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Flathead National Forest

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**Comments for proposed action on Flathead Wild and Scenic CRMP #56356**

A new Flathead Wild & Scenic Comprehensive River Management Plan has been a long time coming. It is important to get this plan right so it will work well into the future.

The suggested triggers and thresholds on various sections of the Flathead River do not seem realistic in relation to current private and public outfitted use. There is limited data to support proposed triggers and thresholds for the scenic and recreational Outstanding Remarkable Values relating to encounters with other floaters and river recreationists. The new CRMP appears to rely on many of the parameters established in the original 1975 Wild and Scenic Study Report, the 1977 EIS and the 1980 Flathead Wild and Scenic Management Plan. The ability for people to recreate on or near our rivers has expanded exponentially since those original plans. The CRMP does not provide historical or current data to establish baselines for triggers and thresholds based on the current level of activity and users desires. The CRMP needs to reflect how river users feel about encounters with others and how it affects their river experience now.

The North Fork Flathead from the Canadian Border to Blankenship Bridge has a unique management situation. Flathead National Forest manages river right and Glacier National Park currently permits camping on river left. The western boundary of GNP is defined as “the middle of the deepest active channel” of the NF. The CRMP should address how the FNF and GNP would manage the NF if permits were implemented. Regulations for both river right and left should be very similar and there should be only one system to obtain permits if or when that occurs. The CRMP plan should clearly state how management by FNF and GNP would work.

The proposed CRMP has inconsistencies when it comes to measuring triggers and thresholds to maintain the scenic and recreation Outstanding Remarkable Values. For example- some triggers say “parties”, another says “people”, another says “watercraft” and yet another “launches” per day. The measurement standards need to be well defined and consistent for all the sections of the river systems. The CRMP does not discuss historic or current private and outfitter use. Without knowing what the ratio of private to outfitter use how can we consider any eventual plan to permit and limit use by either group? Older data and that collected by camera locations in 2018 and 2019 are critical in finding out what this ratio is. There is no specific outline of how private floaters or outfitters would be limited to maintain a proposed ORV. It would be a mistake to leave this out of the proposed plan. Efforts to reduce use on other rivers (Grand Canyon & Idaho Salmon Rivers) has been challenged in court by both private floaters and outfitters to protect their historic rights.

On the NF Scenic section from the Canadian border to Camas Bridge, the plan suggests to maintain its scenic and recreation ORV encounters with no more three parties 60-80% of the time is the parameter. Given the short floating season on this section, the lengthy drive and shuttle required this desired ORV fails to recognize the current population of river recreationists and the ability of the river to support more activity and maintain the ORV. The Idaho Middle Fork Salmon River (a designated Wild and Scenic River) permits and launches seven groups of up to 24 persons each day from 5-28 thru 9-30 each year. The NF Flathead scenic section can maintain its scenic and recreation ORV with more encounters than stated in the plan. Beginning at the Camas Bridge on the recreation section of the NF the acceptable interaction jumps to 40-60 people and 10 encounters with other parties. This seems like an extreme change in acceptable ORV.

The Wild Section of the MF Flathead recreation ORVs seem overly restrictive. To encounter no more than two parties per day or only allow two launches per day at Schafer Meadows does not provide sufficient public access. The same applies to the South Fork Wild Section by establishing three parties per day as the threshold. The remoteness, short season, cost to horseback or fly into the launch site and the need for specialized equipment already effectively limit the use on the Middle Fork and South Fork Wild sections. The MF recreation management unit #1 section ORV encounter limit is too restrictive. The float season on this section usually ends by late July but when flows allow this section provides fantastic overnight river camping opportunities with adequate campsites to accommodate more activity. On the MF recreation management unit #2 section an estimated 51,000 people floated in 2018. Is this tally within the recreation ORV outlined in the plan? MF recreation management unit #3 section appears to have a trigger of use even higher than unit #2 does. The plan needs to recognize that certain sections of the Flathead River system are going to see more activity due to location and ease of entry. The recreation section on the Middle Fork, in particular Moccasin to West Glacier and West Glacier to Blankenship has and will continue to experience very high usage. No part of the CRMP speaks to managing the current level of activity, expanding parking or educating floaters on best practices for their trips in these sections.

The proposed CRMP includes few details about FNF and GNP outreach, education or best practices at river access or takeout points in any section. The plan fails to mention rail transportation along the Middle Fork and spills that may occur into the river. The plan does not address invasive species. The CRMP recognizes Private Land Owners in the river corridor. If a permit system is adopted river corridor property owners should not receive any special or additional right to float the river than the person driving to the river. The plan does not address outfitters or private rafters that send out lead boats to snag campsites while the rest of the party stays back. This type of camp jumping should be prohibited.

The CRMP as presented does not include enough information to warrant adoption. Much of the proposed action consists of old data and explanations of regulations. There is a lack of current data and historical data on recreation use trends for each segment of the river in the plan. The Flathead National Forest has not had adequate funds to collect data in the past. How will they fund future data collection to monitor triggers or thresholds? The public will oppose this plan without better information of year over year use. To aid in collection of data perhaps a voluntary online trip registration or registration at the put in or take out could help the FNF and GNP accumulate better data and identify trends. I ask you provide better historical data and get more public input before proceeding with this draft plan. Adoption of the proposed CRMP, as presented, would be a mistake.

I have recreated on the Flathead River system since 1980. I attended the 6 scoping meetings held in 2018 and the 2019 public meetings. I and several other local river enthusiasts have been actively working with Rob Davies, Colter Pence and Chris Prew since 2014 to encourage improved river management. Thank you for the opportunity to comment.

Respectfully,

Michael Burr

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