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Title:

Comments: Thank you for the opportunity to attend the meetings on 1/21, 22. I appreciated the responses from the forest service group that was there. As some of you may know, and something I should have stated those nights, my history on the Flathead River system goes back to 1976, when I along with one other company, Glacier Raft started the first commercial whitewater trips in West Glacier. In those days, while on the river guiding trips, we would see deer, elk, and bear coming up to the river banks to get a drink, beaver and otter were company as we floated down, it was an idyllic time. I think it was that winter that me and one of the owners of Glacier were invited to Hungry Horse FS office office to help in making decisions on what was a fair, but appropriate number of passengers that would be allowed down the river, and still maintain the ORV's that made the Flathead system one of the first rivers to be part of the Wild and Scenic River System. We asked for three trips a day, with 4 boats per trip:), a far cry from today.

My point in telling you this backstory, is twofold. First, I wonder how many of the decision makers today have any idea what they're talking about when they say they want to maintain ORV's when they've never seen them, the ORV's have already been decimated by overuse, and secondly, how often do any of these same decision makers get on the rivers to see actually see what's going on?

If given a seat at the table, my questions would be:

- 1) Regarding solid waste disposal, the FS idea is to go back from the river 200' with your little bag of poop, and bury it. Honestly, who can tell me that once on the river, 90% of the people won't know 2' from 20' from 200'. If you don't require some sort of carry out system, the plan won't work. It's easy enough to carry "wag bags" or a portable potty, then you simply carry out and dispose of the waste properly. I've been using that system for over 40 years on big rivers all over the country. It works, and it's simple. The USFS representatives at the meetings talked about wanting continuity when it came to the rules of the river. We already know there are many differences in the proposals for Wild vs. Scenic and Recreational, so one more can't make any difference. Specifically, I'm saying carry out on the river segments that border the Park, from the border down on the NF, from Bear Creek down on the MF, both high traffic areas, where I have personally seen way too much toilet paper and poop, below high water marks. In a meeting with the commercial companies two years ago, I asked them if they carried wagbags on their day trips, three said yes, one said no, what the one guy said was "no one has to go in that short period of time". Imagine, 100,000 people in one summer, and no one has to go! In the "wild" parts of the Middle Fork, and the S Fork, conditions are different, traffic, horse packers, pack rafts, etc.
- 2) The capacity numbers are unreal. From the 1986 CRMP, the two main stretches of Middle Fork, from Cascadilla to West Glacier (MU2), and from West Glacier to the S Fork, below Blankenship (MU3) each allowed for 35,713 commercial passengers per year. Over the past 5 years the average number has gone to 71,889 (2021 there were over 100,000), with virtually no limitations for the guide companies. The new proposal will allow for 86,000 in MU2, and 50,000 in MU3, that's a grand total of 136,000 commercial trips, not considering the private groups that go down the river, more than doubling the insane numbers we have now! Imagine how that will damage the mandate of "protecting and enhancing" our river system! When I asked about these numbers at the meetings, the FS guy who responded said the new volume was just fine and wouldn't hurt the river. I see the insanity now from Moccasin Creek to West Glacier as commercial and private boats line up to go through the rapids, to say nothing of the danger when boats come crashing into each other. I can't imagine the future when the numbers grow. For fisherman, imagine what will follow in the next stretch below West Glacier, they'll never see another fish with 50,000 people going by over the summer, plus private boaters.

As far as capacity numbers go, there is a simple solution as to what the exact numbers have been over the past five years or more. Personally, doing river training and volunteer patrols for GNP, I am on the MF at least three

days a week. I can tell you, from mid May (more or less) till at least the end of September there is a photographer that has taken pictures of every boat, private or commercial that has gone down the river and past the rapid called Bonecrusher. If you really want accurate numbers right now for previous years she'd have them at her fingertips.

- 3) The only other proposal I'll share with you is half good, that's the fact that FS plans to stop camping and leaving shuttle vehicles on the gravel bars that are below the high water marks on the river. That's great, but what's the solution for all the cars, where do they go? There are no plans to add parking, so I guess the cars will all back up on Highway 2, imagine the danger to cars and RV's and the people walking back to their rafts along the highway?
- 4) My final question for you all is ultimately, how will this CRMP be monitored? Will someone be checking capacity, looking for fire blankets and hopefully wagbags, I know that through no fault of your own you don't have the manpower, realistically the companies can't monitor their own use numbers, what will be done?

Hopefully, these meetings were sincere efforts to get to an honest basis of what needs to be done to protect the rivers. Something needs to be done right now. Sooner or later the three commercial companies that are now in the hands of real "river rats" will be sold, when that happens those permits will be bought by corporate types, when that happens if proper guidelines aren't in place, nothing will ever be done to protect and enhance what's left of the ORV's