



July 13, 2026

To: Objections Review Officer
 Flathead National Forest
 ATTN: CRMP Project
 650 Wolfpack Way
 Kalispell, MT 59901

Re: Three Forks of the Flathead Wild & Scenic River Joint Comprehensive River
 Management Plan, Objection

Submitted electronically via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=292351>

Dear Reviewing Officer and Anthony Botello, Responsible Official:

The Glacier-Two Medicine Alliance (GTMA) and National Parks Conservation Association (NPCA) formally object 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), along with appendices and supporting documents, dated May 2026. We do so pursuant to the regulations under subparts A and B of 36 CFR Part 218, and within the 45-day objection period ending July 13, 2026.

I. Description of Objecting Parties

Glacier-Two Medicine Alliance (GTMA) is dedicated to the protection and stewardship of the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in the Crown of the Continent Ecosystem, including the forks of the Flathead Wild and Scenic River system affected by this proposal. GTMA and our nearly 2,000 members and supporters have a long history of involvement in the management of the Flathead National Forest (FNF), many of whom enjoy recreational use of the Flathead River wild and scenic river system. GTMA is based in East Glacier Park, Montana on the lands of the Blackfeet Nation.

The NPCA was formed in 1919 to protect and enhance America's national parks system. Our 1.9 million members and supporters nationwide are dedicated to the long-term protection of our crown jewel parks like Glacier National Park (GNP). The future management of the Flathead River system, particularly the North and Middle Forks that bound Glacier National Park, are of huge significance to our members and we believe that management direction should be protective of resources and have future generations in mind.

GTMA participated in every step of the planning process for the CRMP since it was re-launched in 2025. On February 7, 2025, we submitted written comments on the Proposed Action. On March 13, 2026, we submitted written comments jointly with the NPCA on the draft Plan and Environmental Assessment. GTMA staff, board members, and members also attended public informational meetings held at Flathead Valley Community College in January 2025 and February 2026. GTMA discussed every issue raised in our objections below in our comment letters.

NPCA has been involved with the CRMP since the forest started hosting issue workshops back in 2019. We have attended almost every public meeting, planning session, and open house and have submitted written comments at every opportunity: on Scoping back in September 2019, on the Proposed Action in February 2025 and jointly on the March 13, 2026 draft Plan and Environmental Assessment with GTMA. NPCA discussed every issue raised in our objections below in our comment letters.

Pursuant to 36 CFR 218.8(d), the lead objector for GTMA and NPCA, along with his contact information, is as follows:

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Glacier-Two Medicine Alliance
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Additional staff from GTMA and NPCA may be present depending on their availability and timing of the objection meeting requested. Staff who may be present include, but are not limited to:

Sarah Lundstrum
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II. Statement of the issues and parts of the CRMP to which this objection applies

Glacier-Two Medicine Alliance and National Parks Conservation Associations objections pertain to the FONSI, EA, CRMP and supporting documents. Our issues of concern include, but are not limited to:

- **Objection 01:** The CRMP fails to include mechanisms to limit the total number of watercraft per party, especially on the Wild or Scenic segments of the North Fork and Middle Fork rivers where solitude is both desired by river users and is a foundational Outstandingly Remarkable Value in the original designating language.
- **Objection 02:** The CRMP establishes inconsistent management directions for managing solid human waste across the three forks of the Flathead river and land management jurisdictions; the regulations proposed are insufficient to protect water quality and human health.
- **Objection 03:** Party size limits for dispersed camping permits are inconsistent between the USFS and GNP for the North Fork (MU1, MU2 & MU3).
- **Objection 04:** The Forest Service inexplicably dropped the management action in the Proposed Action to prohibit domestic dogs, both on river and on shore, between Bear Creek and Essex, which will allow avoidable conflicts, harm or other adverse impacts to mountain goat family groups to occur.
- **Objection 05:** The CRMP fails to take necessary proactive measures to protect federally threatened bull trout and their spawning redds from disturbance or damage by floaters or wade anglers.
- **Objection 06:** As written, the CRMP does not appear to include a clear, consistent Food Storage Orders across the entire Wild and Scenic River Corridor.
- **Objection 07:** Noise limit regulations proposed for the WSR river corridor are inconsistent between lands administered by the USFS and GNP.
- **Objection 08:** The number of user days provided via Temporary Use Permit to entities who provide services to underserved communities or education-based programming is far too limited, which hinders beneficial access and experience to many segments of the population seeking a connection to wild public spaces.
- **Objection 09:** The monitoring plan, as the basis for adaptive management of the Flathead River through the CRMP, is inadequate to protect Wildlife ORVs and other ORVs from increasing recreational use or other sources of derogation..
- **Objection 10:** The Outstandingly Remarkable Values Assessment is currently inaccurate; and the Flathead National Forest lacks the ability, under the current monitoring plan, to detect and respond to significant degradation of the Outstandingly Remarkable Values identified in the original Wild and Scenic River designation.

III. Detailed description of the objection and suggestions on how the CRMP may be improved to remedy the objection.

Objection 01: *The CRMP fails to include mechanisms to limit the total number of watercraft per party, especially on the Wild or Scenic segments of the North Fork and Middle Fork rivers where solitude is both desired by river users and is a foundational Outstandingly Remarkable Value in the original designating language.*

As we wrote in our comments in February 2025, and March 2026, the plan should include mechanisms by which to limit the total number of watercraft per party as the number of water craft per party, more than the number of people or parties, is a key indicator of recreational solitude (for both shore and on-water parties). Long-trains of craft take longer to pass, which leads to the impression of crowdedness, as well as longer-wait times for anglers to return to undisturbed water. Long trains of watercraft can also generate more noise as individuals communicate across greater distances and more disturbance to shoreline vegetation as a greater landing area may be created. Greater numbers of watercraft in a party are more likely to cause disturbance to fish and wildlife due to greater probability of crossing an animal's vigilance or flight distance thresholds, as well as longer-periods of time when a watercraft is visible, potentially delaying return to the shoreline. We are concerned that the proliferation of individual watercraft is already causing long trains of boats, likely contributing to degradation of the Recreation, Fisheries, and Wildlife Outstandingly Remarkable Values (ORVs).

Requested Remedy: The Forest Service should add a monitoring plan component that tracks the number and type of craft *per party*, as well as the average time for a party to pass the monitoring point. Triggers, thresholds, and potential management actions should then be designed to adaptively limit the proliferation of long-trains of individual watercraft, especially in MF Wild, and NF Scenic.

Objection 02: *The CRMP establishes inconsistent management directions for managing solid human waste across the three forks of the Flathead river and land management jurisdictions; the regulations proposed are insufficient to protect water quality and human health.*

The CRMP management direction for solid human waste is inconsistent, both between managing agencies and between forks of the Flathead River. The Forest Service existing regulations for the North Fork and Middle Fork, both of which would continue, requires that “solid human waste must be self-contained and packed out to an approved disposal site” (Appendix C - iii). However, apparently a river user would still be allowed to dig a cathole on the Glacier National Park side of the North and Middle Fork. Glacier National Park’s proposed management action would “increases the distance human waste is to be buried from the river edge from 100 feet (36 CFR) to 200 feet” (CRMP, p. 95).

Similarly, the Forest Service regulations across the three forks of the river system are inconsistent. Unlike the North Fork and Middle Fork, the new regulation for the South Fork requires “solid human waste containment within 200 feet of the high-water mark” (CRMP, p. 94). As written, it is not clear if the waste must be packed out on the South Fork, or simply contained.

The different regulations between the agencies and between river segments creates unnecessary confusion for users of the river corridor. This will reduce compliance and, by allowing human waste burial to continue on Glacier National Park lands, contribute to declining water quality. Waste packout protects wildlife, recreation, scenic values, and water quality ORVs. Human waste left at camps along all three forks of the Flathead River diminishes the recreational and scenic experience for visitors, attracts wildlife to areas of concentrated human use, and, if unmanaged, can degrade water quality. Requiring all parties to pack out solid human waste also promotes consistency, which is essential for public understanding and compliance. Packout requirements for solid human waste are already a non-controversial, standard practice on Wild and Scenic Rivers throughout the United States, both within and outside designated Wilderness.

Requested Remedy: Create a single directive that applies to *all* users, including floaters, anglers, hikers, stock users and others, both day and overnight excursions, of all three Wild and Scenic-designated river corridor, across both Forest Service and Park Service managed lands. We suggest:

“Within the Wild and Scenic River corridor, all solid human waste must be self-contained and packed out to an approved disposal site from all locations without toilet facilities. This directive applies to all users of the corridor.”

Objection 03: *Party size limits for dispersed camping permits are inconsistent between the USFS and GNP for the North Fork (MU1, MU2 & MU3).*

On p. 95 of the CRMP (Appendix A), GNP says it will increase undesignated (i.e. dispersed) camping party sizes from 12 to 15 to be consistent with FNF regulations. This is inaccurate. FNF regulations stipulate that party sizes in the North Fork Scenic section of the Wild and Scenic Corridor are capped at 20 on the river, and 50 on shore (CRMP, p. 92). As with all management plans, consistency is easier for the public to understand and would improve compliance.

Requested Remedy: Set the *dispersed* camping party size for the entire NF corridor (MU1, MU2 and MU3) at GNP’s more conservative limit of 15. Shore party size could continue to be 50 at developed recreation / river access sites in the NF Wild & Scenic Corridor (i.e. Wurtz, Sondreson, Ford, Coal Creek, Big Creek, Great Northern Flats, Glacier Rim), unless otherwise posted.

Objection 04: *The Forest Service inexplicably dropped the management action in the Proposed Action to prohibit domestic dogs, both on river and on shore, between Bear Creek and Essex, which will allow avoidable conflicts, harm or other adverse impacts to mountain goat family groups to occur.*

Wildlife managers are well aware of the fact that domestic dogs are causing a problem for mountain goats between Bear Creek and Essex, based on multiple records by agency biologists of dogs chasing mountain goats on this stretch of the river (see EA, p. 49 - 50). This finding, combined with a steep decline in mountain goat populations in Glacier National Park over the last 12 years (>30% decline; Graves et al., 2026¹) originally led to a proposed ban on dogs between Bear Creek and Essex as an appropriate management action in the Jan 2025 Proposed Action, a ban we supported. However, the FONSI and CRMP inexplicably lifted the ban and made it an adaptive management action that could be applied in light of future conflicts. No explanation was provided for the change, which is clearly arbitrary and capricious.

Requested Remedy: The Forest Service and GNP should add back the regulation suggested in the Proposed Action prohibiting domestic dogs, both on river and on shore, between Bear Creek and Essex immediately, rather than waiting until more conflicts and adverse impacts on mountain goat family groups to occur. Alternatively, the regulation could be a seasonal restriction prohibiting dogs during the time of the year when goats are present (typically May to July, per EA p. 49).

Objection 05: *The CRMP fails to take necessary proactive measures to protect federally threatened bull trout and their spawning redds from disturbance or damage by floaters or wade anglers.*

As currently written, the CRMP provides a framework for documenting the continued decline of bull trout rather than advancing the federally-mandated recovery of this threatened species. The CRMP makes no attempt to restrict the most harmful activity - intentional or unintentional fishing - beyond what Montana FWP allows. While we believe the Forest Service has legal obligations and mandates to take additional actions to limit mortality and proactively recover the species, not simply defer to the state, such discussion is beyond the scope of this objection. Regardless, the Forest Service does have the ability to limit disturbance or damage to spawning redds caused by floaters and wade anglers. In our comment letters, we suggested the Forest Service establish restrictions on floating through known spawning areas. This could include no stopping, limiting craft numbers to limit disturbance, or prohibiting wade fishing, or some combination. Protective measures—particularly during periods of low flows and elevated water temperatures, when bull trout are most vulnerable—are essential to conserving a species that is already in decline.

Because bull trout are federally listed under the Endangered Species Act, the Flathead National Forest is required to consult with the U.S. Fish and Wildlife Service on any proposed action that may adversely affect the species or its designated critical habitat. Failing to implement reasonable protections for spawning adults and redds raises serious concerns under that obligation. The seasonal restrictions on launches and watercraft implemented on the Middle Fork Salmon River over the past decade to protect spawning Chinook salmon provide a proven management model and could serve as a starting point for developing comparable seasonal protections for bull trout on the Flathead River.

¹ Graves, T. A., Janousek, W. M., Yarnall, M. J., & Belt, J. (2026). Mountain goat declines in a protected, interior, native population. *Ecosphere*, 17(1), e70465. <https://doi.org/10.1002/ecs2.70465>

Requested Remedy: We recommend adaptive float closures - such as restrictions on the number of parties, number of craft, stopping or wade angling - during bull trout spawning season in known spawning reaches.

Objection 06: *As written, the CRMP does not appear to include a clear, consistent Food Storage Orders across the entire Wild and Scenic River Corridor.*

River corridors across the inter-mountain West provide critically important habitat and connectivity for wildlife species, including grizzly and black bears. Ensuring that food and garbage are properly secured on river corridors reduces wildlife conflicts, deters bears and other wildlife from becoming food conditioned, and significantly improves visitor safety. The CRMP does not appear to contain a consistent food storage order to keep wildlife, especially grizzly and black bears, away from human food. The lack of clarity and consistency across all three forks, as well as between the FNF and GNP lands will lead to confusion, lower rates of compliance, and avoidable conflicts that could cause human or bear injury or death.

Requested Remedy: Provide clear, corridor-wide and Flathead wild and scenic river system-wide management direction requiring appropriate bear-resistant food storage or portable electric bear fencing on all river segments, with the same direction applying to both national forest and national park system lands.

Objection 07: *Noise limit regulations proposed for the WSR river corridor are inconsistent between lands administered by the USFS and GNP.*

GTMA and NPCA strongly support the limit on noise to 60 decibels, except in emergencies, to protect wildlife and recreational experience. To improve the efficacy and compliance, this regulation should be consistent across National Forest and National Park Service lands in the corridor. That is, the management direction currently applies *only* to USFS lands, and *not* to GNP lands, where a far less intuitive “unreasonable” standard would continue to exist (see Appendix C - ii). Thus the current proposed management is inconsistent and confusing.

Requested Remedy: A single noise level limit of 60 decibels at 50 feet should apply on all USFS and NPS managed lands within the Wild and Scenic river corridor along the North Fork (MU1, MU2 & MU3), the Middle Fork (MF Wild, MU1 & MU2) upstream of Blankenship bridge, and South Fork Wild.

Objection 08: *The number of user days provided via Temporary Use Permit to entities who provide services to underserved communities or education-based programming is far too limited, which hinders beneficial access and experience to many segments of the population seeking a connection to wild public spaces.*

The CRMP proposes authorizing one temporary education and outfitting and guiding permit per recreational and scenic segment of the river, plus MF Wild (8 total permits) for providers who serve youth, veterans, or other underserved communities or education-based programming; each permit would be limited to a maximum of 50 user days. GTMA and NPCA strongly support efforts by the USFS and others to increase

opportunity for traditionally underrepresented groups or other underserved communities; this proposed action is far too meek. In fact it's laughable. The Forest Service is proposing a total of 400 user days for these communities or education-based programming. Compare this to just to Middle Fork MU2, which allocates 73,810 user days to four commercial outfitters. The 50 temporary special use days for this section is less than 1/1000th of the days dedicated to commercial outfitters. The Forest Service can and must do better.

On p. xxix in the response to comments (Appendix E), the Forest Service claims that they rarely had to turn away applicants for similar, existing temporary permits. We wonder if that truly reflects a lack of demand or perhaps a lack of awareness that such permits exist. Regardless, we hope that opportunities that serve underrepresented communities, including but not limited to Indigenous communities, youth, and veterans, will continue to grow, and encourage the Forest Service to not only actively facilitate greater recreation participation by these communities (i.e. marketing, partnerships, etc.), but to also prepare for it, by creating more opportunities for providers who service these communities to secure temporary special use permits by establishing opportunity to adaptively adjust the number Temporary Use Permits and user days.

Requested Remedy: If demand for Temporary Use Permits (TUP) (either any individual permit or the user days on any of the 8 permits) is exceeded in 2 out of 3 years for any segment of the river, re-allocate a portion of user days from the commercial priority use pool to allow to the Temporary Use Permit pool to meet the increased demand.

Objection 09: *The monitoring plan, as the basis for adaptive management of the Flathead River through the CRMP, is inadequate to protect Wildlife ORVs and other ORVs from increasing recreational use or other sources of derogation.*

As CRMP Specialist reports and the EA indicate, wildlife are susceptible to disturbance. We have significant concerns that skyrocketing recreational use may already be displacing wildlife from the WSR corridor, or could in the future; but without data, managers cannot assess whether recreational use is affecting wildlife use and connectivity. While some of the management actions identified - such as noise limits and bans on overnight camping on gravel bars and drones - should reduce disturbance, it's unknown if these actions alone will be sufficient; nor is any monitoring established to link these actions to changes in wildlife presence or movement in the river corridor. Additionally, most aspects of the monitoring program are tied to recreation rather than fisheries or wildlife ORVs, which include numerous threatened, endangered, or sensitive species.

Similarly, the EA and other documents associated with the CRMP detail human impacts causing declines in several other ORV areas. Best Management Practices monitoring notes poor, degraded conditions at Blankenship, Great Northern Flats, and the Border (EA, Table 5), harming water quality, recreational experiences, and scenic value at these sites while creating the erosion and human impacts that serve as precursors to noxious weed invasions and wildlife attractants. While certain CRMP wildlife reports (Q-001) point to additional monitoring needed or that occurs for sensitive wildlife species, e.g., harlequin duck monitoring (Q-011), none of the monitoring referenced captures recreation-caused disturbance except for conflicts with grizzly bears. In another instance, the plan identifies monitoring of large mammals by MT FWP that is apparently supposed

to help understand the wildlife ORV (Q-016). However, the monitoring identified doesn't even occur in the WSR corridor! (It's all west of the Flathead Valley.) With few exceptions, the monitoring plan is almost entirely focused on monitoring impacts to other users (river or shore), rather than status and trends of all ORVs. In particular, a robust, timely, and well-integrated data collection/ monitoring program is needed to create avenues to help managers rapidly adapt practices to address resource degradations associated with increasing recreational use.

Requested Remedy: Develop adaptive management actions under a more stringent standard for triggers and thresholds, that monitor the status of all ORVs across all segments of the Flathead Wild and Scenic river system. To start, at the very least, USFS / NPS / FWP (with assistance from partners like FRA, Flathead Audubon, etc.), should monitor for wildlife presence across the system, starting with all Species of Conservation Concern identified by the Regional Forester for the Flathead National Forest Plan. This could become a routine part of river and trail ranger patrols, with additional data collected through Citizen Science programs, e.g. Flathead Rivers Alliance, Glacier National Park, iNaturalist / MT Natural History Program. Combined, this information would allow management agencies to track trends over time, which could be correlated with user numbers and other data to estimate potential impacts from recreation. Finally, the need for effective monitoring components with clearly identified trigger points in any plan must be linked to specific - and immediate - changes in management actions to be effective and implementable across the lifetime of the new plan.

Objection 10: *The Outstandingly Remarkable Values Assessment is currently inaccurate; and the Flathead National Forest lacks the ability, under the current monitoring plan, to detect and respond to significant degradation of the Outstandingly Remarkable Values identified in the original Wild and Scenic River designation.*

We have significant concerns about the accuracy of the Outstandingly Remarkable Values Assessment, as much of the explosion in recreational use has occurred since the last assessment was updated eleven years ago in 2015 (e.g., compare current rates of commercial use on the MF, private boating on the upper NFK, and packrafting levels on the SF with those provided in the 2015 assessment).

Similarly, we encourage the FNF to revisit the original Wild and Scenic Flathead River designation as the foundation for creating a suite of management actions and monitoring triggers that will safeguard and enhance those identified ORVs. The purpose of the CRMP is to protect and enhance the ORVs as identified in the original Wild and Scenic designation of the three forks of the Flathead River, not set a new baseline for them, which is seemingly what the CRMP does as currently written. Additionally, the following ORVs are currently not mentioned in the Monitoring Plan: Scenery, Geology, Ethnographic, and History: these need to be included.

Requested Remedy: Revise the CRMP ORV Assessment to include the most current information and data available to improve the accuracy of this foundational document (including data on the Scenery, Geology, Ethnographic, and History ORVs); and provide the general public with the updated assessment. Following this crucial action, provide - through the CRMP monitoring plan - regular, publicly-available, 5-year updates of the assessment for *all* ORVs as the basis for adaptive management actions and decisions throughout the river corridor.

IV. Meeting Request

Pursuant to 36 C.F.R. Section 219.57(a), GTMA and NPCA request to meet with the reviewing officer to discuss and resolve these objections.

V. Conclusion

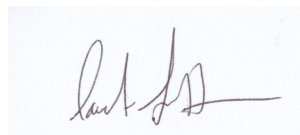
Thank you for your time and consideration. As outlined above, GTMA and NPCA have remaining substantive concerns with the Three Forks of the Flathead Wild & Scenic River Joint Comprehensive River Management Plan that we previously raised in our comments. We look forward to discussing these issues further and hope that our concerns will be adequately resolved through an objection resolution meeting.

We look forward to continuing to work with the Flathead National Forest and with Glacier National Park as this decision is finalized and throughout implementation of this critically important management plan. Please do not hesitate to contact us if you have any questions.

Sincerely,



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