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Comments: Desired Conditions for ORVs

In the Botanical Resources Section on Page 8 of the proposal, it states: "Invasive plant species are at low abundance or non-existent."

Over the last 3 years, I have repeatedly floated all of the Flathead River segments, except for the Middle Fork (Wilderness) segment. I stop and walk within the river corridor frequently. In almost all cases there is, at a minimum, some evidence of invasive plant species and in many cases, there is significant invasive plant species evident. In my opinion the desired condition of the Botanical Resources is far from being met and this proposal does not mention the Botanical Resources ORV in Table 4 proposed management actions, nor in Table 5 monitoring plans.

The river corridor is being overrun with invasive plant species and there is a significant need for the forest service to pay attention to the river corridor's Botanical resources

I ask the forest service to consider including the Botanical ORV in both Table 4 and 5 to ensure proper management of this resource.

Public Awareness

In the Geology section on Page 8 of the proposal it states: "The public is aware of the importance of protecting mineral licks and are provided with observation directions and information on any floating restrictions to protect wildlife in these areas."

There is a public information board at the Bear Creek Boat launch which is upriver from the mineral licks. There is NO information on this board to educate the public on the current restriction around the protected mineral licks. In addition, I cannot find any other hard copy or electronic information for the public to easily access which would inform them of these restrictions.

Lack of adequate public awareness is a bigger issue than just the mineral lick area. This proposal has a number of fantastic proposed management actions, including the protection of the mineral lick area on the middle fork MU1 segment.

For these management actions to be effective and for the public to accept and follow them I strongly recommend the Forest Service and National Park Service greatly increase their public outreach and education plan.

Public access to data and methodology

In the North fork MU1 section under the Outfitter and Guide Services section on Page 10 of the proposal it states: "The number of outfitter and guide permits within the river corridor remains appropriate to provide access to recreation opportunities for all users,"

What is the basis of this statement? I request the forest service provide to the public data for the North fork MU1 segment, including total public usage and total outfitter and guide service days.

In the Middle fork MU2: section under the Outfitter and Guide Services section on Page 13 of the proposal it states: "The Middle Fork Recreational MU2 has the highest percentage of commercial use among the WSR segments, primarily traditional outfitter and guided floating and fishing trips."

What is the percentage of commercial use compared to total recreation usage for this MU2 middle fork section? This data should be provided to the public

In the Proposed User Capacity section on page 17 of the proposal it states: "A detailed user capacity report, including methodology and existing use estimates, will be provided with the draft EA for review."

The public should be provided the user capacity data collected, the methodology used by the forest service and the existing user estimates during this commenting phase of this proposal. Without this data the public has no way to provide educated feedback on the proposed user capacity. Waiting until the draft EA is too late for the

public to provide feedback, challenge the methodology and request modification. The public needs to understand the total historical usage, how much is from outfitters and guides and what methodology the forest service used to determine user capacity. Why can't this data and information be release now?

Equitable treatment of recreational users if trigger or thresholds are exceeded.

In "Table 4: Proposed Management Actions" There is a proposed limit on total outfitter and guide service of 86,000 service days on the Middle Fork MU2 segment. There is also a proposed limit on total outfitter and guide service of 50,000 service days on the middle Fork MU3 segment. Each of these proposals have this statement "The average actual use for the combined reach over the past five years is 71,889 service days". If I am understanding the term "combined reach" correctly that means the MU2 and MU3 segments of the middle fork have had a combined average usage over the last 5 years of 71,889. Is my interpretation of combined reach correct?

In this proposal, for the MU2 and MU3 segments of the middle fork, the Forest Service is proposing an outfitter and guide service days of 136000 (86000+50000). This would be an 81% increase in outfitter and guide service days from the last 5 years average. How does the Forest service support this large increase?

On this same Equitable treatment topic, in "Table 5: Monitoring Plan, Indicators, and Thresholds" There are a number of Float User and Shore User triggers when a management action(s) would be taken. While the proposal does not indicate what type of actions would be taken it would seem logical if a Float User or a Shore User Trigger was exceeded that some type of user restrictions would be put into place.

In the Proposed Management Actions section on page 18 it states "Special uses would be permitted by the forest supervisor as appropriate". It also states "Priority use authorization of use for up to 10 years, based on the holder's past use and performance and applicable programmatic or project decisions to allocate use."

The proposal says in Table 4 in the Middle Fork Recreation for Mu2 and MU3 as it relates to outfitters and guide service "All use from priority and temporary use pools must be approved in advance and is subject to review and rejection if biological or social resource conditions warrant. If monitoring shows there are impacts to social or biological resources associated with the permitted outfitters, the authorized official can restrict use to address resource conditions."

So, we have 2 issues here, what is the definition of biological or social resources as these terms are not defined or used anywhere else in the proposal. It is also unclear if the authorized official can restrict use during the priority use authorization period or if the authorized official has to wait until after the priority use authorization period has expired.

In Summary -This proposal establishes a significant increase in outfitter and guide service days and a trigger/special user framework where management actions would seem to initially and primary impact the public recreational user and protect the special permit user until, at the earliest, the special use permit expires, which could be up to 10 years. This does not seem fair and equitable.

To address this in equity, the statement in Table 4 in the Middle Fork Recreation for MU2 and MU3 as it relates to outfitters and guide service should be clear that all use from priority and temporary use pools could be reviewed and restricted within the priority use authorization period if the desired condition of any ORV warrants. How will the Forest Service ensure protection of the ORV resources and equitable treatment of all recreational users when there is an up to 10 years' timeframe for a special use permits and a trigger/threshold timeframe of 5 years?