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Organization: Flathead Rivers Alliance

Title: President

Comments: February 6, 2024

Anthony Botello - Supervisor

Flathead National Forest

Dear Supervisor Botello,

On behalf of the Flathead Rivers Alliance board, I am writing to provide comments on the proposed action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River System. We appreciate the extensive efforts of the Interdisciplinary Team in crafting this document and welcome the opportunity to contribute to this important process.

We understand that the initial plan presented for review is not complete and we remain hopeful that the final draft will provide the necessary detail to clarify how the proposed strategies will address key management challenges.

We encourage the Interdisciplinary Team to consider the following concerns and suggestions in the final draft:

1. Management Actions for Exceeding Triggers and Thresholds

* Provide a more detailed description of management actions when triggers and/or thresholds are exceeded for each management segment.

2. Monitoring Process

*Clearly define the frequency of monitoring and include a more detailed description of the monitoring process. Specifically will monitoring occur on specific or random days? Will it take place during both peak and shoulder seasons? Will shoreline cameras be used? Will encounters be measured both on the shore as well as while floating.

* Our organization would be happy to assist with some of the monitoring activities.

3. User Capacity Definition

* While we recognize the need for flexibility in management actions, we are concerned that without clearly defined user capacities there will be continued confusion on the part of the public and agency staff regarding when management action is required.

* Defining user capacity as estimates that "only provide a sense of the kinds and maximum of use" may allow future administrations to bypass the court order to "adopt specific limits on user capacity that describe an actual level of visitor use that will not adversely impact the river's ORV's (Friends of Yosemite Valley v. Kempthorne).

*We are puzzled why there is inconsistency in how some of the proposed user capacities were assigned. For example why is the proposed user capacity on the NF scenic MU2 @ 450 users and NF Recreation section from Camas to Blankenship @330 users?

4. Indicators, Triggers, and Threshold Metrics

*In our opinion methods used in the current proposed action to determine indicators, triggers and thresholds (i.e. "no more than 3 boats per day passing the Bear Creek monitoring site during 60% of the days monitored, in 3 out of every 5 years") are confusing and could vary widely depending on how and when the monitoring takes place. We would encourage the Interdisciplinary Team to provide clear concise metrics that will be used to determine when management action is necessary.

5. Preemptive Management Actions.

*Include language in the plan that allow agency staff to implement proactive management actions if needed before the completion of a 3-5 year monitoring program.

6. User Capacity Increases

*We are puzzled by the dramatic increase in user capacity estimates on many of the management sections and are hopeful the final draft includes a more detailed description of how numbers were determined.

*We question why user capacity numbers are being increased when, according to agency staff, thresholds on some sections of the rivers under the current plan are already being surpassed?

*We strongly encourage the release of current and past user days by segments in each of the Management Units. We understand that there is data available that shows both float party encounters as well as shoreline counts. We are hopeful this data will be released in the final draft plan. Without seeing the complete data used to make user capacity estimates, it is difficult for the public to make an informed opinion on future use.

*We are hopeful that the Interdisciplinary Team will be open to revising indicators and user capacity numbers based on public comment.

7. Include Indicators, Triggers and Thresholds that were in the 2019 plan

*We are puzzled that some indicators from the 2019 plan and the current 1986 plan do not appear in 2025 plan. These include shoreline encounters, number of days that the parking lots are full, litter encounters, campsite conditions, campsite occupancy, access site wait times to launch, more detailed water quality indicators, launches per day from Schaefer Meadows, stock use, and sedimentation at use sites.

8. Addressing Overcrowding at Moccasin, West Glacier and Blankenship Access Sites

*We are hopeful the Interdisciplinary Team would consider management actions to alleviate congestion at Moccasin Creek, West Glacier and Blankenship access sites including limiting and staggering commercial launch times, more frequent staff and volunteer presence, and river etiquette education.

9. Accommodations for non-outfitted Users

*We would also encourage the development of a campsite reservation system which would give opportunities for both the non-outfitted and outfitted public the ability to secure campsite during peak season periods.

*We would encourage the Interdisciplinary Team to consider setting aside some launch opportunities specifically for the non-outfitted public users.

10. Native Fish Population Decline

*We are concerned that the threshold for fisheries is defined as a sustained decline in cutthroat and bull trout abundance over a 5 year period. We believe this is too long for a complete recovery to take place and would encourage that a shorter period be considered for management actions to be implemented.

11 Include Current Plan Requirements in the 2025 Draft Plan

*We are hopeful that the final plan would include a description of current restrictions and regulations including food storage, human waste management, and invasive weed management.

Management Actions We Support

While we have outlined areas for improvement, we also want to acknowledge and support several key management proposed in the draft, including:

1. Establishing a mandatory but unlimited free float permit across the system.

*In addition to beginning the permitting process with the wild sections of the Middle Fork and South Fork, we would encourage the inclusion of the upper North Fork (MU1) segment. We are hopeful the final draft will give more details on how these permits will be administered.

2. Prohibition of Camping and Parking on Gravel Bars

*We support no camping or parking on gravel bars. While parking on gravel bars occurs on many of the access sites, it has increased dramatically at West Glacier and Blankenship in recent years.

*We would appreciate the description of infrastructure improvements including access site improvements, expansion of existing parking lots, new parking lots, additional access sites, and how a shuttle service might work to help accommodate this new restriction without dramatically increasing use.

3. Solid Human Waste Containment Requirement

*We support the requirement for solid human waste containment on all segments of the Flathead WSR corridor.

4. Fire Pan or Fire Blanket Requirement

*We support the requirement for firepans or fire blankets within the WSR corridor on the MF and NF.

5. Noise Level Restrictions

*We support noise level restrictions on lands and waters within the WSR corridor.

6. Group Size Limitations

*We support group size limitations as follows: 50 on Recreational sections, 20 on scenic sections and 15 on Wild sections.

7. BNSF Agreement for Spill Prevention

*We are pleased that the draft calls for the establishment of an agreement with BNSF to proactively address

spill potential and prevention along the Middle Fork corridor and are hopeful that in addition to GNP and USFS that FWP be included as a stakeholder in the agreement.

8. Dog Restrictions

*We support prohibiting dogs on the river corridor between Bear Creek and Essex.

9. Camping Restrictions

*We support prohibiting camping from Belton Bridge to McDonald Creek.

10. Signage at Meadow Creek Gorge

*We support installing signage above Meadow Creek Gorge at the Mid- Creek Takeout.

11. Drone Restrictions

*We support banning the use of drones on all segments of the river corridor except in case of emergencies.

Conclusion

In summary we are encouraged the CRMP is progressing and are optimistic that it will be finalized in time for the 2026 floating season. Addressing the concerns outlined above with greater detail will ensure a more effective management plan for the Wild and Scenic Three Forks of the Flathead River.

Thank you for your time and consideration of these comments. We appreciate the opportunity to contribute to this important planning process.

Sincerely,

Bob Jordan
President
Flathead Rivers Alliance