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Comments: Thank you for the opportunity to comment on the updated Wild and Scenic River Management Plan. I have floated many sections of all three forks of the Flathead River, have worked as a wilderness ranger for 35 seasons, and teach wildland recreation management courses at the college/university level.

User capacity has been exceeded numerous times on segments of the Flathead River that are designated as Wild and Scenic. This includes crowding and increased law enforcement due to visitor conflicts, river bank erosion, garbage and human waste near and in the water, uncontained wildlife attractants, as visitor use in adjacent Glacier NP reaches approximately 3 million visitors annually. In August 2024, 749k people visited Glacier National Park, with nearly a 15% increase in visitation compared to the same month the year before (Scott, 2024). Many of these same visitors also seek recreation opportunities on the Flathead National Forest and the upper half of the Middle Fork, the South Fork above Hungry Horse Reservoir, and the lower sections of all three forks, as well as the North Fork. The increased visitor use negatively affects opportunities for solitude, native fisheries, indigenous wildlife including grizzly bears and waterfowl, and water quality.

I support a permit system for all three forks of the Flathead River, a ban on motor vehicle camping or parking on gravel bars like Blankenship Bridge, group size limits and number of visitors groups, human waste containment within 200 ft of the river's edge, prohibiting drones, preventing low flying aircraft through river corridors, requiring a fire plan or blanket for campfires, and a 60db recreation noise level limit and group size limits. Integral to a permit system there should be annual monitoring and regular law enforcement presence, as well as a robust river education program highlighting the Wild and Scenic River Act (PL 96-312) and the Wilderness Act (PL 88-577). I also support the ban on dogs and stopping of boats near the Essex Goat Lick

More in depth information needs to be made available to commenters and the interested public of how the FNF and Glacier NP came up with carrying capacity numbers for the North Fork, and the recreational stretch of the Middle Fork where the number of permits should be limited. Please provide defensible data on how many visitors use the rivers and data related to wildlife trends since the early 80's when the first river management plan was written. Particular attention should be made for lower capacity numbers on the 87 miles of the South and Middle forks that flow through designated Wilderness in the Bob Marshall Wilderness. Increased visitor use can displace wildlife, affect fisheries, and negatively affect the opportunities for solitude in designated wilderness. The four commercial outfitters on the Middle Fork should not be allowed an increase annual user days to 136,000, representing a significant increase since 2017. Quadrupling the permitted service days in the Middle Fork is not acceptable to adequately protect the wild and scenic qualities and should be reduced.

Commercial outfitting and pack stock should be more limited, particularly in designated wilderness. Outfitters should go through professional training to be better equipped to deliver education/interpretation of wilderness and wild and scenic river qualities.

Thank you for your consideration.

Kari Gunderson, PhD.

Wildland Recreation Management

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References

Public Law 96-312 (1980). Wild and Scenic Rivers Act. 94 Stat. 948.

U.S. Public Law 88-577. (1964). The Wilderness Act of September 3, 1964. 78 Stat. 890.

Scott, T. (2024). Glacier National Park Shatters Visitation Record for September. Flathead Beacon