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Comments: Flathead Wild and Scenic River Comprehensive Management Plan Comments:

Flathead Wildlife, Inc. (FWI) is northwest Montana's oldest sportsmen and women club, incorporated 63 years ago in 1956. Our goals are to maintain our hunting and fishing heritage, protect wildlife habitat and public access and to involve youth in the outdoors. Many FWI members regularly float the river forks. Floating is a highly prized local amenity, a chance for family recreation, an escape from summer heat and an opportunity for fishing. The FWI Board of Directors has reviewed the Flathead Wild and Scenic River Comprehensive Management Plan (Plan) and offers the following comments.

1. The Plan often refers to "floater encounters" in terms of river use. The term is not defined and somewhat ambiguous. Floaters tend to proceed down the river in tandem. Depending on river speed and sight distance, you may see the same floaters multiple times during the day. However, if you stop on shore you will be passed by any float parties that were behind you. Likewise, shore parties will have a much different floater encounter experience than floaters. The "floater encounter" definition appears to be key to triggers and thresholds and needs to be better spelled out.

2.Board members expect to encounter other floaters and the triggers spelled out for the forks seem to reflect a much more solitary experience than our members expect. The only sections where solitude is really expected is the Middle Fork Wild Section and the South Fork Wild Section #1 because those sections lie within wilderness areas and are not readily accessible. The South Fork Wild Section #2 (BMW Boundary to swinging bridge) does have road access, albeit a challenging launch site, and would be expected to host a higher number of floaters than the upper section. The winding nature of that section will still provide some solitude even with higher floater density.

3.Camping in the Wild Section #1 of the South Fork can be challenging. Suitable sites are limited in some reaches and used by floaters, shore parties and some private pack trips alike. Camping is particularly limited downstream of Black Bear. Parties often take out late at Mid Creek and sites are limited for those parties that need to camp before packing out the next day.

4.For the Recreational sections of the three forks, floaters expect higher numbers of other floaters than suggested by the triggers, particularly in the Middle Fork Section #2 (Cascadilla to West Glacier) and the North Fork.

5. The primary problems encountered by FWI members are getting on and off the rivers at access points. Some areas appear to have design problems. For Instance, Great Northern Flats on the North Fork has the put-in on a bend in the access road. Vehicles have a difficult time backing trailers up on a curve to the unloading point. Vehicles are frequently parked perpendicular out into the road which impedes traffic flow. The Glacier Rim takeout on the North Fork has a narrow ramp and limited beach space. Improperly parked vehicles make it difficult to back down, particularly with a raft trailer. There should be posting that vehicles are not allowed to park beyond the top of the ramp, load and unload only. Many times picnickers and swimmers are occupying the area available for raft take-out, impeding flow even more. Of course, many of these problems could be avoided through common sense and courtesy but those are often absent in the recreating public.

6. The biggest concern is that imposing limits on floaters through a permit system would hit local residents hardest. Visitors from out of the area often plan far in advance and will consequently apply for a permit. Likewise, outfitters are always planning for business and would reserve permits, hoping to find a paying client. Floats by local residents are often spontaneous, triggered by weather and schedules. Floating is a great family activity and a much needed amenity during hot months. Need for a permit would hinder a spontaneous and early morning departures and it might not even be possible to float on some days with the low "floater encounter" triggers suggested.

7. The one area where floater encounters might restrict an activity is fishing, if rafts pass through a spot frequently enough it can put the fish down. However, that can be alleviated personally by increasing the distance between yourself and other boats. Fish population numbers are stable and the fishery is under management by Fish,

Wildlife and Parks. It does not appear to be necessary to limit floaters to protect fish. The fisheries on the forks are fun but the size of fish doesn't generate the competition for spots seen on some better known fisheries in Montana.

Thank you for considering these comments on the Plan by Flathead Wildlife, Inc., Jim Vashro, FWI President