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Comments on Flathead River CMRP Proposed Action July 2019

We live on the North Fork along the Recreational section in the designated corridor, so we are deeply interested in all aspects of managing our home river!

Here is what I have observed during six decades of utilizing mainly the North Fork Recreational section:

1. When I purchased my property in 1987, my shoreline was comprised of the Rainbow river rock the Flathead is so famous for. You could not step along the shoreline without noticing almost each and every rock covered with the spent husks of stonefly nymphs. Most rocks turned over as well as sandy, gravelly deposits were covered with caddis fly nymph casings. Now, my shoreline is covered with a thick mat of "rock snot" and the shoreline is a brown color and out in the water, a pale green! Very few stonefly or caddisfly nymphs are present.
2. My recent observation is that the rock snot increases as you proceed down river, not as much at Coal Creek, more at Big Creek, and worse just above Blankenship Bridge. Without adequate baselines and continued monitoring, we do not know the causes, but this deterioration is a failure of the Forest Service to do its duty to "protect and enhance" the water quality of the North Fork.
3. In 1987, we were just losing our Bull Trout fishery, and shortly thereafter, catch and release only for Cutthroat. And yet, bait fishing and treble hooks are still allowed, and we are overrun by outfitters, and their hook, handle, photo and release ethic!
4. In 1987, I could walk along my bar along the river, and never see a noxious weed. Now, all fishing accesses, Blankenship Bridge approaches, road corridors, and the river corridor is blanketed with a Pandora's Box of noxious weeds, with the latest infestations of Toadflax, St John's Wort, Oxeye Daisy, and Knapweed being endemic. Each year I hand pull and spot spray, only to be reseeded from upstream and by air from the surrounding Forest Service land.
5. When I used to cross over to the Park, the rocks seemed cleaner, and the prevalence of weeds less. Now, that seems no longer the case.
6. The Blankenship Bridge area is horrendous! Disbursed camping allowed. Very few are self-contained and there is dog and human excrement everywhere. It seems that in the spring, an increasing number of people use the fishing and boat access areas as dog toilets. I could barely get down to the river without stepping into excrement. Take a guess where it all ends up!
7. In recent years and in an increasing number of occasions, I have observed: Dogs running loose across the North Fork on the park side, a clear violation of their rules. Human and dog excrement unburied within the floodplain; evidence of camping and campfires on private land above

Blankenship Bridge; floaters defecating in and along the river; boom boxes blaring; poor launch and retrieval etiquette at access points; campfires at the Blankenship disbursed area during fire restrictions; and on and on.

8. What I haven't observed is any patrolling by River Rangers.

The Proposed Action for the Comprehensive River Management Plan released July 2019 may or may not be sufficient to "protect and enhance" the ORVs along much of the river system, especially the recreational section of the North Fork from Camas to Blankenship. It lacks any sort of specifics that would allow the affected public, especially river front landowners like myself to analyze the "Proposed Action" and make any substantive comments or offer any alternatives. Under the Introduction, Purpose of this Document, paragraph 2, page 1, it states that this document will identify the 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. Where in the document are those components specifically identified? For instance, as a landowner in the river corridor, if some bureaucrat decides that there has been a decline in the "scenic integrity objective", will I be approached, under threat of condemnation, to grant a scenic easement and give up associated private property rights? Is the Land Acquisition Plan one of the components that is being carried forward?

Obviously, the water quality ORV is the most important and what makes the River system so special. It is also the ORV that is most susceptible to deterioration. And yet in an early meeting, the water quality was characterized as "pretty good" and compared to the Missouri! There appear to be no baseline studies, or if they exist, they are incomprehensible to laymen. I believe in the 1980 Plan, it was noted that fecal coliform and other pollutants were present at administrative, launch and camping areas, and promised annual monitoring of the situation. I see no evidence that this has occurred.

It is obvious to me as a river front landowner, the river system has been allowed to deteriorate in many ways under Agency management under the 1980 Plan and yet you would like to just start all over from the current deteriorated conditions, rather than be held accountable for either poor planning or deficient execution.

It seems that the first step in drafting a new plan would have been a critical look at the 1980 Plan, what worked and what didn't, before embarking upon a new plan, seemingly from scratch and absolving the Agencies of any and all responsibility for the significant failures to protect the ORVs, much less enhance them. I doubt that the consultants have ever stepped foot on the river system, and if so, would not have the perspective of a long term user or landowner, and they seem to be ignoring our perspectives.

Following are my specific objections to the CRMP Proposed Action:

The proposal is anything but comprehensive! It should be withdrawn and rewritten to include specifics especially in the area of water quality, but also in the area of wildlife, botany and fisheries which are insufficiently addressed in the document in its current form.

The decision to hire a consultant in the first place. Their kindergarten exercises and meeting formats seemed designed to control the information provided and gain a contrived result. I would rather that

local staff, many of whom I know personally and whom are much more responsive to locals and their neighbors carry out the process. They are also users of the resource with a stake in the outcome, not just someone out of Helena raking in consultant fees!

I strenuously object to the FNF Plan statement of desired conditions including the statement numbered 07 on page 13. First of all, the statement is nonsensical. How else would guided fishing and rafting experiences be provided than by commercial outfitted use? That statement seems to favor commercial outfitters and tourists over mostly local private party use, and is certainly not a statement of desired conditions that I support. In that regard, any restriction of use via permitting or other means needs to come first from the outfitters, as the forest has allowed far too many companies and launches, and has created the overuse problem in the first place.

You need to spell out specifics, rather than just refer to other plans, agencies or documents. On page 21, the statement "Because..., there are some resources where WSR-specific indicators and thresholds were determined unnecessary" is an example of this. How can the public evaluate your proposed action with language such as this?

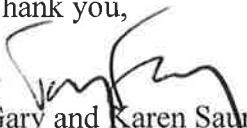
I object to the emphasis on Recreation, as if it were the most important ORV. The Recreation ORV flows from and is highly dependent upon all the other ORVs. Viewing Recreation as a River Value on its own results in the exploiting, publicizing and over-commercialization of the river to the detriment of all other ORVs.

I support a permit system, so long as it does not require me as an owner of river frontage to acquire a permit to launch or retrieve from my property, which I do sometimes almost daily.

I also would like to see a ban on dogs imposed for floaters and users of the river access points. The effect of uncontrolled pets and their waste on water quality and wildlife has not been addressed and needs to be!

Finally, the river corridor in many places encompasses privately owned land such as ours. That is a fact! The Forest Service and other agencies need to recognize and acknowledge this and adopt a more cooperative relationship with landowners. Many, if not most of the landowners I know are good stewards of their property and are greatly concerned about any deterioration in the river outside their front door! Our private property rights need to be addressed and embraced, as we are doing a better job of monitoring and protecting the ORVs of the Flathead than the agencies are doing now

Thank you,


Gary and Karen Saurey



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