

Data Submitted (UTC 11): 2/6/2025 11:56:39 PM

First name: Rachel

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Organization:

Title:

Comments: Dear Supervisor Botello,

I am a 4th generation Flathead Valley resident and I have been recreating and working on the Flathead river system for 42 years. I hold a guides license but do not derive my living from guiding. I recreate an average of 30 days a summer on the rivers and have floated every mile of the system. I average 4 multi-day trips a year on a variety of sections. I have professionally worked in recreation management and have a varied skill and knowledge base to pull from including a BS in resource conservation. Please consider my experience when reviewing my comments.

I am writing to provide comments regarding the scoping of the CRMP for the Flathead Wild and Scenic River System. I understand that the initial draft presented for review is not and that the final draft may include many of my comments or address my concerns.

On July 20, 2024, sitting on the bank of the North Fork between Ford and Polebridge, between the hours of 11 am and 10 pm 67 boats holding approximately 300 people float past me, 100% of these users were private - it was a non-stop procession of boats, there was rarely a moment when a boat was not in sight up or down river. That is a common occurrence. This is unacceptable.

I ask you to please address and take action on the following concerns:

- *Include a more detailed description of management actions when triggers and/or thresholds are exceeded for each management segment on the river system.

- *Given the importance of monitoring in this plan, we are hopeful the final draft will include a more detailed description of the monitoring process. I am very concerned that monitoring will not be rigorous enough. The 2019 working documents shows monitoring of many other ORVs and indicators. Even if the USFS feels it can not deliver on a more robust monitoring program I would like to see all the desired monitoring indicators listed so they can be picked up and acted upon if needed. EX: parking and access points, campsites, etc.

- *I understand the need for agency staff to have flexibility in implementing management actions, but there will be continued confusion if clearly defined user capacities are not identified in the final draft. Estimates which "only provide a sense of the kinds and maximum of use", this statement could interpret as a work around of 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; there are examples of this in other regions.

- *The final draft should give agency staff the ability to implement preemptive management actions if needed.

- *The dramatic increase in user capacity estimates on certain management sections are inappropriate. Those of us who have used the rivers for half a century or more have seen the decline in ORVs due to increased human use. You must adjust numbers down and only change if monitoring and triggers are not reached.

- *More aggressive triggers and actions need to be set for the corridor of the river from impact of road use.

- *Management actions to improve crowding at all access sites must be implemented proactively and should include limiting and staggering commercial launch times and enforcement of individual misuse.

- *Development of a campsite reservation system and designated campsites is required, which would give opportunities for both the non-outfitted and outfitted public the ability to secure campsite during peak season periods. Reserving weekend launch opportunities specifically for non-outfitted public users is long overdue. Significant regulation violations occur all the time. This needs to be under control.

- *Decline of the native fish population is significant and immediate action along with angler surveys is needed as a proactive action, this should not be optional. There is vastly more fishing pressure than ever before and we do see an impact.

- *Enforcement must be addressed, more support is needed

At the public meeting we were given a 'Table 2: Proposed Management actions' to review, I am in support of all proposed actions; here are my additional comments:

- * There should be contained human waste and pet waste for all rivers all stretches.

- *Fire pan should be required on SF Rec MU along with all of the proposed Middle and North segments.

In reading the complete hand out that was provided at the meeting, page 21 lists Triggers and Thresholds... MANY of these triggers have already occurred- ACTION must be taken now, not after waiting for additional monitoring that will only establish a norm at a shifted base line level. Stronger action MUST be taken please. Even my teenage kids have independently noticed a decline in many of the indicators. Agency action is behind on the actions that will mitigate the impacts.

Thank you to you and your staff to their tireless efforts to support our shared public lands and waters! I am looking forward to the new actions!