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Comments: I am commenting here in regards to the FRMP. As a resident of the Flathead Valley I spend many days on the flathead river system with my family recreating. I feel that this plan in many regards is an overstep by the USFS to place controls on the river system rather than enact positive management practices.'

Upon review of the management plan there are many good ideas such as leave no trace, human waste restrictions etc. However there are also many new regulations that would be unprecedented in a river system with use numbers such as the Flathead and under the designation recreational.

Attendance of the open house revealed that the trigger thresholds are arbitrary numbers that are not backed up by historical data. In fact the USFS has only attempted to increase its efforts to collect river use data for non commercial entities during a two year period. This was reported to not be successful and the only other data to rely on is a university study and non-reliable historical data that dates back to the 80s. This is also clearly evident as illustrated by the doubling in the allowance of commercial trips from the 86 plan to now on the middle fork. If 35,000 was the number the river could handle then how can 86,000 be the number the river can handle now?

The role of the USFS should be to maintain and utilize our public resources. Requiring a mandatory unlimited permit system transfers this responsibility to the river user when it should be the role of the regulator. Perhaps if the USFS had made an effort over the past 5 years since the plan was put on hold to do more significant counts there could have been at minimum justification - however that is not the case. Instead incomplete data captured during a peak use period is being used. The USFS needs to make every due effort to collect this data rather than put it on the user. Remove this from the plan and put in place action to both capture better data and educate river users on why regulations such as LNT are important.

When reviewing the trigger limits for permits it becomes clear the role of the unlimited mandatory permits - to allow the USFS to begin the process of creating a lottery permit system based on capacity limits that have no scientific basis. If these do have a basis it is not included in this report. These trigger limits and language should be removed from the plan and only revisited after the USFS has collected defensible data.

The flathead river system is unique in that it spans from wilderness to road and railroad lined forest service to being constrained by private property. It can be assumed that most private landowners would like to see no or limited river use behind their property. This plan puts enables the ability for the USFS to put in place restrictions that help private property owners circumvent the ability for the public to float navigable water ways. Another reason why this should be completely rethought - there should be no trigger limits for private use on sections that border roads, railroads or private property.

If you look at other wild and scenic waterways throughout the country triggers and mandatory unlimited permits supported by limited/no data is unprecedented. For its size the flathead river drainage receives little pressure and only runs through wilderness at the headwater of the north and south. However these triggers and permits cover all reaches - another example of how this has not been thought through.

I challenge the USFS to rethink this plan and create one that educates users on the importance of resource protection, rather than restrict use on an unsubstantiated basis. I would greatly appreciate to be contacted and provided data that supports the trigger limits and need for a permit system.