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First name: Lisa

Last name: Ronald

Organization:

Title:

Comments: Having recently run the Middle Fork of the Flathead River this summer for the first time, I wanted to comment on the proposed actions. While I support the Forest Service's desire to preserve the wilderness value of solitude for river trips within the Bob Marshall, it was unclear from the proposed actions document whether encounter triggers are being approached and actions are imminent. I don't disagree with use limits to preserve a certain type of experience, but the Forest Service needs actual data to warrant a limited permit system. How much use is actually occurring now? How much of that is boating use vs. land (horse, hiker, backpacker) use? It's difficult to get a real-world feel for the consequences of any actions if data isn't supplied to help the public know where use stands now.

In the absence of use data, I can only think about my experience. During my trip, we encountered 2-3 parties/day though they were the same parties. Leapfrogging, which is common during river trips when parties launch on the same or neighboring days, is an accepted occurrence among boaters, and often provides the opportunity for river comradery. From what I could glean from the triggers and thresholds, it suggests that the on-water encounter trigger may have already been reached, meaning that limits would be placed on use. My sense, however, is that some additional use could be accommodated, if party size is kept small. Encountering 1-2 very large parties on the river (ex. 6+ rafts) is very different experientially from encountering 3-5 small parties (ex. 1-2 rafts). Large parties, particular in this narrow rock-filled river corridor, present passing issues, portage and scouting issues (ex. clogging scout stops) and campsite issues (ex. enlarging and hardening sites). My trip would have been equally as enjoyable if we had encountered 3-5 small parties (which were mostly the type we encountered), but would have been dramatically different if additional large parties had been present.

I was also pretty surprised to learn while planning our trip that waste packout was not required. I required my group to pack out human waste anyway. Observing waste-from-water setbacks for catholes is very difficult in much of the river corridor due to the topography, and packing out waste is a universally accepted, understood, and adhered to practice among the boating community. Since use is definitely concentrated in the river corridor, even at current use levels, I would strongly urge the Forest Service to include in the proposed actions waste packout requirements for all overnight parties to ensure that water quality does not degrade and campsite impacts do not increase.

Thanks for all your work to honor the tenets of the Wild and Scenic Rivers Act on the forks of the Flathead. I look forward to the opportunity to comment during the next round.