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Title: Crown Community Conservation Specialist
Comments: February 7, 2025

Flathead National Forest
Attn: Anthony Botello, Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Re: Comments on the Flathead River Comprehensive River Management Plan (CRMP) Proposed Action

Dear Supervisor Botello,

The Wilderness Society appreciates the opportunity to submit the following comments regarding the Flathead Wild and Scenic River CRMP Proposed Action (2025 version).

About The Wilderness Society:

Since 1935, The Wilderness Society (TWS) has led the effort to permanently protect nearly 112 million acres of Wilderness in 44 states. Along with more than one million members and supporters, we believe that public lands belong to and should benefit all of us; and that our organization and work must embody the cultures and perspectives of people and communities across our nation while simultaneously connecting and inspiring people to care about the outdoors. The Wilderness Society's roots run deep in the Flathead National Forest and can be traced back to founder Bob Marshall's time spent in western Montana. The current work of The Wilderness Society is rooted in community-led collaboration, empowering local voices for the ecologic, cultural, and economic vitality of their home landscapes. Wilderness Society staff have deep technical knowledge and have conducted research within Montana and across the nation. In the past decade, The Wilderness Society has actively engaged in all three Montana national forest plan revisions completed to date under the 2012 Planning Rule.

Comments & Concerns:

TWS recognizes the profound value of the three forks of the Flathead River as free-flowing headwaters of the Columbia River watershed, culturally significant waterways for local Tribes including the Salish, Cayuse, Umatilla, Walla Walla, Ktunaxa, and Blackfoot People, critical habitat and climate refugia for threatened and endangered species, and the lifeblood of both local communities and surrounding wildlands.

Monitoring, indicators, triggers, & thresholds:

We appreciate the Flathead National Forest's effort to identify and establish critical indicators and thresholds that will, in theory, trigger potential management actions. We are concerned, however, that there is no description of which management actions would be triggered by each threshold and how said management actions would be implemented and enforced. Given the steep rise in outdoor recreation, including river use, we strongly encourage the development of a thorough and proactive framework that clearly links indicators, triggers, and thresholds with specific and implementable management actions.

Increased user capacity & decreased management capacity:

The Flathead National Forest proposes dramatic increases in visitation and commercial service days while simultaneously citing limitations in capacity and funding under the current administration. At the same time management capacity is strained, outdoor recreation is growing. According to the U.S. Bureau of Economic Analysis (BEA)¹, Montana's outdoor recreation industry grew 14% from 2021 to 2022. Given this recent and rapid increase in recreation pressure and the responsibility of the Flathead CRMP to govern river management for the next 20-50 years, we strongly encourage the Flathead National Forest to provide greater clarity on the relationship between triggers/thresholds and user capacity, especially where triggers/thresholds already appear to have been surpassed. We also recommend that the 2025 proposed action include clear strategies for management if/where triggers/thresholds are surpassed.

Mandatory, unlimited permit system:

We support the Flathead National Forest's proposal to implement a mandatory, unlimited float permit system and the use of that system for further recreational use data collection. We encourage further clarity in the 2025 proposed action as to how data will be used to determine future use capacity management actions, as well as how education on new regulations will be provided to river users. We also strongly recommend the development and inclusion in the 2025 proposed action of a plan to closely monitor use and transition to a limited permit system within the next 5 years should data indicate that use exceeds capacity.

Fire management requirements:

We support the proposed action to require fire pans/blankets on the North and Middle Forks and recommend also requiring the use of these implements on the South Fork Wild sections, given high and often mandatory (due to remoteness) overnight use along those sections.

Waste management requirements:

The 2025 proposed action to "Contain human waste within 200 feet of the river's edge" lacks clarity and does not acknowledge existing impacts related to improper management of human waste. Given increased recreation pressures and the proposal to implement a mandatory yet unlimited permit system, we strongly recommend developing and implementing a mandatory waste pack-out system, which would be consistent with already established expectations within the broader community of river users.

Sincerely,

Anne Carlson, Ph.D.
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Choteau, Montana

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