



Region One  
490 North Meridian Road  
Kalispell, MT 59901  
(406) 752-5501  
Ref: JW012-19  
September 12, 2019

Flathead National Forest  
Attn: Chip Weber, Forest Supervisor  
650 Wolfpack Way  
Kalispell, MT 59901

**RE: Flathead WSR CRMP**

Dear Mr. Weber,

We applaud the USFS for including FWP Fisheries in the development of this CRMP. The data collected by FWP throughout the years is useful in discussions regarding increased river use in the Wild and Scenic forks of the Flathead River. Although FWP has been involved in the process of developing this CRMP, we have the following comments on the updated plan:

- It has become clear that monitoring river use while floating down the river has its disadvantages, as timing dictates how many other floaters the rangers encounter. The USFS has adopted the use of stationary cameras to count the number of vessels/people on the Middle Fork from West Glacier to Blankenship and has developed triggers/thresholds from those cameras. We would encourage the USFS to use this same strategy for other sections of the Middle Fork, as well as the other forks of the Flathead. Similar triggers/thresholds for stationary cameras should be developed for those other sections/forks.
- The plan shows a trigger/threshold for wait times at West Glacier. This is a good thing to monitor, as many of the problems with increased river use occur at the put-ins and take-outs. We would encourage the USFS to develop a similar trigger/threshold for the Glacier Rim access on the North Fork, as use is very concentrated at the site and wait times can be a problem.
- It is not clear from the draft plan, how many of the triggers/thresholds were carried over from the 1986 plan, and how many have had their numbers adjusted based on current use levels. In future drafts of the plan, please highlight where changes have been made.

FWP encourages more consideration for wildlife species from a recreation and river management standpoint. The plan acknowledges that riparian habitat is important to numerous wildlife species, but the desired conditions presented are not clear. Several segments of river do not present desired

conditions for wildlife, and instead use the number of harlequin ducks on a river segment as the desired condition. For harlequins, FWP does not currently have enough survey information to state that duck populations are stable or increasing along certain river segments. For bald eagles, FWP does not survey nests enough to say with certainty that human activities do not result in bald eagle nest abandonment and that no detections of nesting mortalities or nest failures attributed to human influence occur.

We recommend that the Forest Service Wildlife staff continue to work with FWP wildlife staff to further collaborate on their segments for wildlife and to explore potential impacts as we move forward with this plan. If you have any questions, please do not hesitate to contact us. Thank you for the opportunity to provide comment.

Best regards,

*/s/ Jessy Coltrane*

Jessy Coltrane, PhD  
Wildlife Biologist  
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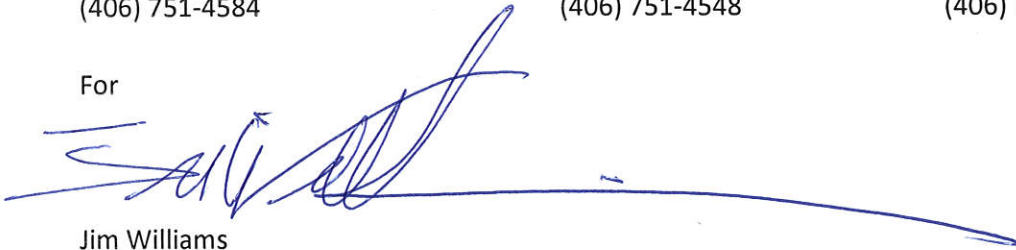
*/s/ Leo Rosenthal*

Leo Rosenthal  
Fisheries Biologist  
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*/s/ Chris Hammond*

Chris Hammond  
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For



Jim Williams  
Regional Supervisor