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Comments:

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To Whom It May Concern:

Flathead Comprehensive River Management Plan: (FCRMP)

I have read and studied most of the supporting documents for this project as published on the National Forest Service website. As a result, I would like to voice my concerns and criticism of the FCRMP.

My concerns with FCRMP are several:

1) The plan fails to adequately address water flow dynamics due to changes in climatic conditions.

As the warm season lengthens due to climatic changes, will the Forest Service adjust the plan to water flow levels? If future snow melts are earlier in the season and less significant, will the plan be adjusted? The current season in the FCRMP is referenced as June through September. Currently, the season avoids disturbing the spawning season of the Cutthroat and Bull Trout. However, fish may try to adapt to changing conditions and conflict with the season June through September. Will the Forest Service adjust the season to protect the spawning of the fish?

2) The plan states that the "trigger" for action for the fishery is a sustained decline over a five period. This is far too long of a time period to trigger a change in management.

As a note, the fishery decline in the Jefferson River drainage was far less than the five years stated in the FCRMP for triggering action. In 2023, the Big Hole fishery collapsed in almost one year. Potential contributors to the collapse were cited as climate factors, disease, water quality issues and increased recreational pressure. It's far less expensive to avoid a mistake, than to make one and try to fix it afterwards.

3) The plan "trigger" dates are far too generous?

The plan trigger dates on the river usage criteria is 3 out of 5 years. This should be a yearly criteria. By the third year, the damage from overuse will have been done. Additionally, limiting usage after three years of overuse will be very difficult for the public to accept. The mindset of "it's been like this for three years" must be avoided.

My criticisms with FCRMP are several:

1) Your trigger criteria for usage states "boats" but I could find the definition of "boats".

The definition of boats may have been overlooked while reading the documents. But, it would be helpful to know whether a boat is any floating vessel that is capable of carrying an individual or something else. Are we talking about 60 float tubes or 60 rafts with 6 passengers per day?

2) Your trigger criteria for action should include water temperatures.

The fishery can be stressed with water temperatures above 68 degrees.

3) Your trigger criteria should be more specific in regards to trash in or near the river.

Guides need to know that their clients and others throwing garbage in the river will not be tolerated. Something like 100 foreign man made items per segment will result in action. This is an incentive to avoid littering and for others to clean up. Also, it lets the public know that littering is not an accepted behavior in a wilderness setting.

4) Your trigger criteria should be more specific in regards to water flow rates.

If flow rates drop below a certain level and the water temperatures rise to near 68 degrees, fish could be spooked by passing boats and stressed. Therefore, flow rates should be a criteria for considering action.

Conclusion:

Unfortunately, certain recreational assets like cold water rivers are under pressure from increased use, development, an extended warm season and pollution. Therefore, the Forest Service's action or inaction in protecting these assets is critical to current users and future generations. Hopefully, the Forest Service realizes the gem of a river under its authority and acts with concern for its continued pristine state.