Mr. Chris Prew
Flathead National Forest
650 Wolf Pack Way
Kalispell Mt, 59901

September 9, 2019

Dear Chris,

My comments on the Draft Proposed Action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River:

**General Comments:**

The 3 Forks of the Flathead are an incredible ecological, cultural, and recreational opportunity for not only local Flathead valley residents, but for visitors to the Glacier National Park area from around the country and the world. With increased use and enjoyment of the river system, I can understand the desire to ensure that this opportunity be available for future generations in the same way we have enjoyed it.

Visitor Capacity

While the WSR defines “*The quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free flowing character of the river area, the quality of recreation experience, and public health and safety.”*, it is a slippery slope to use one user’s quality of recreation experience to limit other users opportunity for that same experience. It is important for many users to be able to experience this beautiful river system in our back yard.

The previous plan and current draft don’t quite explain what determines capacity, nor why capacity is important. Without these metrics, it is difficult to study in the future to determine capacity has been reached or what management actions are necessary.

I do not in any way argue with the intent to preserve Outstandably Remarkable Values. It is important that these resources not be “loved to death” and biologic/geologic/aquatic resources should be protected from over-use. Only a few unethical river users can spoil the experience for many others. Rather than limiting the total number of users, better Enforcement should be utilized to limit the impact of unethical users.

That said, I strongly disagree with Capacity to be a primary determinant for a trigger or threshold action. As I verbally stated in the Public Meeting on August 20, I would rather spend a day on the river with hundreds of ethical users than with a dozen unethical users who ruin the experience for everyone else.

Enforcement

The Forest Service needs to do a better job of enforcing existing regulations. Few people are carrying fire pans or portable toilets if fire rings, charcoal/ash, and toilet paper/human waste are found in any abundance on the banks of the river. I realize that the FS has performed some education, but a few pamphlets are not enough. The commercial raft companies as a group do a far better job of hands-on education and mentoring for the inexperienced floating public.

I support fines for littering or unburied human waste. It’s beyond time to think that education is enough.

Permits

Forest Service spokespeople were reluctant to comment on permits in the public meetings when the topic came up, but the possibility of permits was mentioned in press information. Let’s face it, permits are a possible management tool. Please state in the upcoming draft at what trigger/threshold a permit may become a management tool.

I would support day-use permits to construct sustainable boat ramps/take-outs to prevent sedimentation that adversely affects water quality/fish/botany, and to make loading/unloading a more streamlined process for more users. Lines at the put-ins/take-outs is where much user conflict occurs. I would not support permits if the funding does not go directly toward enforcement and infrastructure. Permits need to directly serve the people impacted by their cost.

**Proposed Action - Desired Conditions, Indicators, and Thresholds**

With increased user demand, I do not support the closure or decommissioning of existing facilities, unless temporary to construct more sustainable facilities (boat ramps, latrines/toilets, etc.).

**NF Flathead – Scenic Segment**

*Recreation*

I do not support administrative use of motorized vehicles if the public is not allowed to use motorized recreational vehicles. It is incongruous to ban the use of motorized vehicles to protect ORV’s only to use motorized vehicles to “promote” ORV’s.

*Recreation – Float Encounters per Day*

I understand the desire for solitude, but solitude cannot be expected on a roadside-accessible river. Solitude is an achievable experience on the Wilderness sections of the SF Flathead and MF Flathead.

While the value of “*Encounters with no more than 3 parties per day during 60%/80% of the peak use season*” language has its basis in the 1980 Management Plan, but this is not an easy metric for the general public to understand. Why are 3 encounters per day the trigger? Why not one? Why not five? Why are encounters the trigger in the first place?

The Draft Proposed Action for the CRMP does not define enough the actual regulations and management actions that could be put in place, leaving too much to the people promulgating this Plan and too little for the general public to understand. We’re being asked to comment on a lot of management language that has little meaning to the person in a boat on the river. A general range of possible management actions and regulations that could be implemented should be included in the Draft.

It seems that staggered launch times could do more to limit float encounters than total parties per day. This will require staff, but permits should cover that cost. Staff should also check for firepan/portable toilets before parties are allowed to launch.

Private/outfitter-guide use should occur in similar user-day numbers as at present day.

*Recreation – Availability of Dispersed Camping Sites Accessed by Vehicles*

This is a nebulous trigger/threshold. If vehicular traffic is an ongoing option, these sites should be hardened for better sustainability. A site should be able to handle 100% occupancy (and have an improved gravel surface and latrine), or have the same regulation as for river users where users are required to pack out their own human waste.

Having another party occupy a site the day before or after a particular user should not be a diminished recreation experience if the site is sustainable and the previous users have packed out their waste.

If erosion is a concern, these sites should be improved or decommissioned. Please provide documentation that erosion/sedimentation at dispersed sites has any statistical significance in comparison to 2003 wildfires.

The plan does not mention how vehicle camping will be managed. Floating river users are impacted, but if they are permitted, will car campers/picnickers also be permitted? Equitable management actions should be discussed.

*Recreation – Float encounters with Shore Parties per day outside of portal areas.*

This ORV/River value places FAR too much emphasis on encounters with other parties, and far exceeds your “3 parties per day” encounter with other float groups. How were these figures calculated?

I would far rather see 12 groups per day on the water and only 3 on shore. Someone else may want no parties on the water and not care about shore groups. This is also a roadside river. This trigger/threshold is burdensome and onerous and limits the recreation experience to too many people, and will be difficult to enforce and the prevention will be worse than the symptoms. Again, it is unethical people in any number who ruin the experience, not large numbers alone.

*Recreation – Campsite Condition*

I cannot agree more with this ORV/River value and the Trigger/Threshold and possible management actions. It is very possible to have dispersed campsites that have minimal impact and are sustainable.

Flathead NF could learn a lot from other National Forests with permitted rivers. The Nez Perce-Clearwater National Forests and Salmon-Challis National Forests are host to the Selway River, “Wild” Main Salmon River, and the Middle Fork Salmon River. In the camping regulations for these rivers, users are REQUIRED to have firepans, fire blankets, ash cans, sieves for microtrash, portable toilets, and kitchen tarps. It is a very simple matter to have permitted river campers utilize the exact same regulations as used on other Forests and carry the same equipment to preserve the campsite experience for later campers and to minimize administrative cleanup/stabilization/rehabilitation efforts and costs.

Simply requiring users to pack out their campfire ashes ensures that driftwood bonfires don’t get so large because all the ash ultimately has to be packed out. This self-limits fire size to that of the small fire pan.

Again, it is not a matter of number of campsites or number of users. It is a matter of people not “Leave No Trace” camping who ruin the subsequent experience for others.

**NF Flathead – Recreational segment**

*Recreation*

I again do not support administrative use of motorized vehicles if the public is not allowed to use motorized recreational vehicles. It is incongruous to ban the use of motorized vehicles to protect ORV’s only to use motorized vehicles to “promote” ORV’s.

*Recreation – Average number of watercraft passing by a selected location per day during the peak use season*

* Please list current number of watercraft/day in this proposed plan. 2017-2018 UM study and Camera data are listed on the website, but not formally stated in either the Proposed Action or in the Background Documents & Links section of the CRMP webpage. I found this information to be more insightful than the high-level discussion in the proposed plan.
* Why Trigger/Threshold of 40/60 watercraft/day?
* I support staggered launches.
* Long waits at put-ins and take-outs are generally one of the most negative recreation experiences on the river. Diminished recreation experience is generally more an issue of individuals or groups taking more time than necessary loading/unloading while others wait. It is an issue of ethics, not of over-crowding. A thousand polite people moving quickly is less diminishing of the experience than 50 people moving slowly or taking up two lanes of a ramp with a single vehicle.
* Group size limits are possibly necessary, and achievable with enforcement at the launch site. Staff at put-ins and take-outs to limit ramp time and keep users moving would significantly reduce long waits.
* User fees would pay for staff—as would tickets for people taking more than 10 minutes on the ramp!

*Recreation – Float Encounters per Day*

Echo my comments regarding the Scenic segment, and that it is a slippery slope to use one user’s quality of recreation experience to limit other users opportunity for that same experience. It is important for many users to be able to experience this beautiful river system in our back yard. Rather than limiting users to relieve the symptom of diminished recreation experience, we need regulations that allow for more people to have a quality recreation experience.

The value of “Encounters with no more than 10 parties per day during 60%/80% of the peak use season” is not relatable to the general public. Why are 10 encounters per day still the trigger? Why not five? Why not twenty?

The Draft Proposed Action for the CRMP does not well-define the management actions and possible regulations that would be put in place, leaving too much to the people promulgating this Plan and left ot the imagination of the public. More well-defined proposed regulations should be included in the Draft or eliminate this Indicator

Again, agree with staggered launch times as suggested in previous ORV/Management action. This will require staff, but permits should cover that cost.

Private/outfitter-guide use should occur in similar user-day ratio as at present day.

*Recreation – Campsite Condition*

Agree. See comments in previous NF Flathead – Scenic segment with regards to campsite ethics and camp equipment requirements.

Do more than consider firepan requirements. IMPLEMENT firepan requirements!!!

*Recreation – Litter encountered*

While some of my previous comments have focused heavily on increasing quality user-days, it is incumbent that users do not create a negative user experience for others. Litter is one of those issues. I absolutely agree that encounters with litter is an indicator of users’ lack of Leave No Trace ethics. More education will help with the majority of people, but some people will continue to ignore education.

PLEASE add citations to your list of Management Actions. Some people will simply not respond to increased education.

I highly suggest the FS write some citations under current regulations! Word will get out, and if it is a matter of making an example of 3 or 4 people, so be it!

**MF Flathead – Wild Segment**

*Recreation*

I appreciate that Administrative facilities in the corridor are managed consistent with wilderness management direction for the area. Thank you. Administration should be consistent with the user experience.

*“Leave No Trace principles are encouraged and enforced.”*
This Statement should carry through the Proposed Action for all river segments.
Enforcement (and not simply encouragement) of Leave No Trace principles is important both to protect the Wilderness and ORV’s, and also other users’ experience.

*Recreation – Float Encounters per Day*

Solitude is a desired experience in a Wilderness area—but is it a Forest Service responsibility to ensure that people not encounter each other? It seems to arbitrarily limit multiple peoples’ experience at the expense of

2 parties/60% trigger/80% threshold again is not easily understood by the public, nor Float Encounters per Day specifically necessary as a value. This needs to be further defined in lay terms. Please describe what “managing floaters (to) address shore party encounters with float parties” might look like.

For example, if 6 launches are allowed per day, 3 could be morning launches and 3 afternoon launches. It is likely given a daily river flow that few of the morning or afternoon parties encounter the other. If all 6 launch in the morning, they’re all competing for the same campsites and see each other all trip.

Echo previous comments that the Draft Proposed Action for the CRMP does not define enough the possible management actions and regulations

Private/outfitter-guide use should occur in similar user-day numbers as at present day.

“*Suggest additional effort be put into proposed restrictions on day float trips and monitoring other launch points.”* Are these actual problems? People hiking in to Castle to launch is somewhat self-limiting, and permits should not be required for day use at this time. Possibly set a trigger at 20/day for future action?

*Recreation – Float encounters with Shore Parties per day.*

Again, why is it a FS requirement to limit float encounters with shore parties or shore encounters with float parties?

Additional regulation should not be required where the vast majority of launches take place at Schaefer. Possibly limit all overnight permits to Schaefer launches?

Again, “60%/80%” is onerous and may trigger promulgation of regulations that have not yet been defined. This Plan should have more well-defined possible Management Actions.

Should have a firm number to trigger Management Actions.
60%/80% only to trigger further study.

*Recreation – Number of parties floating above Schafer Meadows*

Agree. This ORV/River Value/Indicator/Rationale is well-written. 12 is a real number, not “Did I see more than 6 people on 60% of my river days?” May not be a present issue, but could trigger future actions should future trends change.

*Recreation - Number of watercraft launched per day at Schafer Meadows*

This ORV/River Value/Indicator is somewhat redundant with *Launches per day at Schafer Meadows*

70%/80% is not easily defined, and not easily understood by the lay person who will be effected by future regulations.

*Recreation – Campsite Condition*

Agree. See comments in previous NF Flathead – Scenic/Recreation segment with regards to campsite ethics and camp equipment requirements.

**MF Flathead – Recreational Segment - Management Unit 1**

*Recreation*

I appreciate that Administrative facilities in the corridor are managed consistent with wilderness management direction for the area. Thank you. Administration should be consistent with the user experience.

*“Leave No Trace principles are encouraged and enforced.”*
This Statement should carry through the Proposed Actoin for all river segments.
Enforcement (and not simply encouragement) of Leave No Trace principles is important both to protect the Wilderness and ORV’s, and also other users’ experience.

*Recreation – Float Encounters per Day*

Echo my comments regarding other segments, and that it is a slippery slope to use one user’s quality of recreation experience to limit other users opportunity for that same experience.

The Draft Proposed Action for the CRMP does not well-define the management actions and possible regulations that would be put in place, leaving too much to the people promulgating this Plan and left to the imagination of the public. More well-defined proposed regulations should be included in the Draft or eliminate this Indicator

Again, agree with staggered launch times as suggested in previous ORV/Management action. This will require staff, but permits should cover that cost.

Private/outfitter-guide use should occur in similar user-day ratio as at present day.

*Recreation – Campsite Condition*

Agree. See comments in previous NF Flathead – Scenic segment with regards to campsite ethics and camp equipment requirements.

Do more than consider firepan requirements. IMPLEMENT firepan requirements!!!

**MF Flathead – Recreational segment: Management Unit 2**

*Recreation*

High concentrations and/or large groups of users are inconsistent with desired river conditions for this management unit. Says who? This needs to be described and explained if it is a value that will be managed. In reading the 1980 plan, I saw far more concern about potential hydroelectric dam projects than with user groups, so this seems to be a more current value.

I again do not support administrative use of motorboats and UAV’s if the public is not allowed to use motorized recreational vehicles. Administration activities should follow the same guidelines as recreation activities. It is inappropriate to ban the use of motors to protect ORV’s only to use motors to “promote” ORV’s.

*Recreation – Float Encounters per Day*

Echo my comments regarding other segments, and that valuing one user’s quality of recreation experience to limit other users’ opportunity for that same experience borders on discrimination. Again, I support ethical use of our river system; this is a resource we must all share.

*Recreation – Campsite Condition*

Total number of sites does not exceed 15% of current condition? This is worded poorly. IF there are 20 existing sites, 15% of that number is only 3 sites as a Threshold? Does the FS plan to limit sites to 15% of current number?

*Recreation – Campsite Condition*

If designated campsites, reduce party size, permitted camping are Management Actions, how will they be enforced if current regulations are not being enforced?

Do more than consider firepan requirements. IMPLEMENT firepan requirements!!! IMPLEMENT portable toilet requirements!

Please do not prohibit camping. Please DO increase enforcement. Again, the vast majority of users are ethical. If enforcement of current regulations is onerous, how will additional regulations be enforced?

*Access Site Congestion*

Thank you for using real numbers for this trigger/threshold. 15-minutes is far too long to wait at Paola or Cascadilla, and still somewhat long even at busy Moccasin, but is probably a good trigger number. A 25-minute wait is not reasonable.

Differentiate between 3 parties launching at 5min/each and one party tying up the ramp for the full 15 minutes. This is an important distinction. Two parties tying up the ramp for 25 minutes or 5 parties launching 5 minutes apart. There are unloading areas at Moccasin Creek, yet some parties inflate their rafts on the ramp. Hand out written warnings! WRITE SOME TICKETS!

River sites do not need to be expanded if it is a single party causing the wait. They probably need education/warning/citation

Moccasin is an extremely busy and frequently-used site. The paved launch area, concrete ramp, and vault toilet are excellent examples of building a sustainable site. Additional (car) parking would help, and write tickets for non-trailering vehicles in the trailer parking area.

© Walt Kelly 1970

*Recreation – Litter encountered*

I am again troubled that this draft suggests that increased education and group size restrictions are a solution for litter. It is a few people who cause problems for everyone else. Cite them!

Walt Kelly wrote the adjacent cartoon panel in 1970. Can we stop pretending that people don’t know any better in 2019 and that we simply need to educate them?

**MF Flathead – Recreational segment: Management Unit 3**

*Recreation*

If Leave No Trace principles are encouraged and enforced, why is *enforcement* not listed as a management action under Littering in any previous section?

I again do not support administrative use of motorboats and UAV’s if the public is not allowed to use motorized recreational vehicles. Administration activities should follow the same guidelines as recreation activities.

*Recreation – Average number of watercraft passing by a selected location per day during the peak use season*

* Why Trigger/Threshold of 150/170 watercraft/day? Are there really more launches at West Glacier than take-outs at West Glacier? 150/170 is difficult to compare to 10/60%/80% for the upstream Management Unit 2.
* Where are the rapids in this section? It would seem that Management Unit 2 has more rapids, but even on busy days, I have not encountered so many boats that over-crowding is yet an issue.
* Please consider a “watercraft per hour” metric. 150 boats at 10/hour spread over 15 hours is not many. 75 boats/hour at 2pm is a lot.
* I support staggered launches.

*Recreation – Campsite Condition*

If designated campsites, reduce party size, permitted camping are Management Actions, how will they be enforced if current regulations are not being enforced?

Do more than consider firepan requirements. IMPLEMENT firepan requirements!!! IMPLEMENT portable toilet requirements! These are already required from Schaefer to Bear Creek. Why are they not required for overnight camping on the entire river corridor?

Please do not prohibit camping. Please DO increase enforcement. Again, the vast majority of users are ethical. If enforcement of current regulations is onerous, how will additional regulations be enforced?

*Recreation – Access Site Congestion*

5 minutes and 7 minutes is an easily understood trigger/threshold value, but seems low if this section handles 150/170 boats/day.

* Long waits at put-ins and take-outs are generally one of the most negative recreation experiences on the river. Diminished recreation experience is generally more an issue of individuals or groups taking more time than necessary loading/unloading while others wait. It is an issue of ethics, not of over-crowding. A thousand polite people moving quickly is less diminishing of the experience than 50 people moving slowly or taking up two lanes of a ramp with a single vehicle.
* As noted numerous times in the previous sections, it is not the number of users that cause problems, it is a small number of scofflaws that ruin the experience for others.
* User fees would pay for staff—as would tickets for people taking more than 10 minutes on the ramp!

*Recreation – Litter Encountered*

I hope my previous comments are sufficient.

*Recreation – Float Encounters per Day*

I hope my previous comments are sufficient.

 **SF Flathead – Wild segment: Management Unit 1 and 2**

*Recreation*

I appreciate that Administrative facilities in this Management Unit are managed consistent with wilderness management direction for the area. Thank you. Administration should be consistent with the user experience.

**SF Flathead – Recreational Segment**

No comment.

Best regards,

Shawn W. Baker

Kalispell, MT