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Title:

Comments: February 7, 2025

Anthony Botello Flathead Forest Supervisor 650 Wolfpack Way Kalispell, MT 59901

Re: Comments on the Comprehensive River Management Plan Proposed Action

Dear Supervisor Botello,

Please accept these comments on the Comprehensive River Management Plan (CRMP) Proposed Action (PA). I must prefix my comments with one of my favorite memories, when my husband and I took our kids on a Montana camping trip. One of the places we stayed was the Owl Creek Packer Camp Cabin. We hiked the Holland-Gorden Trail watching river pack trains pass us as we did a 13 mile day, not reaching the Flathead River. Kids were small then and it was a long day for them. We loved knowing the wilderness and wild river was there. After that trip we moved to Montana and I became a teacher at Seeley Swan High School. The students were so mature and respectful I knew we made the right move. Now our kids are late teens, one of them at the University of Montana and one still in high school. We have not made it to the wild Flathead River. We love the essay-accessible Flathead part and the kids choose family vacations to go swimming and camping around the Flathead River. We want to get to the wild part and I hope it is still as beautiful and wild as the stories I have heard.

As someone who has seen the growing pressures on public lands, I believe the CRMP needs to address several critical issues to ensure the continued protection of the Three Forks of the Flathead River.

Concerns:

Local Indigenous Voices:

The CRMP should better engage the Confederated Salish and Kootenai Tribes (CSKT) and the Blackfoot Nations in monitoring their cultural resources. These tribes have historical ties to the land, and their input is essential for protecting these resources.

Transparency in Data and Methods:

The CRMP needs to provide citations for existing data and include clear details on future data collection plans, with specific dates and locations.

Wildlife and Habitat Protection:

The CRMP should address habitat degradation, especially for species listed under the Endangered Species Act. Areas impacted by wildlife habituation or habitat damage should be closed for camping until conditions improve. Outfitting Limits:

Outfitter permits should be limited, particularly on the South and Middle Forks, to prevent overuse and preserve wilderness character. The current number of permitted trips exceeds acceptable limits.

Closing Areas for Restoration:

Areas with significant ORV degradation, especially along the headwaters, should be closed temporarily to allow for habitat restoration.

What I Support:

Mandatory free float permits for private parties.

Prohibition of motor vehicle camping on gravel bars.

Fire safety regulations (metal fire pans or fire blankets).

Noise level restrictions to preserve solitude.

Proposals for Improvement:

The CRMP must affirm the Forest Service's obligation under the Wild and Scenic Rivers Act to protect all ORVs based on their condition at the time the Three Forks were designated.

The CRMP must align with the 1987 BMWC Recreation Management Direction (RMD), specifically the limit of 4 social encounters per day (vs. the 16 watercraft/day in the CRMP).

The CRMP should address non-compliance with the RMD in areas such as Black Bear Creek, Hodag, and Young's Lake, and take corrective action.

The CRMP must require users to pack out human waste, as the Flathead is the only major river system in the Western U.S. without this requirement.

A lottery permit system should be implemented for private users, similar to the Smith River permit system, to prevent overuse.

The CRMP must stop all outfitter livery permits on the South Fork and Middle Fork and drastically reduce commercial outfitting across all Forks to preserve ecological integrity.

Commercial outfitting on the South Fork (MU1) should be limited, and pack stock support for river parties should be prohibited.

Addressing these concerns will lead to more sustainable and responsible management of the Three Forks of the Flathead River. I keep a horse at the Gordon Ranch. The kids are strong and independent. My dream is almost realized. Thank you for your time working towards keeping the wilderness and wild rivers alive. Sincerely,

Gretchen Watkins