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Title:

Comments: TO: Flathead National Forest River Management Planning Team

FROM: Bob Jordan

RE: Flathead River Management Plan Comprehensive Project

DATE: September 12, 2019

Thank you for soliciting public comments regarding the proposed update to the Flathead River Management Plan. I am very impressed with the research which has been conducted so far by the University of Montana, and the efforts that have been made by agency staff to provide a comprehensive plan for river management for the next two decades.

I have been actively floating the three forks of the Flathead since 1975, initially as a private floater, then as a permit holder and outfitter on the Middle Fork and North Fork for 30 years. In recent years I have returned to being a private floater on these magnificent waterways.

Given my background, my comments will primarily address the Outstanding Remarkable Values regarding Recreation for each of the wild and scenic segments of the Flathead.

In general, I am in agreement with the triggers, threshold and management actions that have been proposed for each section. My primary concern is with the definition of encounters and parties. As I understand it, if a solo boat encounters another solo boat multiple times during the trip, each time they see each other will be counted as a separate encounter. Likewise, a group of 5 rafts and multiple kayaks with up to 50 people will be counted as a single encounter if they are all in the same party, as is frequently the case on commercial trips.

From a solitude standpoint, I think that encountering 1 boat with 2 individuals 3 separate times during my trip is much less obtrusive than encountering 8 crafts with 50 people once. I'm not sure how much flexibility your agency has in modifying the definition of encounters, but hope that this is considered when implementing management actions.

#### North Fork Flathead- Scenic Segment

I agree with the triggers, thresholds and management actions that have been proposed, with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

While I understand the reluctance to further develop facilities at Sonderson Meadows to discourage more use, the reality is that it is heavily used now and will be for the foreseeable future. As such, I support providing some type of toilet facilities at this site. I strongly support limiting party size on this section of the river, and adopting other management actions which will help maintain the remoteness and near wilderness experience which can be found on this section of river.

I strongly support the use of fire pans and portable toilets by all users on this section of river when camping overnight.

#### North Fork Flathead-Recreational Segment

I agree with the triggers, thresholds and management actions that have been proposed, with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

I support the development of a river access site at Camas Bridge, as well as further development of the river access site at Great Northern Flats. This site is used frequently by both commercial and private parties. Rather than leave the large boulders that were placed there to discourage use, I would rather see the site developed to become more user friendly. By having more improved access sites, I believe river use would be dispersed, which in turn would assist with crowding and parking issues. I strongly support the use of fire pans and portable toilets by all users on this section of river when camping overnight.

#### Middle Fork Flathead - Wild Segment

I agree with the triggers, thresholds and management actions that have been proposed, with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

I would support a volunteer free permit system on this section in the near future to get a better handle on current use as well as help educate those who have not been on this section previously. Also, it would help ensure that parties are using fire pans and portable toilets. In my opinion, this section of river is a national treasure that needs to be protected as such.

#### Middle Fork Flathead- Recreational Segment: Management Unit 1

I agree with the triggers, thresholds and management actions that have been proposed, with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

I strongly support the use of fire pans and portable toilets by all users on this section of river when camping overnight. I would suggest that River Outfitters stagger their launch times similar to how they do it at Moccasin Creek for half day trips. This would help alleviate wait times during the peak use season.

#### Middle Fork Flathead - Recreational Segment Management Unit 2

Given the recent growth of both commercial and private use on the river, I think both trigger and thresholds should be expanded up to 15 parties per day instead of the recommended 10. Otherwise as previously discussed, do not count multiple encounters with the same party more than once. To alleviate increased encounters, I think the Forest service needs to work closely with the outfitters to make sure that companies maintain their staggered launch system.

If commercial companies choose to launch at 15 minute intervals when they have party sizes larger than 50, make sure they are not bumping up against another commercial launch in the process. Also ensure that the 15 minute gap is maintained throughout the trip; in other words, make sure both groups do not come together throughout the trip or at the takeout.

Other management actions to be considered would be to develop another river access for private parties. I would advocate placing a river ranger at the Moccasin Creek access on weekends during the peak season to help control traffic and educate new users. This would go a long way in preventing wait time and decreasing potential conflicts.

I strongly support the management action of developing a shuttle system and developing more parking facilities at both Moccasin Creek and the West Glacier access sites.

#### Middle Fork Flathead -Recreational Segment: Management Unit 3

I agree with the triggers, thresholds and management actions that have been proposed with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

I understand that the county may be moving the Blankenship river access to the other side of the river, which hopefully would provide more parking and decrease the congestion which occurs especially on summer weekends. Until that happens, this would be another site which could benefit by river ranger presence on weekend afternoons during the peak usage season.

As with all sections of the Wild and Scenic Flathead River, I strongly support mandatory use of fire pans and portable toilets for overnight camping. Also to help disperse use, I would like to see the development of a new river access near Coram.

#### South Fork Flathead- Wild Segment: Management Unit 1

I agree with the triggers, thresholds and management actions that have been proposed, with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

This section offers one of the most remote river trips in Montana, along with the best fishing opportunities on the Flathead River system. As such it should be managed accordingly. Due to the need for better use data on this section of the river, I would support a voluntary free permit system in the near future.

#### South Fork Flathead- Wild Segment: Management Unit 2

I agree with the triggers, thresholds and management actions that have been proposed with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

#### South Fork Flathead- Wild Segment: Management Unit 3

I agree with the triggers, thresholds and management actions that have been proposed with the caveat that party size and multiple encounters with the same party as previously discussed be considered.

I am disappointed that the proposed plan did not address the potential for commercial floating permits to be issued on this section of river. This section of river offers a tailwater fishery that the outfitted public could make good use of during the runoff season.

#### Summary Remarks

When I was an outfitter and permit holder on the Flathead, I always believed that one of our missions was to work closely with agency staff to ensure that both the outfitted public and private users would all be able to enjoy the experience of floating these rivers with minimal conflict. I still believe that the USFS and NPS, along with the commercial permit holders share the role of being stewards of the river. As evidenced by the strong turnouts to recent planning meetings, I believe there are a number of private citizens who share this goal as well.

I am hopeful that when management actions are implemented they will not lead to increased conflicts between outfitters and private users, as has been the case on other rivers in Montana including the Madison and Bitterroot.

On the Flathead it has been my experience that most outfitters and river guides are respectful of private floaters

and anglers, but as usage increases there is potential for increased conflicts. As I mentioned in previous comments, I think the increased presence of river ranger rangers at busy access sites would go along way in keeping wait times to a minimum and decreasing the likelihood of potential conflicts.

I am very aware that USFS Recreation budgets are limited, even with the additional permits fees received from outfitters. I hope that the Forest service would support a citizen advisory committee and/or a nonprofit organization composed of a myriad of Flathead river users to assist with guidance regarding management actions. Perhaps a group such as this could assist with raising funds for river related projects, not unlike what the Glacier Conservancy is currently doing with the Park Service.

After observing the rapid growth of river usage over the last few years and looking at the camera based research conducted by the university, I was struck by how the patterns observed during the summer season coinciding with our attendance figures over the many years I was a permit holder. What is dramatically different of course is the recent increase in commercial and private floaters, as well as the number of private and outfitted anglers.

Given the expectation that use will continue to increase in conjunction with Glacier Park visitation, I am hopeful that the new plan will allow for flexibility and encourage continued input from the floating public in the years to come.

Thank you for your consideration of my comments.