

Preparation of a river management plan for the Flathead River Wild and Scenic River system

Sorry, the Project #56536 Public Reading Room is not active.

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