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Comments: Though I have broader concerns about growing use of certain sections of the Flathead River and the high proposed allowable use levels included in the new proposed CRMP, I will focus my comment on monitoring the upper portion of the Scenic North Fork.

Through conversations with Flathead National Forest staff in 2024, I learned that there is no current monitoring of river conditions immediately below the Canadian border and there is no plan to institute monitoring at that location to aid in the future management processes that will be defined by the new CRMP. I believe this to be a significant error. In short, if no one is collecting data at the border, there will be no way to know with much certainty how shifting conditions on the BC side of the basin are impacting US/Montana North Fork conditions. This will make it significantly more difficult to understand and respond to the causes of potential shifting conditions and impacts to ORVs in this portion of the river (as well as other downstream ORVs). No refinement of plan language will be sufficient to inform future adaptation to, for example, worsening water quality in that section of river if we can't say that the water quality coming over the border has also worsened.

Some may think that the joint US-BC legislation in the early 2010's to eliminate future mining and oil and gas extraction in the basin was sufficient in reducing future negative downstream impacts from activities on the BC side of the basin but this is unfortunately not true. Ongoing unsustainable forestry practices on the BC side of the basin and in the river's headwaters, specifically, continue to change, and likely damage, the downstream riverine ecosystem. This has implications for future management of several of the ORVs in this stretch of the scenic North Fork. Specifically, any future management decisions made about shifting conditions related to the Water Quality, Fisheries, Botany, and, perhaps, Ethnographic ORVs on this stretch of river will be being made with severely incomplete data.

I strongly recommend that it be written into the CRMP that the Flathead National Forest and Glacier National Park will make it a top priority to institute and sustain monitoring practices at the US/Canada border to better understand the state of the river ecosystem as it enters the US. To not do so would be to undercut the requirement of the WSRA to preserve identified ORVs.