

Data Submitted (UTC 11): 2/5/2025 2:24:58 PM

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Comments: Dear Supervisor Botello,

I am writing to provide comments on the scoping of the Wild and Scenic Three Forks of the Flathead Comprehensive River ManaPlan. I appreciate the opportunity to contribute to this important process.

Several areas in the current draft plan seem to lack the necessary detail for a comprehensive understanding of how the proposed strategies will address key management challenges. Below are my comments and concerns:

1. There are no indicators that look at use away from the river and within the corridor. The 2019 Proposed Action had fixed station indicators, #day parking lots full, loading times, campsite conditions, campsite occupancy, experience quality index, occurrence of litter, noxious weeds, bank trampling, riparian condition, etc. The plan needs to look away from the river, as well and even discuss stock use within the wilderness and the associated impacts. Please explain why these indicators were not carried forward in the 2025 PA.

2. There's not a good discussion about possible management actions if triggers are reached. Possible additions are: no motors on recreation sections, in SF allow motors only below full pool of HH Res. rather than to Twin Cr., restrict outfitter use to certain days of the week on certain sections, install SCAT machine in CFalls, Require pack out as well of containment of human waste, overnight camp permits in certain sections where camping is limited, Have time slots for commercial use to stagger crowds, party size could differ by sections, etc.

There are 219 miles of designated river which affords the opportunity to find a win-win for most users and provide some creativity in management. For example, why not restrict outfitter use from Border to Polebridge Fridays thru Sunday and move that use to the lower NF? Why not have a river campsite reservation or drawing for sites between Bear Creek and Cascadilla given the limited sites available? Why not limit outfitter use on some sections rather than having a 2-5 fold increase on every section? There are some sections where use can be increased but it should not be across all sections.

3. There is no discussion about plans for existing access: will parking lots increase in size, will new access sites be developed, will toilet facilities expand to Sonderson, Wurtz airstrip? Access sites are currently at capacity. How can MF MU2 and MF MU3 increase to a combined 136000 user days and there is no proposed action to improve or add new sites? Can you please explain where these numbers came from since they are much larger than the 2019 Proposed Action and what type of ORV monitoring (including data) has occurred over the last 5 years to substantiate this proposal?

4. I would argue that the recreation and fisheries ORVs at a minimum may be currently impacted with the existing use. Has there been a survey or questionnaire to collect river users experiences since 2014? In the 2014 survey, a large number of respondents favored or strongly favored: more information regarding appropriate behavior, packing out human waste, decreasing the number of outfitter and guides, limiting boaters to protect fisheries, requiring land base users to pack out human waste, and limiting boaters if visitors feel crowded. Those sentiments were shared from 2012 to 2014 when river use was less than half of what we see today. Given these comments, it may not be prudent to increase use.

5. Has there been efforts to work with the State or County to shift some river use below the Wild and Scenic River corridor? Working with these entities to develop or promote access sites on the main Flathead, Stillwater, Swan Rivers etc. may reduce the number of users upstream.

6. Need a discussion about how capacity was established. 2025 Proposed Action numbers are higher than the 2019 Proposed Action. Why is that? What monitoring occurred to justify the increase in numbers? The ORVs are

the same and if the lower 2019 numbers were established to protect ORVs how are the higher 2025 numbers going to do that?

#### 2025 Proposed Action Inconsistencies:

Page 17- Why would the MF wilderness proposed capacity be at 170 while the SF wilderness is 90 within the wilderness and 30 just outside the wilderness? South Fork gets more use than the MF. Why would the capacity be less outside the SF wilderness than within, given that access is much easier outside? How do backpackers and stock users factor into capacity? Have you considered limiting the number of watercraft per party in the wilderness? For example, impacts on shore users such as anglers would be less if there were only 7 packrafts rather than 15 in a party.

Why would capacity be higher on NF MU2 scenic section than the NF Rec. section? Doesn't it stand to reason that Scenic would be less than a recreation section and that there are more access points on the rec. Section. The capacities are only addressing on water use but there is no discussion about use in the corridor. These two sections represent good examples of how in corridor use or upland use can differ between sections. There is much more upland use and more impacts in the recreation section but yet the proposed capacity is less.

Provide a cross walk of how person/day equates to indicators of parties per day or boats per day. For example, if we use the NF rec section and the capacity is 330 people/ day but yet your indicator is 10 parties per day and the party size is 50 that is 500 people per day which doesn't equate. How are parties defined? Is there spacing or time constraints to be together to count as one party?

Page 18- Explain pool days. It is my understanding that pool days are unlimited for the section Paola to House of Mystery as well as the lower NF below Big Creek. Priority days on the MF from Bear Creek to HOM are capped at about 37,000. However, the cap has been exceeded every year in the last decade by issuing temporary days without any additional analysis that has been available for public review. This also includes a doubling of angler days. In essence, the temporary days have become permanent with a high of 101,051 in 2021. On page 20 it appears that service days are being set at 136,000 for the lower MF. It seems prudent to have a lower cap much closer to the existing one until monitoring of new indicators can determine whether that kind of proposed use can be sustained. If and when a permit is needed because of ORV impacts, its possible that public boaters will bear the brunt of the impact since commercial operations have now been guaranteed 136,000 use days rather than 37,000 and it will be difficult to legally reduce those days. There may be less days on the water for public boaters. Now is the time to argue for a lower cap not during the next planning cycle which may be 20 years.

Page 19- In the SF, restrict motors to the HH Res, High water mark at 3560' rather than Twin Creek to protect bull trout. Pack out of waste should be a requirement not just within 200'. Prohibit 10 HP motors on all segments should be included. Livery services are also in the wilderness for e.g. Pat Clanton at Mid Creek. Require fire pan or blanket in SF as well. Explain how group size limit was established. Address helicopters, are they prohibited? Flying at certain altitudes or landing?

Page 20- provide a breakdown of current public vs commercial use by section. There is no camping from Belton to McDonald Creek; why not extend this restriction downstream to include Blankenship. How is Blankenship being addressed with this plan? See service days questions above. Briefly explain what the current emergency spill plan is with BNSF and how that is annually reviewed and updated.

Page 21- Concern that a threshold with a 5 yr decline for fish maybe too long and late for fish to recover.

Page 22- Include other indicators that address WSR Corridor impacts as mentioned above. Discuss whether it's best to use boat or parties. For example for shore users, impacts may differ whether it's a one person in a kayak or 6 people in a raft. This would count as one boat but please discuss what your assumptions are regarding

impacts to that shore user.

Once again, the math doesn't add up. Group size on river is 20. 20 times 4 float parties is 80 people yet capacity of people/day is 180.

Page 23- Capacity on NF Rec is 330 yet the indicator of 60 boats per day is 3 times higher than the MU2 scenic section (20 boats/day) with a capacity of 450. Rational needs to be explained.

Page 24- Shore user indicators should be added for each MF rec section. Capacities don't line up with encounter indicators. Need shore indicators for SF Wild MU2 and Rec sections. Why are SF indicators worded differently than NF and MF?

It appears that the focus is on river floaters and less indicators for shore users, As an angler, where can I go to fish for the day where I would not experience a steady stream of floaters without having to hike into the wilderness? There should be some sections such as Essex to Cascadilla or the upper NF where there is lower float capacity so shore users can have a pleasurable experience. Perhaps, restrict midday put ins for commercial trips to before 1:00 on certain days on these sections to enhance the shore experience.

Thank You for the opportunity to comment and I look forward to having further discussions with your team.

Pat Van Eimeren