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March 11, 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:

Enclosed are comments from Wilderness Watch on the draft Environmental Assessment (EA) and draft Comprehensive River Management Plan (CRMP) for the Three Forks of the Flathead. Wilderness Watch is a nation-wide conservation group concerned about the proper administration and stewardship of the National Wilderness Preservation System. As such, our comments focus on the Wild segments in the Bob Marshall and Great Bear Wildernesses. We also refer you to our scoping comments and the comments submitted by Swan View Coalition and Friends of the Wild Swan.

Wilderness and the Limits of Acceptable Change

The EA does not have a section on Wilderness. This is a problem because the more restrictive of the two Acts, the Wild and Scenic Rivers Act or the Wilderness Act, applies to the sections in the Bob Marshall and Great Bear Wildernesses (CRMP page 36). In most instances, the more restrictive is the Wilderness Act. Wilderness seems to be an afterthought. Indeed, there is no mention or reference to the extant 1987 wilderness management plan (with updates) that used the LAC process. The LAC plan included extensive public involvement and buy-in, it developed indicators and standards for impacts along the rivers and management actions to address situations where the standards were exceeded or about to be exceeded. Yet it doesn't appear that the existing wilderness plan was consulted at all when developing the river plan.

This wilderness management plan set limits which have not been followed in the Wilderness, as tacitly admitted in the EA (page 31) and CRMP (pages 37 and 54). More specifically the growth in pack raft use on the South Fork seems to have increased angling pressure on bull trout in the area and high levels of use on the Middle Fork (150 people at one time floating, see also CRMP at 114 for daily encounters) are having an impact on the Wilderness, which includes several landings a day at Schafer. The CRMP anticipates improving facilities at Schafer (page 105) and placing a sign on the South Fork (page 100), ostensibly for user safety, which is indicative of the increase in use on the South Fork.

Further, the EA and Plan admit there is not a lot of information about Wilderness. It would appear that required monitoring in the wilderness management plan has not been taking place in recent years. There is no question use has greatly increased on both the Middle Fork and the South Fork, in part due to technologies that permit ultralight packable rafts and in part due to increases in use on the Wild section of the Middle Fork by both outfitted and non-outfitted users since designation as WSR in 1968 and Wilderness in 1978.

Impacts on Fish and Wildlife and Other Recreationists

The CRMP admits, “[f]urther declines in bull trout populations in all three forks are expected due to angling pressure, climate change, and non-native species. Since designation of the WSR system, bull trout populations have declined dramatically” (CRMP at 54). Rather than taking management action, MDFWP waited until 2025 to implement emergency changes in angling (EA at 25). The Forest Service has not taken management action on recreation use. Rather, it kicks the can down the road by stating user capacities are not mandated (EA at 8). In addition, the agencies want to speculate and blame a natural part of the environment, beaver dams, for contributing to the decline in bull trout (EA at 20–21) rather than the managed extinction paradigm (inaction) of the two agencies.

When it comes to other species, the CRMP and EA are largely silent. The agencies don't want to act on the increasing use in Wilderness on the Middle and South Forks even though there are reams of research that show impacts to wildlife (including aquatic) by recreation use. Kicking the can down the road as is proposed on page 11 of the EA with unlimited permits is not management. Rather, it is abdication in a finite world.

One good part of the plan is to prohibit drone use over the river sections in Wilderness and those that border Glacier National Park. Drones have been known to harass wildlife. They certainly can disturb the user experiences of other recreationists. However, this is tempered by the fact drones cannot be legally launched or landed in Wilderness or Glacier National Park anyway.

We suggest that the Forest Service reduce impacts by implementing actual limits on use within the Middle and South Forks Wild segments. This would include packrafts as well as full-sized rafts, kayaks, and other watercraft. It is also clear the current levels of use are excessive and any limits should reduce those impacts. The 1987 Wilderness Plan and the 1980 version of the Wild and Scenic Rivers Plan have been in place long enough for the agencies to have solid recommendations for management action in terms of use limits and carrying capacity, considering the needs of wildlife, fish, vegetation, and other recreationists. The fact very little of substance is in the CRMP and EA is an indictment of agency inaction and failure to monitor what is happening.

NEPA

A major failing of the EA and CRMP is the lack of any alternatives. NEPA requires alternatives, even under the current regime in Washington DC. Alternatives that reduced use, complied with the wilderness management plan, and emphasized self-guided recreation should have been analyzed at the very least to compare with the proposed action.

Please keep Wilderness Watch updated on this plan.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Mh' followed by a long horizontal flourish.

Mason Parker, Wilderness Defense Director
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