

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

Scott Snelson	)	
	Objector)	
	)	
	)	NOTICE OF OBJECTION
v.	)	PURSUANT TO
	)	36 CFR 218

ANTHONY B. BOTELLO	)
FLATHAD FOREST SUPERVISOR	)
Responsible Official)	

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>)

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Prior Participation and Standing to Object

I 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 and March 13 2026, I submitted written comments on the CRMP Proposed Action(PA) and during scoping. These letters are attached to this Objection and are 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 my previous comments.

The project fails to protect bull trout and westslope cutthroat trout populations from decline and does not provide the necessary nexus between increased use levels proposed and the stated biologic impacts (EA) to bull trout and westslope cutthroat populations. The documents continue to sidestep the law's requirements that the fishing ORV was and is to be maintained at levels experienced at the establishment of the designation, not current levels and certainly not minimum levels required by ESA, which is used as the basis of the EA's impact analysis and justification of the FONSI.

The documents continue to fail to acknowledge the law's requirements that the both fish populations continue to not be degraded and the fishing experience (ie catch rates) found at the time of establishment of the Wild and Scenic River.

I attach myself to the objections filed by the Swan View Coalition, American Rivers and Flathead Rivers Alliance and Friends of the Wild Swan which largely reflect my objections.

• OBJECTION STATEMENT

The Comprehensive River Management Plan (CRMP) for the Flathead Wild and Scenic River fails to protect the Outstandingly Remarkable Values (ORVs) of the fisheries in this wild and scenic river system in violation of the Wild and Scenic Rivers Act.

The CRMP requires an Environmental Impact Statement to fully analyze the impacts and protect the Outstandingly Remarkable Values and threatened bull trout consistent with the National Environmental Policy Act and Endangered Species Act.

I raised this issue in my scoping and Plan comments.

REQUESTED REMEDY

Withdraw the Comprehensive River Management Plan, Environmental Assessment and Draft Decision Notice and prepare an Environmental Impact Statement that addresses the impacts to Outstandingly Remarkable Values since the time of wild and scenic river designation. Protects bull trout and native fish from overuse and overfishing. Develop a monitoring plan that actually has the funding to monitor ORVs. Develop triggers that have an immediate effect rather than allowing years to pass without any action to address the problem.

Place a moratorium on issuing any additional commercial use permits on the River until such time as a monitoring plan adequately establishes current fisheries populations and fishing experience levels (i.e. catch rates) by segment over the designated WSR.

As soon as is practicable, put in place the self issue permit system to gather baseline fishing use and fish population data.