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First name: Byron

Last name: Beers

Organization: Great Northern River Guides LLC

Title: Owner

Comments: Page 7,11,16-17 Public Use through Outfitters

Rafting outfitters play an essential role in providing safe, affordable access to outdoor recreation for the general public, particularly for those who do not have the financial means to own personal rafts or the resources to take formal instruction. In recent years, there has been a noticeable shift in how the public engages with water-based activities. Many individuals and families are increasingly choosing rafting outfitters as the most reliable and accessible way to enjoy river adventures, without the significant financial commitment of purchasing equipment or paying for specialized training. Outfitters offer comprehensive packages that include not just the necessary gear, but also expert guides, which significantly enhances the safety and enjoyment of the experience, especially for those who are new to rafting or less experienced.

Over the past five years, rafting outfitters have become a critical resource for public recreation on America's rivers and waterways. They provide an affordable, organized way for people to access public lands and experience nature, without the barriers of expensive equipment or the steep learning curve associated with self-guided rafting. As demand for outdoor recreation continues to rise, rafting outfitters have stepped up to ensure that more people can participate in these activities while prioritizing safety, proper instruction, and environmental stewardship. The ability to enjoy rafting with an outfitter ensures a higher level of security, support, and enjoyment for the public, making it the best choice for both new adventurers and seasoned enthusiasts who prefer not to handle logistics and risks on their own.

Page 7,11,16-17 River Access Points

In recent years, there have been limited improvements at the river access points to address growing demand, with few changes made to increase parking capacity, enhance facilities, or expand launch ramps. Despite the rising popularity of rafting and outdoor recreation, many access points remain overcrowded, leading to congestion and strain on existing infrastructure.

The Flathead rafting outfitters offer an efficient solution for transporting large numbers of the general public to and from river access points, minimizing the logistical challenges that typically arise with private trips. By providing group shuttles and buses, outfitters reduce the number of vehicles needed at the access points, alleviating parking congestion and preventing overcrowding at already limited parking areas. Additionally, these outfitters streamline the process of packing and unpacking, reducing the time clients spend at the riverbanks and ensuring that launches are quick and efficient. This coordinated approach also helps minimize the visual impact of large groups on the river environment, as outfitters can maximize the people-to-boat ratio, using fewer boats for larger groups. As a result, the overall experience is smoother, less stressful, and more environmentally considerate, creating a more sustainable model for enjoying outdoor recreation.

Stewardship and Human waste containment

Rafting outfitters are deeply committed to environmental stewardship and ensuring the sustainability of the Flathead River System. Outfitters utilize human waste containers, or wag bags, on all trips to prevent contamination of the river and surrounding areas. Outfitters are extremely conscious of littering, maintaining a zero-tolerance policy toward trash and waste, and ensuring that clients follow Leave No Trace principles. In addition to environmental responsibility, the Flathead River outfitters emphasize good river etiquette, fostering a culture of respect for both the natural environment and fellow river-goers. Their staff undergoes rigorous training, including raft training, first aid, and swiftwater rescue, ensuring that they are well-prepared to handle any situation that may arise. This combination of safety-focused training and environmental consciousness ensures that both participants and the river itself are protected, promoting responsible recreation for all.

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The Middle Fork recreation on the river include opportunities for expedition length trips and floats with the highest degree of remoteness. This seem inconsistent with the proposed use capacity per day as outlined on page 17 especially when the float is originating from Shafer Meadows at 170 people per day in the wilderness to then lowering the river capacity to 100 people per day Bear Creek to Cascadilla that has road side access points. It doesn't seem as though most of the people that are coming through Bear Creek are likely to float down to Essex or Paola. It seems like the intent and focus for the Middle Fork of the new plan is create a constriction in the Bear Creek to Paola section.

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The MU1 access is undergoing a change, transitioning from Bear Creek to Paola to Bear Creek to Cascadilla, which will impact the rafting experience during the high-water season, typically from May through June. During this period, Great Northern Guides will adapt their half-day trips when the river is over 8ft, moving from the Moccasin to WG section to the Paola to Cascadilla stretch. This shift at high water levels significantly changes the dynamics of the river, offering a more exciting and splashy adventure for participants. While the John Stevens Canyon section, with its large hydraulics, provided more challenging rapids with fewer waves, the new stretch offers a lively, fun-filled experience with a greater variety of wave formations and splashes, creating a more thrilling and engaging atmosphere for the general public. This change not only enhances the overall experience for rafters but also ensures that guests enjoy the safest and most exciting conditions the river has to offer during the high-water season.

The decision to change the Paola to Cascadilla access to align with the Bear Creek to Essex designation, was aimed at protecting the goats on the park side. While the intent to safeguard these goats is commendable, it appears inconsistent with efforts to maintain the goat viewing areas and manage traffic through Logan Pass effectively. The impact of floaters on through this section would be significantly less than that of stationary visitors such as the view area or Logan Pass, as rafters and kayakers are consistently moving with the river current.

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The proposed user capacity of 170 people between Schafer and Bear Creek seems arbitrary and lacks clear justification. For instance, if there were four launches a day with parties of 15 people each as defined in the guidebook, the total could reach up to 240 people, or three launches a day could accommodate up to 180 people. This indicates that the proposed limit of 170 may not accurately reflect the actual capacity for the area or was an arbitrary number. Furthermore, in this section, outfitters are permitted up to seven watercraft per launch, but the trigger threshold for monitoring appears inconsistent, as it is based on just three boats. This discrepancy suggests that the current capacity limits and monitoring practices may not align with the practical realities of river use, leading to potential inefficiencies in managing visitor flow. As a private boater using this section with seven people, we had four boats, which further highlights the inconsistency with the trigger point monitoring, which is based on just three boats. This discrepancy suggests that the current monitoring thresholds may not align with actual boating practices and could lead to confusion or inefficiencies in tracking and managing river use.

The restriction on limiting user days for the roadside access from Bear Creek to Cascadilla seems to overlook the fact that floaters coming from Schafer will also be entering this section, potentially adding 45-60 people depending on the number of parties. This reduces the capacity for additional daily users at the roadside access points at Bear Creek, Essex, or Paola, leaving only potentially an additional 40-55 available spaces for new launches. Additionally, this approach does not appear to consider the "include opportunities for expedition-length trips" mentioned on page 11, with the Paola to Cascadilla stretch being a prime area for camping. The impact of overnight camping on the river further reduces the capacity for daily users to launch at these roadside access points, making the proposed user limits appear restrictive and not fully aligned with the river's recreational potential.

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Additionally, the trigger monitoring for the MU2 section appears inconsistent with the established threshold of 10 parties, especially considering that overnight trips from Paola, which "include opportunities for expedition-length trips" as mentioned on page 11, will be passing through this section. Along with these overnight trips, many private and commercial trips launching from Cascadilla will also be stopping for lunch, likely within a few miles of the Moccasin Creek roadside river access, either upstream or downstream. This increased activity could lead to higher river traffic and congestion in the area, suggesting that the current trigger points may not accurately reflect the full scope of use and flow in the section.

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It seems the intent of MU1 on the South Fork is to limit launches in this section to one or two launches per day, with parties of up to 15 people. However, the number of people per party appears inconsistent with the number of boats specified in the trigger points. Given the challenging river access, boats are likely to be smaller and lighter, or there may be fewer people per boat, which would affect the overall impact and capacity of the area. This inconsistency between the party size and boat numbers suggests that the current trigger points may not fully account for the practical realities of river use in this section.

In MU2 it appears that the intent is to limit the user capacity in this section to 30 people based on current use, rather than what the section is actually capable of handling. Given the difficult roadside access, this plan seems to be tailoring the proposed user limits to match existing usage patterns, rather than considering the full potential capacity of the area. This approach may not accurately reflect the section's ability to accommodate more visitors or provide a more balanced and sustainable experience.