



**BACKCOUNTRY
HUNTERS & ANGLERS
MONTANA**

Flathead National Forest / Glacier National Park
Attn: Comprehensive River Management Plan for the Flathead River
650 Wolfpack Way
Kalispell, MT 59901

September 12, 2019

To Whom It May Concern:

The Montana Chapter of Backcountry Hunters & Anglers (MT BHA) is a group of roughly 3,000 hunters and anglers in Montana who value our wild public lands, waters and wildlife. The Chapter submits the following comments regarding the initiation of the scoping process for the Comprehensive River Management Plan (CRMP) for the Flathead River.

Comments

1. MT BHA recognizes that 1) the purpose of the proposed action document is to identify current management plan components that will be carried forward from previous plans, and will identify those components that will need to be added or updated for the Flathead CRMP; and 2) these actions fulfill the requirements of the Wild and Scenic Rivers Act.

This identification process is broad sweeping, but must be based on the best available evidence in order to inform the scoping process.

2. Previous management and planning documents include: A) the Flathead Forest Plan (2018); B) Outstandingly Remarkable Values (ORV) Assessment (2013); C) Flathead Recreation Management Direction (1986); and D) Flathead River Management Plan (1980). In addition, a summary of recreation monitoring data collection has been cited in Table 7.

As presented in the pre-scoping meetings, there are gaps in data that generally have not been reported to the public that are summarized in ways that demonstrate statistically robust methodology (e.g., accounting for missingness). Rather, narrative description has been used to report most conditions in the pre-scoping process. For future monitoring, we expect efforts to be concentrated on data collection methods that balances efficient use of resources with appropriate density of data points for longitudinal analysis.

3. Flathead Wild and Scenic River (WSR) system-wide proposed actions that are based on the Flathead Forest Plan appear to reduce redundancy in the CRMP for scenery, wildlife,



botanical resources, geology, fisheries, water quality and quantity, and history and ethnography, while still ensuring that monitoring and indicators are accounted for.

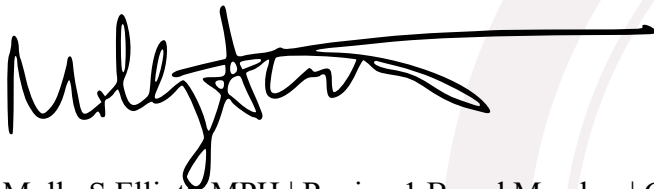
Allowing for updates to the existing agency continued plans (e.g., wildlife monitoring specifies updates to sites and intervals in data collection pending desired conditions not being met) may be perceived as helpful, however, this language may also work against protection of the resource. If wildlife desired conditions are not being met, for example, and the monitoring site is moved multiple times until an area is identified that may be closer to desired conditions, we expect all sites to be reported out to note trend in declining populations that may have otherwise not been recorded. The same comment applies to botanical resources, with respect to identification of an abundance of non-native plants.

4. MT BHA recognizes how diverse and complex the Flathead WSR system is, and appreciates that the uniqueness of each section is addressed by segmenting the proposed action to the specific locations. We are also acutely aware of how many competing opinions exist amongst stakeholders. Some special interest groups demand permitting and restricting use in order to preserve the resource, and other groups vie for no regulation in order to maintain open access to all. While a free-for-all will imminently ensure a Flathead case study in yet another Tragedy of the Commons, we also recognize the need for managing equitable access.

Seasonal limitations on use, limits in group size, permit systems (e.g., self-issued and free) for river travel, limits in campsite use (e.g., group size per site, reservation systems, Leave No Trace enforcement, etc.), access site improvement/development, and outfitter limitations are all reasonable management strategies that have been implemented on other western river systems. While continuing to recognize how diverse and complex the Flathead WSR system is (the system as a whole is unique), it is important to consider how the system may benefit from implementing actions applied in other systems that have proven to improve the overall conditions.

Thank you for considering these comments.

Sincerely,



Molly S Elliott, MPH | Region 1 Board Member | Columbia Falls, MT
• The Montana Chapter of Backcountry Hunters & Anglers

