



Kevin Colburn
National Stewardship Director
P.O. Box 1540
Cullowhee, NC 28723
828-712-4825

www.americanwhitewater.org

kevin@americanwhitewater.org

Chris Prew
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

September 11, 2019

Re: Draft Proposed Action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River

Dear Mr. Prew,

American Whitewater is a national nonprofit organization with a mission of protecting and restoring our nation's whitewater rivers and enhancing opportunities to enjoy them safely. We are a membership organization that has a significant number of members that regularly enjoy the Flathead River and its Forks. We have maintained a consistent staff / contractor role in Western Montana for many years now. American Whitewater is among the primary advocates for new and existing Wild and Scenic Rivers, and is a founding member of the new Wild and Scenic Rivers Coalition. I personally lived in Missoula for over a decade and have paddled many sections and tributaries of the Flathead River.

Values and Context of the Flathead Forks

Various sections of the Forks of the Flathead provide distinct recreational paddling opportunities of the highest quality. The North Fork offers a family-friendly multi-day float trip with road access, sweeping views, and an off-the-grid town with amazing baked goods. The Middle Fork offers a fly-in or hike-in whitewater adventure in a rugged gorge, and several contiguous road accessible sections that boast great whitewater, scenery, and camping. The South Fork offers a pack-in or hike-in float trip with relatively little whitewater challenge. Together, these rivers offer something great for a wide variety of paddlers and interests. Their proximity and similarity spread use out across the various reaches. The Proposed Action does not adequately address how these rivers fit together as an integrated system of river trip choices, nor their unique recreational values. We hope the Proposed Action or Plan can be improved to this end. We recommend thinking about and describing the recreational values of the rivers from the public's perspective, rather than the Agency perspective, and then developing Agency plans to protect and enhance those values.

Multi-day paddling opportunities are a relative rarity in the United States. The nearest commonly paddled multi-day runs are the Smith, Missouri, and Selway Rivers. More importantly, most of the United States offers no backcountry multi-day paddling options whatsoever. People from the East Coast for example regularly travel to the western US to enjoy multi-day paddling trips. Importantly, many multi-day river trips are subject to a lottery-based permit system, which

directly limits use. The Flathead forks offer a much freer experience, allowing people to plan trips at the last minute, to optimize weather and flows, and to shift plans from more restrictive rivers if they fail to secure a lottery permit. The lack of a lottery-based permit is itself an important value of these rivers to the paddling community. The Proposed Action should better describe these values.

Protection of ORV's From Non-Recreation Factors is Not Adequately Addressed

The vast majority of the Proposed Action focuses on the monitoring and management of recreation – and specifically paddling. Even the proposed system-wide Indicators, Triggers, and Thresholds aimed at protecting non-recreation values propose exclusively recreational management actions to protect those resources. While the Proposed Action proposes many ways in which the Forest Service might limit recreation to protect ORV's, largely lacking are any descriptions of potential limits on other multiple uses.

We expected specific guidance on how to protect and enhance WSR values as part of other activities that the Forest Service might permit or conduct. We would expect the proposed action to address timber harvest, mining, road building, trail building, river restoration activities, road dust, road salt, road maintenance, voluntary land acquisition, backcountry flights, and other factors that could affect WSR values. We ask that these omissions be remedied. It may well be that all that is needed is a series of crosswalks with the relevant Forest Plan components addressing these issues with some context on how those components protect ORVs.

The Proposed Action does not Characterize Current Use and Should

It is difficult or impossible to consider the appropriateness of the Proposed Action, and specifically numeric thresholds and triggers, without understanding the current recreational use of the river corridors. For example:

- How many people and groups currently paddle each reach?
- How many people hike in each corridor on trails?
- How many people hunt or fish in each corridor?
- How many people camp in each corridor, and how do they get there (foot, horse, boat, car)?
- How many people visit each reach by vehicle, for day use?
- How many people are involved in commercial recreation, both as guides and customers in the corridors?
- What are the seasonal patterns of total and specific types of use?
- What recreational trends are happening?

The Proposed Action indicates that use information will follow in the EA, but it is hard to develop an opinion on a Proposed Action without understanding why specific actions therein are being proposed, how soon they would be implemented, or what their real-world impacts on recreation would be. We look forward to considering additional information as it is made available.

It may be that this level of detailed use information is not needed until resource conditions or surveys indicate that triggers are being approached. We have no interest in CRMP's being overly burdensome or complex, especially when use is far below capacity, and in fact we prefer simple plans that are easy to follow to protect the river. In this case, if specific reaches are determined to possibly be near triggers, it will require a deeper dive into (all) visitor use

monitoring on those reaches. If not, then some level of detailed monitoring may be able to be deferred until a future date.

The Proposed Action Needs a More Comprehensive Approach to Recreation

Overwhelmingly, the Proposed Action considers management actions that wrongly monitor, limit and regulate only paddling. The plan should also and equally consider all the non-paddlers spending time in the river corridors, utilizing campsites, contributing to encounters, and experiencing and contributing to resource impacts.

Recreational uses change overtime. Even if, and we are not sure this is the case, paddling constitutes the majority of use on the rivers today, that could change in the future. The Plan should monitor all use, not just paddling, to ensure that management actions are focused appropriately. Some current or future impacts may have little or nothing to do with paddling, but if paddling is the only use that the CRMP empowers the Agency to monitor or limit, then paddling could be ramped down to little or no use without addressing the problem.

The Forest Service Manual offers some good advice on this topic: “When it becomes necessary to limit use, ensure that all potential users have a fair and equitable chance to obtain access to the river.” The Manual certainly does not call out boating as the sole type of use to monitor and limit. We ask that the Agency step back and take a more comprehensive view of recreation. This does not mean that we feel that uses should be limited at all, or that solely paddling could be limited if justified, but this should not be the assumed or default outcome, and should not be preordained by narrow monitoring and proposed actions.¹

The Proposed Action Should Describe Management Actions in a Transparent Stepwise Plan

The Proposed Action lays out a suite of potential management actions in tables with no description of what those actions would actually entail, or in what order they would occur. For example, often cited are “permits,” however that could mean anything from unlimited permits to track use, to severely limited lottery-based permits to curtail use. We ask that all proposed management actions be defined in detail. Just as importantly, we ask that the management actions be proposed in phases that first come to better understand impacts and uses, then indirectly limit use to prevent impacts, and only then directly limit use. The Forest Service Manual rightly advises “Apply indirect techniques for regulation of use before taking more direct action.”²

We have seen in the paddling community a fairly high tolerance for seeing other paddlers and shore-based parties while on river trips. Of course, when travelling to these remote rivers we are equally confident in saying that paddlers appreciate and seek solitude. We ask that the Forest Service try to test for support of Indicators, Triggers, and Thresholds in a forthright way so that paddlers know that identifying unacceptable encounter limits also means selecting conditions in which they could be denied a limited permit. There is a tension here, not just in the hearts and minds of backcountry paddlers, but also in the curation of backcountry experiences that feel wild but are also not unreachable due to severe limits. The Selway is perhaps a cautionary tale in this regard. While an assumption worth testing, we would think the vast majority of paddlers would support small increases in encounters on the Selway in exchange for increases in their chances of getting to paddle the Selway. In essence, at some threshold point seeing a few more

¹ Forest Service Manual, 2354.41a – Distribution of Visitor Use

² Id.

people than you'd like on a river is better than not seeing the river at all, since on-water encounters are only one part of the vastly faceted river running experience.

Middle and North Fork Camping Guidance Would Enhance Recreational Values

One opportunity for enhancement in the new plan could be improved guidance to help paddlers find campsites on the Recreational and Scenic sections of both the North and Middle forks of the Flathead. Confusion among at least some landowners and visitors exists regarding where camping is allowed, and specifically which lands are public. In some cases, enhanced collaboration with the NPS and eased NPS camping rules could provide for additional camping on the NPS sides of the river, increase the rivers' capacity, and reduce potential conflicts in mixed USFS/Private/NPS owned reaches.

Conclusions

We look forward to reviewing additional context and analysis from the USFS as this process moves forward. We ask that the USFS zoom out on this CRMP, to include all reasonable threats to the rivers' values, and all forms of recreation. We ask that future information provide significantly more information around potential new permit requirements, which will be a very important issue to paddlers and other river visitors. The plan should clearly communicate what it means for the rivers and for their visitors. While the plan must serve as clear and concise internal direction, it also must serve as an outward facing vision for the river that visitors understand, are partners in implementing, and are proud to support.

We want to close by sharing that the Forks of the Flathead are amazing, and we appreciate the Forest Service's protection and management of them. These rivers continue to offer truly exemplary paddling opportunities, and the rivers themselves continue to thrive.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Colburn', with a stylized, flowing script.

Kevin Colburn
National Stewardship Director
American Whitewater
PO Box 1540
Cullowhee, NC 28723
828-712-4825
kevin@americanwhitewater.org