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First name: Greg

Last name: Schatz

Organization:

Title:

Comments: Please enter my comments into the Comprehensive River Management Plan (CRMP).

The CRMP needs to include that the Forest Service is required by the Wild and Scenic River Act to enhance or protect all ORV's measured against their condition at the time of the establishment of the 3 Forks of the Flathead as part of the Wild and Scenic River System.

The CRMP needs to include that the management of the South Fork (MU1) and Middle Fork (Wild) is dictated by the 1987 BMWC Rec Management Direction (RMD). The CRMP is way out of compliance with the RMD. On page 16 of the CRMP it says, "no more than 16 watercraft per day." The limit of social encounters in the RMD is four. The CRMP needs to recognize this.

The CRMP needs to recognize that, according to Flathead National Forest records from the Spring of 2024, the South Fork (MU1) and Middle Fork (Wild) are woefully out of compliance with the RMD. Some of the areas out of compliance with barren core, inter-party contacts and range condition are Black Bear Creek, Hodag, Independence Park, Salmon Forks, Murphy, Woodfir, Big Prairie, Mouth of Gordon, Big Prairie North, Otter Creek, Hole in the Wall, Hahn Cabin and Young's Lake. There are many other places as well.

The CRMP needs to require all users of the 3 Forks of the Flathead to pack out human waste. The Flathead is the only major river system in the Western US that does not require this.

The CRMP needs to recognize that the resource damage along all 3 Forks is a disaster and start a lottery permit system for private users on all 3 Forks. This system can copy the permit system on the Smith River. On January 22, 2025, at the CRMP question and answer session, I was horrified when District Ranger Davies said, "We want unlimited access to all 3 Forks of the Flathead. Has he not been on any of the rivers? Has he not seen the resource damage? The 3 Forks of the Flathead are not Disney Land and shouldn't be managed as such.

The CRMP needs to stop all commercial outfitter livery permits on the South Fork (MU1) and Middle Fork (Wild). The livery outfitters are putting way too many people on the river. The number of people far exceeds the social limits in the RMD. The livery outfitters are severely overgrazing the area around the confluence of Young's Creek and Danaher Creek. This area is far out of compliance with the RMD for range, barren core and inter-party contacts.

The CRMP needs to drastically limit the number of user days for commercial outfitters on all Forks.

The CRMP needs to significantly limit commercial outfitters doing float trips on the South Fork (MU1). Outfitters should not be allowed to use pack stock support for river parties.

On page 11, Middle Fork (Wild), the CRMP states, "Visitors can expect infrequent encounters with the sights and sounds of humans." It is very common for six parties a day to get on the river at Shafer. There is very limited camping along the Middle Fork (Wild). Currently you cannot get away from the sights and sounds of humans on this portion of the river. This exceeds the standards in the RMD.

On page 14, South Fork (MU1), the CRMP states, "There are ample opportunities for visitors to experience Wilderness character and solitude." As shown in the 2023 RMD report, this is not the case. This portion of the river far exceeds the standards in the RMD.

Due to the resource damage on the lower Middle Fork and North Fork the commercial outfitted use on these Forks needs to be drastically reduced. The CRMP should dictate three boats launched per day for each of the four permitted commercial outfitters on the rivers. Currently many days each summer the commercial outfitters are going over their permitted outfitter days by 50%. There were many days this past summer when there were 1,000 boats a day at the West Glacier river access on the Middle Fork.

The suggested monitoring plan in the CRMP is much too vague and needs hard numbers. Who is doing the monitoring, where are they doing it and when are they doing it. Without solid, verifiable data the Forest Service cannot protect the resource as they are mandated to do in both the Wild and Scenic River Act and the RMD.

The capacity chart on the CRMP is ridiculous and is already exceeded on many parts of the river. The chart should read as follows:

NF 1 = 20

NF 2 = 40

NF rec = 50

MF wild = 20

MF 1 = 20

MF 2 = 200

MF 3 = 250 (including the 200 above)

SF 1 = 20

SF 2 = 30

SF 3 = 70

No more than 50% commercial outfitted on all segments

I have spent the past 35 years packing my string of horses on the Middle Fork (Wild) and South Fork (MU1), over 60 pack trips up, down and across the South Fork and more into the Middle Fork (Wild). I have seen the degradation of resources first hand and it makes me sad. My hope is that this CRMP will bring the river corridors in the Bob in line with the standards set in the RMD so that, sometime in their lifetime, my young friends who are in their 20s, can have the same Wilderness experiences in the Bob that I used to be able to have. My hope is that the Flathead National Forest will step up, do their job and manage the 3 Forks of the Flathead so that they are in compliance with the Wild and Scenic River Act.

I have had several friends who worked tirelessly to write the 1964 Wilderness Act, the Wild and Scenic River Act and the BMWC Rec Management Direction. I'm sure those who have died are rolling over in their graves seeing the destruction the Flathead National Forest has allowed to happen along the 3 Forks of the Flathead. I have been going to river management meetings for the past 20 years. It's time for the Forest Service to step up and get the CRMP done and done right.

In reading this CRMP multiple times, it reads like it is a copy and paste job combining several other river plans and was put together by someone who has not been on any of the Forks. I ask that this CRMP be rewritten by Forest Service staff who work on the 3 Forks of the Flathead, by people who are on the ground every day and see the damage to the resource.

The CRMP says on page 2, "It travels through some of the most wild, rugged country in the United States." The Wilderness portions of the South Fork and Middle Fork are some of the wildest rivers in the western US, and I expect this CRMP to set up a management system to manage use so it is commensurate with the use when the 3 Forks were included in the Wild and Scenic River Act.

