

September 13, 2019

Roy Testa
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RE: FLATHEAD RIVER COMMENTS

I have been floating the North and Middle Forks of the Flathead River since 1978. My first trip to Schafer Meadows was in 1979 and guided there for several years for Glacier Raft Company. I was a commercial river guide and worked for every company at some time or another for 17 years. I still float different sections of these two rivers every summer and do so about 40 days during the season from early May into September.

I attended the meeting on August 13, 2019 and have the following comments to make about the "Proposed Action" which I have become very familiar with. I have also had extensive conversations about this plan with many people in the river community including raft company owners, previous owners, guides and many friends who share my love for the river and have extensive experience on all different levels in floating the Flathead River.

INDICATORS, TRIGGERS AND THRESHOLDS

My comments concerning the above have mainly to do with encounters, numbers of floaters, and impact to the total experience as a floater, and to the impact on the pristine quality of the river and the riverbanks including access points. The other ORV values are important to me, but I do not have the knowledge to make comments concerning them.

FLOAT ENCOUNTERS PER DAY: My first issue with this is the definition of the word encounter explained to me at the meeting, and the word solitude as defined in the document. I do not feel that if you encounter a party initially and then meet them again on the river this should be considered another encounter. Using this as a trigger makes it appear that encounters are a negative experience for floaters. I do not agree with this, in fact I feel that in many cases it is a positive experience. The social aspect is oftentimes a good experience, seeing friends or meeting new friends and sharing knowledge about all kinds of river experiences or just the camaraderie of waving and knowing you are sharing an incredible experience of being on the river together.

The definition of the term solitude is nebulous at its best and at its worse extremely subjective. One man's pleasure is another man's pain. I can tell you that with all the miles, days and years I have floated these rivers I have never felt my sense of solitude affected by encounters to where it detracted from my experience on the river. If an encounter did detract from my experience it was for the brief moment it happened and often times not even then and it certainly did not detract from my overall experience whether it was on a short stretch of river such as Ford to Polebridge or on extended trips of 2, 3 and 4 days. I honestly cannot remember an encounter that was detracting but I can remember many that were positive, where it was actually exciting to meet people, especially in Schaefer, and on more than one occasion up there people who provided safety support for my trip through certain sections. As I

explain below, I believe solitude has a lot to do with one's expectations as to whether or not it is a negative.

The other aspect of encounters is expectations. We all know that weekends and holidays are the busiest user days. That certain days of the week and times of the day are also a factor in having encounters. If a person decides to go to Moccasin Creek at 1 PM on a Saturday, you expect the river to be busy, so it doesn't detract from your experience because you expect it! If you want less encounters float early or late in the day (which I do) and even on weekends this diminishes encounters if these are the only days you can float. I have never floated with the thought "I am not going to see anyone on the river today" and I know if I float certain sections on certain days what to expect when it comes to encounters. Knowing what to expect and most floaters do, diminishes any negative effect of encounters and sometimes makes it a positive.

When as a guide I explained to my clients about the Wild and Scenic River act, the emphasis was always on its role in keeping the river pristine and free flowing. That the surrounding banks and area were also protected from any development like fast food places and residential housing. It seems to me there is a comparison with Glacier Park itself. If you want solitude and less encounters don't hike to Avalanche or Hidden lake in the middle of summer in the middle of the afternoon. Find a trail and a time when it is less traveled.

TRIGGERS: In general, I feel the triggers for encounters are not realistic. They do not take into consideration the specifics of days of the week and times of the day. They do not take into consideration to some extent the different times of the season. Floating in early June or floating in July and August as an example. Three (3) encounters for 60% of the season using your definition is not negative enough to be a trigger and 80% of the season to be a threshold as an example on the scenic section of the North Fork. Three (3) encounters is just not a negative to me or all the people I know that float these rivers.

THRESHOLDS: In general, they are way too low to start the MANAGEMENT ACTIONS.

MANGEMENT ACTIONS

I feel they are all to some extent relevant to preserving the ORV s when appropriate thresholds are reached, the definitive term here being "APPROPRIATE THRESHOLDS". This is the term whose definition needs to be reexamined with regards to the current "proposed action."

GENERAL COMMENTS

With being at the August 13, 2019 meeting, I felt that the Forest Service is earnest in their appeal for help from the local citizens with interest in the Flathead River. I support that idea and think it is essential to the formation of a plan that will work to preserve the ORV s. I also realized that the Forest Service was much more interested in people sending written comments that are knowledgeable and positive in helping, versus emotional ones that do not address the specifics of the proposed action, so they could better understand issues of the citizens, and I agree with that.

Written comments can be difficult, and not very convenient for many people. In writing this I am experiencing a frustration in trying to express everything that I would like to. I would think that this idea will diminish the number of written comments and the value of these comments to some extent.

In ending I would like to suggest that the Forest Service support and promote the formation of a Citizen Committee comprised of people with knowledge and experience concerning the Flathead River from different points of view. People who do not have an agenda except for preserving the ORV s and fairness to all that float the River. Those that have been floating for an extensive period and have a sense of history of the River and its users. River guides and outfitters with that same history, who are not actively in those roles at the present time to avoid conflicts of interest but also some that are active.

This group would meet with officials of the Forest Service during their discussions concerning the plan. This will give the officials a unique insight into the experiences of people who have a unique knowledge of the River. This is something that was not available when the original plan was written but now 35 plus years later is. This would be a serious help to officials. The kind of help that they were asking for at the August 13, 2019 meeting, knowing that formulating the new plan is going to be a very complex and difficult task.

I have discussed this idea with several people who I know, and who have said they would be willing to do this because they think it is a good idea.

I will be the first to offer to serve on such a committee! I hope this letter has some value to you. If possible, I would appreciate any comments you might have on my comments. At the very least perhaps an email acknowledging receipt of my letter.

Best regards,

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