Flathead Wild & Scenic River

Scoping for the Comprehensive River Management Plan

Comments on the draft plan

September 13, 2019

These comments primarily aim at the management of the scenic section of the Upper North Fork of the Flathead River.

- When the river was first designated a Wild & Scenic River the Upper North Fork Section was
 designated as scenic with the intent that it would be preserved in a state of nature similar to
 what existed at the time. Today the river usage has clearly exceeded the limits established. This
 is especially true when the activity levels on the North Fork is assessed in the correct way.
- When the Flathead was first designated as Wild and Scenic, the definition of a floating party was established as a measure of usage. However, at the time, the use of the river was by small parties, generally 2-4 people in one boat. The dramatic increase in usage today is driven in large part by the fact that the average party size has grown to 6-8 people and 2-4 boats. Many parties are now organized with larger groups, some as high as 10-15 boats, who float the river as a group activity. Therefore, in order to properly assess the change in impact we need to measure it based on total people and not just by the old definition of parties.
- Measured by total people the impact has been significant. While this is only true for the months
 of May, June, July, Aug and September, the impact has been significant as many people have
 commented, and the study materials confirm. When the float party information is translated
 into the number of people (rather than just boats/parties) the increase in traffic and people on
 the river clearly indicates the protection thresholds have been violated. This by definition
 means dramatic efforts must be taken to return the river to its condition when it was first
 designated.
- There are different groups of users that must be addressed as part of the plan. This includes local property owners, day use by non-residents, multi day use and use by tourists and commercial outfitters.
- The conflicts that have arisen in the last decade between local residents and day use will only continue to escalate if action is not taken to reduce the impact on the river primarily brought about by dramatic increases in day use by non-residents.
- The upper NF represents a unique opportunity not available in other sections of the river. This opportunity is a relatively low-cost access to a multi-day river experience in a very scenic area. While there are some more remote sections of the Flathead that offer multi day opportunities these are typically accessed at much greater cost. Additionally, many sections of the Flathead provide opportunities for day floats. Indeed there are many, many rivers and other recreational river opportunities nearby, including many that are not part of a national Wild & Scenic River system, and therefore more suited to single day recreation floats. Therefore, serious consideration needs to be given to designating the upper NF for multiday use as opposed to single day use.

- The role model I wish to offer as an example is the Smith River. The river plan solved the conflicts that existed between local owners/residents and floaters. It also provided a mechanism to protect the river corridor from over-use, litter, expanding impacts and human waste. The success of this model should serve as a guide for how we now further protect the upper NF and restore it to is original experience.
- Day use should be allowed by residents who are landowners who have historically only used the river for day floats. Their activity has very little impact on the river usage and should be allowed to continue under a permanent free permit. In addition, local residents should be invited to help support efforts to monitor the river during the busy season. They should only have access to multi-day floats via the permit system.
- Non-resident use should be migrated to a multi-day plan via a permit system. Those looking for opportunities to do only day floats should be encouraged to use the many other sections of the Flathead which offer abundant day float opportunities (the recreational sections of the river). The Upper North Fork should be reserved for multi-day floats. A permit system is necessary to ensure floaters comply with such a system, understand the rules, know where to camp and to collect fees to fund the management of the multi-day experience. The numbers should be kept low to maintain the sense of remoteness that existed previously and is part of the unique scenic value of the North Fork.
- In order to reduce the impact of the multi-day trips there should be designated campgrounds where the floaters can spend the night. Parties should no longer be allowed to just camp anywhere they want. The designated campgrounds should be reserved for floaters only (with no access to them by road) to preserve the experience. They should include fire rings to reduce the risk of wildfire, outhouses to reduce the impact of human waste, and water to provide fresh water to reduce potential pollution of the river by nearby meal and dishes clean up.
- This would also eliminate conflicts with landowners due to camping on private property or loud music/parties at impromptu campsites. It should also dramatically decrease the risk of wildfire. Hopefully it would enable a process by which landowners would no longer have to post numerous "private property" signs along the river corridor, which would significantly improve the experience of floaters. Today it is a huge disappointment to have to float the river and see mile after mile of posted signs. This very much distracts from the experience.
- The permit system should be aimed at controlling the number of float parties to the original guidelines but measured by the number of people. Party size should be limited to no more than a certain number of people or a certain number of boats. For example, it could be up to six people or two boats. This would be a slight increase over what existed at the time the limits were set initially but significantly less than what is experienced today. The focus would be to provide a more remote experience, and this requires fewer people in fewer parties.
- Important to these limits is the definition of "boat". Any floating vessel would be considered a "boat". A party of six could have up to two vessels on their permit. One raft and one kayak or other combination of up to two vessels. Any other floating device would be included in the definition of floating vessel: inner tube, fishing pontoon, SUP, etc.
- The number of sites should be limited to a sufficient number to accommodate a multi-day float. Generally, the upper NF lends itself to approximately a three-day float at most. The border to Ford Station would be day 1, Ford to Sonderson meadow would be day 2. And Sonderson to Coal Creek would be day three. A final float day to Big Creek could be included for a total of a

four-day float. Users could choose between 3 or 4 day floats. But permits would only be provided for at least three nights. In late summer when the river is low it might be necessary to only allow a put in at Ford as the border to Ford section might be too low to accommodate most rafts easily. All of these locations represent excellent opportunities for the campsites as maintenance personnel could access them but they can be otherwise closed to the public to provide overnight floaters a more rustic, remote experience (no cars). All of these areas could be converted to floating party use only.

- The permit system should collect sufficient fees to fund a seasonal ranger position as well as maintenance of the campsites, enforcement of river rafting and fishing rules.
- The success of the Smith River and its immense popularity is a testament to how popular this approach would be. The North Fork has a unique place in the multiple use approach to the entire Flathead River management system. We should provide users the opportunity to experience this unique scenic environment while maintaining that experience for generations to come.
- In closing, I would point out that the experience my children now experience is dramatically reduced from what I experienced growing up in the North Fork. As a Montana family I want all users of the river now and for future generations to have the opportunity to experience the river as it existed when it was first established. This includes all of us who live in Montana but also the many Americans who might desire to also have this unique opportunity. I believe that is what the Wild & Scenic plan was intended to accomplish. I know that most North Fork residents want to return to this experience as well. We will not be adhering to the protection requirements of the Wild and Scenic River Act if we don't dramatically change the way the river is currently used.

Submitted by Jack and Sue McFarland on behalf of their family and other North Fork Residents.

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