

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, July 10, 2022 10:56:16 AM
Last Modified: Sunday, July 10, 2022 11:05:23 AM
Time Spent: 00:09:07
IP Address: 174.45.253.23

Page 1

Q1

Contact information:

Name:	Trevor Nichols
City/Town:	Belgrade
State/Province:	MT
Email Address:	tnichol24@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I am concerned with the potential delay of a commercial cap limit on the Madison. We are talking about delaying a 2020 decision beyond the 2023 date. The Madison is facing tremendous pressure and while I believe restriction may need to be put in place to regulate other recreational use outside of of the cap on commercial fishing we need to relieve pressure primarily in the form of commercial fishing sooner rather than later. Every summer season without a cap just further jeopardizes one of Montana prized fisheries. We are already concerned with the science in regard to the reduction of abundance and lack of recruitment. To damage such a natural resource continually without action when it is known action is need is simply irresponsible. Thank you for taking the time to read my comments.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, July 14, 2022 3:34:57 PM
Last Modified: Thursday, July 14, 2022 3:46:31 PM
Time Spent: 00:11:33
IP Address: 70.33.18.76

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Q1

Contact information:

Name:	Ihor Stadnyk
City/Town:	Ennis
State/Province:	MT
Email Address:	ipstadnyk1@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I oppose the amendment extending the implementation date of the Madison River commercial use cap. The cap should be implemented as originally scheduled.

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, July 16, 2022 1:15:30 PM
Last Modified: Saturday, July 16, 2022 1:26:32 PM
Time Spent: 00:11:01
IP Address: 69.145.169.203

Page 1

Q1

Contact information:

Name:	Greg J. Houska
City/Town:	Missoula
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Email Address:	gjhouka@aol.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

A commercial use cap should be two. The state doesn't route roads through gas station driveways/pumps so the owner can earn more dollars so why does the state seem to think that it owes outfitters? Better yet just use a flat permit fee of \$100,000.00 per year per outfitter. No need to keep track day use etc. Simpler.

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, July 19, 2022 7:27:39 AM
Last Modified: Tuesday, July 19, 2022 7:39:45 AM
Time Spent: 00:12:05
IP Address: 70.33.16.33

Page 1

Q1

Contact information:

Name:	Chris Casey
City/Town:	McAllister
State/Province:	MT
Email Address:	forestercasey@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I fully support capping the use of commercial outfitters. When all the parking lots are full by 830 and you can see 12 boats in a section of river, those are signs we are overusing and crowding locals out with paid sports. I fully support guides and the businesses. I just want some balance. So many want to fish the river can get loved to death. Setting a cap May let us find out about carrying capacity of the river and what constitutes a good experience. Before and after catch and population numbers would be good to keep to see how the ecosystem responds to abit of regulation rather than a boat free for all during the busy season.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 20, 2022 3:42:40 PM
Last Modified: Wednesday, July 20, 2022 3:54:26 PM
Time Spent: 00:11:46
IP Address: 172.56.104.148

Page 1

Q1

Contact information:

Name:	Dori Bailey
City/Town:	Chimacum
State/Province:	WA
Email Address:	theblackwolf@yahoo.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Please keep greedy commercial corporations out!

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 20, 2022 9:42:50 PM
Last Modified: Wednesday, July 20, 2022 9:44:57 PM
Time Spent: 00:02:07
IP Address: 174.204.18.13

Page 1

Q1

Contact information:

Name: Rob Lowe
City/Town: Billings
State/Province: MT
Email Address: Roblowe.mt@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Stop kicking the can down the road and do what's right for the resource which is to cap outfitter use. Enough use is enough use and its time to set a limit on those making a private living off of a public resource.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, July 21, 2022 12:24:49 PM
Last Modified: Thursday, July 21, 2022 12:29:15 PM
Time Spent: 00:04:26
IP Address: 216.129.235.171

Page 1

Q1

Contact information:

Name:	Terry L. Quirk
City/Town:	Ennis
State/Province:	MT
Email Address:	tquirk4555@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I am in support of the commission's proposal to postpone the implementation date until additional public comment takes place.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, July 21, 2022 1:16:53 PM
Last Modified: Thursday, July 21, 2022 1:38:15 PM
Time Spent: 00:21:22
IP Address: 174.246.197.16

Page 1

Q1

Contact information:

Name:	Matt Dodson
City/Town:	Ennis
State/Province:	MT
Email Address:	matt@dodsonflyfishing.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

The proposal to amend ARM 12.11.6705 and kick the can down the road, yet again, is frustrating, irresponsible, and detrimental to the health of our fishery. An obvious political move that smells of corruption, deep pockets, and greed from the Commissioner and work group member worried about not having the historical user days to operate. Capping commercial user days at 2020 numbers has already been considered by a collective majority as too much pressure for the Madison River. Summer of 2021 was a circus in the Madison and it will keep getting worse. All it took was a low water year and hoot owl restrictions placed on every river in the area. The Madison suffered dearly and the quality of the angler experience was diminished beyond belief. More pressure, fewer and smaller fish, and a drastic increase in the conflict and hostility within the outfitter community as well as the public recreational users. I urge the commissioner and the work group to implement the proposed regulations, decide on a fair and simple allocation structure, and - for the love of the Madison River- get something done. Cap at 2020 numbers and preserve the quality of our amazing river. Quality is the long term solution, not quantity. If you're worried about not having enough days to keep the lights on at your lodge, charge your guests more per day.

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, July 22, 2022 9:29:40 AM
Last Modified: Friday, July 22, 2022 9:40:03 AM
Time Spent: 00:10:23
IP Address: 150.131.69.188

Page 1

Q1

Contact information:

Name: **Michael F Minnick**
City/Town: **Lolo**
State/Province: **MT**
Email Address: **cuttbow100@aol.com**

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Dear FWP,

I recently did a 1-week float trip to the Madison River (July 10-17), and I was frankly stunned at the extensive commercial usage of the river! My boat was one of only a handful of private boats floating during the week. I fish >75 days per year and have fished Montana rivers for decades, and this is abnormal. My concern and reason for writing is to encourage FWP not to delay implementation of the commercial use cap for too long. The pressure is too great for this valuable fishing resource.

Thank you,
Michael F. Minnick, PhD
Professor of Biology at UM

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, July 24, 2022 3:43:48 PM
Last Modified: Sunday, July 24, 2022 3:47:13 PM
Time Spent: 00:03:24
IP Address: 72.174.64.97

Page 1

Q1

Contact information:

Name:	James Kuiken
City/Town:	Missoula
State/Province:	MT
Email Address:	jameskuiken@hotmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Please delay the rollout of the commercial use cap until such time that a method for allocating commercial use trips is available or a comprehensive river plan and rule package is available.

The need to balance the many views of recreationist and outfitters is real, as well as protecting the resource. It's gone on this long, its appropriate to wait until a comprehensive plan is in place.

Thank you

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, July 24, 2022 3:57:58 PM
Last Modified: Sunday, July 24, 2022 4:15:23 PM
Time Spent: 00:17:25
IP Address: 73.14.74.167

Page 1

Q1

Contact information:

Name:	Jim Kuiken
City/Town:	Timnath
State/Province:	CO
Email Address:	jimkuiken@yahoo.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

My comment to FWP: "I've been fishing the Madison with a commercial guide for about 30 years. The proposal to limit commercial guides to the larger of the number of days in 2019 or 2020 is seriously flawed. First, in 30 years I have experienced a large increase in boat traffic from non-commercial guides; this is not addressed by the proposal. Second, how does a new guide get established if they have no history in 2019 or 2020? Third, guides, lodges, restaurants, etc., make their living from this. Tourists (like me) fund the local Montana economy. Regulating and limiting the commercial sector as proposed will hurt Ennis & surrounding communities and businesses. The implementation date needs to be deferred until a more reasonable plan can be developed with input from guides, businesses and their clients."

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, July 25, 2022 9:11:21 AM
Last Modified: Monday, July 25, 2022 9:35:13 AM
Time Spent: 00:23:52
IP Address: 65.216.74.168

Page 1

Q1

Contact information:

Name:	Josh Yarrington
City/Town:	Deer Lodge
State/Province:	MT
Email Address:	jyarrington@hotmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Please stop delaying the implementation of the Madison River commercial use cap. The Madison already is overused in my opinion. I stopped fishing it years ago as near impossible to wade fish with outfitter boat floating by every 2-5 minutes. I read years ago (please correct me if I am wrong) commercial use was up to 13,000 commercial use days allowed. Most guides launch between 8am and noon with most day in June-August. This could mean a guide launches every 1-2 minutes on the Madison. This is insane. I am all for people recreating on the Madison. But for commercial users to virtually control the river is too much. I just hope rest of Montana does not become the Madison. Please implement the cap soon. Even though this cap is still way too many boats. Thank you

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, July 25, 2022 10:05:45 PM
Last Modified: Monday, July 25, 2022 10:59:26 PM
Time Spent: 00:53:41
IP Address: 174.45.71.199

Page 1

Q1

Contact information:

Name: Scott Vollmer
City/Town: Gallatin Gateway
State/Province: MT
Email Address: vollmerscott@yahoo.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Madison River ARM Proposal

Dear Madam Chair and Commissioners,

With reluctance, I am writing you today in support of extending the implementation of the Madison River commercial cap until a commercial plan is fully vetted through a scoping effort. The reason why I am reluctant to fully support this ARM amendment is because I believe the commercial use plan developed by the Madison River Work Group is as close as we will be able to come to a plan that works for the outfitting industry and works to allow reasonable new entry for new outfitters into the system. Further, I also am reluctant to support this amendment because the overriding opinion shared by both outfitters in Ennis and the many small business owners in Ennis that support the outfitting industry is that the time has come to limit the outfitting industry and stop future growth of the industry.

With that said, I also recognize the need to fully vet this very important decision with ample public comment. I also realize that a decision of this magnitude could become a political punching bag and time is needed to ensure that individuals and groups can provide their comments without fear that these same individuals and groups will cry foul at a later date about not having an opportunity to comment. I certainly appreciate the importance of this aspect of rulemaking on this topic and because of that I have decided to reluctantly give my support of this ARM amendment.

However, in anticipation of items you will hear from some individuals and groups (largely because I have heard it often in the past), I want to take this opportunity to remind you that the outfitting industry is providing an extremely significant concession by agreeing to a commercial cap on the Madison River. This means that, in the aggregate, the outfitting industry can no longer grow on the river. This is a very bitter pill to swallow for any small business owner like myself, but I am willing to agree to it as a show of good faith that the outfitting industry also has "skin in the game". You will hear arguments from some groups and individuals that the outfitting industry is giving up nothing and in turn is provided with a financial windfall with the creation of a commercial cap. I urge you to ignore these voices as they continue to refuse to recognize that a commercial cap completely eliminates aggregate growth in the industry. Meanwhile, these same voices will argue to you that outfitters should not financially benefit from the commercial cap. Unfortunately, this stance has been and will always continue to be completely contradictory. Our system of economics in our country is such that if you put limits on something and that item becomes scarce, there will always then be a value associated with that item. This assertion is irrefutable. For over 5 years now I have been imploring those who argue for a commercial cap on the Madison and also for no value or property right with allocated trips to please provide examples of this system and I would fully support it. No plan has come forward to this date, most likely because it does not exist. Even in places where the property right to allocated trips or days is denied, business owners still sell their "business" based largely on the future ability to use the allocated trips. We currently see how this model has led to inflated "business" valuations for those who operate on the Big Hole and Beaverhead. It is time for those who argue for a commercial cap on the Madison and also argue that outfitters shouldn't financially benefit whatsoever to have some intellectual honesty and finally admit that it has to be one or the other and can't be both. I again urge you to ignore these voices as unreasonable when they do begin to speak up (yet again).

Finally, I find it very tenuous to delay implementation of a commercial cap until "a commercial use plan is intact". It is going to be very difficult to do this part way through the 2023 season. At that point, outfitters are already booked and if they have already met their historic use for the season then they will have no recourse for clients who are booked for the remainder of 2023. It would seem more logical to me to just delay the implementation of the commercial cap to January 2024. I know this will not be a popular decision but implementing part way through 2023 will prove to be even more unpopular, in my humble opinion. Therefore, with reluctance, I would support delay the implementation of the commercial cap to 2024 to allow for a fully vetted scoping effort on the commercial use plan developed by the Madison River Work Group. Thank you for your time.

Sincerely,

Scott Vollmer
Scott Vollmer Outfitting, LLC
MOGA Director at Large

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, July 29, 2022 9:46:26 AM
Last Modified: Friday, July 29, 2022 9:48:50 AM
Time Spent: 00:02:23
IP Address: 174.198.129.51

Page 1

Q1

Contact information:

Name:	Cannon Milligan
City/Town:	Belgrade
State/Province:	WA
Email Address:	cannonmilligan@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I am an average Joe family fly fisherman residing in Belgrade, MT. The rule change capping outfitter use to 2019 or 2020 trip levels should absolutely be adopted and enforced January 1st 2023 as planned. Any extension to this rule change is simply kicking the can further down the road which will lead to an even further pressured fishery and lead to greater dissatisfaction from all user involved. A lot of time and money was spent putting together these common sense rule changes to our beloved fishery. Do your job commission members and stop bowing to commercial fishing guides, this is for their benefit as much as it is for all involved.

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, July 31, 2022 1:38:07 PM
Last Modified: Sunday, July 31, 2022 1:51:59 PM
Time Spent: 00:13:52
IP Address: 174.248.152.22

Page 1

Q1

Contact information:

Name: Matt Smith
City/Town: Ennis
State/Province: MT
Email Address: hookedonmontana@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Absolutely not!!! This has been a shell game from the start! The commission needs to implement the working groups recommendations now! If the working group wants to meet and come up with other recommendations next year that's fine! But enough is enough! This river is packed with hundreds of guides everyday and it is appalling that you allow this to continue. It's perfectly clear that the commission could care less about the residents of Montana. Only the guides! Stop this madness!

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 01, 2022 4:53:46 AM
Last Modified: Monday, August 01, 2022 5:07:50 AM
Time Spent: 00:14:04
IP Address: 70.33.17.87

Page 1

Q1

Contact information:

Name:	Justin Edge
City/Town:	Ennis
State/Province:	MT
Email Address:	justin@edgeoutfitting.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Commissioners,

Thank you for taking the time to read my comments on the topic of your consideration to propose amending ARM 12.11.6705 extending implementation of the commercial use cap upon adoption of an allocation method or a comprehensive river plan and rule package.

For context, I'm a 39-year-old Madison River SRP holder (#264) in my 9th year of guiding on the upper Madison. I've been an active SRP holder for the upper Madison since 2018 and a guide in other areas since 2008. I live in Ennis, with my wife and two small children. We are extremely blessed to call this valley our home. And not a day goes by that I don't think about how fortunate I am to be an outfitter on one of the world's most treasured trout streams.

The year that I applied for my SRP permit to operate independently as an outfitter on the upper Madison was a tumultuous one for river politics. As you may recall, FWP staff proposed a plan which I viewed (and still do) as misguided and ultimately ineffectual to the problems we faced. I believed it was based largely on an incomplete understanding of the nuances of river recreation and developed by department staff without appropriate input from outfitters and guides. Thus, I was pleased the 2018 plan was rejected. I mention this, because I think it's important to understand that despite being vehemently opposed to the 2018 plan, attending every meeting that was held to voice that opposition, I fully support implementing the commercial cap, already once delayed, as currently scheduled on January 1, 2023. After countless tries with work groups and rulemaking committees, I think we finally found a process that fit the issue, and more importantly a group of representatives that were both knowledgeable and open minded on the topic. The recommendations of this work group reflect that. Is this set of recommendations exactly what I would like to see? No, but I feel very confident that it's a good start and that my opinion on the issue has changed drastically in the last 2 years.

In the past week alone, I've noticed river use levels like I've never seen before. FWP river tech Colton can confirm, as I've chatted with him several times about his ongoing survey of use. And it scares me. I'm generally on the water between Lyons and Ennis 5-6 days a week, almost exclusively as a single boat outfitter since the 2021 season. It is becoming more and more difficult to do my job to the best of my ability, providing my customers with the best possible experience, with current use levels. When I look in all directions in my immediate vicinity on the river and see boats (as many as 15 in one reach, mostly commercial), as well as fully occupied banks by non-commercial wading anglers in certain sections (e.g., Wall Creek WMA and Ruby Creek), and actually being hit by tubes in the Varney to Ennis section, I cannot maintain a particular line through the current for very long without having to pass someone or avoid someone. Mix in a little gusty wind as we're prone to have, and the problem is exacerbated, making these discourteous moves happen faster and with more frequency. I spend more time lately navigating users, trying my best to be considerate, than focused on my line of rowing which is critically important for my job.

Thus, etiquette is slowly deteriorating because no one has a choice. At times, you either pull out in front of someone and get going or you're stuck on the bank waiting for an opening for 15 minutes. And then when you do pull out in the river, you're avoiding wading anglers trying to give them space, and when you do that, you're pulling right into the line of the boat behind you. It's maddening. One of the greatest features of the upper Madison has historically been how easy it is to maintain etiquette, given how fast the river flows, naturally spreading boats out. That no longer is the case on a more frequent basis, with this level of boat traffic and it will continue to get worse in my opinion. Etiquette now seems optional, and no longer recommended if you have any desire to get on with your day. And that's an ominous sign. I feel like 5 years ago, it was a more tolerable busy.

I would even suggest that soon we create a guide school for those who are already guiding or desire to outfit and guide on the Madison, similar to the Kenai River requirements for guides in Alaska. It could be as simple as a 2-day course, which covers everything from etiquette, first aid, river safety specifically tailored to the upper Madison, etc. This way, the Madison will be a place where everyone is on the same page and only attracts guides who are fairly serious about their profession. Something to consider.

Madison River ARM Proposal

It's my opinion that this debate of whether the river is "crowded" has crossed that seemingly arbitrary line of subjectivity and has simply become objectively crowded to anyone with two eyes. I think the 2022 commercial numbers will be staggering. And there's no reason to suggest 2023 won't continue the trend. Therefore, delaying the commercial cap is a dangerous mistake. For two reasons. First, the skyrocketing trend of more and more boats will continue unimpeded. We need to address noncommercial use, sure, but we have a solution to halt increasing commercial use immediately available and we must utilize that tool. Second, the longer we delay, the more tempting it will be for this commission or later commissions to either kill the cap completely or move the goal posts from the current cap target of 2019/2020 to a more recent year, equating to a significantly higher overall trip cap number. I want these regulations implemented on time (and then examine ways to manage noncommercial use) so that we may continue providing top shelf experiences to clients. I want these regulations because those client experiences are vital to the survival of our tourism-based communities. If current trends continue, I also worry about the long-term future of the resource, which is at the heart of it all. For the sake of the resource, user experience, and the health of our tourism-based economy in Ennis, we must be vigilant stewards of the national treasure in our backyard. And more practically speaking, we need a victory from this saga after years of despair and inaction. The implementation of this cap, as scheduled, will move us in the right direction to keep the momentum going.

No topic has been more thoroughly "scoped" than the Madison after nearly a decade of attempts to address it. And we're extremely fortunate to have had a set of individuals who have poured over every possible set of available data on the Madison, brought in experts in the same field from other rivers across the country to present their thoughts and experiences, listened to thoughtful public comment at every meeting, and even had thoughtful and respectful discussions with those public commenters during meetings. Something you simply haven't seen in previous attempts at work groups for the Madison. An obvious sign that everyone in the room is ready to develop a meaningful adaptive plan. Now, not next year, or the next. Now. The idea that we need more "scoping" of this topic, would be so laughable if not so outrageous. I invite any of you who doubt my experiences to join me on the river. I will create time to oblige.

The work group members have stuck their necks on the line and every one of them at the table has skin in the game. After watching years of regrettably contentious meetings on the topic, they've exhibited courage to approach this with an open mind and to reach a consensus to put forward a meaningful plan. At some point, a body of commissioners needs to come along and have the same courage to act as well. Otherwise, we risk this process being lost for good. If we continue delaying this, after such a well-executed series of working group meetings, I have little faith in this commission or any commission thereafter to do what's right.

I've read that the explanation of the majority for not sending the work group's plan to rule making is that the commission wants to be cautious about doing something "monumental" as quoted in the Chronicle. Desperate times call for desperate measures, perhaps even monumental ones. We've been cautious for over a decade. We've beaten this dead horse to a pulp. So much so, that there's nothing left to beat it with. There is no more data or discussions that hasn't already been analyzed and talked about ad nauseum. Any more delays now, will be viewed as purely political and I hope that the majority will reconsider.

I've also read in the commission coversheet that the commission is proposing this delay until "adoption of an allocation method or a comprehensive river plan and rule package." We have an allocation method spelled out in the plan developed and recommended by the work group, using best of 2019/2020. We have a thoroughly scoped topic and a reasonable management plan waiting to be implemented. What are we waiting for?

This plan, an adaptive one at that, is the best version yet and has its widest support yet amongst all user groups. Squandering that sort of opportunity would be a travesty, as well as a disgrace to the efforts this work group has put forward. And unfortunately, this one small action of delaying the commercial use cap risks all the good faith effort so far in this process, potentially setting back future efforts indefinitely by immediately putting the brakes on the momentum we've got on our side. The work group has done the hard work, take advantage of it.

I appreciate your time and consideration,

Justin Edge
Ennis, MT

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 01, 2022 8:49:43 AM
Last Modified: Monday, August 01, 2022 9:18:34 AM
Time Spent: 00:28:50
IP Address: 148.59.191.85

Page 1

Q1

Contact information:

Name: **Timothy H Pinson**
City/Town: **Gallatin Gateway**
State/Province: **MT**
Email Address: **thpinson@mac.com**

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I strongly oppose delaying implementation of plan as adopted. Commercial guides will and other parties at interest will do anything to avoid, delay or cancel any rule that impacts their enterprise. Simply, we don't owe these people a living. Protecting, sustaining and enhancing the resource trumps everything. A shuttle service recently told us that daily activity has exceeded 85 drift boats, that they have had to refuse service to many as they are totally booked. Simply, this is too much, way too much pressure on the river. Also, we need to give this river a rest -- no watercraft allowed on the river 3 days every 2 weeks (Quake Lake to Ennis Reservoir); e.g., Monday, week 1; Monday & Tuesday, week 2. Guides can supplement their workload with guided trips on foot on the 100's of rivers and lakes in the Yellowstone ecosystem. These trips can be very rewarding and enhance options for visiting clients who aren't aware that such options are available. Thank you for your consideration, Tim

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 02, 2022 7:15:20 PM
Last Modified: Tuesday, August 02, 2022 7:18:26 PM
Time Spent: 00:03:05
IP Address: 148.59.190.222

Page 1

Q1

Contact information:

Name: Keith Brauneis
City/Town: Ennis
State/Province: MT
Email Address: keith@riversummitgroup.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

I am in support of postponing any commercial cap rule on the Madison River until a more comprehensive TOTAL river plan can be designed. To include a comprehensive county, city and statewide economic impact study.

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 02, 2022 7:30:25 PM
Last Modified: Tuesday, August 02, 2022 7:32:54 PM
Time Spent: 00:02:28
IP Address: 184.167.230.200

Page 1

Q1

Contact information:

Name:	Paul F Vang
City/Town:	BUTTE
State/Province:	MT
Email Address:	pfgang@me.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

i believe that delaying implementation does not serve any worthwhile purpose. The proposals have been debated at length already, and the overwhelming numbers of river users want it to happen. No more delays!

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 03, 2022 10:37:31 AM
Last Modified: Wednesday, August 03, 2022 10:49:30 AM
Time Spent: 00:11:58
IP Address: 104.28.116.51

Page 1

Q1

Contact information:

Name:	Theresa Dustin
City/Town:	Great Falls
State/Province:	MT
Email Address:	jtadustin@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Commissioners,

Do not amend ARM. Please do not extend the implementation date. This is a needed beginning. Commercial use is an ever increasing stress on our fragile river ecosystems. Unchecked usage will continue to the detriment of future generations of Montanans.

Thank you,

Theresa Dustin

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 05, 2022 12:12:07 PM
Last Modified: Friday, August 05, 2022 12:16:56 PM
Time Spent: 00:04:48
IP Address: 173.49.233.172

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Q1

Contact information:

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City/Town:	Abington
State/Province:	PA
Email Address:	d.c.keifer@gmail.com

Q2

Please provide comment on the proposal to amend ARM 12.11.6705 pertaining to extending the implementation date of the Madison River commercial use cap.

Dear Montana Fish and Wildlife Commission,

I strongly oppose the change to Rule 12.11.6705 that would delay the implementation of the rule on January 1, 2023 as written in the original rule for the Madison River.

This rule was adopted more than a year and a half ago. There has been plenty of time to develop either an allocation method for a cap on outfitter and guide trips; or for the completion of a comprehensive river plan for the Madison River. Somebody isn't doing their job.

This proposed delay is a cynical disregard for the underlying problem the original rule was written to address: overuse and dissatisfaction of river users on the Madison River, and decline in fish populations. Without a date-certain implementation of the commercial use cap, the Commission will create a Catch-22 situation, where there is no incentive to come to agreement on either the allocation method or the river management plan.

The proposed delay demonstrates that the group of commercial users is self-serving, and incapable of regulating the use of a valuable resource both for commercial use as well as the public-at-large and river corridor property owners.

I am a seasonal user of the Madison River. For the past decade, I have spent on average 20-30 days camping and fishing in Madison Valley. I am on the river nearly daily. My recreation dollars supports small businesses in Madison Valley, West Yellowstone and Ennis.

The Madison River deserves better. This is lousy resource management, and the Commission should be ashamed of itself if this rule change is adopted.

Sincerely,

Daniel Keifer
Abington PA
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248.342.8795
