September 10, 2019

United States Forest Service
Forest Supervisor Chip Weber
650 Wolfpack Way
Kalispell, MT 59901

Dear Supervisor Weber,

RE: Comprehensive River Management Plan Comments

Thank you for the opportunity to participate in the scoping process of the river management plan for the Flathead River Wild and Scenic River system. Over the past year, we’ve attended every meeting regarding the outstandingly remarkable values identified in the original designation and both public open houses in August. Please allow this letter to serve as our public comments, observations and ideas for the proposed actions, that we’ve garnered over 44 years of providing commercial outfitting trips on the Middle and North Forks of the Flathead River.

North Fork of the Flathead River

* In 1999 Outfitters permitted to operate on the North Fork agreed to limits which are reflected in current permits today. While Outfitters have been getting a bad reputation as a primary contributor to the congestion, the reality is that Outfitters have very low use on the North Fork.
* Weekends tend to be the busiest days for private boaters on the North Fork and the Blankenship river access gets extremely overcrowded. Weekends are the least busy days for Outfitters. The Forest Service along with Flathead County need to further develop the Blankenship river access to alleviate congestion. There are two sides of the bridge and four corners that could be used to make this happen.
* We do not favor permitting private boaters. With multiple river access sites along the North Fork, managing and enforcing permits would be difficult.

Middle Fork of the Flathead River

* In 1999 Outfitters permitted to operate on the Middle Fork agreed to limits from Bear Creek to Paola which are reflected in current permits today.
* We do not favor permitting private boaters on the Middle Fork because it is not needed. Boaters do not float Moccasin Creek to Blankenship with the intention of seeking solitude.
* In general, floaters are not stopping much along the sides of the river from Moccasin Creek to Blankenship, and while there are many parties using the river, they are mostly floating the same speed and encountering only those in sight.
* The wilderness section on the Middle Fork does not need any further regulation at this time though pack rafters may need regulating in the future depending on how popular this type of boating becomes. The two Outfitters currently permitted in the wilderness have been regulated with low use numbers since 1988.
* The wilderness section is already self-regulating because it is hard to access. Flights into Schafer Meadows, Morrison Creek Trail and Granite Creek Trail all provide limited, expensive and difficult means for the average boater to get equipment and people to the river.

General Comments

* The Three Forks of the Flathead River system is primarily a catch and release fishery and should be treated as one. With two primary native species making up most of the fish in the rivers, and those fish being listed as threatened (Bull Trout) and species of concern (Cutthroat Trout), treble hooks, bait and barbed hooks should not be allowed.
* As a designated Wild and Scenic River with fisheries listed as one of its outstandingly remarkable values, the United States Forest Service should have a say over the fisheries in the Flathead River system.
* We favor a free permit system like the bear hunting permit system from Fish, Wildlife and Parks to disseminate beneficial river information to river recreationalists. Before someone can float on the river, they should pass a short test. This would be a good way to help collect much needed river use information as well as help teach the public topics such as, Leave No Trace, River and Boat Launch Etiquette, and River Safety.
* Outfitter restrictions are listed as a management action on almost all sections of the river in the proposed plan, but Outfitters serve a segment of the public that have just as much right to be on the river as private boaters. This segment of the public, both local and non-local, do not have the means, equipment or knowledge to float on their own and seek the help of an Outfitter to enjoy the river.
* Outfitters are overseen and evaluated each year by the US Forest Service. For this reason, it’s in every Outfitter’s interest to follow regulations and overall be good stewards of the river system.
* Outfitters are constantly educating participants and the general public on Leave No Trace principals, proper fish handling techniques, river etiquette, wild and scenic rivers and the importance of conservation. The dissemination of this valuable information is good for all who enjoy the Flathead River system.
* Outfitters are fast and efficient at river access sites and contribute little to vehicle congestion in the parking lots because their buses return to the offices after the drop-off.
* Outfitters (Glacier Raft Company) have a long history of identifying river hazards and reporting them to the Forest Service and pubic. In many cases, it’s also the Outfitters (Glacier Raft Company) who have been responsible for removing those hazards from the river (ie. 2015 river wide log strainer in Jaws rapid and 2019 channel wide log strainer in Nyack Flats).
* Outfitters have a long history of participating and assisting in river rescues and boaters in distress.
* If Outfitters receive further restrictions, a minimum, they should be able to maintain a constant percentage of current use. If a cap were to be put on Outfitters, the cap should be based on historic use using an average of the two highest use years in the last permit period.
* We have great concern regarding the oil trains which run along the Middle Fork of the Flathead River and believe that preemptive measures need to be taken in order to avoid a disaster. At a minimum, the strongest class train cars should be the standard for carrying oil and other hazardous materials along the river. Should a train car go off the tracks, the goal needs to be containment inside the car and not containment once oil hits the river. If oil enters the river it will be extremely difficult to contain.

Thank you for your time and consideration.

Sincerely,

Glacier Raft Company Owners

Darwon R. Stoneman
Jeff Baldelli
Cassie Baldelli
Darwon J. Stoneman