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Comments: Thank you for the opportunity to comment.

I was born and raised in MT, most of my life living full or part time within walking distance of the Middle Fork of the Flathead. I've spent many hours on, in or by the river experiencing all of the values held in Table 2, page 4, (ORV of Flathead River Wild and Scenic River System Proposed Action). This CRMP is a professional effort to update the difficult management of this precious resource.

Ensuring Sustainable River Management: A Call for Proactive Measures

The River as an Interconnected System
Since one can never step into the same river twice, these concerns apply to all segments, whether in the Recreational or Wild and Scenic sections. What we do in the river at any location inevitably affects the river as a whole. The impermanent and interconnected nature of water means that our uses and overuses will always have an impact, often negatively affecting the very resource we seek to protect.

User Capacity: The First and Most Measurable Variable
By definition, user capacity is the most important variable because it is easily countable and trackable. However, simply measuring use is not enough-the management and monitoring of that use is the most critical tool for ensuring the river's health. Does the proposed plan provide enough tools and triggers to ensure compliance with the Wild and Scenic Rivers Act and to minimize harmful changes? The broad definition of user capacity, especially in the Middle Fork MU2 and Middle Fork MU23 descriptions, may not fully address localized impacts or management needs.

Concerns About Increased Use Limits
The plan acknowledges a 101% increase in permitted service days-doubling the currently allowed number-before adding another 20% increase in the future. While demand for more use is predictable, the river's ability to sustain such an increase is highly doubtful, even with the proposed management actions (Table 4). The plan may be sufficient for current use, but it does not go far enough in preparing for future pressures.

Expanding Monitoring Beyond User Numbers
Monitoring user numbers is essential, but it must go beyond counting people. It should include physical and cultural environmental factors, such as:
*The spread of invasive species (e.g., knapweed and hawkweed).
*Wildlife habitat health and noise impact studies.
*The condition of riparian zones and erosion trends.
To effectively achieve this level of monitoring, a concrete plan is needed-one that mandates education, sanitation, safety, and service participation before allowing users onto the river. Additionally, strict enforcement of the proposed no-stopping areas will be crucial.

Are the Monitoring Tools Sufficient?
The plan introduces a feedback loop, where monitoring is intended to allow for course correction before irreversible damage occurs. However, a key question remains:
*Do the proposed monitoring indicators, thresholds, and triggers provide enough time for effective protection?

While permitting use from priority and temporary pools requires review and approval to prevent excessive strain on biological resources, two major concerns remain:

1.Who is responsible for monitoring, where will it take place, how often will it occur, and what methods will be used?
2.Once damage is detected, isn't it already too late-past the ecological tipping point?

A More Cautious Approach is Needed
Instead of setting high allowable use numbers upfront and then reducing them in response to damage, the opposite approach should be taken:
*Start with a lower cap and gradually release more service days incrementally as long as conditions remain stable.
*Clarify that monitoring should focus on leading indicators (early-warning signs) rather than damage indicators (which suggest it's already too late).
*Use trigger thresholds similar to wildfire restrictions-adjusting access based on weather conditions, area visitation trends, and real-time reports of river-user activity.

The Consequences of Insufficient Protection
The problem lies in increasing user capacity without increasing river protection measures, enforcement, or user responsibility for river care. Without stronger protections, the high-quality recreational experience users seek will be lost, and permanent environmental damage will occur.
Examples from the Madison and Yellowstone Rivers in Montana demonstrate what happens when limits aren't enforced:
*Irreversible ecosystem shifts and habitat destruction alter the river in ways that may never fully recover.
*Overuse leads to long-term declines in fish populations and water quality.
*Restoration efforts become costly, difficult, and sometimes impossible.
To avoid this fate, river managers must focus on early-warning indicators rather than reactive responses-ensuring damage is prevented before it occurs, rather than trying to fix it after it's too late.

Summary
The proposed plan acknowledges the need for limits, but sets user capacity too high upfront, relying too much on reactive monitoring rather than preventative, early-warning indicators. A more effective approach would:
? Start with a lower cap and release more use days only if conditions remain stable.
? Ensure monitoring focuses on leading indicators, not just damage detection.
? Establish clear trigger thresholds for adjusting use before irreversible damage occurs.
? Expand monitoring beyond just user numbers to include invasive species, habitat, and noise impacts.
Without these proactive steps, the risk of reaching an ecological tipping point becomes dangerously high-and once crossed, recovery may no longer be possible.