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Comments: Public Comment on the Draft Comprehensive River Management Plan

Three Forks of the Flathead Wild and Scenic River

Flathead National Forest

Thank you for the opportunity to comment on the Draft Comprehensive River Management Plan (CRMP) and Environmental Assessment for the Three Forks of the Flathead Wild and Scenic River. The Flathead River system represents one of the most significant intact river corridors in the Northern Rockies, and careful stewardship of its Outstandingly Remarkable Values (ORVs) is essential.

While the plan recognizes the importance of protecting these values as required under the Wild and Scenic Rivers Act, several aspects of the draft plan raise concerns regarding the analytical basis for proposed management tools and the overall emphasis of the document.

Specifically, the draft plan appears to prioritize regulatory mechanisms-particularly user-day capacity thresholds and a permit framework-without sufficient baseline data, while placing comparatively little emphasis on education, stewardship, and public outreach.

#### 1. Insufficient Emphasis on Education and Stewardship

Throughout the draft CRMP, management actions focus heavily on monitoring recreation levels and establishing potential management triggers tied to user capacity thresholds (see Recreation Management and Monitoring sections of the draft CRMP).

However, the document provides limited discussion of proactive strategies designed to prevent impacts through education, signage, and user awareness.

Effective stewardship of high-use river systems typically relies on several foundational tools:

- \* Clear signage at access points
- \* River etiquette and Leave No Trace education
- \* Outreach programs targeting new users
- \* Partnerships with local organizations and outfitters
- \* Monitoring tied to education-based compliance improvements

The draft plan references education in general terms but does not clearly identify:

- \* Dedicated budget allocations for outreach and education
- \* Implementation timelines or milestones
- \* Metrics for evaluating effectiveness

Without these elements, it is difficult to determine whether education and stewardship programs will be implemented in a meaningful way. A comprehensive river management plan should prioritize preventative stewardship tools before regulatory mechanisms are introduced.

## 2. Disproportionate Focus on User Capacity and Permit Mechanisms

A significant portion of the CRMP is devoted to discussion of user-day capacities, recreation monitoring, and management triggers tied to recreation thresholds.

While evaluating recreation capacity is a valid management consideration under the Wild and Scenic Rivers Act, the document's emphasis on these mechanisms appears disproportionate relative to other stewardship strategies.

In practice, this results in a plan that reads less like a stewardship framework and more like the early stages of a progressively regulated recreation system.

Given that the CRMP itself acknowledges the need for additional data collection on recreation patterns and use levels, the emphasis on predefined thresholds raises important questions regarding the analytical basis for these proposed limits.

If thresholds are intended to guide future management decisions, the methodology used to derive those numbers should be clearly documented and supported by empirical data.

## 3. Lack of Clear Analytical Basis for User-Day Thresholds

The draft CRMP references the concept of user capacity as a tool for protecting ORVs and maintaining recreation quality.

However, the plan does not clearly present:

- \* The datasets used to calculate proposed user-day thresholds
- \* The modeling assumptions used to derive those thresholds
- \* The ecological indicators linking use levels to measurable impacts
- \* The statistical confidence associated with the estimates

Without this information, it is difficult to evaluate whether the proposed capacity numbers are scientifically justified.

In addition, several of the proposed user capacity estimates appear significantly more conservative than comparable river classifications in the Northern Rockies region.

For example, other Wild and Scenic rivers with similar classifications (Wild / Scenic / Recreational) often support higher levels of recreation without demonstrated degradation of resource conditions.

If the Flathead River system requires substantially lower capacity thresholds than its regional counterparts, the CRMP should clearly explain the scientific basis for those differences.

Absent that explanation, the thresholds risk appearing arbitrary rather than evidence-based.

## 4. Unlimited Permit System as a Data Collection Tool

The draft CRMP proposes implementing a permit system that would initially allow unlimited permits, primarily for

the purpose of collecting recreation use data.

While improved monitoring is an important objective, the use of an unlimited permit system raises several concerns.

First, permit systems that do not regulate access often experience low compliance rates, particularly when users do not perceive a clear management purpose.

Second, permit-based data collection can introduce sampling bias, as compliance tends to be higher among experienced or informed users, while occasional or first-time users may be underrepresented.

Third, implementing a permit system introduces administrative complexity without guaranteeing reliable datasets.

If the agency's primary objective is improved baseline data, alternative methods may be more effective, including:

- \* Direct observation and use counts at launch points
- \* Remote monitoring technologies
- \* Stratified sampling of recreation activity
- \* Voluntary post-season reporting programs
- \* Survey frameworks similar to those used in fisheries monitoring programs such as bull trout population monitoring

These approaches can generate statistically meaningful data without immediately introducing a permitting system that could later evolve into a restrictive regulatory structure.

## 5. Need for Transparent Analysis of User Groups

The CRMP should also provide a more detailed analysis of how different categories of recreation contribute to overall user days.

For example, recreation use along the Flathead River corridor includes:

- \* Commercial outfitted trips
- \* Private boating
- \* Angling use
- \* Non-boating river corridor recreation

In many river systems, commercial outfitter activity represents a substantial portion of total user days.

Any analysis of recreation capacity should clearly present the proportional contribution of each user group, along with the methodology used to estimate those numbers.

Without this transparency, discussions of capacity and potential management triggers may be perceived as inequitable or incomplete.

## 6. Baseline Data Should Precede Regulatory Triggers

The draft CRMP acknowledges that additional monitoring and improved data collection are needed to better understand recreation use trends along the Flathead River corridor.

Given that acknowledgment, it would be prudent to prioritize data collection and monitoring before establishing regulatory thresholds tied to specific user-day triggers.

Establishing triggers before sufficient baseline data exists risks creating a management framework based on incomplete information.

A more appropriate approach would involve:

1. Multi-year baseline monitoring of recreation use
2. Evaluation of ecological indicators tied to recreation impacts
3. Benchmarking against comparable Wild and Scenic rivers
4. Periodic reassessment of management strategies based on empirical findings

Only after these steps are completed should regulatory mechanisms such as permit limits or capacity thresholds be considered.

## Recommendations

Based on the concerns outlined above, I recommend the following revisions before finalizing the CRMP:

1. Develop a comprehensive education and stewardship strategy, including defined budgets, timelines, and evaluation metrics.
2. Conduct additional baseline monitoring and data collection to better understand recreation patterns and potential impacts.
3. Remove or postpone user-day capacity triggers until sufficient empirical data exists to justify them.
4. Benchmark proposed capacity thresholds against comparable Wild and Scenic rivers in the region.
5. Evaluate alternative monitoring strategies before implementing a permit-based data collection system.

## Conclusion

The Flathead River system is an extraordinary natural resource whose protection requires thoughtful, transparent, and science-based management.

While the draft CRMP identifies important management objectives, the current proposal places significant emphasis on regulatory mechanisms without clearly demonstrating the empirical foundation necessary to justify those tools.

A stronger plan would prioritize:

- \* Education and stewardship
- \* Transparent baseline data collection
- \* Regional benchmarking
- \* Collaborative engagement with the public

before implementing regulatory systems that could ultimately restrict access.

Thank you for the opportunity to provide comments on this important planning effort.