

Data Submitted (UTC 11): 2/5/2025 10:24:43 PM

First name: Deborah

Last name: Schatz

Organization:

Title:

Comments: Please accept my comments on the Comprehensive River Management Plan (CRMP) for the three Forks of the Flathead River.

My comments are mainly directed to the South Fork Wild (MU1).

I am a horseback rider who enjoys taking pack trips into the Bob Marshall Wilderness and specifically the South Fork and Middle Fork areas of the Flathead River. I enjoy the river corridors from the trail, and enjoy camping along the rivers.

On a recent trip on the South Fork in 2023, I experienced greatly increased social encounters and campsite densities, and decimated range conditions. I saw no effort from the Forest Service to improve or resolve any of these areas that are out of compliance with the Bob Marshall Wilderness Complex Rec Management Direction of 1987 (BMWC RMD). I also saw a lot of evidence of human waste, especially near the river.

On the first day, I passed four outfitters with pack strings who were providing livery service to floaters on the South Fork, as well as two Forest Service packers and three hiking parties. That put my social encounters on the trail well over the five parties I should expect to see in Opportunity Class IV.

That same evening, I saw five rafts float past my campsite near the river and two campsites near me. Again, that put my social encounters well over the five parties maximum in Opportunity Class IV of the BMWC RMD.

On that same trip through the South Fork river corridor, I found NO grazing for my horses near the river. Several days, I was forced to travel three miles or more from the river to find graze. I saw where outfitters had camped with stock, and grazed off all the available grazing in every suitable camping site I found along the river, namely: Black Bear Cabin, the confluence of Black Bear Creek and the South Fork, White River Park, Big Prairie, Youngs Creek, Danaher Creek, Salmon Forks and Murphy Flats. A Forest Service employee told me that there are over 100 head of stock on the South Fork trail every day. I saw no other private stock users on my trip, and I can understand why private stock users can not enjoy the river corridor of the South Fork.

The trail encounters and range conditions I experienced are clearly out of compliance with the current management plan. At the open house on January 22, I saw no information that implied that the Forest Service had any intentions of admitting incompliance nor correcting the current conditions along the South Fork.

The CRMP needs to include and acknowledge that the Forest Service is required by the Wild and Scenic River Act to enhance or protect all ORVs 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 also needs to include and acknowledge that it must improve conditions to meet the BMWC Rec Management Plan of April 1987.

My recommendations for the CRMP are:

- 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.
- start a lottery permit system for private floaters on all 3 Forks, limiting 20 per day on the South Fork Wild (MU1).
- educate users and outfitted parties to achieve compliance with the Principles of Leave No Trace
- stop all commercial outfitter livery permits on the South Fork Wild (MU1) and Middle Fork Wild.

- drastically reduce the number of user days for commercial outfitters on all Forks.
- require real monitoring (not just point sampling) of the number of users along the South Fork in the BMWC.
- bring the South Fork back into compliance with the CRMP and BMWC RMD for social encounters, range conditions and barren core by closing grazing to outfitted stock, and limiting floating parties on the river to 20 people per day.

Thank you for your consideration.