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First name: Brian

Last name: Chaffin

Organization: Clark Fork Coalition

Title: Executive Director

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

Dear Forest Supervisor Botello,

Clark Fork Coalition appreciates the opportunity to submit the following comments on the Flathead Wild & Scenic River CRMP Proposed Action (2025 version).

About the Clark Fork Coalition

The Clark Fork Coalition (CFC) was founded in 1985 to protect and restore the Clark Fork River basin, a 14-million-acre watershed spanning most of western Montana and a portion of northern Idaho which includes large tributary river systems such as the Three Forks of the Flathead River. CFC applies a science-driven, community-focused approach to its work, relying on a diversity of partners, including conservation groups, researchers, scientists, educators, natural resource agency professionals, elected officials, recreationists, business leaders, and the Confederated Salish & Kootenai Tribes. Through these partnerships, CFC works to improve the health of the Clark Fork River watershed through: (1) direct, on-the-ground restoration of degraded creeks and streams; (2) science-driven advocacy promoting clean water, healthy rivers, and strong water policies; and (3) vigorous public outreach and education that fosters a culture of stewardship and gives people the tools, knowledge, and opportunities to care for the rivers we all share.

Summary of Comments

Clark Fork Coalition is significantly concerned that the Proposed Action does not take the proactive approach necessary to protect and enhance water quality and other outstandingly remarkable values (ORV) in the Three Forks of the Flathead River as required by the Wild & Scenic Rivers Act of 1968. Specifically, we are concerned that:

- *Water quality protections in the Proposed Action are not identified and thus inadequate and unenforceable;

- *No specific consideration is given to the relationship between increasing stream temperatures and impacts to the fishery ORV; and

- *There is a lack of clear management actions linked to Monitoring Plan Indicators, Triggers, and Thresholds. Below we expand upon each of these concerns.

Inadequate Water Quality Protections

The intent of the Wild & Scenic Rivers Act (WSRA) is to provide for the protection and enhancement of water quality and other outstandingly remarkable values in designated river segments under the Act. The Proposed Action states that the Desired Conditions for water quality will be "...maintained or improved through implementation of applicable Best Management Practices within the WSR corridor" (p. 7). The Proposed Action goes on to site the "Implementation and effectiveness of water quality Best Management Practices (BMP)" as an Indicator for monitoring water quality across all river segments covered by this CRMP (p. 21). Management actions will be taken if the Threshold of "Noncompliance with applicable BMPs" is reached (p. 21). Despite this consistent reliance on BMPs to protect and enhance water quality, nowhere in the Proposed Action are these BMPs described or defined. Thus, there is effectively no clear water quality protections related to any water pollutant except for Fecal Bacteria (E. coli organisms) which is specifically listed using the current MT DEQ water quality standard as a Threshold. The lack of definitions, descriptions, or even simply a list of specific BMPs that are or could be applied to protect and enhance water quality is a major omission in the Proposed Action.

Further, Triggers for many of the water quality Indicators in the Proposed Action are based on narrative or

observational criteria. For example, one Trigger for water quality management actions in all segments of the Flathead Wild & Scenic River system is "Observations of potential water quality issues (i.e. human caused erosion, sedimentation, human waste, etc.)" (p. 21). Another Trigger for water quality and fisheries is "Observations of major changes in any of the measured metrics associated with stream use and human impacts" (p. 22). Neither of these Triggers, nor the Thresholds for management actions associated with these Triggers, are clearly quantifiable and thus they are marginally enforceable, if at all. If we use nutrient pollution as an example, without a quantifiable nutrient Trigger and/or numeric Threshold to measure water quality degradation of the Flathead Wild & Scenic River segments, the Forest will be unable to clearly identify and reverse declines in water quality. Increased recreational use pressures (as suggested in the Proposed Action), population growth within the watershed (particularly along the Middle Fork Recreational segment), and climate change, necessitate a proactive (not reactive) and measurable approach to protecting and enhancing water quality on all Forks of the Flathead River.

Water Temperature and the Impact on Fisheries ORV

Water temperature alone is a critical indicator of water quality on all Forks of the Flathead, and is vital to the health of native fisheries-particularly Threatened bull trout. Thus, we suggest as a starting point that water temperature be considered as an additional formal Indicator (along with a corresponding, measurable Trigger and Threshold for management action) for both water quality and fisheries ORVs. Current data indicates that there is already a problem with increasing water temperatures in the Forks of the Flathead River. During the summer of 2024, Montana Fish, Wildlife, and Parks (MT FWP) implemented hoot-owl restrictions on the North Fork of the Flathead River; this was the first time in history that MT FWP implemented hoot-owl restrictions on any Fork of the Flathead River system. Hoot-owl restrictions are implemented when river water temperatures reach a threshold that is lethal for trout and other salmonid species. Hoot-owl is designed to minimize additional pressures (angling, handling) on fish to minimize mortality during these high temperature conditions. In the Proposed Action, the current Threshold for management action is "Sustained 10 years of major changes in these stream metrics due to associated human impacts and stream usage" (p. 22). A sustained 10-year decline in any of the listed stream-habitat metrics (i.e., macroinvertebrate community and algae, terrestrial, riparian, aquatic and invasive vegetation, temperature, discharge, stream/bank morphology, sediment, substrate, water chemistry, human disturbance, and aquatic invasive species), but specifically temperature, will be ineffective in addressing emerging or existing negative trends in water quality and fisheries, and is too long to indicate that river management objectives for protecting and enhancing these ORVs are not being met. Further, an explicit consideration of water temperature as a critical Indicator of water quality and fisheries health is essential given the context of increased private and commercial recreation user days in the Proposed Action, which includes substantial increases in angler days and thus corresponding pressure on the fishery.

No Clear Link Between Management Actions and Monitoring Plan Indicators, Triggers, and Thresholds

Although we recognize that the Proposed Action includes "Proposed Management Actions" (Table 4, pp. 18-20), there is no explicit link between the Proposed Management Actions and the plan to Monitor Flathead Wild & Scenic River segments with the developed Indicators, Triggers, and Thresholds. For example, if a specific Threshold is crossed, what is the corrective management action that will occur? The current list of management actions are not adequate to address the breadth of Indicators listed in the Monitoring Plan. Specific actions for crossed Thresholds concerning water quality and fisheries are not explicitly included in the current suite of Proposed Management Actions. As one example, "restoration" and "aquatic organism passage" is discussed as an action to support the Desired Conditions of the fisheries ORV (p. 9). However, restoration and aquatic organism passage is never mentioned again in the Proposed Action; it is not suggested as a Proposed Management Action, nor is it associated as a potential management action to address the crossing of a fisheries ORV related Threshold (as suggested in the Desired Conditions for the Fisheries ORV). Bottom line: the Monitoring Plan in the Proposed Action is meaningless unless there is a specific plan or suite of potential actions that the USFS could choose from when a specific Threshold is passed for one of the monitored Indicators.

Thank you for reviewing our comments on the Proposed Action; we hope that these comments are helpful in

crafting a more proactive, forward-thinking plan to manage the Three Forks of the Flathead Wild & Scenic Rivers system and to protect and enhance its outstandingly remarkable values, specifically water quality and fisheries. As part of the Clark Fork Coalition's mission, we have long advocated for federal, state, and local water policies-including river management and restoration plans-that focus on protecting water quality and fisheries. Given the geographic importance of this CRMP to one of the headwaters river systems of both the Clark Fork and Columbia River watersheds, we view the clear, explicit protection of water quality and fisheries in this plan as critically important. Thank you in advance for your consideration of our comments, and please reach out if you require additional information.

Kind regards,

Brian C. Chaffin, Ph.D.
Executive Director
Clark Fork Coalition