



July 13, 2026

To: Flathead National Forest

Hungry Horse Ranger Station
Rob Davies, District Ranger
P.O. Box 190340
Hungry Horse, MT 59919

From: Lead Objector(s)

Sam Roloff
President

Bob Jordan
President Emeritus

Flathead Rivers Alliance
PO Box 1906
Whitefish, MT 59937

Re: Flathead Rivers Alliance Objection to the Three Forks of the Flathead Wild and Scenic River Comprehensive River Management Plan

Dear District Ranger Davies,

Flathead Rivers Alliance formally objects to the Decision Notice and Finding of No Significant Impact (FONSI), the Environmental Assessment (EA), and the Three Forks of the Flathead Wild and Scenic River Joint Comprehensive River Management Plan (CRMP) dated May 2026. We do so following the regulations under subparts A and B of 36 CFR Part 218 within the 45-day objection period ending July 13, 2026.

About Flathead Rivers Alliance

Flathead Rivers Alliance (FRA) is a nonprofit organization dedicated to protecting the Three Forks of the Flathead River through proactive stewardship and cooperative conservation. We work to protect clean water, healthy fisheries, and meaningful public access across the 219-mile Wild and Scenic River corridor while fostering a culture of shared responsibility for the protection of the resource.

Our board, staff, and advisors include former agency resource managers, active and retired outfitters and guides, river conservation advocates, educators, and community members with more than a century of combined experience on the Flathead Wild and Scenic River system. Our primary objective is to advocate for management that protects and enhances the rivers and their outstandingly remarkable values (ORV's) while ensuring the long-term health of these systems for future generations.

Summary

The following is a summary of the sections of this document.

- I. Statement of the issues and parts of the CRMP to which this objection applies.
 - II. Detailed description of the objection and suggestions on how the CRMP may be improved to remedy the objection.
 - III. Statement that demonstrates the link between prior substantive formal comments attributed to the objector and the content of the objection.
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- I. Statement of the issues and parts of the CRMP to which this objection applies:

The parts of the FONSI, EA, and CRMP to which this objection applies include, but are not limited to, the following:

- Draft Joint Comprehensive River Management Plan, Feb 2026
 - CRMP Environmental Assessment, May 2026
 - User Capacity Analysis found in Appendix B of the CRMP.
 - Comment Response found in Appendix E of the CRMP.
 - Recreation Specialist Analysis accompanying the CRMP dated January 9, 2026
 - Chapters on Ongoing Management Actions (pg. 80), Proposed Management Actions (pg. 91), Future Management Actions (pg. 99), and Monitoring and Adaptive Management Strategy (pg. 100) within the CRMP
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- II. Detailed description of the objection and suggestions on how the CRMP may be improved to remedy the objection:

Forest Service User Capacities and Monitoring

FRA supports maintaining freedom of access on the Three Forks and appreciates the agency's dedication to providing diverse recreational experiences. Our concern is that the proposed user capacities authorize levels of growth that are inconsistent with the Wild and Scenic Rivers Act's mandate to protect and enhance the rivers' unique characters and outstandingly remarkable values (ORVs).

Except for Middle Fork Recreational MU1, every river segment is constrained by recreational capacity (CRMP, Table 6). By rejecting both the No Action Alternative and the alternative to maintain current capacity levels, the proposed CRMP plans for substantial increases in recreation throughout the Three Forks. Despite this, the Environmental Assessment documents at current usage levels impacts to several critical management areas and ORV's- fisheries, recreation, water quality, scenic values, wildlife and botany. Expanding use before these issues are adequately addressed is inconsistent with the Act's protection and enhancement mandate.

The agency states that fisheries value is the only ORV with clearly documented declines directly attributable to measurable factors and that these declines cannot be attributed to recreational use (Appendix E, p. xxv). While climate-related changes remain the principal driver, the EA also acknowledges that increased angling pressure adversely affects federally listed bull trout and then projects that proposed capacities could increase angler

use by as much as 200 percent in some river segments (EA, pp. 32, 35). Although Montana Fish, Wildlife & Parks regulates fishing, increased float use directly increases fishing pressure and associated catch-and-release mortality.

The EA also documents degradation affecting other ORVs. BMP monitoring identifies degraded conditions at Blankenship, Great Northern Flats, and the Border river accesses, impacting water quality, recreation, and scenic values while contributing to erosion, weed invasion, and wildlife attractants. Wilderness monitoring documents deteriorated campsite conditions in the South Fork and upper Middle Fork. The EA further identifies increasing recreation as a threat to botanical communities, notes changes to scenic values from adjacent development, and documents wildlife displacement and altered viewing opportunities resulting from recreation. Collectively, these findings demonstrate that several ORVs are already under stress.

Because recreational use is expected to continue increasing, the CRMP must establish a monitoring program capable of detecting changes early and establishing timely adaptive management. Flathead Rivers Alliance supports the proposed free, unlimited permit system as an important tool for collecting use data and expanding public education. However, proposed implementation is delayed for two to three years, and management action is generally deferred until thresholds are exceeded during a prescribed percentage of days in three out of five years (CRMP, Table 12). In addition, user capacities, monitoring protocols, and historic data rely on different measures—including users, parties, and watercraft—making consistent evaluation more difficult.

The proposed monitoring framework also depends heavily on field staffing sufficient to collect statistically meaningful data. Recent experience demonstrates that staffing levels can vary considerably from year to year. Flathead Rivers Alliance helps address these gaps through volunteer monitoring, stewardship programs, and River Conservation Fellows, but our organization cannot independently provide the level of monitoring needed to support adaptive management across the Three Forks.

For these reasons, we recommend the following changes to the CRMP:

1. Implement the free, unlimited permit system beginning in 2027 on priority segments—South Fork Wild, Middle Fork Wild, Middle Fork Recreational MUI, and North Fork Scenic MUI—and expand it to the remainder of the corridor over the ensuing two to three years.

A self-issued permit completed at the river access should record the number of individuals in each party, number and type of watercraft, trip duration, anticipated fishing activity, and intended launch and take-out locations. Similar systems are successfully used on peer Wild and Scenic Rivers and provide valuable information for visitor use management while introducing users to the permit program.

Montana Fish, Wildlife & Parks' bull trout catch cards on the South Fork already set the precedent for this type of permit on the Three Forks. Beginning permit data collection sooner will improve understanding of visitor use patterns and support informed management decisions as recreation continues to grow. Flathead Rivers Alliance has worked with partner agencies and river

organizations to evaluate similar systems and is prepared to assist with data collection, education, and program implementation.

A permit system also provides an effective platform for communicating Leave No Trace principles, river regulations, and other resource protection information. FRA's existing river-specific educational materials provide a strong foundation, but an agency-issued permit would ensure that all users receive consistent stewardship messaging before entering the river corridor.

2. Initiate adaptive management strategies after one documented season exceeding capacity thresholds, or after two of three seasons, rather than the proposed three of five.

The proposed requirement that triggers or thresholds be exceeded during a prescribed percentage of days in three out of five years delays management action until after resource conditions may have substantially declined (CRMP, Table 12). The Interagency Visitor Use Management Council emphasizes that indicators should provide *timely* information so that management actions can occur before desired conditions are lost (Visitor Use Management Framework, 2016).

Recent recreation surges during the COVID-19 period and following implementation of Glacier National Park's vehicle reservation system demonstrate that short-term increases in use can have lasting management consequences. Incorporating triggers based on directly measured visitor use—including permit data, automated counters, and field observations—would further improve the effectiveness and timeliness of management responses.

3. Align user capacity standards with monitoring methods.

The CRMP currently measures recreation using different metrics—including users, watercraft, and parties—depending on the river segment. While the Forest explains these differences are based on historical data and user characteristics, the proposed permit system provides an opportunity to establish a consistent and transparent monitoring framework.

Monitoring data should be collected and reported using the same metric that defines capacity for each management unit. This consistency will improve public understanding, simplify implementation, and strengthen confidence in future management decisions. If historical monitoring methods are retained, the CRMP should clearly describe how differing metrics will be applied and reconciled under a consistent management standard.

4. Reduce the proposed capacities for North Fork Scenic MU2, Middle Fork Wild, and Middle Fork Recreation MU3. These recommendations are not a reaction to increased recreation but targeted adjustments that better align user capacities with the CRMP's desired conditions and the Wild and Scenic Rivers Act's requirement to protect and enhance Outstandingly Remarkable Values.

- a. North Fork Scenic MU2

The CRMP proposes a capacity of 480 users for North Fork Scenic MU2, compared with 360 users for North Fork Recreational. The Recreation Specialist Analysis identifies Scenic MU2 as providing greater opportunities for solitude and serving as a transition between Scenic MU1 and the more developed Recreational segment.

Although the capacity analysis relies on historical use data, it does not fully account for access limitations, linked visitor use between management units, or the desired character of the segment. Unlike North Fork Recreational, which benefits from multiple dispersed access points, Scenic MU2 relies on only two primary access sites. Land-based recreation on Scenic MU2 is also concentrated by developments and attractions in the Polebridge area. As visitation increases, MU2 access sites are likely to concentrate use, increase encounters, and create conflicts among floaters and other recreationists.

Because many visitors continue downstream from Scenic MU2 into the Recreational segment while others pass through from Scenic MU1, capacities on these management units are functionally interconnected. Reducing the capacity of Scenic MU2 below that of North Fork Recreational would better preserve its intended role as a transition zone, reduce congestion, and better protect Outstandingly Remarkable Values throughout the North Fork corridor.

b. Middle Fork Wild

The capacity proposed for Middle Fork Wild is 150 individuals, or approximately 5.5 individuals per mile. This estimate assumes that every group recreating on this section may reach the maximum permissible group size of 15 and that all groups will operate on the same three-night itinerary, camping in the same areas. Repeated access by large groups staying in the same campsites will worsen existing user impacts such as large fire rings and human waste. This estimate also does not factor in parties accessing the corridor from Granite Creek, Morrison Creek, or the headwaters of the Middle Fork. User conflicts over campsites already occur at existing use levels by groups on differing itineraries or entering the corridor at different locations.

This segment's access barriers, wilderness designation, and intended character make it very comparable with South Fork Wild MU1 and MU2. However, the South Fork has more outfitted usage and a more diverse recreational community, leading to more frequent usage than Middle Fork Wild, which contains the least visited area of the Great Bear Wilderness (Appendix E, pg IX). User capacity documentation sets a target of 2-3 individuals per river mile on the South Fork Wild segments. Given the similarities between these river segments, this standard should be applied in capacity considerations for Middle Fork Wild as well, restricting capacity below the proposed 150 individuals.

c. Middle Fork Recreational MU3

This segment has the largest proposed increase in user capacity above current estimated use, at an estimated 300% growth even after a slight reduction following the public comment period (EA, May 2026, Table 4). At current levels, parking and launch/takeout facilities are enormously strained, even with parking currently permitted on gravel bars at West Glacier and Blankenship. User experiences are already impacted by space limitations, crowding and pileups of groups, and excessive noise complaints. Due to this section's proximity to town, very large groups are also quite common. Given the limited number of access locations in this highly populated stretch of river, wait times for loading/unloading and river access would appear to be better indicators of overuse than parties encountered while floating.

Increasing recreational capacity this significantly on this segment prior to performing infrastructure improvements and West Glacier, Blankenship, or House of Mystery, all of which have been problem areas for managing launches, parking, erosion, and trash or human waste does not support the needs of the river as a resource. Authorizing this level of use on what is already one of the most heavily visited sections of the Three Forks will lead to degradation of the resource and significant diminishing of the user experience in this area.

5. Require all users recreating within the Wild and Scenic River corridor to pack out human waste. This practice protects the river's Outstandingly Remarkable Values by improving recreational and scenic conditions, reducing wildlife attractants, and helping safeguard water quality. Applying a consistent human waste pack out requirement throughout the ¼-mile Wild and Scenic River corridor will simplify public education, compliance, and enforcement. Flathead Rivers Alliance looks forward to partnering with the Forest Service and other nonprofit organizations to educate users about this requirement. Through previous grant-funded WAG bag distribution and Leave No Trace education, FRA has developed outreach tools that can help support successful implementation.
6. Require both an elevated metal fire pan and a fire blanket for all campfires within the Wild and Scenic River corridor, except at developed campsites with permanent metal fire rings. Appropriate exemptions should be provided for users who do not build campfires and for small-craft users, such as packrafters and kayakers, where appropriate. This recommendation reflects Leave No Trace best practices already required on many peer Wild and Scenic Rivers and would establish a single, consistent standard across all three forks of the Flathead. Consistent regulations will simplify public education, improve compliance, and reduce enforcement challenges.

As currently written, fire regulations differ among the Three Forks and, in some locations, require only a fire pan or a fire blanket. Neither measure alone adequately protects the resource. A fire pan does not fully contain embers or prevent ash from contacting the ground, while a fire blanket alone provides

insufficient insulation from heat. Requiring both provides substantially greater protection for soils, vegetation, and surrounding resources while reducing the risk of human-caused wildfire. A uniform standard will also make it easier for the Forest Service and its education partners to communicate new regulations clearly and consistently across the entire Wild and Scenic River corridor.

III. Link Between Prior Substantive Comments and This Objection

On March 12, 2026, Flathead Rivers Alliance submitted substantive comments on the proposed CRMP. Those comments addressed implementation of the proposed free, unlimited permit system, human waste pack out requirements, fire pan and fire blanket standards, proposed infrastructure improvements, user capacity determinations, and the monitoring and adaptive management framework.

We also recommended more conservative user capacities, greater consistency between capacity standards and monitoring methods, stronger recognition of conservation easements and educational partnerships, and additional protections for Outstandingly Remarkable Values, particularly recreation and fisheries. The objections presented herein are based directly upon and are consistent with those previously submitted substantive comments.

Flathead Rivers Alliance appreciates the opportunity to participate in this process and looks forward to working with the Reviewing Officer and the managing agencies to develop a Comprehensive River Management Plan that fulfills the Wild and Scenic Rivers Act's mandate to protect and enhance the Outstandingly Remarkable Values of the Three Forks of the Flathead River.

Sincerely,



Sam Roloff
President



Bob Jordan
President Emeritus

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