

Data Submitted (UTC 11): 2/8/2025 5:25:08 AM

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Organization:

Title:

Comments: February 7th 2025, CRMP Proposed Action Comments

Dear Supervisor Botello,

I appreciate the effort to see this process through. An updated CRMP is vital for all river users, private and commercial, and it would be devastating to our community, and our beloved Forks, if this process stalls again or is pushed through without proper public comment. Thank you for the hard work by you and your team.

The comments below are focused on the Middle Fork of the Flathead and the management units within and are in no particular order.

1)I propose that all monitoring data that informed the Proposed Action should be released well ahead of the draft CRMP and this comment period should be extended or a special comment period added, to allow users to correct or add to comments they have already submitted so that the draft CRMP can be composed with the most informed public comments possible. I understand that user capacity numbers are not based on a precise formula, but this also increases the need to publish the data. This is the only way the public can develop well-informed, data driven opinions and comments. I think waiting to publish this data is an unfortunate missed opportunity and will lead to inaccurate public comments that are not based on all the facts. What is happening instead is a rumor mill of tidbits of data that were shared with some at the January Info Sessions along with cell phone snapshots of documents that were shared but not distributed are now the only basis for the public to make data informed comments on the Proposed Action. It is important for the public to see the logic and data behind the proposed triggers and thresholds and how they could be connected to the proposed user capacities. I understand that there may not be a precise formula to tie user capacities to trigger metrics, but a combination of written explanation and basic math, extrapolated from the data, would provide the public with more understanding on the thought process and confidence in the proposals. If a written extrapolation of the triggers and thresholds compared to the user capacities exist this should also be released. Without this information I fear that many of the comments that will be submitted during this period will be uninformed.

2)I propose reanalyzing and redefining MU1. I support splitting MU1 into 2 units could help managers zero in on the wildlife limiting attribute and allow for more realistic user capacity to be established while also protecting sensitive wildlife resources. It was shared with me at the January 22nd Info Session that lack of data on wildlife impacts was a driving factor for the user capacity proposal. Meaning that river user impacts on wildlife is not truly known. I do not think that long-term management decisions should be based on a lack of data, but I do agree that these resources must be protected. Splitting this management unit at Essex could be a good compromise. It could allow for heightened protections of the Walton Goat Lick while further studies are carried out, allow for the consideration of use from the Wild section carrying over to the Bear Creek to Essex section, and help more accurately set user capacity numbers and monitoring thresholds and triggers for the Essex to Paola and Paola to Cascadilla sections. I understand there are more wildlife resources in MU1 than just the Walton Goat Lick, and that this may be the reasoning behind its designation and proposed user capacity. These other wildlife resources are much less known to the public and, in my observation, much less frequented by large numbers of goats and other wildlife. In the same way that archeological sites are protected by limiting information on their locations, these other resources enjoy a level of protection that is possibly greater than the Walton Goat Lick, and that could still be the case in a new MU that has recreation as its limiting attribute and a user capacity that is more reflective of current use levels.

3)I support the expansion of the no stopping zone in the Bear Creek to Essex section and the restriction of dogs

from this section. Unlike the other wildlife resources in the corridor, the Walton Goat Lick is an advertised and frequently visited site that requires this kind of regulation to ensure that future generations can enjoy this destination. Although not currently proposed, placing similar restrictions and regulations in areas with lesser-known wildlife resources may inadvertently increase awareness and invite specific and intentional visitation to these sites.

4)I feel there is a discrepancy in the user capacity proposals for the Wild section (170 ppl/day) and MU1 (100 ppl/day). It is well understood that there is a lower tolerance for regular encounters in a wilderness area vs. river sections that are road accessible. Recreation along MU1 is also far more accessible for non-float users of the corridor like sightseers stopping during driving tours, car camping, and easy access to wade fishing which increase encounters and are included in monitoring data. Also, many wilderness users continue their float trips into MU1 and opt to take out at Essex and visit the Walton Goat Lick, an option that is greatly appealing. This discrepancy is a red flag and suggests a lack of communication between the Ranger Districts that manage these units and the officials contributing to the proposed action and draft CRMP. This demonstrates the need for publishing the data behind the proposed user capacities, and monitoring plan's triggers and thresholds.

5)If a group limit of 50 is to be set for all recreation segments as stated on page 19, then an accompanying watercraft limit should also be set. These limits already exist for commercial users and should be extended to private users as well. A single party of 50 people in 5 watercrafts has a very different impact on recreational value than 50 people each in a pack raft. Likewise,

6)I support using watercraft counts as the metric for triggers and thresholds for the Float Experience Indicators, and limiting the use of party counts when appropriate. It is more objective and gives less room for subjective misinterpretation while monitoring. A single party of 50 people in 10 watercrafts has a different impact than a single party of 2 in 1 watercraft, but when monitoring, these 2 encounters would be considered equal.

7)While I do not know the data informing the user capacity numbers and therefore cannot comment specially on the validity of the proposed capacities, I do agree with the proposed distribution of commercial vs. private use on MU2 (80%/20%) and MU3 (40%/60%). I believe that as a community we should stand by the precedence of limited commercial use in the upper sections of the Middle Fork and allow for the visiting public to utilize commercial outfitters to enjoy recreation on the lower sections, concentrating commercial use closer to the West Entrance of Glacier National Park. The 1986 plan established an unlimited priority use pool for the lower sections. The proposal in the 2025 Proposed Action is a good compromise and update. As a federally protected WSR the Middle Fork of the Flathead is open to be enjoyed by users from across the country. These users need access to the corridor but also require a bit more help to ensure safety for themselves but also the ORVs that the WSR protects. This is the role of the outfitter. As partners of the Forest they provide a service and education that the USFS cannot provide alone.

8)I support the idea of utilizing a free and unlimited permit for data collection purposes, but more clarification and consideration is needed. It was mentioned by several officials at the January Info Sessions that Recreation.gov would likely be used for managing the proposed mandatory, free, and unlimited permit across the system with MU1 being the first on the Middle Fork. We need more details on what enforcement will look like and how the data generated from these permits will be used. I think that relying on a website to manage permits for areas that are outside of cellular networks may end up causing unintended consequences. For example, if a party arrives at Bear Creek without a permit and is stopped by a ranger before putting in, will they be expected to drive back to town to access the internet before they can return to carry out their float? If that is the case, the more likely outcome is that this party will move to a different river access where there is no ranger or where a permit is not yet required. This means that the ranger enforcement is redistributing use patterns and not enforcing a permit system that is intended to help better understand use patterns. Likewise, if there is little to no enforcement there will be limited buy-in from the public and the goal of understanding use patterns will also be impacted.

9) There appears to be added provisions in the proposal to allow for additional temporary use permits to be issued for the purposes of education and service of underserved groups. While on the surface our community may agree that these groups should have access to the corridor, but there needs to be more specific guard rails and requirements of the permitted organizations, outfitters, or individuals. These requirements should fall in line with those already enacted for the current priority use permit holders and should specifically outline a not-for-profit status or other verbiage that clearly indicates that this will not be an expansion of commercial, for-profit, outfitting on the Forks. From comments made in previous comment periods, discussions raised in info sessions and meetings throughout this process and within opinion pieces, editorials and articles published in our local media, there is no appetite for the expansion of special use permits. Reassurances to the community through clear and inarguable language in the CRMP, must be provided that clearly outlines the intention behind this proposal and the standards to which these permitted groups/individuals will be held.

10) I very much support the proposed action to restrict camping and parking below the highwater mark on all river sections. This is long overdue and will drastically improve the preservation of ORVs. There also needs to be considerations made for where overflow parking will end up during peak season. Parking facilities at many of the access sites on the Middle Fork are inadequate for current use levels and/or the proposed user capacities. A plan to update these facilities is necessary to avoid safety issues and conflicts. Increased parking in the neighborhood near the West Glacier access site and the possibility of cars parked along highway 2 at the Paola access site are just 2 examples.

I look forward to continuing to contribute to this process and thank you for your time and consideration of my comments.

Sincerely,  
Jon Clausen