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Flathead National Forest

Hungry Horse Ranger Station

Rob Davies, District Ranger

P.O. Box 190340

Hungry Horse, MT 59919

Re: Objection to the Draft Decision Notice and Finding of No Significant Impact for the Flathead Wild and Scenic River Comprehensive River Management Plan (Project #56536, #292351)

Dear District Ranger Davies,

The American Packrafting Association (APA) submits this objection to the Draft Decision Notice and Finding of No Significant Impact (DN/FONSI) for the Flathead Wild and Scenic River Comprehensive River Management Plan, published May 29, 2026. APA is a non-partisan organization with over 3,000 supporters, members, and volunteers across all 50 states, dedicated to conserving the places that are the heart of packrafting and promoting safe, responsible packrafting experiences. APA submitted timely, specific written comments on the draft CRMP and Environmental Assessment on March 13, 2026, and this objection is based on issues raised in that letter that remain unresolved in the updated EA and draft DN/FONSI.

APA appreciates the Forest Service's responsiveness on several fronts. The final plan extends solid human waste containment requirements to all South Fork segments, including the wilderness sections APA specifically requested be covered. The fire containment language now clearly states that fire pans or blankets are required only when a campfire is planned, and a fire blanket is confirmed as a standalone, equal alternative to a metal fire pan, resolving APA's concern on that point. We remain concerned, however, about three unresolved issues from our initial comments.

1. The permit system and monitoring framework do not cover all corridor user types, and implementation does not address our concerns to accommodate packrafters, contrary to the plan's stated comprehensive intent.

APA requested that the mandatory permit system, and the monitoring and management framework built on it, extend to all user types accessing the Flathead corridor, not solely boaters. The updated EA and draft DN/FONSI establish the permit exclusively as a "float permit" tied to river use. Hikers, horsepackers, and anglers, who share the same camps, water sources, and travel corridors as packrafters and who the EA itself acknowledges are not tracked with equivalent rigor, remain outside the permit and monitoring system entirely.

This is not a minor administrative gap. The user capacity framework adopted in this decision is the sole lever available to managers when an outstandingly remarkable value is degraded. Because boaters are the only user group counted, monitored, and permitted, boaters, including packrafters, will necessarily bear the entire weight of any future use restriction, regardless of which user group is actually responsible for the underlying impact. A river management plan cannot reasonably be described as "comprehensive," as required by Section 3(d)(1) of the Wild and Scenic Rivers Act, when it establishes a capacity and monitoring structure for one user type only.

APA also requested that permit implementation explicitly accommodate packrafters who access the river via trail or tributary rather than a standard put-in, including making physical permits available at trailheads given limited

cell service throughout the corridor, and allowing packrafters to obtain a permit from a Forest Service employee encountered en route or retroactively at the takeout. Neither the updated EA nor the draft DN/FONSI addresses these implementation details. Without them, foot-access packrafters risk being unable to comply with a mandatory permit system that was not designed with their access pattern in mind. APA requests that the final plan commit to extending permitting and monitoring to all corridor user types within a defined timeframe, and that permit implementation explicitly accommodate hike-in and tributary access.

2. Solid human waste containment requirements have not been extended to the wilderness segment of the Middle Fork, contrary to APA's request.

APA requested waste pack-out requirements for the Middle Fork Wild segment, consistent with the requirement APA supported and the Forest Service adopted for the South Fork. Table 5 of the updated EA instead states only that "existing human waste containment regulations for North and Middle Fork segments would continue," leaving the Middle Fork wilderness reach without the same requirement now in place on the South Fork. Given that the same rationale used to justify the South Fork requirement, protection of water quality and native bull trout habitat in wilderness reaches, applies with equal force to the Middle Fork Wild segment, APA requests that the final plan extend solid human waste containment to this segment as well.

3. The seasonal trigger of 8 parties for the Middle Fork Wild segment above Schafer Meadows is not supported by evidence of resource impact, and treats floating as inherently more damaging than comparable foot travel in the same reach.

APA raised concerns about mathematical inconsistencies in the Middle Fork Wild triggers and thresholds generally, and this concern extends directly to the trigger established for the reach above Schafer Meadows. The Forest Service's own stated rationale for this trigger is that the section has seen only one or two parties per season in recent years, and that a cap of 8 is "more than quadruple current use." This reasoning assumes, without supporting evidence, that more than 8 floating parties annually would compromise the wild and pristine character of the reach. No documented resource impact, encounter conflict, or degraded condition is cited to justify this figure. Forest Service patrols in this same area have reportedly gone dozens of trips without encountering any user of any kind, boater or otherwise, further undermining the case that floating in this reach requires special capping.

As packrafting continues to grow in popularity and use increases on more accessible river segments, the ability to hike into remote headwater reaches and float out is exactly the kind of self-propelled, low-impact wilderness travel that relieves pressure elsewhere in the system, not a threat requiring the lowest capacity limit likely ever set for paddling. Packrafters are uniquely positioned to access reaches like this one on foot, in a manner functionally indistinguishable from hiking or horsepacking, activities that are not subject to a comparable numeric cap in this same corridor. APA requests that the Forest Service either provide the resource-based evidence supporting an 8-party seasonal cap or revise the trigger to reflect that floating in this reach should be managed no differently than the other forms of human-powered travel already occurring there without restriction.

Conclusion

APA supports adoption of a comprehensive river management plan for the Flathead Wild and Scenic River and appreciates the substantial work reflected in the updated EA and draft decision. The three issues above are narrow, specific, and directly traceable to APA's comments from March. We respectfully request that the Forest Service resolve them prior to finalizing the plan. Packrafters are among the lowest-impact users of this system, and we are also one of the largest and fastest-growing user groups on this river system, well positioned to be full partners in its comprehensive management, not simply the only user group being managed.

Thank you for your consideration.

Sarah Kilbourne

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