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First name: Matt

Last name: Harrington

Organization: Backcountry Packraft Rentals LLC

Title: Owner/Operator

Comments: My name is Matt Harrington and I have owned and operated Backcountry Packraft Rentals for 10 seasons. About half of my business comes from renters who are floating on one of the three forks of the Flathead with the majority being South Fork trips. During that time I have coordinated with outfitters and shuttle drivers who service the Bob Marshall wilderness and have had extensive conversations with both groups about access and impact. In addition to being a stake-holder as a business owner, I have personally floated sections of all 3 forks over the years with family and friends and I have a young family, a 14' frame raft and horses so I hope to do more of that soon. I also enjoy fly fishing, primarily wade fishing on all 3 forks of the Flathead. While I'm definitely biased toward packrafters I'm certainly not unaware of the plight of other stakeholders so please keep that in mind as you read my comments.

I have read the proposed Management Plan and would like to make some comments on the Monitoring Plan, Indicators, and Thresholds, primarily the South Fork Wild MU1 and Middle Fork Wild.

1. I think the language should be changed from watercraft to parties in all regulations to be consistent, or even better number of people going by on the water as this would be the most fair metric and also most accurately project the kind of impact on the water.

A. While I recognize that to certain stakeholders 3 people in a 14' frame boat going by is less impactful than 3 people in individual packrafts going by in terms of the overall remote atmosphere, this feeling is entirely subjective.

B. I think the thresholds based on watercraft are directed against packrafters as the language is more about "parties" in other sections of the thresholds and triggers where packrafters make up a smaller percentages of the users.

C. All the other declining factors this plan is designed to address are most affected by the number of people on the water, not on the number of watercraft on the water.

2. I contend that people who are packed in via horse have a higher impact per user than those who pack in on foot and should be regulated differently.

A. They undeniably have a higher impact on the trail system,

B. They bring in more gear and thus have a bigger footprint/impact on the river shoreline camping areas.

C. They have a higher impact on fisheries due to more potential for contaminating the water with their extra trash.

D. I strongly advocate for two types of permits being issued to boaters- one for those who pack their own watercraft in and one for those who are packed in via horse.

3. This plan entirely leaves out the impact of non-watercraft day users. This group is primarily wade fishermen on the stretch upriver from Bear Creek on the Middle fork and up river from the Mid- Creek take-out on the South Fork, but also includes wade fisherman and hikers that go along the river on any of the numerous access points from the road on all 3 forks.

A. This group is depositing fecal matter in the water system too and are arguable depositing more trash per day per user than other groups discussed as packability for food and beverage is not as much of a factor as it is paddlers.

B. I realize regulation enforcement for this group may be more difficult but I think if the goal is to overall lower the impact on the water system and fisheries, this management lever cannot be left unexplored.

4. I am very excited that this plan seeks to alleviate congestion by addressing some of the regulatory issues involved in shuttles. I had an extensive discussion with one of the few companies that had a license to shuttle in the National Forest (they have since gone out of business) and it seemed that the regulations and permitting process were very cumbersome so any step toward making that easier while still maintaining some safety standards would be a step in the right direction.

5. A key component with this entire program is user education.

A. This includes general guidelines on how to be a low impact user. I have done my best with my renters over

the years on educating them on how to do that but more resources are always appreciated.

B. This also includes education on the regulations (especially as they increase as the result of this plan) and wide disbursement of these regulations to stakeholders (such as myself) so that I can let my renters know about them.

C. Lastly, education on how to comply with regulations would also be helpful (ie: here's a list of packable fire-pans or you need to stop at a muscle inspection station that gives out paper inspection slips, not ones that are linked to your license plate).

Thank you for the time and thought that went into this plan. I recognize the use of this river system needs some regulation in order to maintain the special place that it is. I'm only asking that it be done in a way that really addresses the impact issues in a fair way. Please feel free to reach out with any additional questions.