



GLACIER-  
TWO MEDICINE  
ALLIANCE

February 7, 2025

To: Anthony Botello, Forest Supervisor  
Chris Prew, Recreation Program Manager  
Flathead National Forest Supervisor's Office  
650 Wolfpack Way  
Kalispell, MT 59901

Cc: Dave Roemer, Superintendent  
Glacier National Park  
PO Box 128  
West Glacier, MT 59936

Re: Proposed Action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River System

*Comments submitted electronically:*

<https://cara.fs2c.usda.gov/Public/CommentInput?project=56536> and to Dave Roemer at [dave\\_roemer@nps.gov](mailto:dave_roemer@nps.gov)

Dear Supervisor Botello and Mr. Prew:

On behalf of Glacier-Two Medicine Alliance, thank you for the opportunity to comment on the 2025 Proposed Action for the Comprehensive River Management Plan for the Flathead Wild and Scenic River System.

Glacier-Two Medicine Alliance (GTMA) is dedicated to the protection and stewardship of the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in Montana's Crown of the Continent ecosystem, including forks of the Flathead Wild and Scenic river system affected by this proposal. We are a community-based, grassroots conservation organization located in East Glacier Park on the Blackfeet Nation, with nearly two thousand members and supporters, many of whom live, work, or recreate along the Flathead Wild and Scenic River system (the River) and want to see it protected.

GTMA appreciates the Flathead National Forest (the Forest) and Glacier National Park (the Park) re-booting the public phase of developing a new Comprehensive River Management Plan (CRMP) for the Flathead Wild and Scenic River system. A new plan is sorely needed to ensure the free-flowing character, water quality, and outstandingly remarkable values (ORVs) for all three forks of the Rive are fully protected and enhanced, as required by law, rather than diminished by exploding recreational use, climate change, development or other pressures. We appreciate the public informational sessions, which we attended, as they provided a good format

to ask questions and gain insight. We ask the Forest to carry this planning process forward in a timely manner without further delays.

After a few general comments about the Proposed Action and planning process, we provide more detailed comments about each requested topic in the Proposed Action. Most of our comments focus on the Middle Fork of the Flathead, though we include some concerns about the North and South Forks as well.

## **General Comments**

GTMA strongly agrees with the Purpose and Need for the plan should be to “protect and enhance the outstandingly remarkable values, water quality, and free-flowing characteristics ... for the benefit and enjoyment of present and future generations.”<sup>1</sup> However, we are strongly concerned that the Proposed Action is at present far too-recreation centric. It is far too focused on managing the recreation experience, with insufficient attention to almost every other resource or ORV. This is the chance for the Forest and Park to develop a truly forward-looking, pro-active approach to managing and protecting the Flathead Wild and Scenic River system, not just a plan to accommodate ever growing recreational use.

The Proposed Action lacks, in many cases, sufficient information for the public to fully and effectively comment. More information needs to be released about how the user capacity numbers were derived and what current use is, or best estimates. The public also needs more information on current resource conditions to be able to provide feedback on the monitoring section. Without this information, we have no way of knowing whether we are approaching or have exceeded any of the thresholds, whether the thresholds are set in the right place, or what management actions may be warranted. We are concerned based on conversations with agency staff, other experts, and our own observations that some of the thresholds may already be, or nearly be exceeded. It would be particularly helpful to provide historic data. What were the conditions in 1976 (or the first year thereafter for which we have any information) and how have those conditions changed. Without more information, all the public can offer is its impression and our collective impression based on a lot of collective time in the WSR corridor over the years is that recreational trends are a key contributor to declining resource conditions and user experience, a trend the level of use anticipated under this plan is certain to accelerate.

Finally, we think that the complexity of this plan requires the development of an Environmental Impact Statement (EIS) instead of an EA as proposed. The EIS should include multiple alternatives, including at least one alternative that evaluates potential permit systems or other strategies to limit use on certain sections of the river. Even if not chosen as the preferred alternative, conducting the analysis now will accelerate the adoption of a regulated permit system later should monitoring indicate it is warranted. We discuss this more in our comments on the Monitoring section.

## **Desired Conditions**

Though we generally support the Desired Condition statements as apt descriptions of *present* user experience and management practices, we question if they describe what is actually desirable for the future conditions or provide a clear enough vision to guide management for water quality and other ORVs. Supporting rationale for the desired conditions would be helpful when the draft plan and EA is released. We also find that the statements are way too recreation-centric and almost wholly lacking in any meaningful description of the desired condition for any

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<sup>1</sup> Proposed Action, p. 6

other ORV. The statements need to be expanded in the draft plan to explicitly describe the desired future state for all ORVs, which must, at a minimum be their condition at time the river was designated Wild and Scenic in 1976. The purpose of the plan, after all, is about protecting ORVs, of which recreation is but one! We have specific concerns and suggestions to offer about the following desired conditions.

### Middle Fork Wild

We agree that this corridor should be managed for solitude, including consistency with a Primitive ROS, as well as all other aspects of Wilderness character. However, we question if this is the current state of the river corridor during the height of the summer float season or if this section is already out of compliance. We'd like clarification and the data to support the conclusion. As noted above, the desired condition makes no, or nearly no, mention of fisheries, wildlife, botanical resources, water quality, scenery, or ethnographic resource conditions. Desired conditions for these ORVs should be explicitly added. Finally, we would like clarification about what the statement that current outfitter-guide services "ensures access within the river corridor to a wide range of users..."<sup>2</sup> means. What is meant by a wide range of users? Is this socio-economic demographics? Is this type of use? Some other characteristic? Is it numerical? And if so, how is this compatible with a Primitive ROS? This plan is the opportunity to ensure recreational use on the Wild Middle Fork remains a truly world-class wilderness experience.

### Middle Fork Recreational

Again, this section is missing any desired conditions for fisheries, wildlife or other ORVs. This needs to be corrected. At a bare minimum, a desired condition should be that the river corridor provides quality habitat that is utilized by a suite of wildlife species. Recreation does not displace wildlife from the river corridor. The corridor, including river and shoreline use, is managed to facilitate natural wildlife movement between Glacier and the Flathead National Forest.

### MU1

We take umbrage with the statement "High use and congestion occur at these developed facilities during peak summer season."<sup>3</sup> Why is high use and congestion a desired condition toward which management should work? This makes no sense and needs to be reworked or else justified.

### MU2

We have several concerns. Why is "high and frequent encounters on the river" a desired condition that the Forest and Park would manage toward? It would make more sense to write, "education, ranger contacts, and signage alert recreationists that they may encounter high levels of use and congestion during the peak river season." As with MU1, why is high use and congestion a desired condition? What does it mean for the West Glacier river access to accommodate the number of users? This would appear to allow endless expansion of the access site as use demands. Why is outfitter and guide services only for "whitewater recreational experience"?<sup>4</sup> This is too limited and an odd contrast to MF Wild which seeks to accommodate a "wide range of users."

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<sup>2</sup> Proposed Action, p. 12.

<sup>3</sup> Proposed Action, pp. 12 – 13

<sup>4</sup> Proposed Action, p. 13

### MU3

This section states: “A minimum of two developed facilities ...”<sup>5</sup> This indicates that future facilities could be developed along this segment (but not anticipated on the other segments where the specific number of facilities is stated). Is this the case? This possibility (here and anywhere else in the WSR corridor) is why, as we suggest in the Management Actions section of our comments, management actions outlining the conditions for new or expanded facilities, as well as any prohibitions on such new facilities, need to be clearly described in the plan.

We’re also curious why this section is the only section that states: “Numbers and types of outfitters and service permits are managed to maintain ORVs.”<sup>6</sup> Managing outfitter and other service providers to maintain ORVs should be the first consideration in issuing and managing a permit for the Wild and Scenic Flathead. The inclusion of this sentence here, and only here for the Middle Fork, causes one to question (i.e. worry!) if maintaining ORVs is not a condition for managing permits on other segments of the river.

### **User Capacity**

GTMA has several concerns related to the user capacity estimates provided and the associated management actions, where described. Our primary concern is the lack of information about the methodology used to arrive at the proposed user capacities. The public needs this information if it is to provide any meaningful response to these numbers. We also need to see the data that supports these capacity estimates as the maximum amounts and kinds of public use that can be accommodated without degrading ORVs below the condition that existed at the time the river was designated (i.e. 1976 conditions, not 2025). The public also needs to know what current use levels are (where known) or best estimates (along with the partial data to generate the estimate) if we are to meaningfully comment on the proposed user capacities. Otherwise these numbers are functionally meaningless. The Forest Service should have released the information it has now with the Proposed Action, and not withhold it for the draft EA if the agency desired informed public input.

Our other major concern here is that the user capacities appear to allow for a significant increase above current use levels (so far as they are known or the information is made publicly available), with estimates based on information provided by Forest Service personnel ranging from a twofold to at least tenfold increase without justification for why the river system, a system many long time users already feel is being degraded by the recent spike in use, can handle further increases. It is also unclear whether the current access sites can handle such increases as parking already routinely spills onto gravel bars, along roadsides, or into vegetated areas. It seems likely that accommodating greater use will require expansion of access sites. Clarification about the connection between user capacity and current (or future) infrastructure is needed.

The proposed increase for outfitter use on the Middle Fork Recreational segments is particularly troubling. The plan proposes to increase total service days to 136,000 for the combined reach (MU2 & MU3). The current authorized level is 35,713, while the five-year average of outfitter user days is 71,889. Not only has the Forest Service allowed annual use to double the current authorized level, it proposes to nearly double it again! No reason is given to justify this increase. The level of commercial use has been a longstanding concern on this

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<sup>5</sup> Proposed Action, p.14

<sup>6</sup> Proposed Action, p.14

segment of river, one that was a focus of discussion back in the first iteration of the CRMP in 2019, yet the Forest Service's only answer seems to be even more!

It's also not clear why 80% of the user days for MU2 should be designated to outfitter use. While we appreciate the explanation at the public meeting that the agencies wanted to concentrate commercial use on the lower stretches of the Flathead for social and environmental reasons, and agree this is a good approach, the proposal as presented risks pushing out non-outfitted users entirely, effectively commercializing a public resource.

The Flathead needs to better clarify how it arrived at these numbers and how these numbers may, or may not, affect ORVs and the non-outfitted public. The plan should also include a Needs Assessment<sup>7</sup> to determine whether the current permitted services meets current public needs. All four outfitters on the Middle Fork effectively offer the same services (guided whitewater rafting and float fishing). As we wrote in our comments on the re-authorization of outfitter and guide permits in October, an assessment of whether new services to meet the needs of an increasingly diverse public, or new recreational preferences is needed. In particular, we believe the Forest should assess whether to create new, priority use permits for outfitters—including nonprofits, women-owned, or minority-owned businesses—who provide financially accessible opportunities, conservation education focused services, or serve an underrepresented demographic like youth, Indigenous communities, or the disabled.

It appears the Forest is thinking along these lines when it proposed to “authorize one temporary education and outfitting and guide permit, annually, for each recreational and scenic segment, and the wild segment of the Middle Fork. The permit will be focused on providers serving youth, veterans and other underserved communities, or education-based programming.”<sup>8</sup> We applaud this idea. However, the allocation of 450 user days to underrepresented communities or education programs is insufficient. When compared to at least 136,000 user days proposed for commercial use it is laughable and doesn't even rise to the derisive level of tokenism. The allocation needs to be re-thought with far more days allocated to service for underrepresented communities and educational programming relative to commercial outfitting.

GTMA would also like to understand what the point of a User Capacity is if it is not a limit on use? If this is the number believed to be sustainable before degradation occurs, and the point of the plan is to prevent degradation, how can capacities be anything but limits? More explanation and justification for how these capacities will functionally affect management is needed.

We are also concerned that, with the exception of MU1, the limiting attribute for all user capacities is recreation. We believe additional limiting attributes need to be considered, especially for fisheries, to protect bull trout, and for wildlife to prevent displacement of moose, bears, and other species, in addition to mountain goats, from the river corridor.

In sum, GTMA is concerned that the plan would allow for significant, perhaps continuous, increases in the amount of allowable use. The plan is opportunity to set clear, conservative use levels for outfitted and non-outfitted use, or establish the resource condition indicators and thresholds by which those levels will be triggered into existence.

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<sup>7</sup> Per Forest Service Handbook 2709.14, 53.1f - Needs Assessment, Resource Capacity Analysis, and Allocation of Use.

<sup>8</sup> Proposed Action, p. 19

## Management Actions

GTMA supports the following management actions in the Proposed Action as written, *with suggested clarification or additions* in some instances:

- The establishment of a mandatory, but unlimited, free float permit system to gather more accurate data on river use patterns and use levels. *However, we question limiting the number and selection of initial segments. In addition to providing better, and more comprehensive data, applying the pilot to all river segments may make public education and outreach easier as the public won't have to think about whether or not a specific segment is included. We also suggest making the permits as easy to complete as possible, including both online, in person, and at river self-issue options. If the agency must limit the number of segments, we suggest including at least one segment from each fork, with the most environmentally sensitive stretches or that for which we have the most limited data prioritized. We especially encourage the addition of MF Wild and NF MUI to the initial pilot. We do not currently have data on MF Wild. The NF MUI is the most wild and remote section of the North Fork, and needs to be managed to maintain this characteristic.*
- Prohibition on motor vehicle parking and camping on gravel bars (except to actively launch or retrieve craft), *especially at Paola Creek and Blankenship. The plan should be explicit that this applies to these two areas as well. We would like to see the steps the Forest will take to enforce this closure included in the plan.*
- Prohibition on drones as stated in Proposed Action. *Additionally, the plan should reiterate that this regulation applies to all sections of the WSR corridor within designated Wilderness. Consistency with management of Glacier National Park and Wilderness areas should improve compliance and make enforcement easier.*
- Require metal fire pan or fire blanket for all campfires within the WSR corridor. *The plan needs to clarify if this applies to non-float users. It should. It should also apply to the South Fork as this area sees heavy overnight use.*
- Prohibition on dogs between Bear Creek and Essex river access sits, as well as the requirement to continuously move downriver between the eddy below Staircase Rapid and Split Rock. This action is fully warranted to protect mountain goats and supported by scientific monitoring. *However, we'd like more information about how the Forest Service plans to enforce these prohibitions.*
- Limiting noise to 60 decibels at 50 feet. This is a crucial management action given the proliferation of electronic speakers and the decline in social respect for other users desire to hear natural sounds, rather than other people's music, when out in nature.
- An agreement with GNP and BNSF to proactively prevent and address potential spills. *This should be in place regardless of the CRMP status! Additional parties should likely be involved, including at a minimum, Montana Fish, Wildlife and Parks, and county emergency response. We'd like more details on the actions that would be taken to prevent a spill and what actions would be allowed in the event of the spill. We encourage the agreement to mirror the conservation parameters in a habitat conservation plan so that agreement protects bull trout and other sensitive species during any spill prevention or response actions.*
- Prohibition of camping below high-water mark from Belton Bridge to McDonald Creek.
- Install a warning sign at Mid Creek.

GTMA does not support the following actions as written:

- Group size limits. Instead, we suggest:
  - *Limit group size to 30 for all Recreational Segments to 20 for all Scenic and Wild segments outside designated Wilderness, and to 15 for all Wild segments within designated Wilderness (consistent with existing Wilderness regulations). Group size limits should apply to both shore and float parties for ease of public understanding and enforcement.*
- Human waste containment within 200 feet. The current management action is too vague and may not be sufficient to protect water quality, especially in high use areas or headwaters with steep riparian areas (people often underestimate or don't respect distance, especially if it's difficult terrain). We suggest:
  - *Require solid human waste containment and removal from within the WSR corridor (1/4 mile of the river) on all segments using a Forest Service approved technology such as wag bags or groover system, or the use of existing toilets. This regulation should apply to all users as this would best protect water quality and improve compliance. Packing out solid human waste is a widespread regulation or norm in the river recreation community, including with packrafters. Backpackers in certain environments or high use areas are required to do so as well. Stock users certainly could learn to adjust their practices if required. If the Forest Service limits it to float users, it needs to ensure its monitoring and triggers are set such that it can be expanded to other users should human waste burial by stock or foot traffic cause human health or water quality issues.*
- *“Livery services (which include shuttles) would be accommodated ...”<sup>9</sup> The word “would” should be changed to “could.” Without this change, it may be harder for the Forest Service to limit these services if desired or warranted. Clearer guidelines need to be developed to delineate the conditions when livery services are allowed and when they are restricted or prohibited. Otherwise further expansion of livery services could drive up use on the river (use levels are currently limited primarily by the physical footprint of river access sites in some cases), causing triggers and thresholds to be exceeded more quickly, or contributing to other user conflicts or resource degradation. For example, restricting parking at Bear Creek River Access site is one way to limit the number of people who can float past the Goat Lick. Unregulated livery services, would make it more likely for the user capacity to be exceeded.*
- Management actions related to user capacity, priority commercial use days, or temporary education and outfitting guide permit. We address our concerns under the section “User Capacity.”

GTMA suggests developing additional management actions to address the following issues (we expect the agency to develop the exact action):

- Limits on the number of watercraft allowed per party, especially on the Wild and Scenic segments, as number of craft, rather than total people, is more strongly correlated with fish and wildlife disturbance events or recreational solitude.
- Float closures or restrictions on number of party or number of craft during bull trout spawning season in known spawning reaches to prevent displacement of bull trout or

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<sup>9</sup> Proposed Action, p. 19

damage to redds. The late summer and fall restrictions on craft and launches on the Middle Fork Salmon in place for the past 12+ years to protect spawning chinook could serve as a starting point in developing analogous regulations for bull trout.

- Directives that guide and limit expansion of the recreational footprint, such as expanding river access sites so that any changes to the size or number of river access sites is tightly conditioned on preventing impacts to ORVs. Right now, river access sites are the primary way the FS limits river use and any expansion must account for the increased use it would facilitate. Likewise, impacts on the scenic character of the corridor need to be heavily considered.
- Prohibit (or clearly restrict) the development of new federal structures within the WSR corridor; the primary purpose would be to limit new buildings like cabins, that degrade the scenery and natural aesthetic of the corridor.
- Clear direction that any vegetation, wildfire mitigation, or other forest management projects in the corridor be consistent with and prioritize the protection of ORVs.
- Clarify that bear food storage orders apply to all floaters and other users in the corridor.
- Camping permits for MU2 on the Forest Service side. There is already limited opportunity for dispersed camping due to the predominance of private land on the non-Park side of the river, which leads to competition for the few available sites, or illegal camping in the Park or on private land. A permit to camp in the corridor would reduce conflicts, improve consistency in management across the Park / Forest boundary – likely leading to improved compliance – and provide needed user data.
- Interpretive and educational actions related to historic and ethnographic resources. Where applicable, tribal governments should be engaged in the design, content, and delivery, as well as provide informed consent about what cultural information or sites not already in the public sphere to make public.

### **Monitoring Plan, Indicators, Triggers, & Thresholds**

Effective management requires a solid monitoring plan to detect changes in resource conditions and adapt actions in a timely enough manner to alter trends. The current proposed monitoring plan is too limited in scope, with a focus almost entirely on monitoring for impacts to one value, Recreation, and even the monitoring components for this value are highly inadequate as they are focused almost entirely on one Wilderness character: solitude as measured by number of boats, parties or people (depending on plan component). Other impacts from recreation need to be monitored, such as parking lots, invasive weeds and vegetative disturbance, number of dispersed campsites, defacement of geologic resources, damage to historic / ethnographic resources, and noise events that exceed 60 decibels.

The 2019 Proposed Action included a more comprehensive monitoring plan for recreation, as well as other values. It also includes more attention to the conditions of the corridor, not just the river itself. We encourage the Forest to revisit the 2019 Proposed Action and reconsider what monitoring components to retain.

At the January 21<sup>st</sup> public meeting, the Forest Service personnel explained they only wanted to create a monitoring plan for which they have current capacity to implement. We strongly disagree with this approach. The monitoring plan must be robust enough to protect the River and its ORVs over the life of the plan. If the Forest lacks the capacity currently to conduct sufficient monitoring, the correct approach isn't to say oh well, we can't possibly get to it all, so we won't try. Rather, it is to create the Plan the Forest needs to effectively and lawfully manage



the resources, then work through the budgetary process or with partners to develop the capacity to implement the plan. Many organizations, including ours, would happily participate in helping to collect useful data in a systematic way (some already do). Partners, such as NGOs or commercial outfitters, can help secure needed resources. A complete plan is a critical step to highlight the needs and the capacity gaps.

In particular, GTMA would like to see far more attention directed at monitoring impacts to fisheries (especially given the worrying trends for bull trout) and wildlife. We are alarmed at published reports of declines in bull trout, especially in the South Fork which has held on far longer as a bull trout stronghold.<sup>10</sup> Yet none of the monitoring for fisheries examines bull trout redds. We also question if a sustained decline in abundance or length over 5 years is too long before corrective action is taken. More robust monitoring components for bull trout and westslope cutthroat should be included. Another component should monitor for expansion of non-native species, like rainbow or lake trout.

Regarding wildlife, right now, the only species specifically monitored is mountain goats, and even here if the monitoring plan is sufficient to trigger corrective action. Seeing wildlife is commonly one of the most treasured experience for river users, and the Flathead River system is part of one of the few temperate ecosystems that has almost all its native fauna in relative abundance. Bald eagles, harlequin ducks, river otters, beavers, grizzly bears, mink and moose are just a few of the other species whose trends in the corridor should be monitored. River patrols and trained volunteers, or river user surveys, could all help collect observational data. Alternately, a selected suite of species with different population densities and sensitivity to disturbance, could be monitored using a variety of techniques (observation, cameras, e-dna, collars) to help assess overall trends.

Many of the thresholds and triggers are hard to comprehend or don't seem informed by other parts of the plan. For example, the threshold for Float User Experience for the MF Wild says "No more than 4 boats per day passing the Bear Creek monitoring site, during 80% of the days monitored, in 3 out of 5 years."<sup>11</sup> This is confusing to the average person. What aspect of the user experience is actually being monitored? If it's solitude, one party of 4 boats has a different impact than four parties of one boat. It is also not clear how this has any correlation with the proposed user capacities for this section. The user capacity upstream of Bear Creek is proposed to be 170 people / day. That is 42.5 people per boat! Downstream it is 100 people / day, which is still a very sweaty 25 people per boat. And what does "of the days monitored" actually mean? This could be 50 or it could be none, an inconsistency which makes it hard to confidently identify trends.

Another example concerns mountain goat monitoring. It's unclear what "collaboratively monitor compliance" actually indicates, besides the existence of a partnership. Or what happens if the threshold is exceeded but not the trigger? In other words, there could be 100% compliance with the special order but goat presence on the river still declines. Then what? To effectively ensure recreation is not displacing mountain goats, it seems like the presence and behavior of both goats and recreationists needs to be monitored, and a suite of response actions identified.

The monitoring plan currently lacks any such menu of potential management actions that could be triggered. A suite of potential actions should be developed and analyzed to the extent practicable during the creation of the plan so that they can be implemented in a timely manner

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<sup>10</sup> See, <https://flatheadbeacon.com/2024/11/01/in-northwest-montana-recreational-fishing-for-bull-trout-is-a-catch-22/>).

<sup>11</sup> Proposed Action, p. 23

should thresholds and triggers be exceeded. Waiting till resource conditions are out of compliance to analyze corrective action is too late in many cases given the time most environmental assessment processes require.

We particularly encourage the Forest and Park to think creatively about ways to distribute or limit recreational use as part of the suite of potential management actions that could be triggered in the future or established at the onset of this plan. Some ideas include first-come, first-serve permits, a permit lottery, days or times of days when different segments are closed to commercial use to more equitably distribute use with private boaters, overnight camping permits for areas with limited camping options, craft limits for certain segments or times of year, variable seasonal caps on use based on sensitive resources, etc. Again, assessing these now will help the public understand the range of management options that could be utilized in the future, as well as smooth their adoption from both legal and social perspectives, should their adoption be warranted.

Thank you again for the opportunity to comment on the Proposed Action. We are happy to discuss any of our ideas or concerns further with you. We look forward to continuing to participate in this process to develop a CRMP that will protect the irreplaceable Flathead Wild and Scenic river system for generations to come.

Sincerely,

A handwritten signature in blue ink that reads "Peter Metcalf". The signature is written in a cursive style with a long horizontal stroke at the end.

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