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Organization:

Title:

Comments: Dear Committee,

Thank you for your efforts to draft a new plan and efforts to gather feedback to better serve the public interest. I agree this river system is a remarkable resource and it being nearby is a big reason why we moved back to the Flathead Valley.

I wanted to give you the background that my wife and I and our three children are all Montana natives. My wife grew up on the Yellowstone River, and grew up floating Montana rivers with my family. My wife and I met in the Flathead Valley in 2005 and before we even started dating we and a group of others were doing multi-day trips down the North Fork. We've subsequently have floated at least one multi-day trip down the North Fork (upper section) every year since. Our kids have grown up doing float trips on that river. As well, my wife and I have flown into Shafer Meadows and floated the Middle Fork all the way to West Glacier. We've also floated the lower sections (below the canyon) on the South Fork as well.

After residing in Missoula for several years my wife and I decided to move our family back to the Flathead in 2014. We made the decision during one of our multi-day trips on the North Fork (upper section) My point in saying all this is that having access to these rivers is a huge part of our family's lifestyle and our kids heritage. This is what we enjoy doing. We don't golf, we don't hunt. We do a little hiking and camping. But primarily we fly-fish, and we float the Flathead River System.

In evaluating the concept of "protecting our user experience" here is Megan and I's feedback:

We fervently oppose a permit system altogether at any point on any of the rivers. We think having the freedom to access the entire river system when we choose is key to the wild and free experience on the river. More regulation is not going to improve the experience...in fact it flies in the face of the "freedom to use and choose" that we think characterizes this river system...and therefore additional regulation will only dampen the experience. What's more, we do not feel the river is too crowded on any section. It has never once occurred to us that there were too many people. Yes there are more people in July than other months. But if we don't like it we can float in June or August.

Unlike the Smith, with one put in and one take out, the unique geography of the Flathead Rivers lends itself to a pretty good system of self-regulation. That's because the upper stretches of the North Fork, South Fork and Middle Forks are naturally all difficult to reach, either by a horrible condition road, airplane or pack train (hike). That does an appropriate job of minimizing traffic. Having spent a lot of time on busier river systems, Blackfoot, Madison, we would say our Flathead River system could comfortably handle the traffic of 2X the current use. But the problem with regulation is unintended consequences. If use is limited anywhere it will lead to a higher concentration of use elsewhere.

We would also point out we've read the other comments and it appears there is little support for a permit system at the current use levels. There is one exception to that. North Fork river-front land owners. They appear to want to exclude others from using the river...(in most cases) provided they retain exempted floating rights. I would ask that you would give little weight to those that seek to carve out the public domain for their private use.

Also, the idea of designated campsites also would destroy our experience on the river. We often stay in places rarely if ever used. Many of the sites we used to float on in the early 2000's no longer exist. But most importantly, a big part of the "experience" of floating this river is to have the freedom to choose a camp spot as we float. Having a designated spot might cause us to have to float after dark (if the site was taken or inhabitable from river

changes.) As well, any designated site would be more used and domesticated (and therefore less wild) from repeated use. If you want to improve the experience and spread the pressure over a larger area, get Glacier National park to allow camping in non-designated sights on the park-side of the river. Since they are collaborating with the NFS on this that is a way they could add value.

Should any form of permit system be implemented, it should be a voluntary permit at the put-in to provide an opportunity to better educate the public low-impact use best practices, as well as obtain user acknowledgment/agreement of such regulation/practices.

Finally, one comment that other's shared that we agree with guide use causes a different kind of impact. Guided trips do affect the user experience since those groups are usually larger, and seem to be increasing at a higher rate than non-guided use of the rivers. 20 years ago you rarely saw guided trips on the upper North fork and a small percentage of users on the whitewater section of the middle fork were guided trips. Now it's constant guide boats on the Middle fork and more and more guided groups on the upper North Fork. If there was any effort to restrict additional use I would like to see the NFS start with any increase of additional commercial use. A local advertising company told me he alone distributes 20,000 rack card flyers for the 4 guiding companies here each year. That's a lot of potential guided customers! Before we exclude the general public we should further limit how much commercial outfits can profit from a public resource.

Thank you for considering our comments.

Scott & Megan Lester