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First name: Radley

Last name: Watkins

Organization:

Title:

Comments: February 7, 2025

Anthony Botello

Flathead Forest Supervisor

650 Wolfpack Way

Kalispell, MT 59901

Re: Comments on the Flathead River Comprehensive River Management Plan Proposed Action.

Dear Supervisor Botello,

Please accept these comments on your Comprehensive Flathead River Management Plan (CRMP) Proposed Action (PA) into the public record.

I am a backpacker, horseman, angler, kayaker, and natural resource professional who resides in Missoula and Condon Montana. When I worked in Glacier National Park in 2000 as a field tech on a grizzly bear DNA project, we could always find parking spots at trailheads to begin our work. Now it is hard to visit the park at all. There are more people on the landscape than ever before. We need to consider this in the CRMP. I believe these issues are essential for the continued protection and sustainable management of this treasured river system.

Concerns:

1. Local Indigenous Voices and Considerations:

The CRMP currently lacks designated space for input from the tribal nations who have historically lived on and used this land. I urge you to engage the Confederated Salish and Kootenai Tribes (CSKT) and the Blackfoot Nations more actively in the monitoring of their cultural resources. The National Environmental Policy Act (NEPA) affirms our nation's commitment to preserving important historic, cultural, and natural aspects of our national heritage. Both the CSKT and the Blackfeet have deep historical ties to the land, and their inclusion in decision-making is vital. As noted in research by Thompson (2015), the Flathead River headwaters are a significant part of the aboriginal territories of the CSKT, and the Blackfeet have also utilized this area for generations.

2. Transparency in Data and Methods:

The CRMP should be more transparent in the data collected and in future data collection plans. I would like to see data citations and references included throughout the plan. Additionally, future data collection efforts should include clear dates and locations to provide important context, ensuring that data is both relevant and reliable as management decisions are made.

3. Wildlife Concerns and Habitat Degradation:

The current plan does not sufficiently address the potential impacts on wildlife habitats, particularly regarding species listed under the Endangered Species Act. In particular, areas should be closed for camping if wildlife species such as Grizzly Bears exhibit signs of habituation. Furthermore, if there are impacts, such as noise or trampling, affecting habitat for species like lynx or wolverines, those areas should be closed until these impacts are mitigated. The plan should integrate clear monitoring protocols for habitat quality across all species, taking into account these sensitive environmental factors.

4. Limiting Outfitting for Resource Quality:

I strongly recommend that livery outfitting ("drops") be limited in certain sections, particularly in the South Fork and Middle Fork, due to the degradation of Outstanding Remarkable Values (ORVs). As noted in the CRMP, outfitting should be managed to maintain the wilderness character and solitude of the river corridor. Reducing the number of permitted outfitting trips in these areas is critical for preserving the river's natural values and preventing overuse.

#### 5. Closing Areas for Habitat Restoration:

While the CRMP is finalized and during its implementation, it is necessary to consider closing certain areas for camping to allow for habitat restoration. Sections of the river that have significant ORV degradation due to overuse, especially along the headwaters, should be temporarily closed to camping. The proposed plan acknowledges that the headwaters are among the few areas with high-quality native plant communities. Without action to limit use in these sensitive zones, their ecological value will continue to decline.

#### What I Support:

I do appreciate several key elements within the CRMP as it stands:

\*Mandatory, Free Float Permits for Private Parties: I strongly support the requirement for mandatory, free float permits for private parties. This is a smart approach to monitoring and collecting essential data about river usage.

\*Prohibiting Motor Vehicle Camping on Gravel Bars: The restriction on motor vehicle camping or parking on gravel bars is a critical step in protecting the riverbanks from further degradation.

\*Fire Safety Regulations: I also support the requirement for metal fire pans or fire blankets for campfires, as this will help protect the sensitive riparian areas and reduce the risk of wildfires.

\*Noise Level Restrictions: The inclusion of noise limits is an important aspect of preserving the solitude and peace of the river corridor. The 60-decibel limit is a thoughtful approach to managing human activity.

#### Needed inclusions to the CRMP:

\*The CRMP must include language that affirms the Forest Service's obligation under the Wild and Scenic Rivers Act to enhance or protect all Outstanding Remarkable Values (ORVs), measured against their condition at the time the Three Forks of the Flathead were established as part of the Wild and Scenic River System. This foundational principle should be a key element in the plan.

\*The CRMP should recognize that the management of the South Fork (MU1) and Middle Fork (Wild) is dictated by the 1987 BWC Recreation Management Direction (RMD). The CRMP, as currently written, is not in compliance with the RMD. Specifically, on page 16, it states, "no more than 16 watercraft per day," but the RMD limit for social encounters is only four. The CRMP needs to acknowledge and comply with this standard.

\*According to Flathead National Forest records from the Spring of 2024, many areas on the South Fork (MU1) and Middle Fork (Wild) are significantly out of compliance with the RMD. These areas include Black Bear Creek, Hodag, Independence Park, Salmon Forks, Murphy, Woodfir, Big Prairie, Mouth of Gordon, Big Prairie North, Otter Creek, Hole in the Wall, Hahn Cabin, and Young's Lake, among others. The CRMP should address these issues and take corrective action.

\*I urge the CRMP to require that all users of the Three Forks of the Flathead pack out human waste. The Flathead is the only major river system in the Western U.S. that does not have this requirement, and this must change to prevent further degradation of water quality and the surrounding environment.

\*The CRMP must address the current resource damage along all Three Forks and propose a lottery permit

system for private users, similar to the permit system in place for the Smith River. During the CRMP question-and-answer session on January 22, 2025, District Ranger Davies stated, "We want unlimited access to all 3 Forks of the Flathead." This approach is both reckless and unsustainable. The Three Forks of the Flathead are not a theme park, and they should not be managed as such.

\*The CRMP must stop all commercial outfitter livery permits on the South Fork (MU1) and Middle Fork (Wild). These outfitters are putting too many people on the river, far exceeding the social limits set forth in the RMD. The area around the confluence of Young's Creek and Danaher Creek is being severely overgrazed, and it is out of compliance with the RMD for range, barren core, and inter-party contacts.

\*There must be a drastic reduction in the number of user days allocated to commercial outfitters across all Forks. The current levels of use are simply unsustainable and detrimental to the river's ecological integrity.

\*The CRMP should significantly limit commercial outfitting on the South Fork (MU1), and prohibit the use of pack stock to support river parties. This will help minimize the impact of these commercial operations and protect the sensitive environment along the river corridor.

Thank you for your time and consideration of these important issues. Addressing these concerns will lead to a more sustainable and responsible management plan for the Flathead Wild and Scenic River.

Sincerely,  
Radley Watkins