



October 31, 2024

Rob Davies, District Ranger
PO Box 190340
Hungry Horse, MT 59919

Re: North and Middle Fork Flathead River Outfitter and Guide Permit Renewal Project

Comments submitted as PDF electronically via:
comments-northern-flathead-hungry-horse-glacier-view@usda.gov

Dear Mr. Davies,

Thank you for the opportunity to comment on the renewal of five existing priority outfitter and guide special use permits for the non-wilderness portion of the North and Middle Forks of the Flathead River. Our comments are offered on behalf of the National Parks Conservation Association's (NPCA) 1.6 million members and supporters nationwide who are dedicated to the protection of our national parks and adjacent public lands, as well as the more than a thousand members and supporters of Glacier-Two Medicine Alliance (GTMA), many of whom regularly recreate or otherwise enjoy the Flathead River system.

GTMA and NPCA support outfitted and guided recreation on our national forest lands, including the Flathead River. Outfitters and guides can provide a valuable public service that enhances access and responsible recreation of our public lands, as well as can instill greater appreciation for their preservation and careful stewardship. However, we have some concerns about the re-authorization process that need to be considered.

Like many other members of the public, we were frustrated by the limited amount of information the Forest initially provided about the permits, including almost no information about what activities were permitted (including any designated river sites), the terms of the permits, whether any violations of a permit had occurred, what the allocated vs actual user days for each permit were, as well as any change in outfitted and non-outfitted use of the river over the past 10 years at a minimum. We appreciate the responsiveness of the Forests' recreational staff to ours and others request for more information, for the information provided about the types of permits and their administration, as well as the data on commercial recreational use levels from 2015 – 2023. We also appreciate the extension of the public comment period in conjunction with the release of this information.

However, we disagree with the Forest's proposal to reissue the permits for another automatic 10-year term. The Forest is about to reboot its planning process for a new Comprehensive River Management Plan (CRMP) to guide, amongst other things, recreational use on the North and Middle Forks of the Flathead River. The planning process should include a

thorough, comprehensive assessment of outfitter and guide services on the Flathead River, including but not limited to the non-Wilderness sections of the North and Middle Forks. A comprehensive assessment is necessary to ensure the type outfitter and guide services provided and the number of priority days authorized are compatible with the protection of these rivers Outstanding and Remarkable Values, including the conservation of fish and wildlife species, as well as other ecological, historical, cultural and social values. The future type and allocation of outfitter use needs to properly account for the exploding level of general non-outfitter recreational use that the North and Middle Forks have experienced in recent years. We are deeply concerned that recreational use (both outfitted and general public) of the river is already having negative impacts on the conservation of sensitive species like grizzly bears, bull trout, westslope cutthroat trout, and mountain goats, as well as their ability to move across the landscape. Scientifically robust analysis of recreational impacts on fish and wildlife (as well as other natural and cultural resources) should substantially inform the recreation use and capacity limits on these two rivers.

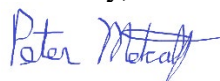
Thoughtful consideration should also be given as to whether the current suite of permits meets the present public interest (the type of outfitted activities has been largely unchanged over the last 40 – 50 years), as well as how to create opportunity for new priority use permits for niche outfitters, such as women or minority-owned businesses, or nonprofits (like Flathead Lutheran Bible Camp, the sole nonprofit amongst the five current permittees) that provide a comparatively financially accessible opportunity for a guided trip and/or serve an underrepresented demographic, like youth, Indigenous communities, or the disabled.

We understand that the permits' pending expiration does not allow for a decision on whether to re-issue to wait until after the CRMP has been completed. A ten-year renewal will complicate the ability of the Forest to make any changes to outfitter and guide services that the CRMP indicates for the North and Middle Forks of the Flathead River. Therefore, the Forest should condition, as it indicates that it will, the re-issuance of these permits on any changes directed by the revised CRMP or other Forest management plans, laws and regulations, or directives. This should include the possibility of a reduction in priority use days, other alterations to the permit's terms and conditions, or its cancellation.

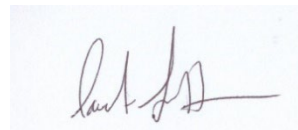
As far as the current suite of outfitters are concerned, we know of no reason any of them should not have their permits renewed for the period between April, 2025 and the completion of the new CRMP.

Thank you again for the opportunity to comment on the re-authorization of outfitter and guide permits for the North and Middle Fork Flathead River. We would be happy to discuss any of these ideas further with you or other appropriate US Forest Service staff.

Sincerely,



Peter Metcalf
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Glacier-Two Medicine Alliance
East Glacier Park, MT



Sarah Lundstrum
Glacier Senior Program Manager, National
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