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Organization:

Title:

Comments: To my beloved Forest Service;

I write as someone who has done a fair bit of packrafting in Glacier and the greater Bob over the past 15 years, including around 2 dozen trips on various sections of the South Fork of the Flathead. My experience matches what data is available here; that significant increases in floater use are having an accelerating impact on wilderness experience and various ecological factors.

My first concern for your planning process specifically regards floater use on the South Fork of the Flathead, insofar as my understanding is that there is none of statistical substance. With the 2017-2018 U of Montana study failing to capture data in the roadless section, I think it is important to address this, ideally with a camera trap study at both Mid Creek and somewhere above the White River. There is a large amount of rumor concerning floater numbers, much understandably informed by personal bias and interest. Without data any work here is speculative.

My secondary concern, again specifically for the South Fork, regards the volume and impact of secondary and tertiary outfitting, on floater trips of various types. I would like to see firm numbers, with respect to both users and boats, of outfitters who either pack in whole groups or arrange to do gear drops (with the prospective floaters hikin in). My assumption is that these services have noticeably increased user numbers of late, and would thus be appropriate subjects for future inclusion in any regulations and permitting schemes.

My third concern, once again specifically for the South Fork, regards permitted outfitter trips. My anecdotal experience over the years has been that these trips occasionally exceed the person limit, and often exceed the number of stock per person allotted in regulation, with the later doubtlessly being tied to the former. In addition, I have consistently experienced unpleasentness from staff of outfitted trips while floating, at least suggesting a sense of entitlement. I would like to see more robust monitoring and enforcement mechanisms in the new plan, including specific and significant penalties for violations for exceeding the limits already in place.

My final concern regards collaborative issues, specifically with Glacier NP and Montana FWP, regarding invasive specific protocols, and fishing regulations. My understanding is that FWP fish monitoring on the 3 Forks of the Flathead, and likely especially on the South Fork, is one of the more robust bits of data from which user trends and impacts can be extrapolated. I would like to see a mechanism for consistently integrating such data into the user planning and monitoring process, as well as a way for the FS to consistently highlight this information, which might catalyze discretion on the part of catch and release fisherfolk. I am also concerned about integrating invasive species checks between agencies, specifically but not exclusively for trips which exit Glacier NP on to the Middle and North Forks.

Yours sincerely;

David Chenault