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Comments: Thank you for the opportunity to comment on the Draft Comprehensive River Management Plan for the Three Forks of the Flathead Wild and Scenic River system. The plan has clearly improved with each draft and reflects a thoughtful effort by the agencies to address modern recreation pressures while protecting the river's Outstandingly Remarkable Values. My comments are offered in the spirit of strengthening the plan's ability to protect the long-term ecological health and recreation quality of the river system. In particular, I hope the final plan will more clearly address how increasing river use will be managed proactively to prevent irreversible impacts rather than reacting after damage has already occurred.

Public Comment on the Draft Comprehensive River Management Plan

Three Forks of the Flathead Wild and Scenic River System

To the Forest Service, National Park Service, and cooperating agencies,

Thank you for the opportunity to comment on the Draft Comprehensive River Management Plan (CRMP) for the Three Forks of the Flathead Wild and Scenic River system.

It is evident that the plan has improved with each draft. The inclusion of user capacity analysis, monitoring indicators, thresholds, and adaptive management tools represents meaningful progress toward a more modern and thoughtful framework for managing the river system. These additions demonstrate an effort to respond to increasing recreation pressures while protecting the river's Outstandingly Remarkable Values.

However, the central challenge facing the Flathead River today—rapid growth in river use—still appears insufficiently addressed. While the plan recognizes increasing demand, the overall approach relies heavily on monitoring impacts after they occur rather than establishing strong preventative protections before ecological or recreational thresholds are crossed.

Because the Flathead River remains one of the most intact river ecosystems in the northern Rocky Mountains, the goal of river management should be to strengthen stewardship in ways that prevent degradation before it occurs.

A Forward-Looking Approach to River Stewardship

River systems are dynamic and interconnected. Actions taken in one section of the river inevitably influence conditions elsewhere. For this reason, stewardship of the Flathead River should be approached holistically across all segments—Wild, Scenic, and Recreational.

Human use of the river, whether through recreation, access infrastructure, or concentrated activity in certain areas, has cumulative effects on fisheries, wildlife habitat, vegetation, water quality, and visitor experience. As visitation continues to increase, the risk of crossing ecological and recreational thresholds grows.

The draft plan appears capable of managing current use levels. The greater challenge will be ensuring that the

river remains healthy under the increasing recreation pressures that are likely in the coming decades.

For this reason, the final plan would benefit from placing greater emphasis on proactive protections that prevent impacts before they occur, rather than relying primarily on reactive responses once thresholds have already been exceeded.

User Capacity and Recreation Experience

One area where this issue becomes particularly important is in the proposed user capacity levels.

In some segments of the river—especially on the Middle Fork—the plan proposes potential use levels significantly higher than current use. It is not entirely clear how these increases were determined or how they relate to the actual physical and ecological limits of the river corridor.

Rivers, like any environment, have limits to the number of people they can support without degrading both ecological conditions and recreational experiences. When use levels become too high, problems such as bank erosion, wildlife disturbance, vegetation damage, noise conflicts, and sanitation issues tend to increase.

Overcrowding often becomes the catalyst for many of these impacts. Even if ecological damage is not immediately visible, excessive use can quickly diminish the quiet and solitude that many visitors seek on the river.

Allowing thresholds to be exceeded for extended periods before corrective action occurs undermines the purpose of having thresholds at all. Effective stewardship should focus on preventing those thresholds from being crossed rather than reacting after damage has already begun.

This concern is particularly relevant in areas where the plan itself identifies declines in several river values, including fisheries, wildlife habitat, water quality, and plant communities. Increasing allowable use levels while these resources are already experiencing pressure may unintentionally accelerate those impacts.

Monitoring and Early-Warning Indicators

The monitoring framework described in the plan is a valuable step forward. Monitoring indicators, thresholds, and triggers can provide an important feedback loop that allows managers to adjust course as conditions change.

However, monitoring systems are most effective when they function as early-warning tools rather than damage-detection tools.

If monitoring primarily detects impacts after they occur, restoration becomes far more difficult and expensive. A stronger approach would focus on leading indicators—signals that pressures on the river system are increasing before irreversible damage occurs.

In addition to tracking visitor numbers, monitoring could include indicators such as:

- * shoreline vegetation disturbance
- * wildlife displacement or habitat impacts
- * invasive species spread (including knapweed and hawkweed)

- * noise levels and recreational conflicts
- * sanitation and waste management conditions

These indicators could provide a more complete picture of the health of the river corridor.

Opportunities to Strengthen Stewardship

Several practical management strategies could help strengthen stewardship while maintaining public access to the river.

One option would be the implementation of a free permit system for river users. Even if permits were initially unlimited, such a system would provide valuable data on river use patterns and help managers understand when and where use levels are increasing.

The agencies might also consider strengthening partnerships with local stewardship organizations that already support river protection and education. These organizations can play an important role in improving river access infrastructure and promoting responsible river use.

Additional stewardship measures that may deserve consideration include:

- * prohibiting motorized camping and parking on gravel bars
- * strengthening enforcement of drone and noise regulations
- * implementing appropriate group size guidelines
- * improving enforcement of no-stopping areas in sensitive locations
- * expanding education programs focused on river stewardship

These measures could reduce impacts while preserving the high-quality recreation experiences that attract people to the Flathead River.

The Importance of Preventative Management

Many river ecosystem impacts are extremely difficult to reverse once they occur. Overuse can lead to long-term declines in fisheries, degradation of wildlife habitat, erosion of riverbanks, and permanent loss of the quiet recreational experiences that define Wild and Scenic Rivers.

When limits are not enforced or when corrective actions occur too late, restoration efforts can become costly, difficult, and sometimes unsuccessful.

For this reason, effective river management should focus on preventative strategies. One approach would be to begin with more conservative use levels and increase them gradually if monitoring shows that conditions remain stable.

This precautionary approach reduces the risk of exceeding ecological limits while still allowing flexibility to adjust management as conditions evolve.

Summary

The draft Comprehensive River Management Plan represents a significant step forward in river management planning. The inclusion of monitoring frameworks, adaptive management tools, and user capacity analysis provides a strong foundation for protecting the Flathead River system.

However, the plan still appears to set user capacity levels relatively high while relying heavily on reactive monitoring to address impacts after they occur.

A stronger approach would:

- * begin with more conservative use levels and adjust them gradually if conditions allow
- * emphasize early-warning indicators rather than damage detection
- * establish clear triggers for management action before thresholds are exceeded
- * expand monitoring beyond visitor numbers to include ecological and habitat indicators
- * strengthen stewardship expectations among river users

Without these proactive steps, the risk of crossing ecological tipping points increases—and once those thresholds are crossed, recovery may no longer be possible.

Implementation Questions

To help clarify how the final plan will be implemented in practice, I respectfully ask the agencies to address the following questions:

1. How will user capacity estimates translate into enforceable management actions?
If monitoring shows that use levels are approaching or exceeding the estimated capacities for a river segment, what specific actions will be implemented, and how quickly will those actions occur?
2. How will the agencies ensure that monitoring identifies early-warning indicators rather than simply documenting damage after it has already occurred?
What indicators will be used to detect emerging pressures on fisheries, wildlife habitat, vegetation, and recreation experience before those resources are significantly degraded?
3. How will increasing recreation demand be balanced with long-term protection of the river's Outstandingly Remarkable Values?
If monitoring indicates that rising visitor numbers are beginning to affect fisheries, wildlife, or recreational experiences, what management tools will be used to prevent those impacts from becoming permanent?

The Flathead River system is an extraordinary natural resource. The updated CRMP provides an important opportunity not only to manage today's recreation pressures, but to ensure that the river remains healthy and resilient for generations to come.

I hope that the observations and suggestions of interested citizens will be carefully considered as the final plan is developed, particularly in regard to how the plan will be implemented on the river as well as on paper.

Thank you for the opportunity to comment.