

Data Submitted (UTC 11): 2/5/2025 8:13:01 PM

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Comments: The 117 members of the Back Country Horsemen of the Flathead (BCHF) appreciate the opportunity to be engaged in the public process concerning the very important Flathead Wild and Scenic River System Comprehensive River Management Plan (CRMP) and provide the following comments for consideration.

BCHF has been actively involved in this river management update for the past 20 years. In that time, we have seen a significant increase in damage to the resource along the South Fork (MU1) and Middle Fork (Wild).

Our comments are geared directly towards those portions of the South Fork (MU1) and Middle Fork (Wild) which are in the Bob Marshall Wilderness Complex. Our comments revolve around the statement on page two of the CRMP, "It travels through some of the most wild, rugged country in the United States."

The CRMP should include a statement outlining the Flathead National Forest's recognition that the goal of the plan is to enhance or protect all ORV's measured against their condition at the time of the establishment of the three forks of the Flathead as part of the Wild and Scenic River System.

The South Fork (MU1) and Middle Fork (Wild) are both in the Bob Marshall Wilderness Complex (BMWC), one of the wildest Wilderness areas in the lower 48 states. Both of these rivers are also protected by the Wild and Scenic River Act. Both of these rivers are also protected by the 1987 BMWC Rec Management Direction, which BCHF had a hand in crafting.

As of the spring of 2024, the USFS BMWC Rec Management Direction monitoring data shows that many places along the South Fork and Middle Fork are out of compliance with the BMWC Rec Management Direction. The amount of barren core, poor range conditions, and inter-party contacts are significantly out of compliance. Some of the many places out of compliance on the South Fork (MU 1) and Youngs Creek are Youngs Lake, Hahn Cabin, Hole in the Wall, Otter Creek, Big Prairie North, Mouth of Gordon, Big Prairie, Woodfir, Murphy, Salmon Forks, Independence Park, Hodag, and Black Bear Creek. None of this resource degradation is included in the CRMP.

BCHF feels it is time to implement a mandatory lottery permit system to limit the number of users on the river, in the BMWC, until such time as the goals in the BMWC Rec Management Direction are met.

We feel that all commercial livery outfitting permits need to be halted, as they are putting a significant burden of users on both the South Fork (MU1) and Middle Fork (Wild), as well as on the grazing available along the river corridor, specifically at the Confluence and lower Youngs Creek.

We also feel that commercial outfitted river parties need to be significantly limited by the group size, number of trips and number of boats. Outfitters also need to secure their outfit on their rafts and not be allowed to have pack strings to support the party along the river. The range conditions do not meet the standards in the BMWC Rec Management Direction due to the large number of stock outfitters utilize to host rafting parties. It is very common to pass 90 to 120 head of pack stock for three or four outfitted rafting groups on the South Fork.

On page 11, Middle Fork (Wild), the CRMP states, "Visitors can expect infrequent encounters with the sights and sounds of humans." At this point in time this is not the case. It is quite common to have six parties get on the river at Shafer the same day. There is extremely limited camping from Shafer to Bear Creek, so it becomes a mad dash of parties who end up camped on top of each other.

On Page 14, South Fork (MU1), the CRMP states, "There are ample opportunities for visitors to experience the Wilderness character and solitude." There is no Wilderness character or solitude on the South Fork at this time. Many members of BCHF have observed the following. There are many days when there are 40-60 people a day getting on the South Fork at the confluence. There are many days where there are 100 people using the South Fork between Salmon Fork and the Mid Creek Takeout. There are many nights when there are 60-70 people camping within a quarter mile of the Salmon Forks Bridge. The resource cannot stand this much abuse.

BCHF suggests the following numbers of users for the capacity chart:

South Fork (MU1) -no more than 10 people per day getting on the river at the confluence and no more than 60 people on this section of the river at any given time.

BCHF suggests the following numbers of users for the capacity chart:

Middle Fork (Wild) - no more than 10 people per day getting on the river at Shafer and no more than 40 people on this section of river at any given time.

Our comments on the proposed Management Actions are as follows:

1.Mandatory, limited, lottery permit system for river users.

3) All river users need to pack out human waste; the Flathead is the only major river system in the western US where this is not the rule.

The suggested monitoring plan is much too vague and needs hard numbers. There needs to be specific dates when the monitoring will be done. Monitoring needs to be done in July; to monitor in September or October is completely useless. In addition to river rangers, there needs to be specific monitoring sites and dates on both forks of the river.

The plan must dictate that there need to be seven river rangers on the South Fork MU1 with one river ranger leaving Big Prairie every day. To have the current system of one river ranger making one trip down the South Fork per week is absurd when the USFS is charged with managing the river.

The plan needs to dictate that there be four river rangers on the Middle Fork Wild with one river ranger leaving Shafer every other day.

In the suggested monitoring plan for the South Fork MU1 it says no more than 16 watercraft per day passing a monitoring site. This is significantly out of compliance for social encounters in the BMWC Rec Management Direction which dictates that a person will encounter no more than four other parties a day.

It is the recommendation of BCHF that this CRMP be rewritten by USFS personnel who actively use the South Fork and Middle Fork. To have someone from the Washington office copy and paste a river plan together that matches the other river plans in the West is not productive. As 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 we expect USFS management to keep it that way.