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Title:

Comments: Comment 1: As defined in the Proposed Action for the Comprehensive River Management Plan (CRMP), issued 6 JAN 2025, under Proposed Management Actions, Table 4: All Recreational Segments >> All >> Limit group size to 50 people on the river (page 19).

Suggested edit: For each user (private or commercial), it should be determined how often one is allowed to launch a "group size of 50 people on the river." Example: "Limit group size to 50 people on the river, no sooner than every 30 minutes." This will help eliminate congestion, overlap of users, and an overall negative experience to all users at both river access sites and while on the river.

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Comment 2: As defined in the Proposed Action for the Comprehensive River Management Plan (CRMP), issued 6 JAN 2025, under Proposed Management Actions, Table 4: Middle Fork Recreational MU1 (from Bear Creek to Cascadilla) >> Wildlife >> Prohibit dogs, both on river and shore, between Bear Creek and Essex. ..etc..
Education and outreach would occur at river access sites and during river patrols (page 19).

Suggested edit: Prohibit dogs on shore between Bear Creek and Essex but do not prohibit dogs on river. If the term "on river" means, "in the river," as in swimming, then that needs to be clarified. Dogs should be allowed on rafts through that section, if they stay on the watercraft the entire time from Bear Creek to Essex.

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Comment 3: Topic: Monitoring Plan, Indicators, Triggers, & Thresholds. Throughout Table 5, specifically under the Triggers column (page 22-25).

Suggested edit: It states throughout the "Triggers" column, triggers such as "float parties," "boats," "watercraft," and "people." The definition of "float parties," for example, is vague. The language in which to measure use needs to be very specific and concise throughout the entire plan.

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Comment 4: Topic: Enforcement.

Suggested edit: Nothing in the CRMP speaks to the parameters by which the USFS, Fish, Wildlife & Parks (FW&P), and/or the National Park Service (NPS) are going to "police" or enforce rules/regulations. There needs to be measures by which consumers can ensure that the rules are being enforced.

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Comment 5: Topic: Infrastructure, Land, and River Management

Suggested Edit: Nothing in the CRMP speaks to how the USFS, FW&P, and/or the NPS are going to make the much-needed improvements to river access sites. I.e. parking, ingress and egress routes, gravel bars, restroom facilities, launch sites, etc. There is an immediate need for each river access site to be assessed, improved, and maintained. For example, either a pit toilet or porta-potties NEED to be open/at the West Glacier river access site from early May to the end of October. There is no excuse why this location is ever without a bathroom facility. Same goes for many river access sites on the North Fork. Another example/suggestion, if parking is monitored and potentially expanded in some locations, this will avoid the need for people to park on main roads/highways, it will lessen congestion getting on and off the river, and it will make for a safer environment.

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Comment 6: Topic: Outfitter and Guide Services.

Suggestion: I'd like to comment on the importance and significance of Permit Holders (commercial outfitters) on the Flathead River. For example, at Wild River Adventures, their river stewardship, safe river practices, and leave no trace principles set the bar for exemplary use on the river. Furthermore, as the smallest outfitter, they ensure a quality experience for both tourist and private users alike. To best manage the seasonal tourists, it is in everyone's best interest that they are on the river with a reputable and professional outfitter-guide to ensure best practices, proper river etiquette, offer educational opportunities, and safe river recreation habits.

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Comment 7: As defined in the Proposed Action for the Comprehensive River Management Plan (CRMP), issued 6 JAN 2025, under Proposed Management Actions, Table 4: Middle Fork Recreational MU2 & MU3 >> All >> ".....The proposed authorized service days would include all current permitted service days, with the remainder being held in priority and temporary use pools. All use from priority and temporary use pools must be approved in advance and is subject to review and rejection....(page 18 & 20)."

Suggested edit: Total outfitter and guide service days at all locations need to be distributed in a fair and equitable manner. One permit holder (commercial outfitter) should not have a monopoly on a majority of the allotted service days. If a permit holder does not intend to use all their allocated user days, then those days may be disseminated, equally, to other permit holders. Currently, in the draft CRMP, it does not state how the priority and temporary use pools are to be distributed (i. e. first come/first serve, via a lottery, etc).

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Comment 8: As defined in the Proposed Action for the Comprehensive River Management Plan (CRMP), issued 6 JAN 2025, under Proposed Management Actions >> Temporary Use. Short-term, non-renewable outfitting and guiding use that is authorized in increments of 50 service days, up to a maximum of 200 service days in a 180-day period (page 18).

Suggested edit: In the draft CRMP, it should specify/limit who may apply for the "Temporary Use" days and the criteria to obtain and operate under said days should be similar to what commercial outfitters are required to have in order to operate on the Flathead River.

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