



P.O. Box 2410  
Brevard, NC 28712  
americanwhitewater.org  
828.508.1359

March 11, 2025

Re: Flathead Wild and Scenic River CRMP

Dear Planning Team,

American Whitewater is a 501(c)3 nonprofit organization that has been working on whitewater river stewardship projects since 1954. We represent everyday canoers, kayakers, and rafters that like to spend time on whitewater rivers. We are a founding member of the Wild and Scenic Rivers Coalition, and have been supporters of the Wild and Scenic River System ever since our members played a role in creating and advocating for the passage of the Wild and Scenic Rivers Act. Many American Whitewater members regularly enjoy and care about the forks of the Flathead River, and our staff has significant experience on all three forks and numerous tributaries. The rivers, their protection, and their enjoyment are important to our organization and our community. We feature the rivers on our website, and would like to partner with the Forest Service to share elements of the CRMP with the public to encourage sustainable and responsible visitation.

On February 6, 2025, American Whitewater submitted comments on the proposed action. The Forest Service did little to address our comments and concerns in the Draft CRMP, including some simple issues we brought up the math correlating triggers and capacities. Because of this we will reiterate some of our prior comments and ask that they be addressed in the final CRMP.

American Whitewater is supportive of the proposed management actions in the Draft CRMP. We appreciate the proposals to have unlimited permits, to address human waste and fires, to set capacities, and to focus on water quality and wildlife along with recreation. We appreciate the acknowledgement of climate change's impacts on the rivers. Our primary request for improving the CRMP is that it be constructed as a true *Comprehensive River Management Plan* rather than its current form as a *Paddling Management Plan*. Paddling is the only use that is tracked with permits, the only use with capacities, and the only activity considered for limits if values are diminished. The agencies fail to adequately consider the capacity effects of hikers and horse-based users that camp and travel along the rivers. In a second significant oversight, the Forest Service fails to guide or limit its own activities in the corridors with the CRMP. We ask that these omissions be corrected in the final plan.

Please consider the following comments on the Draft CRMP:

- **Equitably consider capacities and effects of non-boaters.**

The Draft CRMP by and large reads like a paddling management plan rather than a comprehensive river management plan, and it should be expanded to encompass other activities in the corridors. Most notably, while the capacities include all visitors; indicators, triggers, and thresholds in the Draft CRMP are largely focused on the number of boats descending rivers rather than also including the number of hikers, horsepackers, hunters, anglers, campers, picnickers, etc. The proposed action seems largely blind to biophysical impacts of other visitors, and those visitors' contribution to social or physical capacities of the corridors.

This is a concern in part because with boaters as the only user group with permits and subject to management based triggers, boaters would likely become the only user group that is limited to remedy any future issues, regardless of which group or combination of groups is causing the issues.

While this is an issue across the plan, we note that it is particularly concerning on the South Fork MU1 where the Draft CRMP notes that use is approaching capacity, but does not consider all visitors equitably.

The agencies should reconsider the approach to monitoring use levels, and consider monitoring all visitors through counting people, and/or cars at trailheads and access areas, rather than just counting boats.

- **Guide, limit, and focus agency activities in the corridor through the CRMP**

The Draft CRMP is a very outwardly focused plan that focuses on managing visitors, while being largely blind to an inward view of the agencies' own actions that can and do affect river values. The need for such guidance is highlighted in the Forest Service's proposed Granite Moccasin Project that would cut timber, mitigate fire risks, build new roads, and pose risks to scenery and water quality in the Middle Fork Flathead corridor. The CRMP should guide and constrain current and future projects like this to ensure that their objectives are met to the extent possible while protecting ORV's. It is in the public interest that the CRMP protect the river and guide management of not just visitors, but also the full suite of potential agency management actions that could impact or improve those values.

- **Please remedy or explain the relationship between Middle Fork Flathead triggers, thresholds, and capacities, which appear to contain mathematical errors.**

The Middle Fork Wild Section has a capacity of 150 people, but has a trigger of no more than three boats per day exiting the reach during 60% of the days monitored, in 3 out of 5 years. The threshold is four boats per day during 80% of the days monitored in 3 of 5 years. If there are 3 boats exiting the river per day, and a rough average trip is 4 days, and average people per boat is 2, then the trigger would be met when there are only 24 boaters on the whole reach. It would

be met when there are only a handful of people exiting the river in a day - likely one group. That is nowhere near the 150-person capacity.

In addition, we ask how would the Forest know if capacities are met since while capacities include all visitors, the monitoring only includes boats? For consistency, indicators, triggers, and thresholds should be based on the number of people rather than the number of boats, and be applied to all visitors. This would align these monitoring tools with capacities, and also apply equally well across all users.

The trigger of only three boats exiting the Wild Middle Fork per day on 60% of monitoring days feels low, since three boats is most likely a single trip. This means the Forest Service will be concerned if there are not at least 40% of days when there are no groups exiting the river. We ask that the Forest Service take a hard look at the relationship between the capacity, trigger, threshold on this section of river, and ensure the thresholds do not indicate management interventions are needed prior to capacity being approached.

- **The trigger, threshold, and capacity proposed for paddling upstream of Schafer Meadows appears arbitrary and lacks a sufficient basis or rationale in the record, and should be better explained and increased based on analysis.**

The Draft CRMP proposes a trigger for the Wild Middle Fork section of no more than eight parties *a season* floating the headwaters above Schafer Meadows. This is a vanishingly low trigger and unprecedented in its small scale, as is the threshold of eight trips per season for this reach. There appears to be no justification for these capacity metrics in the User Capacity Report or any of the CRMP documentation. These capacity metrics also only apply to the small number paddlers that want to experience this area each year, without consideration of the presumably larger number of hikers, hunters, and horsepackers. We note that some packrafters in this reach may not proceed past Schafer, and their effects may be nearly identical to those of hikers. We see no reason why more trips than this would cause issues, and request that these numbers be increased based on an analysis and justification that integrates other kinds of visitors.

- **We support a train spill agreement, but it should be broader to include rail line repair or replacement.**

Thank you for naming the threat that a train derailment could pose to the Middle Fork, and proposing a dialog and agreement focused on how to reduce the likelihood of a spill and how to respond to such a spill. This is very important.

In addition, we also request that the USFS and NPS proactively reach a rail maintenance agreement that would protect the river. If a flood, landslide, or other issue were to damage the rail line, repairs would be made with great haste, likely under an emergency waiver from many permits. In this case there could well be ways of repairing the line that protect river values (like not removing native rock from the river) and other cheaper and faster ways that damage the

values. Without an agreement in place, this work could happen prior to, and without consultation. We speak from experience on this matter, and strongly encourage such an agreement to be reached prior to emergency conditions.

- **Consider and discuss multi-day use of frontcountry sections as a valued use by the public.**

The Draft CRMP discusses the various frontcountry sections of the Middle (MU 1-3) and North (MU1 & MU2) forks as though they are distinct day runs. Desired conditions are focused on day runs. While day use is certainly common, so too is multi-day use. Multi-day paddlers will traverse all of the frontcountry sections of the Middle Fork of North Fork, and therefore there should be sufficient alignment of CRMP components to support multi-day use.

- **Thank you for emphasizing and valuing the freedom and safety benefits of not requiring limited permits.**

One of the great and increasingly special things about all sections of the Flathead River forks is that the public does not have to win a lottery or reserve a slot to paddle the river. This allows the public to enjoy the river with the relative freedom and ease that people seek out on Wilderness and frontcountry rivers alike. It also allows last-minute changes in plans due to weather, flows and personal or group factors without the pressure and penalties of forfeiting a hard-to-get permit. This can lead to better and safer trips, especially on hydrologically flashy rivers with dynamic weather like the forks of the Flathead. The Draft CRMP acknowledges that providing reservation-free experiences on these rivers is a desirable management element of these rivers.

- **Camping closure should be mitigated.**

Prohibiting camping on cobble bars at certain Middle Fork access areas will reduce excellent reservation-free low-key riverside camping opportunities for river visitors. We recommend that the Forest Service seek to identify new opportunities nearby that could fill this niche, and that provide some scenic or recreational experience of the river away from the road. The Draft EA mentions that such mitigation is envisioned, but only vaguely. Please include some desired conditions and proposed management actions in the final plan to identify and construct some camping opportunities that provide either a direct river experience (such as on a bluff with an overlook), or easy access to river experiences. Informal but sustainable camping locations are welcomed.

- **Capacities, triggers, and thresholds should be revisited prior to future limits.**

We feel that capacities, triggers, and thresholds should all be revisited prior to any limiting of the number of public permits in the future, and that indirect limits be exhausted prior to the imposition of direct limits. The public should be able to weigh the impacts of reductions in their ability to get on the rivers with their encounter tolerances and other factors based on recent and current conditions. Predictions of how a certain number of encounters will feel to visitors are not

always consistent with the actual experience of that number of encounters. And, the very real impact of being denied the chance to paddle, hike or horseback ride along a river for one or many years can shift encounter tolerances. We ask that the Forest Service build this check-in with the public into the CRMP, and conduct it prior to limiting permits in the future.

- **We support mandatory permits and request specific measures.**

We support the idea of requiring mandatory unlimited permits. This will be helpful for understanding usage, and should apply to hikers and other visitors as well as paddlers. Because cell service is poor along these rivers, physical permits should be available at access areas and trailheads. Permits also offer the Forest an opportunity to share Leave No Trace and other information about how to visit the rivers sustainably and with relative safety.

We request that these permits be free, and made available online or in-person at key locations. Because recreation.gov requires fees, we ask that the agencies consider an in-house solution, or a partnership approach with a supportive non-governmental organization. We would welcome a conversation on how to accomplish this.

In addition, cell service and wireless internet are hard to find near the forks of the Flathead. We ask that the agencies support and share some wifi locations near these rivers to help paddlers comply with permitting requirements. WiFi in West Glacier and Polebridge would be a big help, as well as near Essex.

- **We support human waste management and request specific measures.**

We support the requirement to control human waste within 200 feet of the river for all visitors. A human waste system (wag bags, groover, etc) should be required on all sections of all three forks for anyone camping within 200 feet of the river, *regardless of the form of travel those visitors are engaged in.*

We request that the agencies support or offer a scat machine somewhere central to the three forks of the flathead for groover cleaning. Requiring portable toilets without ensuring the infrastructure exists to empty and clean them poses major challenges for the public.

- **We support fire pan requirements and request language clarification.**

We support the requirement that firepans or blankets be required for fires along the North and Middle forks. However, we request that firepans or blankets not be required as mandatory trip equipment for groups that do not have an interest in having fires. This caveat would in particular support packraft and kayak trips for which firepans are unwieldy or prohibitive. It seems like this is explicit in the Draft CRMP that states firepans are needed “for campfires,” which indicates that if visitors are not having campfires they do not need a firepan. We ask that this be made even more explicit.

- **We support group size limits.**

Instituting some group size limits makes sense and is a standard management approach.

- **Tributary paddling should be acknowledged and supported in the CRMP.**

The CRMP should acknowledge positively that paddlers will occasionally run tributaries to these rivers, often ending their trips on one of the Flathead forks. These trips offer outstanding solitude, whitewater quality, water quality, and scenery. These backcountry trips exemplify the kind of use that should be supported by the CRMP.

Thank you for considering these comments.

Sincerely,



---

Kevin Colburn  
National Stewardship Director  
American Whitewater  
P.O. Box 2410  
Brevard, NC 28712  
kevin@americanwhitewater.org