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Flathead National Forest

Supervisor Anthony Botello

Public Comment Project 56536

Re: Proposed CRMP dated January 6, 2025

I have read the Proposed Action for the Flathead Wild and Scenic Comprehensive River Management Plan (CRMP) dated 1-6-2025 and attended the public meetings held January 21 and 22, 2025. I participated in all the public scoping for the proposed 2019 CRMP. I first met Rob Davies in 2014 to discuss impacts to the from increased use. I have been floating the Three Forks of the Flathead River since 1981 and offer the following comments:

ORV's - I believe the Flathead Forest (FF) interpretation of Outstanding Recreational Values (ORV's) has changed significantly for the worse. The proposed CRMP draft in 2019 was far more concerned about preserving ORV's than the 2025 proposal. Increasing use and overuse was recognized in the 2019 proposal and a high percentage of public comment then was about the impact of the increased use. Today far more river use is occurring impacting ORV's, however the 2025 plan basically increases capacity to meet the increased use. Better monitoring and enforcement are necessary to protect the Flathead River System. The USFS is a timber management agency and recreation is not a top priority. Without funding for monitoring and enforcement this CRMP will not be effective. FF and Glacier National Park (GNP) need to work harder to make sure the new Flathead River CRMP has boots on the ground to monitor and enforce.

Management Units - The proposed plan introduces new river Management Units (MU's) and are a good idea. Certain sections of the river system are going to see more use than others and need to be managed differently. River users are free to choose which sections to recreate on. However, it is imperative to get accurate river use data. Commercial River User days are well documented, but private river use is not. This was acknowledged by FF specialists at the public meetings. Private river use has exploded like commercial river use over the last 7 years. It is time to get accurate private river use data. FF, beginning with the 2025 season should implement UNLIMITED FREE MANDATORY FLOAT PERMITS on all MU's in the North, Middle and South Forks. This project could be in partnership with the Flathead River Alliance (FRA) as the FF and FRA now are working together to update signage at river access points. A simple paper permit form could be modeled after the Lower Salmon self-permit successfully used at Hammer Creek access on the Main Salmon in Idaho for many years. An online option for these permits could be developed in 2026 but better private river use data collection should be a priority now. Specifically, the proposed plan states up 86,000 commercial user days for Middle Fork MU2 is acceptable and states this is 80% of total capacity for this section. By default, private river users would receive 20% of capacity on MU2. It is imperative that private river users not be disadvantaged by commercial river outfitters getting more user days. On the North Fork, MU2 ends at Camas Bridge so it makes sense that the river access there be improved. This would facilitate proposed user capacities and take stress off Big Creek access. No effort is made in the 2025 plan to improve or add river access to better manage increased use or direct it to different MU's.

Human waste and fire pans - Overnight River users on all forks should be required to pack out human waste. A SCAT Machine should be installed to help dispose of human waste. Others who recreate on the river such as hikers, fisherman, horseman and campers could use the 200-foot rule. Overnight river users on all forks should be required to use a fire pan or fire blanket.

Outfitter and Guide Service days - River floats provided by Commercial for-profit businesses offer a valuable service on the Flathead River for tourists, locals and those who cannot do it themselves. On Middle Fork MU2 (Cascadilla to West Glacier) the proposed commercial user days are 86,000 annually. On MU3 (West Glacier to SF Confluence) proposed commercial user days are 50,000 annually. The past 5-year average commercial user days from Paola to House of Mystery which represents the new MU2 and MU3 combined is 71,890. To allow 136,000 commercial user days over these 2 units is either an error in the proposed plan or a windfall to the commercial outfitters. MU2 and MU3 commercial user days combined need to be reduced downward to no more than the past 10-year average from the Paola to House of Mystery which were the data points the FF had been using. That average amount should then be allocated between proposed MU2 and MU3. A 10-year average would soften the huge increase due to COVID and reflect a more accurate picture of what commercial use was in the run up to the 2019 draft plan. The proposed plan must better acknowledge private river user days. Equal allocation of use by private and commercial users. Any other notion could lead to litigation as has been the case on the Colorado River and Middle Fork Salmon when commercial use attempted to disadvantage private use.

Monitoring, Enforcement and Funding - Monitoring indicators in the 2019 proposed plan, but left out of the 2025 plan, such as overcrowding at access parking lots, human waste, litter, wait times and noxious weeds are clear indicators of impacts to ORV's and should be added back to the current proposed plan. The proposed plan speaks of education as the primary tool to address river issues. FF and GNP both need to have ticketing in the toolbox to enhance enforcement. FF has been reluctant to issue tickets and this needs to change. FRA could assist with River Education and perhaps can help with some monitoring. Funding to monitor is required. Triggers for encounters defined in Middle Fork MU2 and MU3 are already being exceeded. Monitoring timelines of 2-3-5 years are too long to wait for action that may be needed right now. 5 years have passed since the 2019 proposal and conditions have deteriorated.

Gravel bars - Without additional parking being created at Glacier Rim, Blankenship Bridge on the east side, Paola Creek and the West Glacier accesses enforcement of no parking on the gravel bar is not possible given the current use and capacities described in the proposed plan. Overcrowding in the defined parking areas at these river access points is real and dangerous. That is why it has spilled onto the gravel bars and highways.

Island camping - The Northfork has numerous islands in the river channels. The boundary with GNP is described as the middle of the main channel. This is a difficult marker so FF and GNP should reach an inter-agency agreement to allow camping on these islands to spread out the impact on the FF west side camping and still let GNP issue back country camping permits for GNP east side camping. Overall campsites in the river corridor are seeing more litter, human waste, fire rings and noxious weeds left behind.

Wildlife and Fisheries - Data should be provided to document the impact or decline in the Mountain Goat populations to justify expanding the closure order on Middle Fork MU1. If there is such impact, then this closure is valid. Flathead Valley Trout Unlimited have written that the negative effects of human and angler use on Bull Trout are well documented. In addition, Montana FWP employees and private anglers have repeatedly noted a high occurrence of hooking scars on Cutthroat Trout. MFWP has recently recommended modifying fishing regulations to single hooks throughout the entire Flathead River system. This suggests that even a catch and release Cutthroat Trout fishery may be nearing capacity. It is obvious there is increased congestion and activity at all river access sites.

Seriously consider these concerns and my concerns in my letter submitted in 2019 as you develop the final proposed CRMP. Thank you for the opportunity to comment.

