Data Submitted (UTC 11): 7/12/2026 11:39:28 PM
First name: Suzanne
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Organization: North Fork Preservation Association
Title: Secretary
Comments: July 12th, 2026

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

Dear Supervisor Botello,

The North Fork Preservation Association (NFPA), a nonprofit conservation organization, formally objects to the Decision Notice and Finding of No Significant Impact (FONSI), the Environmental Assessment (EA), and the Three Forks of the Flathead Wild and Scenic River Joint Comprehensive River Management Plan (CRMP) dated May 2026. We do so in accordance with the regulations under subparts A and B of 36 CFR Part 218 within the 45-day objection period ending July 13, 2026. As a local grassroots organization, we have a strong investment in, and extensive knowledge of the North Fork of the Flathead area in particular, and general knowledge of the other forks of the Flathead WSR. We have participated in the public comment process for the CRMP during the previous comment periods, submitting comments on February 6th, 2025, and March 12, 2026. Board members have participated in the public meetings hosted by the United States Forest Service (USFS), Glacier National Park (GNP), Fish Wildlife and Parks (FWP), and the Federal Fish and Wildlife Service (FWS).

The parts of the FONSI, EA, and CRMP to which this objection applies include, but are not limited to, the following:
* User Capacity Analysis found in Appendix B of the CRMP.
* Existing Regulations found in Appendix C of the CRMP.
* Comment Response found in Appendix E of the CRMP.
* Recreation Specialist Analysis accompanying the CRMP dated January 9, 2026
* EA
* Chapters on Ongoing Management Actions (pg. 80), Proposed Management Actions (pg. 91), Future Management Actions (pg. 99), and Monitoring and Adaptive Management Strategy (pg. 100) within the CRMP.

Our objections are noted below, and specifics to the discussion in our previous comments are referenced where appropriate.

User Capacities

NFPA believes that the proposed user capacities are inflated across the entire Flathead River Wild and Scenic River Corridor (WSR). The final draft inflates capacities, despite numerous comments from the public concerned with the potential impact of those capacities. Specific to the North Fork MU1 and MU2, we propose a remedy as stated on page 3 of our comments dated March 12, 2026: "Given these environmental concerns, we request a reduction of the user capacities for NF MU1 and MU2 before the 2026 CMRP is finalized. These capacities should reflect a 33% increase from estimated existing use as suggested by encounter data." We are particularly concerned regarding the dramatic increase in proposed user capacities on MU2. This increased level of use should not be arbitrarily set without a much clearer understanding of current use and impacts. It is again worth noting that this section of the North Fork flows through the North Fork section of Glacier National Park; the

management plan for this portion of GNP prioritizes management that preserves its wilderness character.

River Monitoring

Further remedy to our objections to proposed user capacities would be to establish a more robust river monitoring program, incorporating existing monitoring by GNP, USFS, and University of Montana with citizen science monitoring projects. Page 8 of our March 12, 2026 comments discusses the implications of reduced agency capacity to monitor effectively. As discussed on page 10 of our comments, "A robust monitoring system is imperative to protect the ORVs of the Flathead Wild and Scenic River System." We note that multiple community organizations are willing to or already participate in monitoring. Results of NFPA monitoring efforts are noted on pages 2-3 of our comments. Part of this remedy should be to make monitoring data readily accessible to the public.

Permit System

While the CRMP proposes a mandatory, unlimited permit system, we believe delaying implementation for 2 to 3 years does not sufficiently address the urgency to address river user concerns. The river corridor continues to experience degradation each floating season. Recreational use is expected to continue to increase and declines in Outstandingly Remarkable Values (ORVs) are already occurring, including the bull trout fishery, increase in noxious weeds, degradation at river access points, and the need to impose management strategies for campfires and human waste. The CRMP must establish a monitoring program capable of detecting changes promptly and enabling timely adaptive management. Community partners could help accelerate the implementation of a permit system. The NF MU1 should be included in the initial rollout of the permit system. Funding to help implement the permit system is likely available outside of the agency, such as through the Resource Advisory Council (RAC). We propose accelerating the planned permit system to an implementation date of 2027 as a remedy to the current "too little too late" approach.

Human Waste and Fire Containment

Human waste disposal and use of fire should follow Leave No Trace principles. All commercial and overnight river users floating the river system should be required to carry out human waste. This is similar to current FWP and GNP regulations that require PFD (personal floatation devices). Fire blankets and/or pans should be required for campfires on all sections of the WSR where established metal fire rings are not provided.

NFPA appreciates the opportunity to participate in the objection process. We look forward to continued dialog finalizing a CRMP that protects both the ORVs of the unique ecosystem which encompasses the Flathead WSR system and its users.

Sincerely,

Flannery Coats Freund, President
NFPA

Suzanne Hildner, MD, FACP, Secretary
NFPA

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