

**Public Comments on the Madison River Work Group’s Recommendations**

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Comments on the Commercial Management Recommendations
Clearly you are trying to roll back the number of trips to 2019 levels. 2020 is a dumb year to use. It is a shame that those companies that grew post-Covid are penalized and you reward the "old" companies that might not have adapted to the post-Covid world. Like the appeals process. FWP should use some spot-check enforcement of any rules. To a client, FWP has very limited visibility on the Madison.
It is ridiculous to allow 100 commercial trips/day between May and Oct. 10000 trips/year is too many considering the additional pressure of non-commercial trips. Total trips from all sources must be capped.
As an avid kayaker who loves to paddle an enjoy the serene beauty the beartrap canyon has to offer I am disappointed to hear about the implementation of a permit system at all. I have never run into any (real or perceived) social conflicts. That being said I think a permit system is a bit ridiculous and overly cumbersome. I have never encountered more than two other groups putting in at the same time (even on most weekends). Please let the people continue to kayak and float without all the unnecessary busywork! Power to the people!
As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.
Feel free to regulate fishing outfitters, but not the residents of Montana
I have several concerns with the Madison Work Group’s recommendations for Bear Trap Canyon. The first concern is the Work Group members did not adequately reflect the people most likely to be impacted by their recommendations. As a whitewater kayaker, it appears that there were only members who use the river for fishing. These users will ultimately have a different outlook on use, perceptions of crowding, and solutions to perceived challenges. The second issue I have with the work group recommendations is that they were made with limited or no data on river use. The recommendations point to data collection as a key reason for permitting. It seems the correct path forward would be to collect data sufficient prior to making recommendations. This can be accomplished without limiting river access.

Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Joe Vincent

The bear trap section of the Madison river should be unregulated for normal rafters. Putting regulations on day trip personal rafts will only cause issues for users like me to get permits in time and abide by the new regulations. We have enough government over reach already, we do not need more regulations in our beautiful wild areas like bear trap.

I agree with all the recommendations presented. Proper usage by parties should be maintained and reconsidered periodically to insure fairness to parties and continued protection of the Madison. My party floated it in July (with Blue Ribbon Fly Fish Shop of W. Yellowstone) and can't tell enough people to visit and do the same. Peg Jones, Save Our rivers, Inc. and TU, Macon, Ga.

I do not believe there should be new regulations of the commercial interests on the Madison River at this time. The fisheries are healthy, that should be FWP's primary concern. Trying to regulate how much fun someone has, or the quality of the outing by setting an arbitrary number of boaters and those fishing from the boats is like trying to herd cats. The experience is in the eye of the beholder. I have not heard of conflict on the river from too many boaters and fishermen. That is not the purview of the FWP. Keep the fish population healthy. Let the free market determine the number of outfitters and guides. When one of our local rivers nearby is 'hoot owled', there is not some sort of major conflict on the Madison. Please do not create a problem where one does not exist.

As a Whitewater paddler will be submitting comments that include the following points. 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits -- like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Mark Neitenbach 3000 Pheasant Run Berthoud, CO 80513

I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation.

I oppose this

Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.

I have been floating the Bear trap from the powerhouse to warm springs for 30 years. The only congestion I experience at the ramp is when one particular outfitter sits on the ramp and waits for their clients and will not move until they arrive. Sometimes that is an hour. Everyone else unloads and gets off in 10-15 minutes.

First, Kudos to both the MT FW&P department and the Madison River Work Group. Your access and willingness to hold meetings and listen to the public has been exemplary (and has gotten better with time). This web site is likewise very well put together and informative (if only everyone would read it!). I have been following this issue since the inception, and the single most significant aspect of the handling of it by you is the fact that you have been willing to slow down and take a much more careful look at all the ramifications of your actions. Good for you. It is refreshing to know that you understand the complexity of this issue as your very first sentence in this category illustrates: "Providing opportunities for new river service providers to operate commercial trips on a river when use is limited is a challenge." I would add current "outfitters" that are relatively new along with this group as they face the same challenges for growth. At the recent public meeting in Ennis, a question was asked which in essence inquired as to "just how did we get to this point?" I found the answer was not particularly specific and subjective in nature. So, to expand on that, is all this rule making really indicated? I would caution against setting in stone "rules", read laws, that are perhaps unnecessary. Did we learn anything from societies rush handling of Covid-19? I am unconvinced that new rules are even necessary. If the "group" sees otherwise, then another question is, should one specific group (and a smaller group at that) bear the brunt of the negative impact of the new "rules"? Please continue to be thoughtful and measured in your overall response to all this.

I am writing to oppose limiting non-commercial permitting and limits to river use for non-commercial groups on Beartrap Canyon. Non-commercial group usage is not a problem on the river and there is no good reason to limit the public's use on this section of the Madison river.

The FWP Commission should not move forward with the recommendation to use 2019 or 2020 historical use day at this time. The recommendations do not adequately contemplate how newer outfitters will be allowed to gain additional days and threatens too many small businesses and their owners who have worked hard to build their business in the face of stiff competition from other outfitters many of which have much larger and more established businesses. There is no data to indicate that the fish population is at all suffering and it is unfair to place the burden of public opinion almost exclusively on the shoulders of younger, smaller outfitters who will lose the ability to grow their business.

I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.

The plan to require a permit/reservation system for whitewater recreationalists is absurd. The Quake Lake section and the Beartrap Canyon sections are not crowded and see little use for much of the year. This proposal for a permit/reservation system is a non-solution for a problem that does not exist. A simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient to get a better handle on need for a more restrictive system. I do not often boat these sections of river, maybe once or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug

Commercial trips on the Madison have more than doubled in the last 10 years. Managing commercial use is a first step to managing the crowding issues on the river. There are many small Montana businesses who rely on outfitting and guiding on the Madison and establishing a cap based on 2019/2020 numbers allows outfitters to operate at high historic numbers.

Your proposal to mandate wilderness permits on the Beartrap is out of line with its use. The overuse is downstream. You've got your government regulations aimed at the wrong target.

Only commercial trips should be required to be under a permit system. They make money off of a free resource and therefore take more trips overall. This causes the "social conflict" mentioned. Please keep this section of river open for the whitewater boaters that have lived in this state for decades. It is my favorite section of water.

I oppose the non-commercial usage of Bear Trap Canyon. Preserve wild and scenic rivers.

Oppose

Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.

I would like to keep this section of river for local citizens vs commercializing this river.

Permits are not the answer!
Not a fan
Do not impose fees or permits for the quake lake section for whitewater paddlers. The section is low use and will not solve any problems, only create undue burdens for recreationalists
I disagree with your recommendations to control paddlers in the Bear Trap Canyon. I have fished or boated this canyon since 1987. I agree with the recommendations of American Whitewater: The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. In addition, I also agree with American Whitewater, that a self registered and free log system would be a good plan so as to know when boaters are in the canyon. Thank you for your consideration, Susan Welch
The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.
I strongly oppose the plan to regulate daily floats in the beartrap, especially pertaining to the regulation of daily private boaters. There just isn't enough people floating privately to require this action! This is one of those situations where if it isn't broken, don't fix it!
I paddle beartrap several times a month and I have never seen an issue with crowding. I think any permitting would be a waste of energy and unnecessary. It would also be un fair to the locals who enjoy many random after work laps on the run.
Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.
I oppose the permit recommendations
STOP THE RESTRICTION. THESE ARE PUBLIC WATERS
MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!
I don't think the Bear Trap needs any further commercial permitting along with having a cap for individual recreationalists. This portion of river is very technical, and many floaters do not use or access it because of its difficulty. There should not be a permit system for individuals with slotted departure times!
I have paddled the beartrap over 50 times and I have never felt like it was too crowded. Half the time I don't see anyone else in there. For this reason I feel that there is no need to implement a permit system. Thanks
We already went through all this, and already commented and had a plan—you all dropped the ball. Pick it up, do your jobs and protect the river. Again, stop doing nothing and go back and see my previous comments.
I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. I have been rafting the bear trap for just under 20 years, going for the first time when I was just a kid, to current day running kayaking and rafting trips with my friends and family. In all this time I have seen minimal increase in private users, and nothing that has ever hindered anyones ability to enjoy and recreate in the area. In my opinion the current number of users in no way hinders the conservation or preservation of such a wonderful canyon. Primary private users continue to be respectful, careful, and aware of the bear trap ecosystem and other boaters.
This proposal is unfounded and unnecessary and only exists to restrict the public's ability to access public lands via the Madison River. The location of the stretch of the proposed limit, in tandem with the strenuous nature of the rapids/river itself along that stretch, already limits the number of individuals who recreate within Beartrap Canyon. Imposing an official capacity limit on Beartrap Canyon will unnecessarily limit those who wish to recreate in Beartrap.

No to beartrap!!
Please implement these changes! As a guide I think regulation is needed
Limiting access to the Madison river seems unnecessary and unfair. The proposed start times favor commercial outfitters and mostly limit private boaters. From personal experience, there is no such need for these limitations.
Keep public waters and lands open to the public!
I oppose it
Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.
Bear trap needs to be unfiltered public access. There is no reason why a permitting system needs to be enacted.
I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.
I don't see any real justification for more regulations, just a concern about more use. Inflation will likely reduce current levels of use.
Preserve freedom! Avoid rules that restrict freedom and place additional fees!
I support this recommendation. The can has been kicked down the proverbial road for too long, something must be done and the time is now.
I agree with the workgroup's recommendations
This is crazy their are actually very few whitewater stretches in our area that allow non permitted sport whitewater activities. The major use in this area isnt even Upper bear trap its the tubers on the lower stretch absolutely!! The real issue here is that stretch do something to restore that section control tubing and fix the problem.
I have read the recommended Commercial Management Recommendations and agree with the stated goals and objectives, as well as the methods outlined. Having experienced the Madison on a float trip with a professional guide, I attest to the exquisite beauty and experience of the Madison, and I believe a major factor in the experience was the serenity and sensation of being alone with nature. The fishing was exquisite -- but also the breathtaking beauty of the float itself, witnessing the birds along the section, and the peacefulness. In order to preserve this beauty, I agree that a management plan is desirable and necessary.
The total number of commercial boats on a daily basis should be reduced below the 2019-2021 historical highs. It's better to preserve a revenue source than destroy it and end up with no revenue source. Prices may go up but people will pay more for a quality experience.
All proposed sound like reasonable recommendations to further control and protect thus great water resource.
i certainly support the recommendations. i live in n.c. but a group of us come west every year to fly fish. we visit new areas in wy. and montana. prob every 3 years we visit sw montana in the twin bridges area. we notice the fishing activity on the madison as always busy. much more so than the beaver head and the big hole. so i think capping the usage is very important to protect future usage.
The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.
I agree

I have Flyfish the Madison with a guide it's a beautiful river and I would hate to see it over run
As likely we will dance around the core problems as has already happened. Having fished the upper Madison and tube floated the lower portions for over two decades I have experienced first hand the growing problems. I thought you were on a good track to begin with but the pressure from guides not to change has stopped that in it's tracks. Guides move from hole to hole one behind another all day long and all season.. you can catch and release everything but the same fish will die. The Big Hole fishing has already been killed due to this with no corrective action. My initial reaction is to totally close the upper Madison for fishing for the next five years. Then we would have a river worth fishing again. Throwing the tubers into the conversation is at best a calculated diversion conversation . Adequate parking can and should be available. Keep the fishing rafts out of these access points and most if not all issues disappear
I'm very happy to see that forethought and planning is being taken to preserve this amazing resource. It appears there has been a lot of thought and consideration put into these plans and I support their implementation. As a life long resident of Florida I can tell you first hand what happens when our natural resources are not adequately protected. Some of my greatest memories are floating down the Madison River with my father. Please do everything possible to ensure one day I can repeat these memories with my son.
It's been several years since i've fished the Madison but I would hope that the existing traffic on the river does not become excessive, keeping existing guiding licensees at the current level. The Madison fishing experience is unlike any other cold water fishery in the country.
To relieve all your problems and the overuse....boats must be removed....walk in only. This will provide the trout with sanctuary areas...which will help to make a more healthy fishery.
Recommendations are adequate
Having fly fished the Madison River on several trips to Montana, I have observed the issues and fully support the recommendations for commercial management.
I agree with all the recommendations. I float the Madison for 2 weeks every year at different times of the year. I believe management of the non-commercial floaters is appropriate to maintain the quality of the fishing experience on the river.
I support this recommendation
I AGREE WITH THE RECOMMENDATIONS AS POSTED. The trip I took with a professional outfitter was one of the greatest of my life- and everything they did was directed towards protecting the resource. I don't think the general public can be trusted to do the same and river access should be left to vetted operations that can be trusted with this river.
As a fly fisherman, we support the floaters/tubers on lower part of river and use of permits. Think getting permits will be difficult to enforce. You will have to check if floaters/tubers have permits. Like the idea of capping guide boats to current trip levels and the idea of adjusting the limits.
I support the recommendation to limit guided trips to the current levels. It allows adequate access without risk of overfishing/crowding the river.
Supportive of efforts to manage this valuable and treasured natural resource
There is no perfect solution, but I think these recommendations have come the closest to a viable option. Ultimately action needs to be taken to protect the limited resource and return quality of use to what it once was. I've been fishing the Madison river for 20 years and in that time I've seen the decline of the fishery and the increase in use. The increase in use will continue but this is the most viable option to protect the fishery.
As a property owner in the Madison Valley since 1982 I believe it is incumbent on Montana FWP to enact rules that will preserve the quality of the experience and the fishing on the Madison River. The number of commercial fishing days should be limited and commercial floats should be on a permit basis only. There are days when the river looks like a regatta in New York harbor.

Although I appreciate the groups interest in addressing the obvious overuse of this resource, I feel recommended constraints are a tale of too little too late. My own anecdotal experience over the past 3 years living in Ennis suggests commercial use accounts for the vast majority of stress on the fish and float sections, despite the vigorous denial by stakeholders. Most of the "old timers" who live here I know will not even consider fishing the river between June and September because of the intense overcrowding and deteriorating fishing, as drift boats sit unused in their yards year after year. The guides I interact with are unhappy at current production and increasingly having to resort to less refined techniques to collect fish numbers (e.g., trolling the river). The obvious and precipitous decline of this fishery is ignored by guides (possibly attributed to cognitive dissonance) who are now charging well over 500 dollars a head, benefiting from public land. There is also little perceived incentive to reduce usage for local business owners who are non-fisherman, who think they stand to gain from increased tourism, not realizing the collapsing quality of the fishery will eventually result in even more economic hardship. To ask commercial interests to inform on their current impact is like asking the fox to guard the hens. It is exactly like asking the oil companies to evaluate the impact of drilling, or the mining company to comment on the impact of digging up a mountain (just see how that turned out in Butte). My own recommendations would appeal first to removing the blinders, created or imagined, to what is really happening, which is not pretty. Historically I have little faith this will occur, as humans typically brings a natural resource to the brink of destruction before acknowledging impact. Ideally, I think a more radical approach is warranted, particularly where pressure is coming from guides whose base is on different rivers. As such, Big Hole guides should not be able to carte blanche move operation to the Madison when conditions on their drainage deteriorate. For expediency, commercial allotments be strictly limited and funneled through a select number of private venders in the county or a single elected sponsor, possibly rotating. In addition, commercial profits should help support their own management, not fishing licenses (this may already be the case). It is obvious the tipping point for this river's trout population was reached years ago, so without aggressive stocking, the reduction of trips should probably be closer to 12-14 thousand per year or less. As painful as that may seem to local shops, the long-term result will be sustainability.

I am a recreational floater on bear trap canyon. I have never thought it was too crowded. Putting a barrier on this stretch in the form of a permit for the general public would do nothing other than accelerate the animosity that leads to "social conflict" mentioned by the Madison river work group rather than mitigate it because let's be honest- this conversation wouldn't be happening if it weren't for the outfitters attracting hoards of people to the upper Madison (completely different stretch with a completely different set of problems)

Commercial trips on the Madison needs to be severely limited. We should look into having certain stretches of river open only to local MT residents on certain days.

I do not support limiting public access to float recreation in the Beartrap Canyon section of the Madison River. As a whitewater recreationist, I have not experienced excessive public use that affects my enjoyment of the river. Commercial use of this section is also fairly minimal. The sections above Ennis Lake and below Beartrap see far greater use, and I do support limits to both commercial and private recreation in these high use areas.

I am against this proposal.

I oppose the madison river work groups non commercial bear trap canyon float permit recommendations I've been floating this stretch of river for 6 years and have never seen any issues with non commercial over use or anything but respect for the waters by these user. This permit system would create an uproar in our community and would take away from our already limited public land and water use.

Im opposed to the proposed restrictions in Beartrap Canyon. A non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans.

please remove permit system from the Bear Trap. The river is not crowded, and public access is paramount.

I feel that the current commercial use management is working just fine and should remain how it is.

I have not seen a commercial trip while paddling the bear trap. I dont see the need to reserve spots for commercial trips that float here and there.

This is a classic example of over regulation. Do not take the resource away from the majority of the general population.

As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe

I oppose it and am concerned and want FWP to reject the Beartrap non-commercial portion of the Work Groups recommendation and not send it to the BLM. It sounds like you will be losing access and that seems anathema to Montana values, law, and constitution.”
Beartrap needs no regulation and the private boaters in the whitewater community for the most part opposes regulations. I get the upper and all the fisherman.
Without saying to much, more restrictions on the bear trap is no good.
Businesses should not be allowed to profit off wilderness.
Keep Beartrap open to the public!!
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.
This is an unfair and restrictive use of public access. The beartrap is already hard enough to plan to float. Logistically there's a lot of variables like weather, and water levels that already make it difficult to float. But by adding on a system of permitting which requires fees and paper work it will limit public access even more. REQUIRING A PERMIT TO FLOAT DOWN A RIVER IS UNCONSTITUTIONAL it's another form of limiting people to prevent them from doing the things that make them happy. We have a god given right to pursue happiness, not pay for a permit or fee in order to do things that make us happy.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
As someone who floats this section multiple times a summer this is a bad idea. This seems like a thinly veiled attempt to prioritize commercial use over private use. We hardly run into more than one other party during the day, usually at the kitchen sink. If there is a need for more data as you state in the proposal, why don't you send someone to collect this data before you enact changes.
Hello. I disagree with the proposal idea of a permit system on the lower Madison, specifically Bear Trap Canyon. For starters, the ARM disproportionately helps commercial outfitters and gives them unequal access to a public resource at the expense of the general public. Secondly, a permit system for the lower Madison is very aggressive, considering the upper Madison receives much more commercial and recreational pressure. Anecdotally, I have never had an issue with congestion through bear trap canyon, however, I have run into issues with guides and congestion on the upper on multiple occasions. Thirdly, the Bear Trap canyon section of the Madison River provides one of the only accessible whitewater runs during the summer in southwest Montana. While it is understandable that fishing pressure is a concern, I've yet to see any data supporting a cap on kayakers/rafters to help the fish population or protect Bear Trap's resource. Lastly, I don't believe there is sufficient data on usage of this section of river to necessitate a permit or reservation system. I personally believe that it would be more beneficial to institute this on the far busier sections of the upper Madison, but only after sufficient empirical evidence reflects the need for it. Thank you.
I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP's data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn't provide any evidence to support its conclusions. There are less severe and more effective ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. I have floated Bear Trap (X number of times). (Share your boating experience here). (Share specifically whether you think there is "social conflict" on the Bear Trap Canyon river segment). Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the



most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.

Additional commercial use licenses would be ok...only if they do not reduce the non-commercial use or restrict the number of non-commercial that can float. I do not support the requirement that non-commercial users obtain a permit. Outfitters are upset because they have to "share" and don't get their way 100%. Limit the outfitter and not the non-commercial user.

I don't agree with it. Beartrap has never been an overly busy whitewater stretch nor is it overcrowded. The idea that it needs to be regulated like this is ridiculous. Keep the public lands accessible for the public.

Bear Trap is a prized section of white water in SW Montana which runs year round due to dam control. I have been kayaking it for over 15 years it's wilderness vibe. In my experience, this section of the Madison regulates itself. The rapids are big enough to keep most fisherman and novices away and its seclusion paired with a lengthy shuttle deem it to be a full day excursion. The most boats (kayaks and rafts) I've ever seen on the river is 10 or less. During the summer, dam managers often release water during the morning hours and cut the flow around mid day which gives a window for a fun mid-summer, high water run if you time it right. The implementation of a permitting system will ruin this prized section of white water. It takes away our ability to choose when we want to run the river (during the daily dam releases) and won't allow for last minute trips when an unexpected dam release occurs. If crowding for Bear Trap Canyon is your concern, I would go spend more time at the put in. In my experience (10 plus trips/season) I have NEVER seen more than 1 other party on the put in and most people have been quick and respectful. Let's keep public waterways public until crowding is truly an issue, like the lower tubing sections on the Madison.

Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?

There is no need for a permit system for private citizens to float the Bear Trap Canyon. The crowding problems are with the float fishing users on the stretches above and below the Bear Trap. please do not implement a permit that is not needed at this time.

My comments solely address the proposal to implement a permit system for the Beartrap section of the Madison. I am strongly against implementing a permit system on a stretch of the river that doesn't deal with crowding over overuse. FWP needs to focus it's energy & resources to deal w/ the mayhem on the upper Mad (below Reynolds Pass bridge, above Ennis) and on the Lower Mad (California City put in to Blacks Ford). I'll provide further comments in the appropriate box (below).

Please dont commercialize our recreational lands! Montanans like me love to continue to recreationally float at beartrap.

The section that should be seeing more restrictions is the upper section of the Madison, not Bear Trap. It sees far more commercial trips and overfishing. Bear trap is used both by fishermen and whitewater enthusiasts alike. From July to September, this is some of the only accessible whitewater around Bozeman. Restricting this access does not help the trout in the river nor does it help boaters to enjoy the river. Montana has nationally renowned stream access laws and it would be a shame to see commercial boaters getting more opportunities on these rivers than locals.

This plan Give too many permits to commercial use and not enough to private users

The Beartrap Canyon is a designated Wilderness area and provides a beautiful escape into wild lands for all, the restriction of private users by implementing a permit system is not going to benefit the protection of the canyon but only limit the publics opportunity to enjoy that area. Please do not enforce a permit system. You are taking Montana's wilderness away from the folks who live here and come to enjoy its beauty and selling it to the highest bidders, the commercial fishing industry. You will be allowing other industries to think it is okay to sacrifice the publics interest in order to bring in more tourism all for monetary gains over freedom to enjoy Montana as a member of the public.

This area does not recieve nearly enough use to warrant a permit system. A lot of that is due to the remoteness, shuttle length, and the difficulty of Kitchen Sink rapid. These things alone keep this river from being overcrowded. We need open public access for this place, especially for promoting river conservation among the masses.

Hello, I am a former Bozeman resident. I love beartrap canyon, the remote terrain that you can reach from the river is one of the most rewarding parts of life as a paddler in Bozeman. Please don't restrict access to this beautiful section of river.

I am not for permitting day trips for private boaters, especially on any section that is Class IV. This in and of itself is self regulating for private boaters. Any permit structure on day trips severely reduces my desire to visit a section of river to for day trips. Last year I spent a week in the Boise area boating the various sections of the Payette and the Madison is definitely on my list of rivers to visit and do a stay and play, but if it is permitted I would rather just go someplace else and not deal with the process. It is bad enough for multi-day rivers, but day trip permits are unnecessary. I live 30 minutes form the Upper Colorado and the Arkansas, two of the most heavily boated rivers in the US, and yes, they can get busy, but you just have to regulate your launch time to self regulate your experience. Of course, these rivers have commercial caps on them and I believe do abide by a "loose it or loose it" policy for commercial trips. So I do support a RUP and "use it or loose it" for commercial trips.

I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP's data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn't provide any evidence to support its conclusions. There are less severe, and more effective, ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. I have never floated Bear Trap. But it is high on my list, and I am traveling to Montana next year to experience it. From reports by friends of mine who have run it, it is a pristine and exciting stretch of river, and those friends have never experienced any "social conflict" mentioned in the misguided proposal. Imposing a limited float permit system on the Madison's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.

The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.

As a local resident and guide, I don't believe this management plan or it's goals will benefit the public. The commercial use should be regulated and limited more. I'm familiar with outfitters in the Bear Trap and their presence has had a negative effect for the general public. I repeat - Private boat access should be supported, not limited.

Oppose restrictions on public use of bear trap canyon. Leave open to public use. Thank you

so let me get this straight. You want to double commercial use on the river, yet want to make tax paying Montanans have to sign up for to use on land that Montanans tax payers dollars pay for and are used to maintain this beautiful stretch of river. That's wrong! You guys know this is wrong! Make the right choice!

Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.

Keep it fully public accessible!

Get rid of the Montana River Use Permit proposal! Keep our public lands and waters free.

Keep beartrap OPEN

Keep Beartrap open to the public, no reservation system!!!

Keep it public. It's a great section of river.

We do not support limiting public boating access in Bear Trap Canyon. Crowded conditions are not severe enough and do not affect the quality of experience. We have been going to Bear Trap for decades and believe your recommendations are overreach. Thanks for listening.

<p>Do NOT restrict private boater usage. Hundreds of private boaters use the beartrap and other sections of the madison year round. As a year round user, I find it complete obscene that I would have to apply for a permit. I've been a monthly user for over 10 years and have never had an issue with crowding or overuse. Money should not be keeping us from utilizing a public resource.</p>
<p>To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -Evan Garcia</p>
<p>Hello, I would like to voice my strong opposition to the requirement of a permit to float the Madison River, specifically through Beartrap Canyon. This is an amazing whitewater resource that will be severely compromised for all by the proposed permit requirement. The canyon is long enough of a day on difficult enough whitewater to be sufficiently self-regulating. I have ran the Beartrap dozens of times and never have I seen more than 8 boats. That is including rafts, kayaks, or anything else. The introduction of a permit for this stretch will all but ruin the best late-season whitewater run in Southwest Montana. I speak for the entire Montana whitewater community when I plead with you: please do not turn the Beartrap into a permitted stretch. Signed, Jack McNeil</p>
<p>I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.</p>
<p>No restrictive permit system on the Madison, and no guide Priority</p>
<p>I believe that using 2019 or 2020 numbers for commercial trips is a good thing. I also support "No Peak" season.</p>
<p>I totally agree with the recommendations.</p>
<p>Don't permit the bear trap canyon. This is our prized whitewater and public land. We take care of it and love it. Don't close it off to us and then allow 1 million yahoo's a day to float tube below warm springs. Don't permit our "Trap"</p>
<p>I believe we need to do something to protect the resource It is the outfitters lively hood and all so the publics So let's be fair to all</p>
<p>I agree with these recommendations.</p>
<p>Why take away a recreational area for already a very specific and limited group of citizens? You should really be limiting the commercial boaters and no commercial alike if you really want to permit. This is another garage for the commercial boaters to not have any "problems" in their way. I work very hard every day in the hospital in Bozeman and my outlet is rafting Montana waters. Especially those closest to Bozeman as I often go after work in the summer months. Why do you want to take this away from us? Why do you want out of staters reaping the benefit of natural resources that land owners here pay for but cannot use? For money?? We call that greed. Don't be a Dick.</p>
<p>Stop making everything benefit the commercial raft companies. They are already out of control with their usage of every river in the state.</p>
<p>I do not agree with this proposal regulating Montanans from using their land. I do agree with regulations for Commercial use fishing and whitewater trips but taking freedoms from the residences for recreating is not ok with me</p>
<p>I am a licensed outfitter guide 30626 with a Madison SRP 54. I've been guiding the Madison for 33 seasons, most for Bud Lilly's Trout Shop and now on my own. I think it is very unfair to use Madison guide days from 2019 and 2020 (Covid year when most of my clients couldn't fly iut from the East or were otherwise impacted by the Pandemic. 2019 was a bad year for me as I had a joint replacement recovery. This season 2022 I have had over 25 guide days on the Madison. In years past I averaged over 60 days. If you use 2019, 2020 as a base line, you are effectively excluding me and other veterans from working the river we have guided for many, many years. I request you use more current data 2022.</p>

We just need to put a fishing season in effect like the rest of the United States. No need to mess with the guides, or their trips or anything else. Just give the fish a break each winter. This has been used with tremendous success all over America.

No comment

The most effective step to reduce over fishing and overcrowding on the Madison River would be to eliminate or significantly restrict professional guided fishing use. Period. Locals should not be forced to support the outfitter industry.

It would be nice for a public resource to stay focused on the public, and not the commercial.

How will commercial use be tracked? How do you know if they are doing 1 trip or 10 trips? Word of mouth is not sufficient.

Please just leave everything as it is now...no new regulations.

Dear Madam Chair and Commissioners, I am fully supportive of the work group commercial management recommendations. The plan the group created is not perfect, but it is as close as we will be able to get for a plan that will serve as a template for other river systems. It is simple, provides fluidity between commercial operators, and provides a mechanism for new entry into the system. I don't feel as if the "use it or lose it" mechanism is necessary, as commercial operators will be compelled to sell, rent, or lease their trips well before they would ever lose them. However, I understand the need to have this mechanism as a part of the plan and support its inclusion.

Thank you for your consideration of the following comments. With the regards to the proposed commercial use management recommendations: The commercial use management recommendations as proposed by the Madison River Work group are going to fail the sporting communities of Montana, both public and commercial interests and the unintended consequences are going to be wide reaching, spilling over to other nearby rivers. If you cap the total use and do not limit it to peak season (mid-June to mid-September) the long-term effects are going to be a worsening of crowding during the peak season. If outfitting businesses continue to grow, which has been the 5-, 10-, 15-, and 20- year trend, over time use on the Madison River will be condensed into the "prime" months if use is limited during the shoulder season. It is foreseeable that a user with 100 total days will over time use the entirety of this allotment during the months of June, July, and August, as other rivers are available to fish before and after. The long-term effect will be that shoulder season use will drop off significantly, prime season use will continue to grow, and crowding issues will only be amplified during the time period of peak crowding. However, if shoulder seasons are designated as unlimited use, there would be no incentive to "save days" for the prime season and likely use would remain spread out according to current trends. I would strongly recommend any commercial use regulations include a window of 6/15-9/15 annually. The other primary concern with regards to capping use at any level will be the obvious issue that if crowding is already an issue, capping use at current levels will fail to fix any of the problems. The other unintended consequence of this will be that if you cap use on one river, the spill over traffic to other nearby rivers will be significant and amplify existing issues already present on other resources, namely the Gallatin, Yellowstone, Jefferson, and Missouri Rivers. As outfitting business grow, "new trips" will be disproportionately sent to these other rivers, which only relocates the problem, rather than fixing it. Additionally the often acute temporal and spatial problem of crowding on the Madison River will continue to fester as outfitters can still launch "unlimited" boats at any ramp on any given day. The problem of crowding is not due to total use on the river, but is instead due to highly acute use at specific boat ramps, at specific times, by the largest river users. The same observation is true on rivers across western Montana. With that, the only solution to this problem that is both fair and forward thinking, would be to limit outfitters statewide to a fixed number of "launches per boat ramp, per outfitter, per day" across all rivers, with variability depending on the size, popularity, and carrying capacity (i.e. maybe 3-4 on the Madison River, but only 1-2 on smaller rivers like the Stillwater River). This type of proposal would effectively allow new entry, allow for current outfitters to continue to grow, spread out commercial use, and avoid significant spill over issues on neighboring rivers. With regards to the benefit or detriment to the resource and the public good, the proposed regulations also aim to financially benefit a small group of outfitters, while taking away from the public good and the resource. Simply put if you monetize permit in a "cap and trade" type system where outfitters can sell their use days, this will guarantee the long term buying/selling of days that over a long horizon will reach the level of millions of dollars, none of which the state of Montana, FWP, tax payers, sportsmen, or any other interested party would ever see. It would be a shame to see the state effectively award outfitters the ownership of a resource, but not have any of

these gains go back to actually improving the resource. I would close out my comments by noting I am a licensed outfitter that would stand to personally gain significantly from these regulations, but am the first to admit that assigning ownership to “commercial use days” is simply wrong. Rivers, fish, and wildlife in Montana are first and foremost a public resource for the public good. The proposals made by the work group are not in the spirit of public good, will only continue to exacerbate existing conflicts and issues, and quite frankly were made with significant conflicts of interest, upon review of the members of the work group and how much they stand to personally gain. There are alternative, progressive, and forward thinking management strategies that will better address existing and future issues, but the interested parties as of yet have clearly demonstrated their only interest is securing a long term financial resource they aim to benefit from, as would I. I would ask the commission to consider the well being of the young kid just born in Ennis and their future and not just the well being of the largest commercial users on the river today.

Generally, we all agree that there are too many people using the river. As such, I think that, at the very least, we need to cap the number of commercial permits where they are today. No more new permits should be allocated.

I'm sure the guides and outfitters will flood this wanting more time so they can make more money. the river needs less - not more . they are raping the rivers

Item 3. As an angler without a boat, I probably hire a drift boat and guide 15-20 times per summer. However, during 2020 with COVID, and somewhat during 2021 because of fires, I reduced the number of guided trips. The use of ONLY 2019 and 2020 is WRONG. It penalizes guides/outfitters that may have had COVID health issues or COVID client issues. If a guide/outfitter had a broken leg, or hip replacement -- there went the season for them. There needs to be a LONGER period of time considered (more than 2 years). I realize this would negatively hurt new guides/new outfitters, but it isn't fair to penalize older outfitters/guides who have been on the Madison for many years. Please use a window of 5 years, not 2.

The outfitters got what they wanted, an allocation of trips, similar to an allocation of client use days on the Big Hole and Beaverhead. The allocation creates a vested interest for outfitters and is like instant cash. Outfitters on the Big Hole and Beaverhead sell client use days for \$1200 to \$1500 per client use day. The recommendation that the public will have to get a permit to float the Madison is an indication of a total disregard of the public's right to use a public resource. Will there be as many trips per day for the public as there are total outfitter trips allocated? This proposed plan will commercialize the river. This proposed plan is NO surprise with the make up of the committee being outfitters and people who have a commercial interest in the river. This will set a precedent for other Montana River plans. I hope the public responds.

looks good. commission must now do their job and act to protect the Madison River resources

The Madison river has been pummeled with Commercial guide fisherman i.e. boats. 2020 through 2022 has been completely out of control. Hundreds of Commercial boats a day float the 30 miles of the upper Madison river. This has become a real problem for every person I have talked to. The fishing is not even close to what it once was. Case in point, my brother and 5 of his friends fished Sept 15-17 2022 with some of the oldest and best guides on the river. All the guides live in Ennis and have guided the river for more than 20 years! The Result of three days of hard fishing was 4 fish caught out of 6 fishermen! That's three days of great weather and flows. The comment from all 6 fishermen was there are so many guide boat on the river and something needs to be done! FWP has kicked the can down the road for close to 3 years after the commercial cap was passed by the commission. There has been no restrictions implemented what so ever in 3 years now. FWP cannot extend the Implication any more! This is a really bad look for FWP, Ennis Mt. and the health of our community and river! People are totally unsatisfied and will eventually stop coming. I find it appalling that fwp allows this. If the commercial guide community can not agree on the regulations then close the river to them. They will start to agree really fast at that point. Unregulated rivers cause greed to flourish. The Madison river is certainly a great example of that! When will FWP start caring about resident Montanans? Seems they are only concerned about guides and nonresident people that ruin our rivers.

ban outfitters

Reduce fishing pressure on upper Madison. Too many launches. Boat after boat after boat after boat. The quality of the experience no longer exists. Reinstate closed season.

There is FAR too much commercial use and not nearly enough opportunity for Montana, non commercial citizens. This is just another way of taking away our public lands and waterways. How about having a lottery for the ----- outfitters and leave the public lands to the public.

### Comments on the Opportunities for New Entry for River Service Providers and Outfitting Financial Models

I like the opportunities for new providers. As a client, the \$625 Float Trip income used in the spreadsheets is high. Most services are a bit lower. Do not let Shop/Lodge/Multi-boat outfitters tell you that they might make as low as \$0 on trips. They would not be in business if that were true. They are making plenty of money, they may just account for it differently.

The number of permits is already too high, suggest reducing the number of permits by 1/3. The river is significantly overloaded and does not present an opportunity for new service provider entry.

As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.

No comment

I question the accuracy of these numbers and how they compare with other outfitters throughout the state. Specifically, depreciation of a trailer and boat being estimated at \$2000, the 300% swing in admin costs (between \$1000 - \$3000), and the large swing in commercial insurance costs. This Financial Model does not appear to be well researched or vetted. It seems a better method to would be to utilize the NAICS code for outfitters to understand what the industry average is for these items.

Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you.

This is the most concerning aspect of your proposed regulations for me. How can a new startup guide EVER hope to rise to having his own outfitting business if you limit the RUP's to the arbitrary number of days from 2019 or 2020? He/she can't. You will create a financial model like Montana's liquor licenses. Huge dollars in it and only a few well funded buyers can hope to obtain a liquor license. No established outfitter is likely to sell a few days to this guide, a few to that one. It would negatively financially impact the business which that established outfitter may wish to sell in the future. I urge you not to implement this recommendation at this time.

Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds.

Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.

<p>These models do not adequately address the issue of new entry to the outfitting space and will result in new and younger outfitters being unfairly harmed and unable to grow and manage their business. These recommendation risk creating a two tier system where wealthier and more established outfitters will be the only ones who can bid and successfully purchase days from other outfitters because newer and smaller outfitter will not be able to make a competitive bid against more established companies.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>Commercial trip allocation should not increase in the aggregate.</p>
<p>Yes, I think capping the amount of guided trips is good. The guided trips should be permitted and regulated. The public should not need a permit for a BLM river.</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>Support</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.</p>
<p>Sure</p>
<p>Stop taking away access for private boaters. Stop the greed. Don't ruin Montana</p>
<p>There is no need for more guided trips on the Madison. There is enough guided fishing going on already. Stop selling Montana to tourism and leave the Madison alone for what commercial operations that already exist and the for the locals</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Ibid</p>
<p>This proposal is unfounded and unnecessary and only exists to restrict the public's ability to access public lands via the Madison River. The location of the stretch of the proposed limit, in tandem with the strenuous nature of the rapids/river itself along that stretch, already limits the number of individuals who recreate within Beartrap Canyon. Imposing an official capacity limit on Beartrap Canyon will unnecessarily limit those who wish to recreate in Beartrap.</p>
<p>Keep public waters and lands open to the public!</p>
<p>I oppose it</p>

<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>I don't see any real justification for more regulations, just a concern about more use. Inflation will likely reduce current levels of use.</p>
<p>Preserve freedom! Avoid rules that restrict freedom and place additional fees!</p>
<p>I support this recommendation. It limits barriers for new entry and encourages fluidity and transferability of allocations.</p>
<p>I agree with the workgroup's recommendations</p>
<p>I read the recommendations for Opportunities for New Entry for River Service and Outfitters. Not being in the business, I found it interesting and educational for me to understand all the implications of implementing a management plan. As a beneficiary of management (as a future client) I agree with the proposed plan.</p>
<p>Use liquor license model to prevent low entry cost scalpers from making a quick buck then leaving industry. Once a person has major skin in the game they tend to have more desire to protect it.</p>
<p>The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.</p>
<p>I agree</p>
<p>I think it's a good idea</p>
<p>I'm very happy to see that forethought and planning is being taken to preserve this amazing resource. It appears there has been a lot of thought and consideration put into these plans and I support their implementation. As a life long resident of Florida I can tell you first hand what happens when our natural resources are not adequately protected. Some of my greatest memories are floating down the Madison River with my father. Please do everything possible to ensure one day I can repeat these memories with my son.</p>
<p>You guys want your cake and eat it too. You're going to have to live with less guides...don't add more.</p>
<p>Recommendations are adequate</p>
<p>I support the recommendations of June 2022 because business enterprises are dynamic. Regulations that recognize business realities are necessary to optimize recreational use of the Madison without over-use and crowding.</p>
<p>None</p>
<p>I support this recommendation</p>
<p>I support this and the model makes sense.</p>
<p>Very happy to see that a balanced approach to access for new entry of river service providers to level the playing field and avoid the liquor license effect</p>



As someone who's income is dependent on the Madison river and fishing in general, I can appreciate the need to allow new use. Ultimately the total number of commercial use needs to decrease, and whether that comes from existing users or new users, commercial users needs to realize that the fishery is not viable at this pace and look to other water bodies. The continued growth in the area will just continue driving the quality of the experience down to the point that commercial opportunities will cease to exist.
N/A
New entry provisions are fine so long as total access is capped.
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
There are very few outfitters floating that section. It has been a public river, abd should remain so. The difficulty of the float has kept it exclusive to experienced and respectful boaters.
I support the addition of new providers, and would support the mechanism that allows providers to transfer their permits to each other in the easiest way, while keeping the total number of permits the same.
Not needed.
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe
It seems unnecessary to permit this stretch, and inappropriate to increase commercial access. Let's save permitting for places that need it due to crowding and demand.
Keep the amount of outfitters limited. Make them compete for the right to outfit. That keeps the outfitter who best represent the beautiful bear trap in business and weeds out the hacks. Any asshole can row a boat. Doesn't mean they should
No thanks. Eliminate commercial use of the bear trap. Make it a public resource only.
Keep Beartrap open to the public!!
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
I am fine with the recommendation as long as it does not limit non-commercial use.
Keep the beartrap stretch open to public and not commercial. It is a scenic river that needs to be enjoyed and accessible for all, not with a permit draw.
Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?
It's a dream to paddle on this river one day. Please keep it open for everyone!
I believe a RUP with a lose it or loose it clause would increase new entry opportunities with future forfeitures while also giving outfitters the leeway to operate knowing future allocations and conditions.

Do a self registration system at access points, and a new study, to see what is actually happening, before making major changes.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
Keep beartrap OPEN
Keep Beartrap open to the public, no reservation system!!!
I repeat, money should NOT keep public land out of public hands.
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -Evan Garcia
I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
No restrictive permit system on the Madison, and no guide Priority
I totally agree with the recommendations
Don't permit the bear trap canyon. This is our prized whitewater and public land. We take care of it and love it. Don't close it off to us and then allow 1 million yahoo's a day to float tube below warm springs. Don't permit our "Trap"
I agree with these recommendations
Stop making everything benefit the commercial raft companies. They are already out of control with their usage of every river in the state.
I am an advocate for individual freedoms over commercial use and there are places the commercial people can use to make money but please do not put money over my freedoms Please regulate commercial use. Please do not take my freedom to recreate and put money over my access to public lands
I appreciate that FWP has a provision for new entry of River Service Providers. Otherwise, no other comments.
Please just leave everything as it is now...no new regulations.
This looks like an attempt to restrict competition and establish monopolies for existing outfitter and guides.
Dear Madam Chair and Commissioners, I am fully supportive of the recommendations of the work group for new entry into the system. This is one aspect of the work group's plan that I spent the most time conversing with work group members about while they were meeting. The most crucial aspect needed for new entry is avoiding a moratorium on permits for river service providers. This will limit the "artificial valuation" found in other permitted river systems, with the best example being the Big Hole and Beaverhead. The work group also attempted to reduce artificial valuation through avoiding peak and off-peak commercial limitations. While I would prefer to have no cost of new entry, I also understand that this is an impossible ideal to achieve. All professions have some sort of cost to enter the profession, and guiding is not immune. What the work group created is a system that will limit these costs as much as possible.

With regards to the opportunities for new entry, a similar system has failed in the past on the Big Hole and Beachhead Rivers and it would be naive to think slight changes would somehow change the reality the big outfitters continue to grow, new outfitter entry in non-existent, and "use it or lose it" doesn't work because the days always get used.
less not more
should work fine. FWP Commission must now do their job
ban outfitters
There is FAR too much commercial use and not nearly enough opportunity for Montana, non commercial citizens. This is just another way of taking away our public lands and waterways. How about having a lottery for the ——— outfitters and leave the public lands to the public. Sincerely, Cary Gubler

<b>Comments on the Commercial Trips ARM Recommendations</b>
Off-peak trips should not be counted against the annual allocation. Or use a formula to incentivize outfitters to offer more off-peak trips.
The number of commercial trips need to be reduced to 2/3 the 2019 levels. 501c trips must count towards the cap otherwise this is just an end-around of rules to limit fishing pressure.
As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.
No comment
The second recommendation indicates the number of trips will be based on the number of 2019 or 2020 trips, whichever is higher. Why isn't this known and stated? We are in Q4 of 2022. These recommendations also frequently refer to "fishing outfitters," which is a clear indication that my initial concerns that the Work Group is primarily focused on reducing fishing use. Their recommendations surrounding fishing use will be affecting many whitewater users who are not being considered.
Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Joe Vincent
See answers above. I do not wish to see any limit at this time to the number of commercial trips on the river. The fishery is healthy. I think it is a difficult task to regulate for the 'right' number of users on the river. That is speculative and very open to interpretation.
The restriction of private boaters to accommodate outfitters is unfair and motivated by capitalist goals.
Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.

<p>The use of historical days counts from 2019 or 2020 going forward 4-5 year in 2023-2024 is arbitrary at this juncture. Many younger, smaller outfitters, even those who did have businesses established in 2019-20, have worked tirelessly to grow and maintain their small businesses for the past 4+ years and have had to deal with the constant worry that their ability to successfully own and grow their business could be stripped at any moment by a vote to implement this incomplete historical system. More time must be spent planning for the implementation of the commercial cap to ensure that all outfitters are given a fair opportunity to ensure that allocation is fair and contemplates outfitters of all sizes. Additionally, users who have had their business since 2019-2020 but have under 100 days of historical use should be given a minimum of 100 days which is the least amount of days needed by a sole provider outfitter to adequately run a business and have a successful season. Alternatively, those users under 100 days, who will be most affected by a commercial cap, should be allowed to use their best days total from any of the years leading up to the implementation of the commercial cap. Those increases, if there were any could make the difference from an outfitter being forced to discontinue their business as it will not be viable, to at least seeing the short term reward from their hard work over the past few years in the face of uncertainty surrounding what may happen to their business and their passion for being a part of the outfitting community.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. A simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient to get a better handle on need for a more restrictive system. I do not often boat these sections of river, maybe once or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>Commercial trip allocation should not increase in the aggregate.</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>Support</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.</p>
<p>Sure</p>
<p>Increasing the amount of commercial trips would increase unwanted river traffic and is a bad idea. Enough commercial operations happen already as it is.</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boats on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</p>
<p>MT is for the people, not commercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Ibid</p>
<p>This proposal is unfounded and unnecessary and only exists to restrict the public's ability to access public lands via the Madison River. The location of the stretch of the proposed limit, in tandem with the strenuous nature of the rapids/river itself along that stretch, already limits the number of individuals who recreate within Beartrap Canyon. Imposing an official capacity limit on Beartrap Canyon will unnecessarily limit those who wish to recreate in Beartrap.</p>
<p>Keep public waters and lands open to the public!</p>
<p>I oppose it</p>

I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.
I don't see any real justification for more regulations, just a concern about more use. Inflation will likely reduce current levels of use.
Preserve freedom! Avoid rules that restrict freedom and place additional fees!
I support this recommendation. Forfeiture of unused allocated trips is especially crucial.
I agree with the workgroup's recommendations
I agree totally with the Commercial Trip ARM Recommendations.
The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.
I agree
I'm not sure but as long it's good for the river great because I don't live there so I leave to the one's that do live there
I'm very happy to see that forethought and planning is being taken to preserve this amazing resource. It appears there has been a lot of thought and consideration put into these plans and I support their implementation. As a life long resident of Florida I can tell you first hand what happens when our natural resources are not adequately protected. Some of my greatest memories are floating down the Madison River with my father. Please do everything possible to ensure one day I can repeat these memories with my son.
Your not going to need any caps....if your have walk-in only except for the paralyzed or blind.
Recommendations are adequate
I support this proposal as it seem to level the playing field.
I agree with the recommendations.
I support this recommendation
I support.
Very happy to see that clear, quantitative guidelines are in place to utilize full allocation of commercial trip quota like other popular destination fisheries, these recommendations at least give the pathway to tracking commercial use.
N/A
overall effect of rules should be that there is no expansion of the amount of commercial use permitted on the river
I OPPOSE RESTRICTED ACCESS TO BEAR TRAP CANYON
I oppose the Madison river work groups non commercial bear trap canyon float permit recommendations
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
Keep outfitters out
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe

Commercial fishing vessels on the water act like the bear trap is there private river. They are annoyed at the put-in if their launch is inconvenienced in the slightest. Stop commercial use of the vest trap.
Keep Beartrap open to the public!!
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.
a commercial guide service will poorly impact the beartrap canyon because it will limit the amount of public access even more.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
I am fine with the recommendation as long as it does not limit non-commercial use.
Less commercial trips the better.
Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?
It's
I agree with the ARM Recommendations but do not believe that outfitters should be allowed to transfer trips to another outfitter. This promoted the ownership of a public use and benefit and invites shady dealings amongst outfitters to subvert the intention of the ARM and "use it or loose it" doctrine. There should be a range for the holder to retain al permits. ie if your average use over 3 years is 90% of your allocation, you should be able to keep your entire allocation so that there is room for growth and for bad years were everyone's numbers are down.
Leave the river alone until the agency knows what is occurring, and tread lightly when limiting access.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
Keep beartrap OPEN
Keep Beartrap open to the public, no reservation system!!!
Fuck your commercial trips.
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -Evan Garcia
I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
No restrictive permit system on the Madison, and no guide Priority

I agree with the new ARM recommendations.
I totally agree with the recommendations
Don't permit the bear trap canyon. This is our prized whitewater and public land. We take care of it and love it. Don't close it off to us and then allow 1 million yahoo's a day to float tube below warm springs. Don't permit our "Trap"
I agree with these recommendations
Stop making everything benefit the commercial raft companies. They are already out of control with their usage of every river in the state.
I am an advocate for individual freedoms over commercial use and there are places the commercial people can use to make money but please do not put money over my freedoms Please regulate commercial use. Please do not lake my freedom to recreate and put money over my access to public lands
No comment.
Please just leave everything as it is now...no new regulations.
Dear Madam Chair and Commissioners, I fully support the ARM recommendations developed by the Madison River Work Group.
less not more
The outfitters got what they wanted, an allocation of trips, similar to an allocation of client use days on the Big Hole and Beaverhead. The allocation creates a vested interest for outfitters and is like instant cash. Outfitters on the Big Hole and Beaverhead sell client use days for \$1200 to \$1500 per client use day. The recommendation that the public will have to get a permit to float the Madison is an indication of a total disregard of the public's right to use a public resource. Will there be as many trips per day for the public as there are total outfitter trips allocated? This proposed plan will commercialize the river. This proposed plan is NO surprise with the make up of the committee being outfitters and people who have a commercial interest in rthe river. This will set a precedent for other Montana River plans. I hope the public responds.
will work fine when implemented but commission must act now
ban ouyfitters
There is FAR too much commercial use and not nearly enough opportunity for Montana, non commercial citizens. This is just another way of taking away our public lands and waterways. How about having a lottery for the --- outfitters and leave the public lands to the public. Sincerely, Cary Gubler

Comments on the Commercial Watercraft Rental Delivery
Watercraft rentals must be counted against the total commercial trip cap otherwise this is just another end-around of the rules to limit fishing pressure. The exception would be if there is no fishing equipment in the watercraft.
As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.
Data should be taken prior to make recommendations

<p>Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Joe Vincent</p>
<p>Leave the happy innertube floaters alone!!</p>
<p>Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.</p>
<p>More data may be necessary for this particular aspect of the recommendations. Especially prior to any type of action being taken by FWP.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>Support</p>
<p>This should be completely outlawed - the tubing culture on the Madison has no place here.</p>
<p>Not a fan</p>
<p>It would be good for rental companies to have to register there stuff but there's no need to non commercial river permits on the Madison. Waste of time and money and a nuisance to the local river community.</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Ibid</p>
<p>This proposal is unfounded and unnecessary and only exists to restrict the public's ability to access public lands via the Madison River. The location of the stretch of the proposed limit, in tandem with the strenuous nature of the rapids/river itself along that stretch, already limits the number of individuals who recreate within Beartrap</p>



Canyon. Imposing an official capacity limit on Beartrap Canyon will unnecessarily limit those who wish to recreate in Beartrap.
Keep public waters and lands open to the public!
I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.
I don't see any real justification for more regulations, just a concern about more use. Inflation will likely reduce current levels of use.
Preserve freedom! Avoid rules that restrict freedom and place additional fees!
I support this recommendation. Tube delivery businesses contribute significantly to congestion and overall use of the river.
I agree with the workgroup's recommendations
Having witnessed tubing on a few rivers (Virginia and Florida) I do not personally believe that floating bodies (usually smeared with toxic sunscreen and other oils) are a healthy addition to any natural water source. I adhere to the recommendations of the National Park Service, as I learned about them in the Dry Tortugas -- the use only of clothing and the avoidance of any sort of body lotions, oils or sunscreens -- to preserve the water quality. However, this is not a method that could be easily regulated with companies or private parties taking vessels down the river. So I would lean against this type of float trip, where people are in the water.
The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.
I agree
The river is for everyone to use . as a fly fisher I don't like the floaters they spook the fish. But they still have the right to use it
I'm very happy to see that forethought and planning is being taken to preserve this amazing resource. It appears there has been a lot of thought and consideration put into these plans and I support their implementation. As a life long resident of Florida I can tell you first hand what happens when our natural resources are not adequately protected. Some of my greatest memories are floating down the Madison River with my father. Please do everything possible to ensure one day I can repeat these memories with my son.
We have a tail water fishery here in Middle Tennessee that was a fantastic trout river. A few years ago commercial kayaking and tubing was introduced and ruined it. Now you spend your time dodging kayaks and tubes while trying to fish. Don't let the commercial kayaks and other water craft ruin the Madison. Trash and other pollution will follow the commercial rental watercraft. The Madison beauty and natural experience is unequalled.
No boats....no problems
Recommendations are adequate
This proposal is necessary to implement a comprehensive management plan to preserve the Madison R for all users, regardless of the precise business type. I support the final recommendation.
I agree with the recommendations.
I support this recommendation
I fully support.

Supportive of efforts to manage this valuable and treasured natural resource for this category of commercial enterprise
The commercial rental business on the lower madison does impact all users and there needs to be a method to track use and growth.
Commercial trips on the Madison needs to be severely limited. We should look into having certain stretches of river open only to local MT residents on certain days.
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
Keep Bear Trap public and open without refulations.
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe
This is egregiously restrictive and designed to discourage rental providers, which will directly increase the number of commercial clients. This is a political maneuver designed by commercial companies for their benefit.
Please get the inner tube rentals out off the river. Beer cans and garabage is all that brings.
No thanks.
Keep Beartrap open to the public!!
In favor
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
I do not support the requirement that non-commercial users obtain a permit. Outfitters are upset because they have to "share" and don't get their way 100%. Limit the outfitter and not the non-commerical user.
Not needed at all.
Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?
I have no problem with these recommendations but would not restrict shuttle services to only the high density zones.
No comment.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
Keep beartrap OPEN

Keep Beartrap open to the public, no reservation system!!!
Fuck your extra rules.
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -Evan Garcia
I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
No restrictive permit system on the Madison, and no guide Priority
Agree that this should be tracked and managed
We need to start collecting data on all users on the river, to gain a better understanding of usage.
I totally agree with the recommendations
Don't permit the bear trap canyon. This is our prized whitewater and public land. We take care of it and love it. Don't close it off to us and then allow 1 million yahoo's a day to float tube below warm springs. Don't permit our "Trap"
I agree with these recommendations
Stop making everything benefit the commercial raft companies. They are already out of control with their usage of every river in the state.
I am an advocate for individual freedoms over commercial use and there are places the commercial people can use to make money but please do not put money over my freedoms Please regulate commercial use. Please do not lake my freedom to recreate and put money over my access to public lands
I feel this use whether commercially-supported or private is one of the largest overuse segments of the entire Madison River. "Floating" between Warm Springs Day Use Area and Greycliff FAS is enjoyed by thousands of people every summer, but is also the recreation segment that needs the most oversight and management. This is an area where a token (\$1 per floater day) fee might help pay for LEO presence to mitigate user conflicts, noise, dogs, and trash in the river.
Please just leave everything as it is now...no new regulations.
This proposal is a terrible idea. You're trying to kill small businesses by creating more bureaucracy and red tape. MT FWP should have no jurisdiction over regulating any aspect of the Madison River, or any other river in Montana. This is an example of government trying to expand itself, like cancer tries to expand itself.
Dear Madam Chair and Commissioners, I am fully supportive of the commercial watercraft rental delivery recommendations from the Madison River Work Group as they provide a means to collect better data on the extent of inner tube floating use that happens on the Lower Madison River.
no issue with this
ban outfitters
No commercial float trips on upper Madison. Too many boats now.

Comments on the Economic Implications of Madison River Commercial Limit Options
<p>You did not state the obvious. Limiting the number of trips will drive up the price to the consumer. As the Madison becomes financially non-competitive with other rivers, consumers will find other options, mostly other rivers in other locations, but sometimes maybe even a different sport. The past few years the Madison River fishing experience has NOT been a premium product. We are fishing more days on other rivers and outside of Montana. In other words, we are taking money previously spent on the Madison River and choosing to spend it elsewhere. Be very careful of this trend of increasing prices.</p>
<p>Eliminating fishing pressure on the madison is about protecting this unique resource and has nothing to do with economics. Will there be economic consequences as a result of eliminating fishing pressure, you bet. If it's just about the money start stocking the river with trophy fish, have no limits on access of any kind and quit fucking around making believe this is about protecting the resource.</p>
<p>As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>No comment</p>
<p>Throughout these recommendations there seems to be a lack of real data collection and analysis. I believe we need to take a step back and collect data prior to the implementation of regulations.</p>
<p>Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>This concerns me greatly. We need small businesses in our river communities. They are the lifeblood of our towns; their families have children who attend our schools; they are the ones that buy groceries in our local markets; buy gas at the stations and in the dead of winter, are here to keep our towns alive. I think the suggested regulations and limits will have ripple effects that are not anticipated. As we all know, once a regulation is in place, it is next to impossible to reverse it. Please gather more information about what instigated this whole work group, which in my understanding is primarily crowding and lack of facilities at the put-ins and take-outs. Fix those issues and revisit the need, if there is still one, to limit users on the river.</p>
<p>The economic outcome would not be great enough to outweigh the limited public access to our public space. This river is all of ours. Protect our public spaces for all.</p>
<p>Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.</p>

<p>The projections in this section of the recommendations do not adequately contemplate the potential price gouging that can and will result from a commercial cap and open transferability of commercial days. As stated above, the result of such a system without more in place to protect the interest of younger and smaller outfitting businesses, will create a two tier system where larger and more wealthy outfitter will be able to easily outbid any smaller outfitter who would hope to purchase day to try and grow their business. I implore the Commission to please take the ramifications of this decision with regard to small businesses, their owners, and their families seriously. Please do not move forward with a commercial cap and transferability of day until more time and research is put into how the allocation of days can be fair and smaller outfitting families will not be made to shoulder the brunt of the regulation at the expense of their businesses. Further, these projections do not address or contemplate the negative effects these recommendation will have on our community. The Ennis community is dependent on the guiding and outfitting community and to implement regulation that will stifle and in many cases destroy small outfitting businesses will hurt the young families that make our community vibrant and grow. A good example is to look at the town of Melrose on the Big Hole, there really are few to no young families there to help that town grown and prosper like we are fortunate to have in the Ennis community. Prematurely implementing these recommendation without further research and planning for how this will affect young, small outfitters and their families will have detrimental effects to the community as a whole.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.</p>
<p>The paddling community should be consulted on limits of our use, and we were not.</p>
<p>No limits</p>
<p>Stop selling Montana and do not increase the amount of commercial fishing allowed on the madison.</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Ibid</p>
<p>As a 6th generation guide on the salmon rivers in Idaho, and passionate believer that outfitting and sharing the rivers with people will help protect these spaces. For the bear trap canyon in particular I think it would be a shame to make it a public permitted system with launch times. Adding more outfitting permits and time slots for the outfitters I think is great. But restricting this space from kayakers and rafters in the local area is taking a gem away from a community of people that don't have to many sections of major whitewater near long other than the Gallatin. Please consider not adding launch times for public. A outfitting and permit system can be put in place without limiting the public use.</p>

This proposal is unfounded and unnecessary and only exists to restrict the public's ability to access public lands via the Madison River. The location of the stretch of the proposed limit, in tandem with the strenuous nature of the rapids/river itself along that stretch, already limits the number of individuals who recreate within Beartrap Canyon. Imposing an official capacity limit on Beartrap Canyon will unnecessarily limit those who wish to recreate in Beartrap.

Keep public waters and lands open to the public!

I oppose it

Dear FWP Commission and Staff, Thank you for the opportunity to comment on the 2022 Madison River Workgroup recommendations. I oppose the workgroup's recommendations for permitting for non-commercial use on Bear Trap Canyon for the following reasons: 1. There is not a private user conflict on the Bear Trap Canyon: My family are frequent non-commercial users of the upper Madison River through Bear Trap Canyon and float this section between 2-8 times a year. I personally have not seen more than 2 groups at the launch at any time and have not witnessed a conflict between parties. Likewise, parking spaces have not been limited even when construction equipment was staged in the launch area parking lot during much of the summer of 2021. For context, the Cyr put-in on the Alberton Gorge likely receives 20 times the traffic, and even there, conflicts are a rarity. 2. I have only ever witnessed a need for local river permits for commercial raft companies, not local recreational users: During the 6 years of rafting Bear Trap Canyon on the Upper Maddison River I have never had an overcrowding issue due to non-commercial rafters. I believe the only potential cause of overuse and crowding of the Bear Trap Canyon on the Upper Maddison River would be due to commercial groups. An example of this is the Middle Fork of the Flathead River. I usually raft the middle fork of the flathead river multiple times a year and have done so for the past 6 years. There is always overcrowding at the launch, along the river, and at each major rapid. However, this is solely due to the commercial raft groups. At any given time, I have only seen 1-2 other recreational rafters at the launch but see 6-10 commercial rafts from each commercial raft company. 3. My family has personally invested roughly \$20,000 into rafting Montana rivers over the years: My family chose to return to Montana because the state allows for easy access to the outdoors. Over the years they have invested roughly \$20,000 into gear and safety equipment because rafting is an enjoyable hobby everyone can participate in and there is easy access to exciting local rivers. The whitewater of Bear Trap Canyon on the Upper Maddison River has been a major draw for us and has helped grow our interest in the hobby. Limiting access would cause the most damage to local families and friends who enjoy the resources Montana has to offer when the most use and damage stems from overuse by commercial raft companies. 4. A significant and negative impact of current use has not been documented: Prior to regulating, FWP should demonstrate that the current use of Bear Trap Canyon creates an unintended impact on the natural resources of the area. Measuring the number of permittees provides a data point that is irrelevant without determining that a negative and significant impact exists. 5. Permitting is not needed to regulate private use on Bear Trap Canyon: The difficulty of floating Bear Trap Canyon self-regulates non-commercial traffic. The same is not as true for commercial parties led by experienced guides where permitting is appropriate. 6. The workgroup does not have required non-commercial representation: Please review the membership of the working group to ensure the members meet the criteria for "three non-commercial river users, (and) two people with Madison Valley business interests that are not connected to commercial outfitting". If workgroup members or their immediate family derive household income through participation from commercial guiding or fishing, these members do not qualify to be considered non-commercial. If that is the case, the workgroup should be re-assembled to allow the appropriate number of non-commercial voices, and the pending recommendations should be invalidated. Not doing so makes it more likely that the recommendations will be successfully litigated by opposing parties. I believe in stewardship of our natural resources. I appreciate the role of FWP in preserving the Montana we all treasure, including wild game, and habitat. However, I also reject the premise that use is overuse, and that the current non-commercial floats on Bear Trap Canyon need regulatory intervention.

<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Fishing the Madison outside the park in waders is one of my favorite fishing memories from 20 years ago, big strong healthy trout challenging my fishing skills. I hope to fish it again. I think new regulations during spawning periods may justify some reduction in usage but I have seen no analysis of this issue and how float trips affect the river spawning redds. I would also like to see increased access for waders via private property owners. More public access areas.</p>
<p>Preserve freedom! Avoid rules that restrict freedom and place additional fees!</p>
<p>Transferability of allocated trips will be crucial to avoid negative impacts on established and new outfitters.</p>
<p>The Economics of Commercial Limits is an important consideration. As a resident of southwest Florida, where our fishing guides have suffered from various outside impacts (human and natural) to their service opportunities, I understand that changes can deal a staggering blow to local economies. I trust the working group's recommendations, and support their conclusions.</p>
<p>The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.</p>
<p>I agree</p>
<p>I would leave it to you . the river pulls a lot of money in for the guides And everything else in the area</p>
<p>You will never solve the upper Madison over fishing problem by worrying about the economic implications.. it's solve it now or the economic consequences will be much worse when the guides clients find out there are very few fish left..they are already massively going to the Yellowstone</p>
<p>I'm very happy to see that forethought and planning is being taken to preserve this amazing resource. It appears there has been a lot of thought and consideration put into these plans and I support their implementation. As a life long resident of Florida I can tell you first hand what happens when our natural resources are not adequately protected. Some of my greatest memories are floating down the Madison River with my father. Please do everything possible to ensure one day I can repeat these memories with my son.</p>
<p>None</p>
<p>Recommendations are adequate</p>
<p>The economic basis for a thoughtfully managed Madison River is realistic and sound. It supports the proposed modifications to the regulations.</p>
<p>I agree with this analysis.</p>
<p>I support this recommendation</p>
<p>I agree and fully support.</p>
<p>A large majority of independent outfitters(outfitters without a brick and mortar or lodge presence) do not cover the cost of shuttles, lunches, and few if any outfitters cover the cost of flies/equipment. the majority of overhead costs are deferred to independent contractor guides. Despite the need to regulate use, there still should be a viable path for independent guides to create a larger business as an outfitter.</p>
<p>N/A</p>
<p>The goal should be to preserve the quality of the resource, not maximize the profits of the outfitters. Increased useage can only diminish the quality of the fishing. The portion of the river above the Westfork bridge should be restored to wade fishing only. You should be regulating for posterity and not for short term economic interests.</p>

Commercial trips on the Madison needs to be severely limited. We should look into having certain stretches of river open only to local MT residents on certain days.
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
There are no economic advantages to focusing on commercial trips. The Bear Trap has been a public river section, and it's important that it remains as such.
Bear trap does not need to go to a permit system. There is not enough traffic on this section of the Madison to warrant a permit system. If any section of the Madison needs to be on a permit system, it's the section below the Bear trap that is so heavily floated by tubers.
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
This is a direct slap in the face to Montanans and is a horrible money grab to turn Beartrap Canyon into a commercially run river. Born and raised in Montana, I valued public access to lands and rivers and vehemently oppose this proposal.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe
Limit outfitters but don't touch the publics right to enjoy the river
Keep Beartrap open to the public!!
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
The implementation of this proposal would be counterproductive and contradictory to the values of all river culture. As whitewater paddlers and fly fishermen, we are weekly users and active stewards of the rivers in Western Montana. We see firsthand the impact of traffic on waterways and actively work to maintain the prestine areas we've come to love. This proposal is utterly unnecessary and a legislative overreach. The Madison River should be kept publicly accessible without restriction and commercial operation for profit should not impede public access to public land or waterways.
I don't believe there are many outfitters or commercial operations down Bear Trap canyon. I am sure there would be a significant economic impact If this policy were to be implemented on the upper Madison, however, it does not seem that there are competing commercial groups on the Bear Trap Canyon section.
I don't think theh study fully takes into account the amount of input that non-commercial users add to the economy. Sure, they may not spend all the money at once, like a commercial outfitter, but they spend more over the year. I would be for limiting commerical use and increasing non-commercial use...i.e. the "normal" floater. Increase their use and ability to access the river.
Majority of these river trips are on the lower madison. Not beartrap canyon. Barely anyone commercially runs beartrap. The economic implications are skewed because you don't see the river as two sections. Lower madison is for angling off drift boats. Upper madison, beartrap, is for experienced whitewater paddlers. Theres a clear indication which one people fly here for. Montana isn't known for our excellent whitewater and Bozeman has barely any solid stretches other than the Gallatin Mad Mile. Don't permit Beartrap and ruin something the local whitewater community enjoys and appreciates and cherishes.
Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?



Please do not install a permit system for the Madison river along any section. Montana is a haven of public land access for the people and blocking river access goes against every value that Montana's hold dear. I am worried for the president this permit system would set for other river and public land access. We need more access for more people, not less.
Alright I'm gonna be straight up and simple with this. First of all I'm commenting here on behalf of limiting access to PUBLIC land to allow more commercial trips to take place. First of all, private boaters are much more suited to be out there recreating on their own terms. Private boaters are smarter and more skilled than passengers on commercial trips who are pretending the raft trip is a Disney ride so I imagine you'll see a huge increase in accidents and trash left behind. You're basically restricting people who's livelihood is based off of wanting to get out on the river to allow more tourists who boast a huge lack respect for their surrounding environment. I'm so glad that we don't have to deal with these stupid bullshit river access problems here in the PNW. We have the freedom to hop on any river at any flow at any time and nobody can say jack shit about it. Make America great again, stop limiting access to rivers.
No permits for public land
Yes, I understand the economic implications but there is a fine line where it negatively impacts the experience. Again, seeing use skyrocket on the Upper Colorado over the last 20 years has definitely affected how and when I use the river. Simply slamming as many people down a resource for the sake of economic gain diminishes the resource, the experience, and can lead to negative publicity and other consequences for visitors, towns, and locals.
No comment.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
Huh.
Keep beartrap OPEN
Keep Beartrap open to the public, no reservation system!!!
Fuck your economic implications. It's public fucking land let's keep it that way.
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -
I would like to see commercial use remain at the same low levels they currently are in bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
Please do not make this a permitted river!!
No restrictive permit system on the Madison, and no guide Priority
Please do not permit the Beartrap canyon. This river is not heavily trafficked. Even on weekends and nice days during the summer I only see at most one to two other groups and sometimes none. Permitting would greatly limit my access and days I can go enjoy this section of river.
I totally agree with the recommendations
Don't permit the bear trap canyon. This is our prized whitewater and public land. We take care of it and love it. Don't close it off to us and then allow 1 million yahoo's a day to float tube below warm springs. Don't permit our "Trap"
I agree with these details.

Stop making everything benefit the commercial raft companies. They are already out of control with their usage of every river in the state.
commerce over public access is not ok. Please do not take my freedoms so select people can make money. This is basic
Personally I would rather see the funds gathered elsewhere and cut the number of outfitters way down and take the stress off of the water ways!
Please just leave everything as it is now...no new regulations.
Dear Madam Chair and Commissioners, As I have stated to you in prior correspondence, I urge you to ignore those voices who argue that there should be a commercial cap on the Madison and that no commercial entity should benefit from the transfer of allocated trips. I would be supportive of this type of system if it could be created and have implored those over the past 5 years who have this viewpoint to provide a methodology for this system. Unfortunately, this system cannot exist and we have many examples of previous systems that attempted to deny the property right to allocated trips and have produced artificial valuation of outfitting businesses. The key to keeping the valuation of allocated trips minimal is fluidity within the system - river service providers should be able to sell, rent, or lease at their discretion in whatever increments they chose. Yes, this will create a windfall for 1st generation outfitters, but there is no way of avoiding that if you are seeking to cap commercial use in the aggregate.
Montana is growing other industries besides tourism reliant upon guided fishing trips. Limiting new permits might slow our growth a little but I think it is a small price to pay to protect the resource and quality of life that attracted us to Montana in the first place.
they don't need to rape the rivers make a fortune
This can work.
ban outfitters
If you don't stop the pressure you won't have a Madison River experience and fishermen will stop coming. There goes Ennis.

<b>Comments on the Non-Commercial Final Recommendations</b>
Absolutely have online access to make a day reservation. Any fee for maintaining this reservation system is a negative for non-commercial users. Increase commercial fees or fishing licenses a nominal amount to cover the non-commercial users.
This is totally inadequate, you need to permit all access to the river and limit the number of permits.
For number two, "Protect resources, both physical and biological, from the threats of unregulated growth of recreation on the river." I certainly agree, but I am aware of no studies or data that suggest such an aggressive permit system would protect the resources on the Madison River (outside fishing studies perhaps). I would rather have more public education campaign and a free permit system that I've used on other western rivers to (number 3) "collect recreational user count data in several reaches of the river." This proposed permit system seems like a gorse overreach. Also, a fee to offset reservation system fees seems ironic! In my experience having platforms like rec.gov, I find them to be cumbersome, obnoxious, and increased costs to the user by 200% due to their service fees.
Please DO NOT put a limit on the non-commercial use of Beartrap Canyon. I have kayaked that stretch of river since 1989, and it is still uncrowded. I have not had any crowding issues. I believe that instituting a permit system for this stretch would "put it on the map" and would likely increase use. I can't stress enough how important this issue is to me. I want to be able to take my grandkids down this stretch of river and I don't want to have to wait years for a permit like many other rivers. Thank you for the opportunity to comment!
As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system

<p>proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Joe Vincent</p>
<p>As a boater and conservationist, I was not surprised to hear that Montana Fish, Wildlife and Parks is proposing that the Madison River be permitted, but I was surprised by the extent of it. Perhaps I was surprised because, as I'm told, the group that worked on the plan emphasized fishing to the exclusion of whitewater boating. Fully a quarter of the seats were delegated to commercial outfitters, nearly half to business interests; none to the whitewater community. It's true that the Madison Valley is swarming with anglers and drift boats. One can see that just driving through Ennis on the way to the river. I've paddled my kayak or canoe on nearly all the Madison below Quake Lake—with the exception, I'm happy to say, of the class 5 section right below the lake's outlet. I've seen lots of drift boats in the popular fishing sections, especially from the West Fork to Ennis. And yes, I've witnessed the bikini hatch. But I've also had days on the river with few or no other boats. From the S-turn to Three Dollar Bridge, I've never seen a boat from another party, and from Three Dollar Bridge to the West Fork I've seen few. The Quake Lake section and Beartrap Canyon aren't the waters that draw anglers, and they aren't friendly to drift boats. I've had days when I spent less time paddling downstream than trying, unsuccessfully, to hitchhike upstream. I've had days when I paddled a couple dozen miles without much interruption. Montana, and particularly southwestern Montana, is fortunate to have some of the best rivers in the West. Instead of reducing access, let's focus on something that would have an actual result. Let's actively support the Montana Headwaters Legacy Act, which would include wild and scenic designation for the upper Madison and Bear Trap Canyon, as well as other high-value streams in southwestern Montana.</p>
<p>It is too early to determine whether users are impacting this river. Put this money into education on LNT, etc.</p>
<p>Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.</p>
<p>I float the bear trap, through the kitchen sink 4-10 times a year, for the past 30 years. During the week, there might be 1-3 other boats on the river. Weekends, there might be 4-8. Kayakers float by in packs of 3-5, and you might see 4-5 packs per day on the weekend. I do not see a need to regulate private use.</p>
<p>I am writing to oppose any limits to non-commercial use of beartrap canyon. There is no current relevant problem issue with the publics use of this section of the Madison river and I strongly oppose efforts to limit the publics use on this section of river.</p>
<p>More Data collection on recreational users is needed especially prior to the implementation of a commercial use cap on the river. I think it is important that all users see that the increase in river traffic is driven far more by an increase in recreation users and far less by commercial growth. Please take the time to collect this crucial data prior to voting to implement any of the commercial use regulation especially if there is not more consideration to how that commercial cap will effect the small business owners and their families.</p>
<p>I am strongly opposed to requiring a Madison River Float Permit for non-commercial users. I feel this permit requirement would create a significant barrier to access for all non-commercial user groups. I also feel this permit requirement will create inequitable access to public lands for underserved communities, minorities, the economically disadvantaged and people with disabilities.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>

<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>The proposed non-commercial use system is an assinine attempt to control a problem that does not exist. It represents one of the more restrictive day-use schemas to be applied anywhere in the western US--for a river segment that receives relatively low use.</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.</p>
<p>No permits should be required for the Quake Lake whitewater run. This run is low use.</p>
<p>No private boater restrictions. It's public land. Keep it that way. Multi use recreation means private boating too not just for profit. Stop taking away access for private boaters. Stop the greed. Don't ruin Montana It's a day use section for god sakes. Don't continue the gross commercialization of this amazing state.</p>
<p>A pay permit is not the answer. It limits access to a public resource to those with more financial assets and flexible time schedule. These recommendations are angler-centric and leave out the recreational paddler. The recommendations say nothing about Hebgen reservoir, Quake Lake, and Ennius reservoir. That is still the Madison River. Are flat water paddlers required to obtain a permit and register to use these bodies of water on the Madison river?</p>
<p>The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits -- like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>Beartrap and quake lake sections do not see enough use to warrant limiting or regulating use</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p><b>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</b></p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Agree with addition of a permit and the collection of data that it will provide. The same should be done with Bear Trap initially.</p>
<p>Ibid</p>
<p>Noooo! Permits for the people</p>
<p>This proposal limits non-commercial use of the entire river outside of Yellowstone National Park. There are areas of the river that receive much less traffic that will be negatively affected by this recommendation. For example, the restrictions on the Quake Lake class V section of the river are unnecessary given that the section rarely sees more than one group per day. In general, the recommendation seems biased towards commercial use at the expense of public users like myself.</p>

<p>Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Permitting recreational boating in bear trap canyon is unnecessary. Roadside parking lots and fishing access are responsible for the most users and highest impact users. Bear trap canyon is not busy and boaters do not disturb fish habitat. Please focus efforts on the most impacted areas.</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon numerous times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river because it is a beautiful place to reconnect with nature and experience fantastic whitewater. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Add more public access areas for waders. Not all can afford expensive float trips.</p>
<p>Preserve freedom! Avoid rules that restrict freedom and place additional fees!</p>
<p>I support this recommendation. A non-commercial River Use Plan is as important, if not more important, than a commercial plan. It has been a free for all for too long, something must be done and now is the time.</p>
<p>I agree with the workgroup's recommendations</p>
<p>I agree with the recommendations to implement required permits for non-commercial uses. I would hope that data collection methods are adapted immediately, given the significant increase in usage, to protect the Madison.</p>
<p>A reserved permit should be required for boats and wade fisherman. The fee should be high enough to cover the reservation system and enforcement officers for aforementioned.</p>
<p>The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.</p>
<p>I agree</p>
<p>I agree</p>
<p>To relieve all your problems and the overuse...boats must be removed...walk in only. This will provide the trout with sanctuary areas...which will help to make a more healthy fishery.</p>
<p>I support the final recommendations.</p>
<p>I agree with these recommendations.</p>
<p>I support</p>
<p>No non commercial in my opinion.</p>

Supportive of efforts to manage this valuable and treasured natural resource
There needs to be a clear path to regulated use on the Madison. I would prefer to make the process of recreational use of the Madison slightly more difficult through a permit system, in order to hopefully bring the fishery back to what it once was.
Instituting a permit system for the Madison River does not address the problem of crowding on the river, instead it limits public access to a valuable outdoor resource by making it more difficult for people to enjoy their resources. I understand the need to measure use on the river, however there are better ways to do this such as surveys at boat launches and takeouts. This added inconvenience will only lead to increased conflict and decreased satisfaction for those recreating on the Madison River.
I regularly paddle the whitewater section directly below Earthquake Lake, known by whitewater paddlers as the "Quake" section. I am on this short section of river (<2 miles) as much as anybody and I can scarcely remember a time when there was another group there other than my party. This is the best section of hard whitewater in SW Montana during the later summer and early fall, as there are consistent flows due to the dam. Attempts to monitor or restrict private access on this section of the river would unnecessarily limit access to a recreational resource. I have paddled the section once between Hebgen Lake and Earthquake Lake, on a 4th of July weekend I was the only paddler on the section, although it was lined wall to wall with anglers on foot. I have not been on any of the other float sections of the Madison above Ennis, but I am strongly opposed to regulations that provide increased or maintained access to commercial outfits while decreasing access for recreationalists. I am saying this as somebody who guided commercially on rivers for 10 summers all across the country. This recommendations seems like a firm step in the direction of limiting local recreational use in favor of commercial operations.
Agree
There needs to be days on stretches of the river for MT residents only.
I fully support the permit process for overnight trips, but limiting day use to permit only would have a negative impact on access for our community.
I oppose this
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
No permits!
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe
This is unnecessary and unneeded. There is no evidence of over crowding or social conflicts at the launch or in Bear Trap Canyon proper. Stating there is a problem, as the Non-Commercial Final Recommendations says, does not create an actual issue. This is egregiously restrictive to a group of uses that was not allowed to provide any input.
It is comical to me that this committee has found no need to alter the for-profit commercial plan, and instead has decided to limit public access to a public resource. The river belongs to the people, not to the guides. While there is certainly a crowding issue the easiest way to rein that in is capping commercial use. As a non-commercial user of the river and resident of the valley I often float evenings after work with my wife and friends, if I decide I want to float on the public water that is the Madison River and I forgot to get a permit or the shops are closed for the day what am I to do. This self serving committee pandering towards commercial interest is egregious. The river belongs to the many not the few.
I am against a permit system for the Beartrap section of the Madison River for private boaters.
It seems unnecessary to permit this stretch, and inappropriate to increase commercial access. Let's save permitting for places that need it due to crowding and demand.
Keep Beartrap open to the public!!

<p>I respect the stated objectives of the Non-commercial Recommendations. I, too want to preserve the quality and recreation of the Madison River. I am supportive of the plan to collect data on use patterns. As long as the permit system is designed as a data-collection tool, I can live with it, although other counting methods could be less intrusive. However, I am opposed to it if it is designed to limit non-commercial use. My concern is that the two permit recommendations for the Madison River seem to include the river in its entirety outside of YNP ("...when floating between the Yellowstone Park boundary to Ennis Lake or from Warm Springs Day Use Area to the Jefferson River confluence."). This is a significant management change to the river that would make it unique among day-use river sections. Additionally, it applies a broad brush to the entire river making no exceptions for the Quake Lake Class V section that gets used by one group per day... occasionally. Or lower sections of the lower Madison between Blacks Ford and Headwaters State Park that, anecdotally, see much less use and may be affected by this recommendation. I have never floated the other sections of the upper Madison between the Reynolds Bridge Area and Ennis Lake; thus, I cannot personally comment on these sections. However, I hear this area struggles with heavy traffic. I recognize that the Madison River is a well-known and heavily trafficked fishing river. As a whitewater kayaker, these plans appear to value fishing above other forms of river recreation and fail to differentiate between high-use fishing sections and lower-use recreation areas.</p>
<p>Please do not place regulations on who and when private boaters can access this amazing white water.</p>
<p>Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.</p>
<p>Do not capitalize on a river. There's other ways to generate income that are much more effective. Tax the rich.</p>
<p>Permitting multi-day wilderness stretches of river with limited camping resources makes perfect sense. Permitting Day-run sections of river makes no sense at all and is usually advocated for out of greed by commercial users. Having to try to predict a day trip and hope to be able to acquire the permit puts an unnecessary and onerous burden on private boaters and is absolutely contrary to the spirit of the West in general and Montana in particular. The prospect certainly dampens my enthusiasm to return to MT for more boating the future. This scheme must not be allowed to come to fruition.</p>
<p>A permit system is an unnecessary and unjust burden on public access.</p>
<p>Accept as stated.</p>
<p>I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!</p>
<p>Keep public access to public land free! Lower commercial trips.</p>
<p>I do not support the requirement that non-commercial users obtain a permit. Outfitters are upset because they have to "share" and don't get their way 100%. Limit the outfitter and not the non-commerical user.</p>
<p>Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?</p>
<p>The section that should be seeing more restrictions is the upper section of the Madison, not Bear Trap. It sees far more commercial trips and overfishing. Bear trap is used both by fishermen and whitewater enthusiasts alike. From July to September, this is some of the only accessible whitewater around Bozeman. Restricting this access does not help the trout in the river nor does it help boaters to enjoy the river. Montana has nationally renowned stream access laws and it would be a shame to see commercial boaters getting more opportunities on these rivers than locals.</p>
<p>This area does not recieve nearly enough use to warrant a permit system. A lot of that is due to the remoteness, shuttle length, and the difficulty of Kitchen Sink rapid. These things alone keep this river from being overcrowded. We need open public access for this place, especially for promoting river conservation among the masses. As a local whitewater kayaker in this state, the idea of a permit system here is simply outrageous.</p>
<p>No non-commercial permit adoption. Let the public use their land!</p>

I do not support Private Permits for any day use.
No comment.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Collect the data. Analyze the data. Provide insights from biologists. Then make a recommendation.
Please oppose regulating public use on bear trap Canyon. Leave open to all public.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
KEEP BEAR TRAP OPEN
Keep beartrap OPEN
Non-commercial use should remain unrestricted to allow for free use of the river, as it is necessary for public good.
As a whitewater kayaker, I am confused as to why I need to acquire a permit to kayak the Quake Lake section of the Madison River. This is a stretch of water that is not navigated by fisherman or by general river floaters. If the number of permits get limited in the future, us as kayakers may not be able to recreate when the water rises as this may be unpredictable if all the permits are reserved. I foresee this being used as a mechanism to kick out public recreators by limiting their number of permit holders and raising the number of private permits... I do find that warm springs and down at times is congested but only during the peak season in the summer. I do not believe a year-round permit system is necessary and would be a waste of resources It is not define as what a "small reservation fee" is going to be in regards to getting a permit.
I float the river year round, on weekends and other holidays that are more likely to be busy. The beartrap section has never been busy or congested at the put in, on the river, or the take out. It absolutely does not need a permit system.
Keep it public.
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -
I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
No restrictive permit system on the Madison, and no guide Priority
I totally agree with the final recommendations.
I totally agree with the recommendations
I do believe we need to protect this resource but again let's be fair to everyone
I strongly disagree with the recommendation that private floaters must obtain a permit for their outings on the river. No other day float river in Montana requires this and it seems that management/enforcement of this unwieldy recommendation will be very difficult.
It certainly seems unnecessary that non commercial users who are just inner tube floating should have to pay a fee to secure use of the Madison. This will generally detract from users wanting to go to the Madison. At the least I hope there will be no tickets for not having secured a permit



This is a very limited and specific group of people that use this section of the river. Please do not take away another gift that the tax payers pay for. please do not take away my outlet from the stressful work in healthcare. B maybe we can all just get commercial licenses then.
No reason to do this at all! I've been running the beartrap for years and it's never busy.
I am against permits required by personal watercraft for Bear Canyon. Apologies if this comment is not in the right place.
Let the people and the land regulate the use by sheer capacity of the facilities of the area we do not need more rules. First come first serve that's simple NO MORE REGULATIONS please. Make boaters pack it in pack it our for human waste thats simple
Just need to implement a fishing season like the rest of America. That's it.
1. Management fee should be only enough to cover electronic registration and data collection. It should not go into the general fund. 2. DO NOT USE RECREATION.GOV for this service. It provides no service to you as the manager other than a website. It costs users \$6/reservation and will actually increase user pressure when they over-market it to profit on \$6/reservation.
I am absolutely, and strongly, opposed to any requirement for a recreational float permit! I have frequent guests who's daily plans are not specifically known in advance, and for whom a float is weather dependent. And you want to charge money to administer something that should not exist in the first place! I suspect this may be driven, at least in part, by commercial users wanting to limit recreational users. DO NOT DO THIS!!
Keeping the river public use would be preferred to commercial use
This is not a viable option and it doesn't follow Montana values or traditions, and it is being severely impacted by outfitters and the FWP catering to the same outfitters!
no opinion on this part
Dear Madam Chair and Commissioners, I understand the need to compile more accurate reports of non-commercial use on the Madison River and I support the work group recommendations to do passive data collecting and require a Madison Float Permit. However, if you truly are looking to limit numbers on the Madison River, then it cannot be done with capping commercial use alone. The largest segment of use on the river is non-commercial, and there will be no way to limit overall use if non-commercial use is also not limited.
My only comment would be an alternate proposal: the state needs to designate certain stretches of rivers statewide that have significant economic benefit and world-class trout fishing as "blue ribbon", mark them accordingly with blue signs, and require a separate permit to use them that would be required for all river users. Of the total miles of river in the state, very few have these special qualities, and the opportunity to use them should be paid for by users to continue to improve these rivers.
I support expanding the wade/walk area as it is getting crowded too. The floaters have LOTS of river to fish whereas waders don't (and use less water per fisherman to boot.)
agree but Commission must now do its job
Good idea.

<b>Comments on the Vessel Requirements on Upper River</b>
Makes sense.
Stupid.
This seems like a classist recommendation where people who cannot afford watercraft vessels are excluded from enjoying the upper river. Who stress the fish out more, fishermen or tubers?

<p>As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you.</p>
<p>Restriction of vessels will not solve conflicts between floaters. Adults with good communication skills and courteous river etiquette will solve this issue.</p>
<p>Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.</p>
<p>This is complete overreach by the work group in recommending that people not be allowed to hop on a tube if they would like or float with their families in certain section of the river. To restrict families and other recreational users in this manner is not only wrong, it is un-American.</p>
<p>I am strongly opposed to the proposed vessel requirements on the Madison River. People should be able to tube a river, plain and simple. If someone has hands or feet, they have propulsion. Get over yourselves fly fishers. Education among the user groups is what needs to happen here, not implementing regulations that create barriers to recreation for groups that have been singled out.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>Oppose</p>
<p>This regulation is unnecessary, seems to be fairly discriminatory and designed to primarily favor one particular user group over all others - anglers.</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.</p>
<p>Very pleased that the recommendations will help keep the upper Madison free from the large tuber traffic that has become so popular on the lower Madison. Thanks</p>
<p>The paddling community should be consulted on limits of our use, and we were not.</p>

<p>This recommendation completely ignores canoes and kayaks. The Quake Lake section received few paddle groups a year. There is no need to limit that section. Having the Work Group choose what craft is acceptable is classist. Allowing multi-thousand dollar rafts and drift boats but denying less expensive crafts (ie. float tubes, air mattresses) is restricting users based on their economic status.</p>
<p>We will not comply. The quake lake run have very little use. I am one of maybe 30 that have taken a raft through this section of river. This has nothing to do with Fish or Wildlife. whitewater boaters were not even asked for recommendations.</p>
<p>Inner tubes and such should Be allowed on all stretches of the Madison.</p>
<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>Ibid</p>
<p>This recommendation favors fishing and commercial fishing trips above other kinds of boating. I enjoy tubing with friends and always find ways to avoid conflicts with other groups and giver fishing trips plenty of space. Let the public enjoy the river and don't restrict public access in favor of commercial fishing. If you want to improve the fishing experience, limit fishing.</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Study of any negative effects are needed.</p>
<p>Preserve freedom! Avoid rules that restrict freedom and place additional fees!</p>
<p>I support this recommendation. A vessel with adequate propulsion is essential to reduce river conflict and provide for a safer experience for all.</p>
<p>I agree with the workgroup's recommendations</p>
<p>I read the Vessel Requirements and the proposed definition of vessels. I'm not sure why tubes etc are not included. Certainly masses of people floating along with tubes or other non-motorized vessels could have similar impacts and create similar conflicts to regulated operators and their clients. Not being familiar with the numbers that are experienced on the Madison of this type of floating, I am not sure my understanding is clear enough to comment. However, I would suggest that decision-makers take a look at the floaters on some of Florida's rivers where the tubes are literally packed like sardines. No other usage could exist in those conditions.</p>
<p>The walk and wade portions of the Madison downstream of Quake Lake need to be increased. No boats at all should be allowed in the walk and wade section. No boating should be allowed anywhere on the Madison for at least two days per week.</p>
<p>I agree</p>
<p>I agree</p>
<p>To relieve all your problems and the overuse....boats must be removed....walk in only. This will provide the trout with sanctuary areas...which will help to make a more healthy fishery.</p>
<p>I support the final recommendations</p>

I agree with these recommendations.
I support
Oars required, no free floating tubes. I frequent the mountains of North Carolina and Georgia and the tubers on the rivers are parasites.
I agree that boats need adequate propulsion.
Supportive of efforts to manage this valuable and treasured natural resource
Any floating vessel, whether a drift boat or float tube creates a choke point at access sites and on the river. they should all be treated to the same regulation.
I do not stand for these vessel requirements on the Upper Madison river. This will barely decrease the crowding on the river, and only benefits the fishermen and commercial outfitters. Growing up in Ennis, tubing on the river through town was a popular pastime, and I never once saw an encounter where a person on an inner-tube negatively impacted another river user. After three years of guiding commercially, I can confidently say that if people on inner-tubes are negatively affecting a day of fishing, it is not their fault, the affected fisherman is simply not a skilled enough angler to work around them. This proposal only benefits one interest group on the river at the expense of the others. Participants of different sports need to learn to work around each other instead of simply limiting each other's access. I do not want to see any part of the Vessel Requirements move forward.
These vessel requirements seem to be directly aimed at banning tubing, as I think its authors are explicit about. I am not a tuber and will not be adversely affected by this proposal. But I am adamantly against limiting access to one user group while allowing access to another. If use must be limited to preserve biologic integrity, then these regulations must be applied across all user groups equitably. It is unethical and unnecessary to pick and choose one method of engaging with nature as being more entitled than another. This article seems to feel that there is an excessive amount of tubers bumping into wading anglers. As I am sure there have been occasions where a tuber has bumped into a wading angler, I seriously doubt that the number of these instances exceeds the number of instances where a craft with "propulsion" bumped into an angler. Just because a tuber floated closer to an angler than they would like is not a reason to ban an entire user group. This article feels strongly like its intentions are to keep a resource open to one user group and close it to another simply because one does not want to see the presence of another.
no vessels with motors should be permitted anywhere on the river.
I am against this proposal.
I oppose the madison river work groups non commercial bear trap canyon float permit recommendations
This is a classic example of over regulation. Do not take the resource away from the majority of the general population.
As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe
Allowing motorized vessels on the river is a recipe for disaster. Bear Trap above the family is already a sign that people with motorized craft will not obey "no wake areas" and will put everyone else at risk. Keep the Madison non-motorized.
Keep Beartrap open to the public!!
This is a statement of judgment about "appropriate" river use that by all appearances favors fishing (specifically commercially guided fishing) above all else. I recognize that the quality of fishing holds a high intrinsic and economic value to the community. I don't have a dog in this fight, given that I don't inner tube rivers with any regularity and don't go to the upper Madison. However, the favoritism toward one recreational use over another is hard to get past. The quality and value of fishing seem like they would be better protected by limiting the amount of fishing than other activities, but I will let your staff biologists answer that question.
Please do not regulate
Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.

Accept as stated.
I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!
Keep public access to public land free! Lower commercial trips.
No comment
Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?
I agree with vessel requirements and would add mutli-chambered for inflatables except for crafts less than 10 feet (basically trying to allow packrafts as an exception
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
KEEP BEAR TRAP OPEN
Keep beartrap OPEN
To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration.
I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.
No restrictive permit system on the Madison, and no guide Priority
I would find that this would be hard to enforce. Although a great idea, just because they have oars or paddles, this doesn't always mean they know how to.
I totally agree with the recommendations
How can you stop someone that just enjoys the River and is not hurting the resource this River is just not for fisherman!
I agree with this recommendation
No please don't ruin a good thing like every other river. Next it will be the Yellowstone. No good!
Let the people and the land regulate the use by sheer capacity of the facilities of the area we do not need more rules. First come first serve that's simple NO MORE REGULATIONS please. Make boaters pack it in pack it our for human waste thats simple
no opinion on this part

Dear Madam Chair and Commissioners, I support the vessel requirements for the Upper Madison as developed by the work group. The intent was to reduce conflicts between inner tubers and anglers. With the amount of angling that takes place on the Upper during the time of year that inner tubing is popular, combined with the nature of the river, heavy inner tubing pressure on the Upper would produce conflicts and decreased river satisfaction. It is best to allow inner tubing to take place on the Lower Madison when the peak of inner tubing pressure does not align with the peak of angling pressure.
Single person float craft should be allowed but no fishing from the moving craft should be allowed.
ok
Good idea

Comments on the Bear Trap Canyon Float Permit
Makes sense.
If it's truly a wilderness cap the trips to 2 a day.
I live in Bozeman and have been floating Bear Trap Canyon 2-3 times per summer for the last 10 years. I am opposed to a permit system for private boaters for the following reasons. 1) Boater Safety NorthWestern Energy provides zero guidance to the general public on their strategy for managing the flows released from the Ennis Dam. This creates a safety risk now, and that safety risk will only be expanded when private boaters are forced into 1-hour launch windows. For example, a normal day in July and August might see flows start the day at 3,000 CFS and be reduced to 1,250 CFS at Noon. For a private boater that can only get a 7:00 AM launch time, should they run the Kitchen Sink at 3,000 CFS? Should they wait 5 hours at the Kitchen Sink, assuming that flows will be reduced to a more manageable 1,250 at Noon? What happens if they don't reduce flows at all that day? These questions highlight the uncertainty that exists now and the tough questions that private boaters will face under a permitting process. I oppose this permitting proposal, but if it goes through, it MUST be accompanied by NorthWestern Energy providing guidance to the boating community on their strategy for managing the dam so that people can make informed decisions about when to get permits. 2) Data Gathering In the Final Recommendation, the stated #1 objective is to "Gather better data on floating recreation in the Bear Trap Canyon Wilderness Area." There is a sign-in box now at the boat launch. How many launches did we see on average each day last year between June and August? The Final Recommendation states that "the number of parties floating through the Bear Trap Wilderness regularly exceeds the 6 parties per day defined by the BLM in their Limits of Acceptable Change." We know the average number of private float trips happening per day now through the sign-in box, so why not share that number with readers as a means to provide context for this situation? If the committee doesn't feel that the sign-in box data is accurate, then please consider adding another sign on the boat ramp that reminds people to fill it out... because the sign-in box is very easy to miss right now. A Recreation.gov permitting process should not be needed to gather reliable information on Bear Trap Canyon usage. This proposal is overkill if data gathering is actually the #1 objective. Thank you for taking the time to read this comment, and for your work in protecting the Madison River. Sincerely, Logan
First of all, I'm an avid whitewater kayaker. I've been living in the area for nine years and rarely encounter social conflict or congestion at the put in of the Bear Trap. Certainly, the take out at Warm Springs can get busy, but usually kayakers arrive before the tuber rush so I'd personally have not experienced much issues there either. This seems to be written with no kayak input what so ever as we usually do not use the boat ramp at the put in. Also, if six groups are recommended in the past, but now that is recommended to be a 350% increase of allowed trips (21 permits a day), where's the data behind these numbers and how they were decided? Also, if a permit system is instituted, preferably free, DO NOT LIMIT to certain times of the day to launch (within an hour window) for safety reasons when in a wilderness context! For instance, if I launched at four o'clock today, I'd only have 2.5 hours of daylight for a 10 mile wilderness run.

These recommendations feel at complete odds with how recreators actually use the river, for a number of reasons. First, there is not enough traffic or launch congestion on Bear Trap to warrant limited launch windows. Second, the “social conflict” mentioned in the proposal I have only ever seen manifest as a few parties spontaneously congregating at the Kitchen Sink to run safety along shore and cheer one another on. Even in a wilderness area (which was more “wild” before the new cell tower), taking out to scout and then watch others run the hardest rapid is a natural and treasured part of whitewater culture, not something to be avoided. And, having technically skilled individuals who happen to be onsite at one of the most dangerous rapids in the West is NOT a bad thing. Additionally - the proposed recommendations exacerbate rather than alleviate safety on this stretch of the river. The dam is not run on a regular schedule, and the schedule is not posted in advance. We private boaters have all done our share of watching the CFS tables on the river below the dam and guessing at when they'd open and close the gates - using that to decide when to launch, AND showing up to the put-in prepared to wait should the river be higher than my comfort level to row. Should private boaters be forced to launch during 1/2 hour windows, I 100% believe that either people will be forced to miss out on their floating days for NO good reason, OR they will feel pressured to row the river at a higher CFS than their skill level safely allows - causing highly unnecessary and easily avoidable safety concerns. Where were the private whitewater recreators in this decision? Where were they on the supposedly Work Group that was supposed to represent diverse interests without conflict of business interest? We appreciate being able to comment now during this public comment period, but you should have made us a part of the proposal process because we are the vast majority of the daily use of this river. And giving so many slots to commercial trips - which I am sure will be prime time - will be tipping the balance from public to private use which is NOT in keeping with Montana’s public land principles. I understand that you likely want to “get ahead” of use issues with Bear Trap, but let it be said that running day permits through Recreation.gov will guaranteed attract far more traffic and contribute to causing the problem you want to avoid by putting this stretch on the radar of random searchers. Thank you for your consideration. I sincerely hope that you will recognize that Bear Trap Canyon does NOT need day permits for floaters and whitewater enthusiasts should be able to launch when they want, choosing their preferred safe times around the dam flows.

Please DO NOT put a limit on the non-commercial use of Beartrap Canyon. I have kayaked that stretch of river since 1989, and it is still uncrowded. I have not had any crowding issues. I believe that instituting a permit system for this stretch would “put it on the map” and would likely increase use. I can’t stress enough how important this issue is to me. I want to be able to take my grandkids down this stretch of river and I don’t want to have to wait years for a permit like many other rivers.

DO NOT PERMIT THIS SECTION OF RIVER!! This is a gem of a river, please do not ruin it. I live here and love this stretch of river. I think you would make it worse by having permit holders banking on a date and maybe going when it is unsafe and above there safe skill level. This is serious whitewater and we don't need it flooded with out of state permit holders. If you do this, it will make this river more unsafe. I have never had a probalem at the put in as long as people are rigged and ready. The problem lies there. Make the the put in a little bigger eddy by moving maybe 4 rocks. Please don't ruin the best day stretch in Montana by permitting it! I beg of you

I am a lifelong Montana resident and I oppose the Madison River Work Group’s non-commercial Bear Trap Canyon Float Permit recommendation. I have floated Bear Trap over twenty five times in my boating career. Not once have I experienced anything resembling social conflict. In fact, of the roughly 60% of times I have actually seen other parties on the stretch, folks are more than happy to see one another. Running whitewater is a communal activity whose users depend on one another for safety. In fact, I have personally participated in two separate rescue scenarios. Once, helping a party right their boat, and another time helping a stranded boater back to his party. In my experience, the most common place to encounter another party is at the scout for the Kitchen Sink rapid. It's common for boaters to discuss negotiating the rapid, and offer downstream safety for those running the rapid before them. Limiting the number of private boater launches would not only deprive Montana residents of a premiere outdoor experience, it would be the reckless destruction of a community safety system. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP’s data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn’t provide any evidence to support its conclusions. There are less severe, and more effective, ways to gather meaningful data to support a significant river use management

<p>decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. Imposing a limited float permit system on the Madison's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.</p>
<p>As a Whitewater rafter living in MT, I agree with American Whitewater! 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not.</p>
<p>The recommendations being proposed do not seem as though they were created with input from whitewater recreators nor does it seem as though whitewater recreators have had a voice in developing these proposed recommendations. Having floated Bear Trap Canyon this summer, I did not experience any of the overcrowding issues expressed by the advisory board. A permit system for a small section of water with minimal recreational use has no merit and will only serve to restrict public usage.</p>
<p>Beartrap is a seldom used section of the Madison river. I raft 20-30 days a summer and never see anyone on the river or at the out in, with the exception of maybe one or two groups... being a dam released river that is not on a set schedule, this would reduce our ability to see that the water is high and rally our friends to go have fun outside in the summer.</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 6 times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river because Beartrap canyon provides dam controlled water accessible during most seasons, a scenic float, good whitewater, and fishing opportunities. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>Please do not regulate non commercial trips in bear trap</p>
<p>Please reconsider the proposed changes for the Madison River. I am normally a supporter of FWP, and I think that they do a great job. But these new rules and regulations are just not in the best interests of many of the quake and beartrap paddlers. I align with many other boaters when I say: 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not. Thank you. Joe Vincent</p>
<p>Dear Mr. Sperry, I am writing in opposition to the proposed permits on the whitewater sections of the Upper Madison (Beartrap Canyon and the 1.5 miles below Quake Lake). I am a member of the 2004 U.S. Olympic Whitewater Canoe Team and have paddling extensively around the world. I've been fortunate to call Montana home for the last 15 years and Bozeman for 12. I have personally seen overcrowded and resource depleted rivers across the world and can confidently say the whitewater sections of the Madison are not in this category. While I</p>



do understand the need for regulations on the fishing sections, Beartrap and Quake Lake should be excluded from the working group recommendations. Thank you for your considerations and willingness to solicit comments from the community.
Adding permits and more regulations to the bear trap section will only cause issues with rafts and personal use boats. There is not enough traffic during the week to justify permits nor do we need more government regulations on personal use boats in that section of river. I use this section of river all the time and very rarely see other boats at all. Permits on the bear trap are completely unnecessary.
I have kayaked and rafted the Beartrap dozens of times. It has never been busy enough to necessitate limits or restrictions.
No to float permits, and no to having to designate a leader and a sub leader and only 20 people in a group, etc. Just no. Leave the inner tube floaters and the spontaneity of the experience alone. Goodness!
Self-serve, self-pay permits at the put-in would be reasonable. We in the whitewater community strongly object to having to purchase permits online in advance with the requirement to specifically designate the number of people and especially the requirement to launch within a specific 1-hour window.
The proposed fee-based, reservation only, permit system on the Bear Trap Canyon section of the Madison River is un-justified and not needed. The boat launch area is not a heavily used access point and there is not much crowding on the run. Paddlers and whitewater members were not consulted about this proposal, and they are the main users who would be affected. If the Madison River Work Group feels the need to collect use data, then free, self-issued, onsite permits would be appropriate, like those found at backcountry trailheads. The paddlers who access this section are respectful and conscience of their use. I participated in a river clean-up and cleaned up the Bear Trap trail, going up the canyon there was relatively no trash after the 1/4 mile of the trail. Overuse is not a problem on this section, and the bottom line is the paddling community should have been informed and consulted before our use and access is limited.
I have been paddling the bear trap about once a month for the last 4 years and it has never seemed crowded enough to warrant a permitting system. Many other stretches of the Madison seem like they would benefit from some sort of control but Bear Trap should remain unpermitted.
Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon
I am opposed to the final recommendation regarding Bear Trap Canyon Float Permits. There is an abundance of evidence that moving to a permit system is not justified at this time; among those reasons: recent studies have not been conducted to properly determine usage of Bear Trap Canyon - the most recent study was conducted in 2016; a public notice was not made to inform users that potential changes about Bear Trap Canyon were going to be discussed within a Working Group; State Law MCA 12.11.405 states that less restrictive measures be considered/used before resorting to permitting and other more restrictive regulations regarding rivers. Additionally, as a Class IV section of river, Bear Trap Canyon is only usable by experience boaters, meaning that traffic in the area is naturally limited. I urge you to reconsider permitting Bear Trap Canyon, which is unnecessarily and unjustifiably limiting the access of non-commercial boaters to our public lands.
The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding.
I would like to say I am not for this permitting system on the Trap. How can you implement this without conducting a proper study and collect data first? Seems kind of ass-backwards to start a permit system, and THEN conduct a study. I've also like to say I've never had any social conflicts at the put-in. Please do not implement a permit system on the Trap! Seems completely unnecessary.
I oppose the bear trap float permit being on introduced. Bear trap should remain open to the people
Keep public land in public hands. Lets not destroy and take away more land from the Montana people. With the rate mt is going we will have nothing left to enjoy in this beautiful state. Why destroy what everyone is coming here for.

<p>I do not think a float permit is needed for private floaters. Time of day restrictions are difficult to follow when you float with multiple people.</p>
<p>Please hear out the whitewater community that you are targeting with this permit system before you implement it. A free, self-permitting system at the put-in location will provide the data expected, without limiting the opportunity for people to enjoy the public land that has been free to use since it was established as such. A great portion of paddlers use the upper put-in with plenty of space. I have never encountered congestion, or issues concerning how busy the put-in, or even the parking lot, is. It is unfair to put such restrictions on a community without their input, especially when they know the area well, and could help to create a system that works for all parties involved. Please help us to keep this area accessible! Thank you</p>
<p>I gather that because apparently this section of river flows through a designated "wilderness area", that "protective" measures are deemed appropriate. I have reservations on that general concept. At least the link above this category illustrates a cautious approach in general, including revisiting the situation before perhaps final implementation of "rules". But I again question the need in the first place. I find #3 under "Recommendations" to almost be egregious!</p>
<p>I feel whitewater kayakers were not properly considered in the proposed permit process. Kayakers often do not use the Beartrap boat ramp, a point of conflict that the proposed permit process attempts to address. If there is to be a reservation system, it should be applied to the use of the boat launch itself, rather than river use. A free onsite self-issued permit system for river use would be a better solution to gather information for a more accurate study, with future discussions to include the paddling community.</p>
<p>I am strongly opposed to requiring a Madison River Float Permit for non-commercial users. I feel this permit requirement would create a significant barrier to access for all non-commercial user groups. I also feel this permit requirement will create inequitable access to public lands for underserved communities, minorities, the economically disadvantaged and people with disabilities.</p>
<p>I personally kayak the Madison many times in a year, almost once a week in some months, and I have never encountered overcrowding or any social conflict at the river or put in. Even though parking is condensed, most people are responsible with shuttling, carpooling, etc. There have never been any issues that I have witnessed. I am speaking against the use of a fee/permit based system that is proposed.</p>
<p>Your justification for implementing non-commercial river permits is that "the increased growth of recreation on the Madison River has raised concerns related to social crowding and the potential for degradation of the resource." "Concerns" are not sufficient justification to tax the use of a public resource. Until your working group can provide evidence showing that the regulation of the river will tangibly improve the quality of the resource in clearly-defined ways, your "concerns" are unwarranted, unjustified, and a threat to my and others' freedom to exist in the place. You have imposed a solution to a problem which you intend to study. This is bad management, and I am concerned that the implementation of fee-based, reservation-only permits in the Bear Trap Canyon will limit my ability to use and enjoy something which I own. I am 22. Your generation hasn't left me a lot in the way of national inheritance. Please don't ruin this too.</p>
<p>The plan to require a permit/reservation system for whitewater recreationalists is absurd. The quake lake section and the beartrap canyon sections are not crowded and see little use for much of the year. This proposal for a Permit/reservation system is a non-solution for a problem that does not exist. I simple sign in kiosk or online permit for day use without a lottery or restriction on number of permits would be sufficient yo get a better handle on need for a more restrictive system. I do t often boat these sections of river, maybe or twice a year, but have been visiting these sections for 20+ years. Commercial fishing guides need to be regulated more, leave the private boaters alone! Thanks for the consideration, Doug</p>
<p>Please reject the recommendation to require a permit to float Bear Trap Canyon. There is no data collected and presented that indicate this is needed. No other day trip sections of river require a permit in MT. The permit system and launch times are overly restrictive, and add unnecessary burden and cost to private boaters. Since when has Bear Trap Canyon been too crowded? I believe other stretches of the river have much more traffic for commercial and private fishing use. The private boaters that access Bear Trap canyon are experienced and familiar with ramp etiquette. Why are recommendations even being considered with lack of data? I fear this is the start of losing access to public waters. I object to the recommendations. I request FWP REJECT the Work Group's Non-commercial Beartrap Canyon Float Permit recommendation and NOT forward that on to the Bureau of Land Management (BLM). Thank you.</p>

<p>I oppose the Madison River Work Group’s non-commercial Bear Trap Canyon Float Permit recommendation. This recommendation seems like a distraction from the issues in the upper river. This river corridor and the fishery are part of the public trust. Elevating the influence of commercial interests and efforts to privatize the experience should be rejected. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP’s data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn’t provide any evidence to support its conclusions. There are less severe, and more effective, ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. In my personal experience, social conflicts are exceedingly rare in the section of the Madison, certainly nothing like the river above Ennis Lake. Imposing a limited float permit system on the Madison’s Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.</p>
<p>The wild trout and the habitat are the economic driver. The streambed and the fish therein our part of the public trust. The sustenance of the fishery should be prioritized over private recreational interests, which should in turn be prioritized over commercial interests.</p>
<p>I oppose the non-commercial usage of bear trap canyon. Preserve wild and scenic rivers.</p>
<p>It would appear that all the work done on all of these recommendations are done for and on behalf of over used commercial outfitters and guides. The Bear Trap section is neither and should be excluded from this entire process. If it becomes over run as well, limit commercials not privates.</p>
<p>I believe it is a mistake to try and permit the Bear Trap canyon for floating of non-commercial boaters. The experience and skill in running the canyon keeps the numbers down on its' own. I have never had a conflict with other boaters at the put-in ramp. Perhaps permits can be required for commercial floaters that are making money off of their floats. This goes for other area rivers as well - commercial floaters should have to pay for permits.</p>
<p>Oppose</p>
<p>Please do not require permits for private boaters year round in the beartrap canyon. This proposal seems like a suggestion to an issue that is not a real problem and would only benefit the commercial boaters that are capitalizing the canyon. I’ve had the privilege of floating the beartrap canyon for the last 20 years and have seldom had conflict with other boaters. The few times were as suggested at the peak hours of put in during the middle of summer. Those conflicts could be improved by educating the boaters and requiring all boaters private and commercial, to use a proper staging area to rig the boats so when entering the ramp area the process goes quickly. I didn’t see a river management employee on any of my two trips down the corridor last summer and only once was the put in crowded with floaters. If there is something to be managed on the Madison, the takeout of the beartrap is a great place to start. Thanks for your time and I hope you’ll consider keeping private boaters in the canyon and not catering to the two commercial outfits.</p>
<p>The proposed non-commercial use system is an assinine attempt to control a problem that does not exist. It represents one of the more restrictive day-use schemas to be applied anywhere in the western US--for a river segment that receives relatively low use. The 6-parties per day quota is as astronomical underestimate of what could be considered reasonable use in this area at a level that will not impact resource values. The BLM has begun with an extraordinarily low baseline, which would naturally create the managerial perception of over-use, and is not trying to tailor a permanent rule to this too-low use number. This proposal should be scrapped in its entirety, and any further use/management work should make a much more honest effort to be inclusive off all affected user groups, collect real input, and be prepared to come the conclusion that no active management is needed at Bear Trap whatsoever beyond a reasonable day use fee to manage maintenance at put in locations etc.</p>
<p>Respectfully, not enough is being done here. In an effort to please everyone we are losing sight of what truly matters - the environmental and ecological health of the river. My hope is that you revise the plan to reduce daily</p>

access levels across the board, for ALL stakeholder groups. The future of one of the West's iconic rivers is at stake.
No permitting! Keep it open to local citizens and no commercial traffic at all. Keep it wild and don't sell Montana's treasures. We pay taxes. We should get preferred
Montana is for Montanans! Not tourists!
I don't agree that parties are disrespectful. Every party I have ever been a part of cares very much about protecting this special resource. In fact allowing people the freedom to recreate creates more positive relationships with the land. I don't think public lands are meant to profit the government. This land is for the people we care about it limiting public access is not the answer.
The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be.
Montana Fish Wildlife and Parks should not follow through with a float permit system for Bozeman's Bear Trap Canyon for all kayakers and rafters. This would require specific launch times and would cap daily launches. I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a highly restrictive management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust taking of public access to one of the most unique rivers stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Once open public access becomes highly restricted it never returns to the way it is now. Before Montana Fish Wildlife and Parks makes a decision on this damaging change, it is recommended that you examine and study how the U.S. BLM manages the Lower Salmon River in northern Idaho. This river has a significant amount of use without any private party permits or a lottery system and the river resource is just as pristine as it was when I first started floating this river in the 1970's. I also fully support and agree with the following comments made by American Whitewater on this critical issue: "American Whitewater will be submitting comments that stress the following points. 1. The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. 2. Free, self-issued, on-site, unlimited permits --like those found at many backcountry trailheads-- would be acceptable on Bear Trap. The online or in-store limited reservation permit system proposed by the work group would not be. 3. No permits should be required for the Quake Lake whitewater run. This run is low use. 4. The paddling community should be consulted on limits of our use, and we were not." Kelly Courtright, 39812 N. Short Rd., Deer Park, WA 99006 Email: kayakfarmer@gmail.com
I have been floating this section of river for 25 years. I have not to this day heard a story or witnessed overcrowding at the launch site for this section of river. This management plan will take an extremely aggressive action at limiting public use.
I do not believe that the Bear Trap needs a permit system. This system only limits access to the public while promoting it for outfitters. We need public spaces that don't have a waitlist to get to. I have yet to ever go to the canyon and have to wait for others to launch. I don't believe this is a necessary measure and I think it will actually be detrimental to access for those who truly cherish and respect that magic canyon.

<p>If the objective is to gather better data on the river users in the Bear Trap canyon, limiting access to the river is going to give false data. A sign in/out box at Warm Springs would be a better alternative. There are multiple put in options for the Bear Trap (dam, double drop, powerhouse). How can you establish a launch time with three potential put ins? I have never personally felt that the Bear Trap canyon was crowded. On a busy day I might see 4 parties. Never have I had or heard of a conflict occurring at the put ins of the Bear Trap. If you take the supposed recommendation of 6 parties per day every day of the year you end up with 2190 parties. I find it difficult to believe that there are that many parties going through the canyon annually. Furthermore, I have never been surveyed during my many trips through Bear Trap Canyon in the past 9 years. Where is the data coming from? An operations guide should no be based solely off of anecdotal evidence. Charging a fee to pay for the collection of the fee is preposterous. Please do not go through with these highly restrictive recommendations.</p>
<p>I disagree with your recommendations to control paddlers in the Bear Trap Canyon. I have fished or boated this canyon since 1987. I agree with the recommendations of American Whitewater: The proposed strictly-limited, reservation only, fee-based launch windows for Bear Trap Canyon are not justified, will not solve any real problems, will impact paddlers, and were not vetted with the public. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. In addition, I also agree with American Whitewater, that a self registered and free log system would be a good plan so as to know when boaters are in the canyon. Thank you for your consideration,</p>
<p>This recommendation makes no sense and was not part of the charge for the workgroup. There is no identified issue with congestion, user conflict, or fishing pressure on this section of the river. The whitewater challenge and no camping rule already self limit the amount of use. The putin and takeout areas are well suited for the levels of use. Please remove this recommendation and focus your efforts on other sections of the Madison where they might be needed.</p>
<p>I feel that the restricted use to private boaters on public lands is unconstitutional. Commercial outfitting is important for the economy, for getting new people into the sport and for fun recreation. However, it is the private boaters who carry the sport on their shoulders and teach the next generation-not only about the sport but also about land and river conservation. Limiting access to private boaters would be nothing less than a slap in the face.</p>
<p>I've kayaked and rafted the Beartrap section of the madison for 20+ years, multiple times per year. I have never felt the river was overused and have never experienced crowding or conflict with other groups boating. In fact it is very rare I've encountered more than 1 other group on a day out. I feel the proposed regulations are aimed at a problem that does not exist and will only serve to limit river access and cause undue complications for boaters. Please reconsider the proposed permitting plan. I know many many local boaters and not one of them feels the current proposal is necessary. It is aimed at a problem that does not exist.</p>
<p>As an avid whitewater kayaker for 20+ years, I oppose this recommendation. The evidence is insufficient and does not warrant such impositions. I have kayaked the Bear Trap Canyon many times over the years and would hate to see this happen! It just seems unnecessary. Have you been to this incredibly beautiful stretch of river? Please perform further investigation before making a quick decision to limit public access to this river! Thank you.</p>
<p>I strongly oppose the regulation of private boating permits in bear trap! There just isn't the numbers on a daily basis to require this system.!</p>
<p>This float permit is unnecessary. I have floated the Bear trap canyon more than 500 times both commercial and non-commercial. I have had zero problems at the put-in with other boaters. I know that FWP has no jurisdiction for this section of river. This is going to get taken to court and will only cost the tax payer more money. Kill this proposal now. We do not want it.</p>
<p>Limitations and use of permits is unnecessary for beartrap. Kayakers don't even use the boat ramp. We/they put in upstream of the ramp to enjoy more whitewater. Beartrap is not a popular enough section to be permitted and it would negatively impact the local river community that enjoys being able to run the river whenever they please</p>
<p>The proposed permit system for Bear Trap Canyon is arbitrary and unjustified. It won't solve any real problems and it will impact paddlers who were not consulted at all regarding this matter. Many paddlers do not even use the boat ramp where the launch windows aim to ease crowding. Not to mention, the quake lake section is rarely even used by whitewater paddlers. You guys are focusing on the wrong users.</p>

<p>Having been floating the Madison since 1981 I feel the best and only option is to limit the # of guide boat on the river. Limit outfitters to one or two boats per access the older the outfitters the more boats the lower the guide # the more launches and do not allow guides from out of state to guide on the Madison. Close sections to guides different days of the week. Close section to out of state fishing different days of the week.</p>
<p>I don't support the permit recommendations for bear trap canyon</p>
<p>This permit system seems silly given that every time I've run this stretch, I've seen AT MOST 2 other groups on the entire river. Most recently, I saw zero and this was not the first time my group was alone on the river. Overall, I can't imagine that a permit is required for this stretch of river.</p>
<p><b>STOP THE RESTRICTION. THESE ARE PUBLIC WATERS</b></p>
<p>Oppose</p>
<p>MT is for the people, not comercial outfitters. Don't limit public land access, it goes against everything MT stands for!</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon numerous times in the past 15 years and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river because it is a beautiful section of canyon with excellent whitewater and fishing. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is an initial regulation jump that goes too far, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for adding a self issue permit and collect data on usage, and completing a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>I have paddled the beartrap over 50 times and it has never seemed crowded. Around half of the time I don't even see any other groups. For this reason I feel that a permit system is not necessary.</p>
<p>Ibid</p>
<p>I oppose private float permits on the Bear trap canyon</p>
<p>I am strongly against the work group's Bear Trap Canyon Float Permit recommendation because it is prioritizing commercial outfitters over the private boaters. This stretch of the Madison permits itself as only competent, responsible river users are able to make it through this section. There are much more effective ways to gather river usage data on the Bear Trap than going to the debauchery of a website which is Recreation.gov. I have floated this stretch easily over 25 times in the last 4 years and have yet to run into an incident involving social conflict and more often than not we are the only group at the put-in even on a Saturday. If the goal is to gather usage data, why not require people to fill out the book that has been at the put in for years, put up a game camera, or have an employee at the put-in. There are better options. PLEASE REMOVE THE BEAR TRAP CANYON FLOAT PERMIT RECOMMENDATION FROM THE MADISON RIVER PROPOSALS!</p>
<p><b>ALLOW THE PEOPLE TO FLOAT! No more commercial trips!</b></p>
<p>I oppose this non comercial permit plan, and do not think there is a need to limit access to this resource</p>
<p>I have been floating the Bear trap canyon section of the Madison for 5+ years. I do not find this section of river to be highly trafficked (or even moderately so) as this section requires advanced knowledge of class IV whitewater navigation and therefore does not appeal to more generalized crowds. Those choosing to enjoy the beautiful canyon are folks passionate about Montana rivers and experiencing nature in the dynamic, immersive and exciting way that rivers provide. Bozeman has a massive and inclusive whitewater community even though the whitewater access in the area is relatively limited compared to another whitewater meccas. We love our rivers and bear trap binds this community together. Montanans from all walks of life can agree that one of the quintessential Montana qualities is it's free public access to wild and beautiful places. We love our rivers and want to protect them as much as you do! Please allow us to responsibly govern our own use of the bear trap canyon, as crowds there do not compare to lower sections of the Madison!</p>

I request · FWP REJECT the Work Group's Non-commercial Beartrap Canyon Float Permit recommendation and NOT forward that on to the Bureau of Land Management (BLM). Proposal Summary of "Non-Commercial Bear Trap Canyon Float Permit Recommendation to the BLM": · This recommended permit regulation opens both the BLM and FWP to potential litigation. · Claims the canyon has more pressure than recommended resulting in congestion and social conflicts · Objective is to spread out launch times, gather data and protect resources · Proposes to implement a permit system that will restrict launches to one every half hour with four slots blocked out for commercial outfitters Response to proposal: · There is absolutely no evidence of over crowding or social conflicts at the launch or in the canyon of Bear Trap · The Beartrap Canyon recommendations are illegitimate and not in compliance with applicable laws. o Non-compliance with NEPA/MEPA: no recent studies have been conducted on the area since 2016, making proposing new rules for bear trap premature o Non-compliance with other state laws: MCA 12.11.405 requires less restrictive intervention be used first when considering regulations/permitting on the use of rivers and implementing a limited or restricted use permit on Beartrap is not less restrictive. · Illegitimate planning process: o Bear Trap canyon has been excluded from user surveys and programs that were implemented to gather data on other areas before electing new restrictions o Evidence of strong bias in the data collection and presentation used o FWP has no existing authority to regulate Beartrap o The Work Group that prepared the proposal has conflicts of interest with commercial use of the canyon, those conflicts of interest were not notify the public of these conflicts of interest. Additionally, there is no representation from private boaters in the work group, which was supposed to be focusing on non-commercial regulations o The recommendation was not based on any prior BLM planning documents o Process did not consider the impacts on the ecology, fish, and fisherman in the canyon o There was no outreach done to whitewater boaters, as well as no public notice that Bear Trap was to be included in the Work Groups planning efforts with potential future regulatory changes Other reasons for opposition: · This planning process acknowledges the canyon has limited use and that no data exists on current use and pressure. The proposal intends to use this very restrictive permit system as means of data collection which is immensely premature and unjustified. · Bear Trap is the least used section of the Madison River yet is the only section with a proposed permitting system. Using congestion and social conflict as a means of instituting new restrictions has no grounding as it has the least amount of pressure compared to the upper and lower Madison. Beartrap is a class IV+ river and thus is self-limiting, making the demographic of boater more experienced and skilled, therefore likely to be rigged and ready faster without causing congestion or social conflicts. · These recommendations favor outfitters at the expense of private boaters. This proposal restricts private boaters while increasing the permit opportunities for outfitters. There is no evidence that commercial groups need four launch times per day, between 2019-2020 there was only ONE commercial trip recorded. Commercial use in Bear Trap Canyon is the only source of complaints of congestion or conflict, and since commercial trips make up such a small proportion of the boaters in the canyon there is no way a significant enough number of issues occur to necessitate a restrictive permit system. The proposal also recommends restricting private trip groups to a maximum of 16 people, with no limit on the size of commercial trips which is unjust. · This type of proposed permitting system is historically only used on multi-day floats and would be onerous for complexity and cost to day-use river users. Other rivers that have used the proposed permitting process have resulted in a huge increase in applications and use pressure which is the opposite of the goal of the Work Group. Rec.gov is not the preferred choice for permits by the public. In Summary: There is no data to support a private boater permit system in Beartrap Canyon. The proposal was formed based on commercial interests without any reasonable evidence or consideration. It is unprecedented that such restrictive measures should be taken on private boaters at the benefit of outfitters. The Bear Trap discussion is creating a problem where none exists. Creating a staggered launch permit system is unnecessary and unheard of in managing federal public lands. If social crowding is truly an issue, other solutions like improving the launch area would be more effective without undue restrictions on boaters.

I am a whitewater kayaker and have enjoyed paddling on the Bear Trap for several years now. While paddling Bear Trap I have noticed that there are normally only more than six groups per day on the weekends. The Bear Trap has never felt crowded, and I have always enjoyed my experience. I have never used the official boat ramp for a launch, instead putting in at an access below the dam. Allotting an hour per launch feels like an excessive amount of time. And it's worth noting that Bear Trap gets significantly less boat traffic than any stretch of the

river, save the Quake Lake Class V stretch. The only other groups I see on a regular basis are commercial trips. A permit system to reduce congestion along this beautiful stretch of river is unnecessary.

Dear FWP Commission and Staff, Thank you for the opportunity to comment on the 2022 Madison River Workgroup recommendations. I oppose the workgroup's recommendations for permitting for non-commercial use on Bear Trap Canyon for the following reasons: 1. There is not a private user conflict on the Bear Trap Canyon: My family are frequent non-commercial users of the upper Madison River through Bear Trap Canyon and float this section between 2-8 times a year. I personally have not seen more than 2 groups at the launch at any time and have not witnessed a conflict between parties. Likewise, parking spaces have not been limited even when construction equipment was staged in the launch area parking lot during much of the summer of 2021. For context, the Cyr put-in on the Alberton Gorge likely receives 20 times the traffic, and even there, conflicts are a rarity. 2. I have only ever witnessed a need for local river permits for commercial raft companies, not local recreational users: During the 6 years of rafting Bear Trap Canyon on the Upper Maddison River I have never had an overcrowding issue due to non-commercial rafters. I believe the only potential cause of overuse and crowding of the Bear Trap Canyon on the Upper Maddison River would be due to commercial groups. An example of this is the Middle Fork of the Flathead River. I usually raft the middle fork of the flathead river multiple times a year and have done so for the past 6 years. There is always overcrowding at the launch, along the river, and at each major rapid. However, this is solely due to the commercial raft groups. At any given time, I have only seen 1-2 other recreational rafters at the launch but see 6-10 commercial rafts from each commercial raft company. 3. My family has personally invested roughly \$20,000 into rafting Montana rivers over the years: My family chose to return to Montana because the state allows for easy access to the outdoors. Over the years they have invested roughly \$20,000 into gear and safety equipment because rafting is an enjoyable hobby everyone can participate in and there is easy access to exciting local rivers. The whitewater of Bear Trap Canyon on the Upper Maddison River has been a major draw for us and has helped grow our interest in the hobby. Limiting access would cause the most damage to local families and friends who enjoy the resources Montana has to offer when the most use and damage stems from overuse by commercial raft companies. 4. A significant and negative impact of current use has not been documented: Prior to regulating, FWP should demonstrate that the current use of Bear Trap Canyon creates an unintended impact on the natural resources of the area. Measuring the number of permittees provides a data point that is irrelevant without determining that a negative and significant impact exists. 5. Permitting is not needed to regulate private use on Bear Trap Canyon: The difficulty of floating Bear Trap Canyon self-regulates non-commercial traffic. The same is not as true for commercial parties led by experienced guides where permitting is appropriate. 6. The workgroup does not have required non-commercial representation: Please review the membership of the working group to ensure the members meet the criteria for "three non-commercial river users, (and) two people with Madison Valley business interests that are not connected to commercial outfitting". If workgroup members or their immediate family derive household income through participation from commercial guiding or fishing, these members do not qualify to be considered non-commercial. If that is the case, the workgroup should be re-assembled to allow the appropriate number of non-commercial voices, and the pending recommendations should be invalidated. Not doing so makes it more likely that the recommendations will be successfully litigated by opposing parties. I believe in stewardship of our natural resources. I appreciate the role of FWP in preserving the Montana we all treasure, including wild game, and habitat. However, I also reject the premise that use is overuse, and that the current non-commercial floats on Bear Trap Canyon need regulatory intervention.

I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon 30+ times and have not experienced or heard about the crowding issues FWP is claiming. I value having access to this river. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.



<p>I oppose the non-commercial recommendation for Bear Trap Canyon. FWP's use estimates are skewed and provide insufficient evidence to support claims of crowding and congesting at launch points. The Madison River Work Group's recommendations are heavily influenced by undisclosed commercial interests, and propose an unduly heavy-handed approach to non-commercial management. Further, the resources necessary to implement, enforce, and monitor the proposed non-commercial permit system could be better used in other areas currently experiencing higher use and impact. I strongly encourage FWP and the MRWG to revisit the recommendations for Bear Trap Canyon. Imposing a limited float permit system on Bear Trap is both unnecessary and an unjust burden on public access to an otherwise self-regulating stretch of difficult whitewater.</p>
<p>As with the staff, no comment.</p>
<p>As a user of the Bear Trap canyon I oppose the establishment of a permit system on this stretch of river. I get out on this stretch half a dozen times in most years from spring to fall, in kayaks and rafts, and have seen no conflict between users. That's not to say that I don't see people out there. But the people I do see are able to respectfully share the river for the very limited time that groups are crossing paths with one another. This includes fisherman, kayakers, rafters, commercial, and non-commercial users. The imposition of a permit system on this stretch of river seems to me absolutely unnecessary and a blatant overreach by the powers that be. Please leave access to this stretch alone. The remoteness and the technicality of the whitewater in this stretch are enough to keep it from turning into what we see up- and downstream of the canyon, which is the absolute abuse of a river. And people on this stretch of river are generally well-versed in river etiquette (especially in comparison to other stretches of the Madison and other rivers). I believe that a much more thorough study of usage is necessary. I support the collection of river usage data. I completely oppose a system of permitting for the general public. I respectfully ask that you do not punish the users of the Bear Trap Canyon for the mis-management and abuse of the rest of the Madison River.</p>
<p>This would double commercial outfitters while hurting locals, i would much prefer access to continue as it currently stands.</p>
<p>Preserve freedom! Avoid rules that restrict freedom and place additional fees!</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Montana Fish Wildlife and Parks' commercial and private boating use estimates are insufficient evidence to support crowding claims and do not warrant such a heavy handed management approach. Additionally, the significant increases in warden staff required to successfully monitor and enforce the permit system are an unnecessary use of state funds. I have floated the Madison River's Bear Trap Canyon more than ten times and have never experienced or heard about the crowding issues FWP is claiming. At maximum, I have seen one or two other parties on this stretch of river - an extremely uncrowded stretch when compared to almost any other river I float in Montana. There is absolutely no reason to restrict access to Beartrap. Open public access on this river is incredibly important to provide a place for people to experience the wilderness, understand its value, feel the power of a great Montana river, and internalize the value of rivers and clean water. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon.</p>
<p>I support this recommendation. Requiring a permit will help to provide data on river use, reduce congestion and the put in, and formalize a log of users entering a section of river with significant rapids and consequences. At the very least, this should be a no-brainer just from a safety/rescue standpoint.</p>
<p>I agree with the workgroup's recommendations</p>
<p>The proposal is completely unnecessary and would restrict access to public lands. The difficulty of the rapids, length of float, and long shuttle all work together to organically limit the number of users per day.</p>
<p>This is so dumb Fix the tubing issue! Leave access to a whitewater feature in upper bear trap open for public use!</p>
<p>I agree with the recommendations of the Bear Trap Canyon float trips -- so perhaps the Madison DOES experience the overuse that some Florida rivers endure?</p>
<p>I agree</p>
<p>I've not heard of this place but permits are a good idea</p>

To relieve all your problems and the overuse....boats must be removed....walk in only. This will provide the trout with sanctuary areas...which will help to make a more healthy fishery.
I believe the proposal for bear trap canyon is unnecessary and too restrictive. Bear Trap is the least used section of the Madison River and has the strictest proposed permit system. The proposal claims there is congestion and social conflicts, but as a recreational boater myself and everybody I have talked to has never had a problem with either in Bear Trap canyon. This recommendation favors outfitters at the expense of private boaters. There is no evidence to support that commercial trips need 4 out of 21 launch windows every day. The launch window design also restricts boaters ability to coordinate timing the dam release/ water flows with floating through rapids which has massive effects on the float. There has been no data collected to support the claims in the proposal and no intention of gathering data other than implementing permits. It is not based on any prior BLM documents or plans. This proposal was not included on the 'Non-Commercial Final Recommendations, May 2022' requested details to be collected list. There should be more data collected before such a restrictive system is put in place, using this plan as a means of collecting data is hugely unjustified.
I support the final recommendations
I agree with these recommendations.
I support
Permit required.
I agree and support.
Supportive of efforts to manage this valuable and treasured natural resource
The Beartrap Canyon Float Permit Recommendations will not solve any issues present on this stretch of river. After hundreds (30+ trips a season for 6 years) of trips through this canyon in both kayaks and rafts, I have never ran into more than a few other parties in the canyon, and have never had these parties decrease the quality of the wilderness experience. I have also never experienced the claimed congestion at the put-in, where the most I have had to wait for access to the boat ramp was less than 2 minutes. The permit recommendation will only make it more difficult for private recreationalists to experience this wonderful stretch of river (the only good year-round whitewater in Southwest Montana) while increasing access for commercial outfitters. The only problem that potentially needs help is the congestion at the takeout during the summer months. The proposed permit system for the Beartrap Canyon would make extremely minimal difference in this area. Float permits for the Bear Trap canyon are both unnecessary and unwanted at this time. It is a bad solution to a problem that doesn't exist. There is no need to make changes to the systems in place for accessing the canyon. At this time, any changes to the access in the canyon will hurt the few user groups who regularly use and appreciate this special section of river. Although there may be benefits to commercial users on this stretch, this benefit for the few is at the expense of the many.

I kayak and raft the Bear Trap Canyon very regularly. I also guided commercially for Montana Whitewater on this section for a number of summers. I strongly oppose the proposals of this article. Again, this feels like an attempt to limit recreational access in favor of commercial access. It feels like a solution in search of a problem that will make recreational access less accessible by implementing unnecessary road blocks that could create undue tension between land management and user groups. I regularly paddle this section of river and have never felt like the amount of use hampered its wilderness experience. I am sure that the number of groups on a busy weekend day does exceed 6 throughout the day, but by the BLMs definition of group size (6 people x up to 16 people in group) I doubt that the use exceeds 96 people, even on a busy weekend day. I have used the raft access point very frequently and have never waited more than a few minutes for another group and have never felt like any interaction with another party was anything other than polite and helpful. Most people drop their raft off to the side if they need more time to rig it and move their car up to the other parking area. Most kayakers put in above the raft ramp at the established trail, as there is good whitewater upstream of the boat ramp. If the primary issue is boat ramp congestion then use restrictions should be limited to users of the boat ramp, not people putting in upstream, although I don't feel like this is necessary. The take out is an absolute junk show, but this is due to the popularity of the float and drink section next to the road where people are putting in, not the small amount of people taking out of the Bear Trap. I have, on occasion, had to float down to the next takeout due to congestion but I am happy to share the river with other users and don't mind the take outs being first come first serve, as this is again really only an issue on a busy weekend in the middle of the summer. I have floated other sections of the river below the classic tubing section, down by Greycliff. I have hardly seen any other users down there and feel attempts to limit access are totally unnecessary. Again, I have never felt like the Bear Trap canyon was too crowded, and as a frequent user I can't remember the number of times I encountered 6 groups there in a day, and I doubt the use ever exceeded 96 people throughout the whole day. This article feels like an attempt to prioritize commercial use over local recreation and prioritize certain user groups over others. I would be much more in favor of other solutions that worked towards practical fixes. I am happy to pay into a river use pool that funds maintenance/improves access points. I feel the money it would take to maintain the proposed regulatory system is much better spent maintaining or improving access points, funding education on stewardship of natural resources, or promoting clean/drain/dry initiatives to prevent the spread of invasive species, for a few examples. I am all in favor of taking steps to protect natural resources, this section is one of the few sections of local quality whitewater in the late summer season and it would be really unfortunate for the local community to see its access diminished in favor of commercial operations and unnecessary restrictions that don't fix relevant issues. I am not opposed to a sign-in triplicate system with a drop box at the put in to monitor use and see when, how, and how much people are utilizing the resource, even if this included a small fee that went towards maintaining access, leave no trace education, and clean/drain/dry initiatives. Requiring an in-depth permitting system with specific launch times is unnecessary and creates more problems than it solves, especially when no data has been gathered concerning the amount of use the river is seeing, how a permit system would effect this use, and what kind of impact this use has on the local ecology. This feels like an attempt to prioritize commercial use, and was written by people who are grumpy that they have to share a resource with other users.

The proposed "4 of 21 launch times blocked out for commercial river service providers" need to be assigned at random to allow private and commercial to have an equal chance of obtaining prime launch times

The volume of traffic in the bear trap has been minimal in my experience. Opportunities for social conflict are rare and certainly not worth the added user and administrative burden of permitting and scheduling every party. That process would concretely diminish the experience far more than rare or hypothetical social conflict. How will you manage those who hoard permits but don't use them?

Commercial use should be severely limited. Recreational use should not be a permit system. You are taking this resource away from the residents of MT by doing this!

**I OPPOSE RESTRICTING PUBLIC ACCESS TO BEAR TRAP CANYON**

These regulations are not needed. Further, there is no data given to support this recommendation. Finally, the user groups most affected (recreational whitewater floaters) have no representation in this working group.

<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP's data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn't provide any evidence to support its conclusions. There are less severe, and more effective, ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. Imposing a limited float permit system on the Madison's Bear Trap Canyon segment is unnecessary, and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.</p>
<p>As a whitewater recreationist who typically floats Beartrap Canyon 1-3 times per year, I have not experienced the congestion issues described in the Beartrap Canyon section of the Madison. I oppose limiting public access until more recent and accurate use data is collected. I have experienced over-use of the river in sections above and below Beartrap Canyon, and support limitations on both private and commercial use in these sections to protect the integrity of the river. Please reconsider the current proposed permit system until a more detailed analysis of Beartrap Canyon use is performed.</p>
<p>Do not support</p>
<p>I oppose the Madison river work group non commercial bear trap canyon float permit recommendations</p>
<p>I am against this proposal.</p>
<p>I oppose the madison river work groups non commercial bear trap canyon float permit recommendations</p>
<p>The Bear Trap has been. Public float. It is challenging, and only serious boaters are the regular users. There is no overcrowding, and the section has enforced its own set of unspoken rules which physically can not be violated. Please keep the Near Trap public w no restrictions or regulation.</p>
<p>No permits! Please it increases cost</p>
<p>I do not agree with this. I have never experienced aggressive behavior. Private boaters boating this section are generally willing to help and speed up other boaters to keep things moving.</p>
<p>This is a classic example of over regulation. Do not take the resource away from the majority of the general population.</p>
<p>As a born and raised Montanan, I vehemently oppose this proposition.</p>
<p>Trying to disguise this as a data collection tool is disingenuous and we all know once this is in place it's not going away regardless of the data collected. I have run Bear Trap nearly 50 times as both a private boater and commercial guide (non-fishing) and have never had problems with other parties, only on an occasional peak summer weekend would I have to wait my turn to launch, most of the time I see no more than one other group. This permit is not needed and is not supported by the vast majority of locals.</p>
<p>There is no data to support the proposal to permit Bear Trap Canyon and it should be completely rejected. These recommendations have been generated in a process that is contrary to MEPA. As a whitewater kayaker, I regularly float Bear Trap and have never seen more than a few groups out there. I have never seen more than 6 parties per day and with the shuttle, Bear Trap is an all day affair, so you are seeing all the traffic at one point or another, either on river or in the parking lot. There is no evidence to support limiting private boaters as there is no conflict that has been reported on this stretch of river. There are various launch sites for small crafts so the boat ramp is virtually never used and has never been a site for altercations. The recommendations developed by the work group that supposedly represent a variety of interests are favoring commercial use on the Bear Trap. The work group has conflicts of interest which was acknowledged in the April 28, 2022 meeting (1:17:24) and has not been notified to the public. The proposed regulations would double commercial use while limiting private use of Bear Trap canyon. The regulations also don't limit the number of people in a commercial party while limiting the number of people in a private party to 16. If this were truly about the environmental impact on the Madison river, then use limitations would be introduced on the upper and lower sections of the river, which are packed with people tubing and floating during the summer. The recommendations for float permits in Bear Trap</p>

Canyon should be rejected completely. This proposal does nothing more than limit public access to a public river while increasing commercial access and lining the pockets of the few whose companies would profit.

As a concerned citizen, I am letting your department know that I am OPPOSED to the plan to permit and therefore restrict the use of the Beartrap section of the Madison River. Please do not do this, as it would make it more difficult for whitewater enthusiasts to boat their favorite stretch of Whitewater. Thanks, Joe

With all due respect to the FWP and the BLM, this proposal is extremely unwarranted and unwanted. As a lifelong Montana resident who has boated the beartrap canyon for the last twenty years I have never considered the canyon overcrowded. Most days in the beartrap I don't even see other boaters but on the occasional summer day where there are more than six boats on the river it in no way diminishes the float in any way. I sincerely hope this proposal is scrapped and no changes are made to this area in regards to private or commercial boaters. Thanks for your time.

This is unnecessary and unneeded. This is egregiously restrictive to private users and it is designed to benefit commercial users. There is no evidence that commercial groups need four launch times per day. The proposal also recommends restricting private trip groups to a maximum of 16 people, with no limit on the size of commercial trips, which is unjust. The proposal was formed based on commercial interests without any reasonable evidence or consideration. These recommendations will create a huge impact on private boaters without any representation from private boaters. A staggered private launch permit system is unnecessary for this river; additionally staggered launches are unprecedented on any other rivers. If there are overcrowding and social issues, as the commercially biased work group contends, then improving the launch area would be more beneficial than the proposed permitting system.

Having floated this section for years (first float was in 1997) I've only seen congestion at the put in one time. I've never seen social conflict between floaters on this stretch. Short story is that this is unnecessary government overreach to solve a non-existent problem. The statement is made that the permit will be used to understand use while at the start of the proposal an unequivocal statement is made that there are regularly more than 6 trips made a day. I'd be surprised if there are often more than 6 boats a day other than a few weekends a year. Most people sign in - how about using the sign in data to compile your list. Make sign in mandatory if need be like is used for block management use.... Limiting put in times severely limits use by anyone out of the immediate local and also limits the ability to avoid or hit a pulse when the dam is being actively managed potentially putting people at risk if they are forced to launch in a defined window. Overall this doesn't feel well thought out. Sincerely.

I STRONGLY oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. Implementing a non-commercial floater permit system will limit public access to this stretch of river and prioritize commercial interests over Montanans. In 2020, FWP's data indicates only two commercial float trips were taken down the Bear Trap Canyon, yet the proposed permit system allocates four launches per day to commercial users. The recommendation doesn't provide any evidence to support its conclusions. There are less severe and more effective ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. I have floated Bear Trap 1-2 times a year for the past decade and have NEVER experienced any "social conflict" or felt overcrowded. In fact, 90% of the time my group are the only folks at the put in. It is very rare we encounter other people, and if we do the encounter is very amicable. I find it very hard to believe any sort of "social conflict" is actually happening. This stretch of river is remote, time-consuming to drive to, and requires skill to navigate the challenging rapids. All things that keep the crowds that you see on the upper and lower sections away. This section SHOULD NOT be treated the same as the upper and lower sections. Please don't keep me (a native MT whitewater enthusiast) from experiencing this beautiful stretch of river because of an unfounded conclusion based on poor data and opinions. Imposing a limited float permit system on the Madison River's Bear Trap Canyon segment is unnecessary and would represent an unjust burden on public access to one of the most unique river stretches in the state. I strongly encourage FWP and the Work Group to instead advocate for a new study to qualify and quantify any harm before jumping to rash conclusions and limiting public float access to Bear Trap Canyon. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals.

Public river access is a vital component of recreating in the state of Montana. By restricting this, we are restricting the right to responsibly recreate and the ability to teach others how to do the same. Though Warm Springs to Greycliff is a high density zone, most of the river users in Bear Trap Canyon are experienced floaters with high regard for how to manage congestion and other potential hazards on the river. Requiring permits to launch, and capping the daily permits available, would severely limit access to this iconic water and would discourage self-regulation for responsible river users.
I am against a permit system for the Beartrap section of the Madison River for private boaters.
Why don't you get the data, then propose a policy? Seems like you're proposing to do it backwards. Also, I question the 4 slots dedicated to commercial activity. If your gonna give them 4 slots a day (that they don't seem to currently use) Ya oughta make em build a new ramp and a couple shitters for the public's sacrifice to their private profit.
I do not agree that permits should be required to float bear trap canyon
It seems unnecessary to permit this stretch, and inappropriate to increase commercial access. Let's save permitting for places that need it due to crowding and demand.
By voting for this you limit my rights to access wilderness. Do the right. Vote no
I STRONGLY oppose the non-commercial Bear Trap Canyon Float Permit recommendations to the BLM. I float Bear Trap Canyon 2-3 times per year, and I've done so for about the past 10 years. Not one of those times did it ever feel crowded or congested at the launch. Not one of those times did I ever experience any sort of "social conflict," even when multiple parties arrived at the ramp simultaneously. Why is that? Well, for one, it's never crowded on Bear Trap Canyon and also because -- *shockingly* -- its still possible to show common courtesy to fellow boaters on a boat ramp without the need to impose such an unnecessary permitting system. This is a unique stretch of whitewater in Montana. It is unique both because of its difficulty and because of the feeling of solitude you get in a region that is otherwise crowded with tourists. The difficulty of the whitewater leads to the solitude. You do not get the same sort of crowds in Bear Trap Canyon that are present, for instance, on the Gallatin. Not even close. Although there may be legitimate reasons to impose certain restrictions on the upper and lower Madison, that same rationale does not hold true in Bear Trap. I have been down this stretch of river on two separate 4th of July's in recent years, and in both those instances there was still hardly anybody on this stretch of river. So on a day when there should be peak crowds on a river, it was still not busy and still not in need of such unnecessary permitting. Every time I have floated Bear Trap, I was able to launch my boat without any alleged "social conflict" occurring and I was also able to comfortably park my truck and trailer in the available parking. Do not implement this permit system. This recommendation smacks of an agency trying to create a solution in search of a problem. There is no problem! Indeed, the Madison River Working Group's own recommendation even implies it is still searching for that problem -- it proposes to implement permit requirements and restrictions while it goes about gathering better data on floating recreation. This is backward reasoning. Instead, complete your necessary due diligence now so you can prove to the public there is an actual problem that needs to be fixed before imposing such unnecessary recreational restrictions. Let's suppose, for example, that after completing your two year study, that BLM and/or FWP found that the area was not being overly burdened by floaters. What do you suppose would happen then? Would FWP/BLM come back and decide to get rid of the permitting system altogether? That seems highly unlikely. It is much harder to remove a governmental restriction than it is to initially impose that same restriction. I therefore urge you to complete your study now. Find out whether there is in fact a problem. Then, and only then, should you be making recommendations for a permitting system which places limits on the number of people allowed to launch per day. Failing to complete that study before taking agency action to limit recreational opportunities on this river would be nothing short of arbitrary and capricious. Simply put, there is not a substantial amount of user pressure on this stretch of river, and certainly not to the extent that would necessitate a permitting system. If there is such a need for this agency action, then FWP has the burden to prove it. I therefore strongly urge FWP to not adopt such unnecessary recommendations put forth by the Madison River Work Group.
Keep Beartrap open to the public!!

<p>As a regular floater on the Bear Trap Section of the Madison River, I am concerned by and opposed to the recommended non-commercial permit system for paddling the river. This will be a significant blow to the local paddling community as this is the only high-quality paddling during the non-high-water season. I suspect (but do not have data to support) the Madison River Work Group's assessment that greater than 6-groups float the river on the weekends is correct. Anecdotally, I am less sure about weekdays. I have crossed paths with other groups and always enjoyed my wilderness experience, but this is subjective. The put-in - The Working Group is correct; the boat ramp, such as it is, would be congested if two groups tried to put in simultaneously. I imagine the trailer backing and launching would quickly become challenging with more than two groups because of the single-lane road up and downstream of the ramp. However, kayakers and canoers rarely use this access point because there is great whitewater upstream of the raft ramp with established access or trails to the river. One solution would be to have a reservation system for the boat ramp others feel like this is a problem. I have never had any issues here when I have been with rafters or rowed a raft through. Finally, an hour seems like an absurd amount of time to block the ramp for rigging. Put-in continued - Having a put-in time assigned by the permit due to boat ramp congestion while having no intention of using the problematic access point solves a non-problem. Parking at the Warm Springs takeout is certainly a challenge, especially in the heat of the summer. However, this is a shared access point and is put in for a wildly busy tubing/ SUP/ fishing section of the Madison River. The section downstream is more heavily used by far. I don't know that there is a solution that does not come through as "us vs. them" for parking at Warm Springs other than first come, first serve. I have never been an issue because I start earlier than innertubers. I feel for the BLM officers trying to manage this access point on a busy weekend. I am strongly opposed to a non-commercial day-use permit on the Bear Trap. And I am strongly opposed to assigning put-in times for groups with no intention of using the potentially problematic boat ramp. In its entirety, these recommendations are a heavy-handed non-solution to a non-problem that has the feeling of prioritizing commercial use over private use.</p>
<p>I do not agree with this regulation. I love to bear trap and take good care of it when I float down it. Regulation for this river is not chill</p>
<p>Reducing private boater access goes against the ideals practices of both the people who have been boating/recreating on the Madison for years, as well as against the ideals of Montanas public lands. Montanans don't need more commercial outfitters restricting PUBLIC access for everyone. We need to keep Bear Trap access as it currently is, a permit systems would be tragic for Montanan's.</p>
<p>No. Just No.</p>
<p>A permit system is an unnecessary and unjust burden on public access. I oppose this recommendation.</p>
<p>Accept recommendation as stated to avoid crowding.</p>
<p>Don't restrict public access through a permit system. If you need to collect data there are other ways to do that other than a permit system.</p>
<p>I oppose the Madison River Work Group's non-commercial Bear Trap Canyon Float Permit recommendation. I support the permit system for non-commercial watercraft on the warm springs to Jefferson confluence section of the Madison; a section of river that is clearly getting overwhelmed by use. The bear trap is far from this situation, however, and the management plan should match the need. Implementing a non-commercial floater permit system will limit public access to this stretch of river for no demonstrated need or benefit to the ecosystem or resource. There are less severe, and more effective, ways to gather meaningful data to support a significant river use management decision, such as conducting a new survey to update the last Bear Trap use survey from the 1990s. I would happily participate in this study, or even volunteer to help with the study itself. I have floated Bear Trap many times in the five years I have lived in Bozeman, and have rarely seen other users. I certainly do not think there is currently "social conflict" on the Bear Trap Canyon river segment currently. Please remove the Bear Trap Canyon float permit recommendation from the final Madison River proposals. Thank you for your consideration,</p>
<p>There is no data supporting the need for permits. Public lands should not have restrictions on the public to use them.</p>

<p>I 100% oppose this bill! You are creating a law before something you is even a problem! This is the most beautiful stretch of water in the state and you will only be restricting those capable enough to run a trip through it. People running that section of water are not idiot tourists, they are competent boaters who will pull over to pick up trash or communicate with one another when an area requires passing. Please do not create a sign up sheet, this has ruined camp grounds, ski hills and other types of recreation in the state! Boaters respect nature, they dont ruin it!!!</p>
<p>Keep public access to public land free! Lower commercial trips.</p>
<p>The proposal to require permitting on the Bear Trap Canyon section makes no sense. There is no issue at this time of resource overuse. It is a solution looking for a problem, but the problem doesn't actually exist. In addition to being unnecessary, it puts an undo burden on private boaters and sets a terrible precedent on restricting access to a public resource.</p>
<p>As a weekly paddler of bear trap canyon, I and many others feel this is a completely unnecessary overreach and over regulation. There is no issue needing resolved to justify the implementation of a permit system. If revenue generation for conservation is the intention of permits, a required permit without designated launch slots would likely satisfy most parties while maintaining access both public and private. Please keep access open.</p>
<p>While there are more people using the resource, there has never been any social conflict in my experience of rafting and kayaking throughout my life when two parties show up at the same time. It is extremely easy to work this out amongst the groups instead of relying on a governmental intervention to solve an issue that doesn't really exist. FWP's time and resources would be better allocated towards data collection and upper Madison management plans instead.</p>
<p>I do not support the need for a permit, only because outfitters are complaining. The river is for all use and non-commercial needs to come before commercial (paid) use.</p>
<p>Non-commercial hardshell kayaks and canoes should be exempt from the permit requirements for Bear Trap Canyon. Kayaks are carried by hand to the put-in and the take-out and do not need to use the boat ramps. Consequently, kayaks do not contribute to congestion or social conflict. There is no need to regulate them in the same way as rafts and driftboats.</p>
<p>see earlier comments</p>
<p>Rare Gem that ISN'T overcrowded and actually provides something nice for locals to enjoy. Why ruin this!? To give outfitters money?</p>
<p>No permits</p>
<p>My entire life has been on the banks of Montana rivers. I grew up fly fishing Montana streams and have since become a fly fishing guide and avid whitewater kayaker. My entire winter is spent paddling Beartrap canyon. Overuse is absolutely not a problem. I am the kind of person who prefers to be alone or in small groups when exploring and I have never once felt that there were too many people in this beautiful canyon. Don't forget that the instant you start restricting access to places you make people love those places less. The only reason that Montana had the public land that it does is because Montanans are allowed to love those places without restriction. I really hope that you make the right choice and don't start making public lands less public.</p>
<p>Please do not install a non commercial permit system for the Madison river along any section. Montana is a haven of public land access for the people and blocking river access goes against every value that Montana's hold dear. I am worried for the precedent this permit system would set for other river and public land access. We need more access for more people, not less.</p>
<p>My prior comment was in regards to this. I'm not going to wiggle it around. Y'all know what to do</p>
<p>This is very clearly only taking the commercial beneficiary interest into consideration by limiting public use of a river while expanding upon commercial use of the Madison. Public rivers should remain for public use, stop turning Montana into California</p>
<p>There is no need for a permit system for private citizens to float the Bear Trap Canyon. The crowding problems are with the float fishing users on the stretches above and below the Bear Trap.plesde do not implement a permit that is not needed at this time.</p>



<p>The proposed beartrap permit system would benefit the few and negatively impact the many. There are thousands of wilderness opportunity experiences across Montana in which catching site of other human activity is unlikely. Ive been a bozeman local for 5 years now and beartrap has been a place of frequent recreating site for myself and many others. It has NEVER been crowded. On its busiest days, ill see 2 other parties of humans. I moved from a place with river system permits in place and it made it difficult for the locals to have access around work schedules and made it easy for vacationers to go through commercial outfitters. Really not cool, there is already a Dam on this river, there is no need to cutoff access.</p>
<p>I am strongly AGAINST implementing a permit system on the Beartrap Canyon portion of the river that doesn't deal with crowding over overuse. I've been kayaking and rafting this stretch for 30 years and have never, not once, experienced any crowding or user conflicts. On the contrary, the river runners I've encountered have been super respectful with an understanding that we'll all keep an eye out for one another. With the CFS pulsing that seems to regularly occur, rapids like the Double Drop, Green Wave, and - in particular - the Kitchen Sink benefit from having multiple parties watching out for one another. FWP needs to focus it's energy &amp; resources to deal w/ the MAYHEM on the upper Mad (below Raynolds Pass bridge, above Ennis) and on the Lower Mad (California City put in to Blacks Ford).</p>
<p>Do not permit the trap, gatekeeping our best whitewater access near to bozeman. This is a local gem. Many people enjoy recreating here on the nice weather weekends! A permit system would cut off our capability to float when the weather and FLOWS are ideal.</p>
<p>The section that should be seeing more restrictions is the upper section of the Madison, not Bear Trap. It sees far more commercial trips and overfishing. Bear trap is used both by fishermen and whitewater enthusiasts alike. From July to September, this is some of the only accessible whitewater around Bozeman. Restricting this access does not help the trout in the river nor does it help boaters to enjoy the river. Montana has nationally renowned stream access laws and it would be a shame to see commercial boaters getting more opportunities on these rivers than locals.</p>
<p>The bear trap canyon stretch is hit or miss on flows after runoff. Waking up and checking the flows is often your best bet. Permits would turn that into a gamble. This is not a crowded stretch of river by any means. A long shuttle keeps people away. It would be a shame to loose this beautiful, exciting, quiet piece of our backyard</p>
<p>These recommendations are restrictive. Especially to locals who get on the river after work. Lots of times when we get off early we last minute get on the water. This would restrict the amount of times we could paddle. I also fail to see how this will help. With long drives between put in and take out, I'm sure people will be early or late and still have to deal with congestion. Please do not implement!</p>
<p>It's a dream to paddle on this river one day. Please keep it open for everyone!</p>
<p>Regulating bear trap by instating permits will ruin this portion of river for native montanan floaters. The summary states this is a move to uphold the LoAC dictated by the BLM of 6 parties per day. But in the proposal it states it will let 21 parties of 16 people per day? This is especially frustrating because Bear Trap seems to be one of the least floated stretches in the bozeman area. Sure when a stretch gets loved to death and the environment is suffering permitting is useful but bear trap certainly doesn't meet this criteria. The other argument for "congestion and social conflict" is also irrelevant. Should we start requiring permits and time windows for public streets because they get congested and people get in road rage fits? Implementing these permits also removes the ability to choose when you want to float, which is a key issue for bear trap canyon especially. The flow is dependent on water release from dam operators, and choosing when to float based on when the water is released is a key factor to floating the sink. From fishing the canyon, I have not ever seen anyone get into an argument and the most congestion I've seen is 2 boats maximum. Montana needs to keep public waterways public, and allow rafters to float the river freely. Thank you.</p>
<p>Please do not enforce a permit system in Beartrap Canyon. This will only limit the publics ability to enjoy our beloved outdoors spaces and benefit the commercial fishing industry. We can not keep bidding away Montana's treasures the the highest bidders. By enforcing a permit system you are leading by example and other industries will continue to think it is better to make decisions based on monetary gains over the publics ability to continue to enjoy the treasures Montana has to offer. Please do not contribute to this sad reality we currently face.</p>
<p>This section can not be permitted. This would throw the beauty of Beartrap canyon out the window. As a year round user of this section, it has no issues as is. Keep this section the way it is, keep Montana free.</p>

No permits for public lamsb
I do not support permits for private partiers conducting day-trips.
Keep it free and unrestricted.
The Bozeman river community does not want Bear Trap to be permitted. It should be open and accessible to private parties/users to eliminate the possible restriction to public access. Permitting this section would indicate discrimination against a community that has used and cared for this community the most. Kayaking and rafting should not have a price tag or permit, especially if it is a 3 hour float DAY trip.
I do not support the permit system for private boat access. Launching in the Bear Trap is tricky, but this kind of regulation will favor outfitters in long term
No no no!
I'm not in favor permitting the Beartrap section of the Madison. I'm primarily an angler, but am an aspiring whitewater enthusiast and find day runs necessary for my enjoyment of the sport and resources. I cannot often find time for multiday permitted trips and rely on day trips to participate in the sport. Please do not make this run effectively unattainable for me.
I am deeply disturbed and am STRONGLY against the proposal to implement a permit system on the bear trap canyon section of the Madison river. This section does not see enough traffic to warrant the proposed permit system, and will greatly impact access the local whitewater community's access to this amazing resource. Permits and regulations are a good thing for preserving the resources of high use multiday wilderness runs, or sections of rivers that see high fishing traffic but bear trap canyon is neither of these. The precedent that a permit system on bear trap canyon sets for increased regulation and limits to access to public waterways makes me livid. If a permit system is established here the same thing could happen on the Gallatin, the Flathead, Alberton Gorge, or the Stillwater rivers, and while I no longer live in Montana or boat these rivers regularly my heart breaks for the local paddlers who will no longer have the freedom and flexibility to access these resources when they wish. If the state of Montana is going to start requiring permits for day runs on its rivers I will be visiting other states and spending my tourist dollars elsewhere on my river vacations, and I am certain that many others share this mindset. Please do not allow this permit system to pass.
Please keep this public river open to private boats and do not limit our access. We historically are the best stewards of the river corridor, not commercial outfitters.
Keep it fully public accessible!
In my experience as a rafter and fishermen there is no need for monitoring of the Bear Trap Canyon for floating as the high risk rapids in the Bear Trap keeps away novice fishermen and rafters preventing crowding. I have never seen more than 6 boats in the canyon at a time. The Bear Trap is the one place seasoned rafters can go to escape the madness that we have seen on the Madison and Yellowstone as Bozeman grows. As someone who appreciates the Bear Trap as a place to escape the conveyor belt that the Madison and the Yellowstone have become, you are taking away a place where locals go to escape the constant onslaught of outfitters on other rivers in the area. In regards to the congestion that you speak of the experienced local rafters that are floating the Canyon know the proper River Etiquette to use at a boat ramp/slide. These are not tourists on the Madison in their floatie tubes. These are experienced rafters who have launched their boats numerous times and know to be quick and efficient on boat ramps/slides and be considerate of other rafters looking to launch their boats. These are also rafters who once on the water know to keep distance between groups out of respect for the other rafters experience and safety. Another factor to take into consideration is the reason why rafters come early to the Canyon, the float is long. It takes on average 8 hours to finish the canyon. A lot of rafters will be pushed out due to time constraints etc. that are unnecessary due to the limited amount of experienced rafters in the area that are able to float the canyon. These permits would limit local rafters and fisherman's public land access which is why many of us have moved to Montana. We beg you to not take away one of the only places left in the area where you can enjoy the outdoors without paperwork, permits and constraints.
KEEP BEAR TRAP OPEN
Keep beartrap OPEN

<p>As a manager of one of the two commercial permits on the Beartrap, I disagree with this regulation personally. If anything, restrict permits on the weekend and communicate with two outfitters weekly to determine if usage of these launch times reserved for them will be used or not. Beartrap is a sacred place for the local boating community with great flow and secluded. Seeing other people or putting on with others should not ignite a permit discussion.</p>
<p>There is absolutely no reason to Permit Bear Trap, leave it the fuck alone</p>
<p>Specific launch times and permits promote unsafe use of the river, by forcing people to go when they are unprepared, and if conditions are not ideal. By specifying permits it's going to limit people's ability to safely learn and recreate on the river.</p>
<p>Absolutely not, no permits</p>
<p>I kayak Beartrap consistently year-round. I have never once that that it was congested and I am troubled by this proposal. You are proposing to limiting public access to certain time slots and allowing commercial access to 4/21 of the launch time windows. These time slots will inevitably (conveniently) be lobbied to prime time-frames. Stop trying to push the public out of public lands for companies to make money. Stop trying to restrict public access to public lands altogether.</p>
<p>This proposal appears to be a solution looking for a problem. I frequently recreate in Bear Trap and do not feel there is a need for boaters to be required to obtain a permit for purposes of spreading out launches. To me, it appears that there is minimal crowding and no social conflict arising from river users. If data is required to better understand this issue, then conduct a study to collect that data. But don't use a restrictive river permit system to make data collection more streamlined. Thank you.</p>
<p>Don't restrict public access to public lands.</p>
<p>This section of the Madison is self-regulating and sees a dramatically lower number of users than other sections due to the fact that the rapids are big enough to keep most fisherman and novices away, and it is secluded and requires a long shuttle time. This is a ludicrous recommendation. I will address each recommended point below:  1. The Recommendation states that the limited launch area can also result in congestion and social conflict when multiple float parties arrive simultaneously. I find this to be untrue. Unlike float boaters or fishermen, whitewater boaters tend to be more social and less prone to conflict. We are a social group and tend to look out for the safety and well-being of others, especially those not even in our own party. The road to the put-in contains many locations for launches and adequate parking even on "busy" days for bear trap. 2. Since neither FWP or BLM has established any benchmark data (the work group recommendations state that the Permit is recommended to gather use so it is assumed no data exists), a restrictive paid permit is a ridiculous first step. 3. If permitting is desired for further study, I'd advocate for a self-service Kiosk at the Powerhouse launch site and ask that boaters sign in with the number of people/boats in their party which will allow FWP and BLM to track user data. There should be absolutely no restrictions of group size or launch time, however. The water is frequently pulsed in the morning during summer and limiting what time of day groups can access would be extremely unfortunate. 4. While the Beartrap Canyon whitewater flows through BLM wilderness, the put-in (Powerhouse) is not on land managed by the BLM. Other than scouting the Kitchen Sink rapid and occasionally the White Horses rapid, VERY FEW whitewater floaters even step foot on BLM land until they reach the Warm Springs take-out. If a given number of people launch in a day, why is there no concern with whitewater boaters at the take-out? It's because there isn't social conflict from the whitewater boaters.</p>
<p>I am a regular floater in Bear Trap Canyon and a full time resident in Ennis. I have never experienced congestion on this stretch of river, especially in comparison to the upper stretches of the Madison with commercial trips and the lower stretch with tubers. This stretch is still managed well with communication between boating parties, and often the people that I run into are kind and respectful and we end up cheering for one another in the kitchen sink. I understand the need to plan for the future congestion of this magical stretch of river. But as a resident of Ennis, you are taking away from the magic of living in this valley by making us pre plan every float by permit times. I have never seen the volume of floaters that this proposal even speaks of, one party to launch every hour is a huge amount of volume. Why add all of this planning and monitoring when it is not necessary right now? I think more work needs to be done in surveying user times and where people are coming from to float. Perhaps we begin permitting on weekends only. I truly think that more research is needed. I have never</p>

<p>seen anyone at the launch conducting surveys. Please assign someone to get real numbers before putting a permit system on this stretch of river.</p>
<p>Implementing a permit system would be greatly flawed to public land owners. I strongly oppose a permit system for Bear Trap.</p>
<p>This proposal seems unnecessary for this Wild &amp; Scenic stretch of the Madison. I've been recreating here for the past 7 years and have never ran into any over crowding or conflicts with other groups. My favorite part about having the Bear Trap canyon close to town is to be able to have a quick getaway into the wilderness and really feel like you're out there. It's a beautiful resource to have so close to town, I'm not sure why you would want to add more restrictions to this river. It really makes no sense at all because the river self regulates itself with the difficulty and remoteness. Seems like a giant waste of time to implement this permit system. I do agree with permitting over used stretches of rivers to ease congestion and conflicts at put ins/take outs. I am a commercial river guide in Idaho and I believe the permitting works great on the Middle Fork and Main Salmon. I also guide on the Lochsa, which receives far more use than the Beartrap. Even on Memorial Day weekend, I've never had a conflict with other groups on commercial trips or when I'm private boating. Montana needs to attempt to mimic Idahos management of rivers and not come up with ridiculous proposals like this one. It would be great to implement a permit system for the fisherman on the upper and lower madison, but the bear trap can continue to regulate itself.</p>
<p>To whom it may concern, I have been running the bear trap canyon of the Madison since I was 13 years old. (20 years now) it was one of the staple whitewater/scenic sections of river for a young kid growing up in Southwest MT. Given it's friendly nature and dam controlled water levels it is one of the only whitewater sections that can be run nearly year round. It is a massive asset and gem to the river community of SW Montana. Please do not change the public access to run this river as it is probably due to the popularity of fishing and guiding on the Madison. If anything permit and charge all outfitters to guide this section and be strict on it. Leave it open to the public to be able to float and enjoy one of the very few whitewater / wilderness sections in the state. Thank you for your consideration. -Evan Garcia</p>
<p>Hello, I would like to voice my strong opposition to the requirement of a permit to float the Madison River, specifically through Beartrap Canyon. This is an amazing whitewater resource that will be severely compromised for all by the proposed permit requirement. The canyon is long enough of a day on difficult enough whitewater to be sufficiently self-regulating. I have ran the Beartrap dozens of times and never have I seen more than 8 boats. That is including rafts, kayaks, or anything else. The introduction of a permit for this stretch will all but ruin the best late-season whitewater run in Southwest Montana. I speak for the entire Montana whitewater community when I plead with you: please do not turn the Beartrap into a permitted stretch. Signed, Jack McNeil</p>
<p>I would like to see commercial use remain at the same low levels they currently are for bear trap canyon. And allow private parties to continue to access the canyon without a reservation system. The current regulations in place are sufficient to preserve the wilderness experience.</p>
<p>This permit would completely ruin the bear trap experience. I grew up rafting Bear Trap and have made the best memories there mostly due its uniqueness. This permit would destroy the specialness of the Bear Trap.</p>
<p>Please do not do this. The local boaters enjoy this river stretch so much, and it is not overcrowded at all. All great people floating that care about each other and the river.</p>

I am writing in opposition of the recommendations submitted in this proposal. There is no actual data shown in this recommendation to support regulation. They are trying to push through an unneeded restriction in an effort to use that as the data to support itself after two years. This is backwards to the intent of the working group and should not be considered. Bear trap was not a part of the working groups purview and therefore should not be a part of the recommendations submitted. In addition there are blatant giveaways to commercial guiding companies which in effect limit the public access even more than it should. 4 launches per day are more than what currently meets demand and is in effect limiting the ability of the public to use the resource even more. Year round permitting was not studied and there is absolutely no justification to this limitation. There are much more in-demand rivers that do not have year round regulation on it and there is no data to support this recommendation. Boater groups were not considered in this recommendation, fishing, rafting, and kayaking are significantly different user groups who interact with this stretch of water in vastly different ways from the time on water, to the size of a group, to the way in which they start a trip. Many kayakers do not even use the boat launch and are not part of any congestion at the boat launch. They launch upstream and move much faster than the rafting groups. As someone who has spent over 10 years rafting, kayaking, and fishing in bear trap this recommendation flies in the face of my experience and puts an unneeded burden of limited access to public lands. Again I am writing in opposition of these recommendations and would ask that any future recommendations collect actual user data, document impacts currently happening, and find solutions for actual problems instead of just adding unneeded regulations that take away public access to a stretch of river that is only usable as a day float.

This section does not need to be permitted!! It is a serious stretch of white water which keeps the crowds away anyways. I have floated this canyon multiple times and have never had any kind of issues with overcrowding or negative behavior from other boaters. It is an amazing stretch of river that people deserve to have access to. Why add more access for commercial outfitters to take inexperienced people down while making it harder for local river enthusiasts? You are effectively just letting tourists experience the river and not local people who will actually take care of it. Limit fishing if that's the concern, but don't take something so special away from the locals who love to float the bear trap. Please don't do this. This section of the river brings so much joy to so many people.

No restrictive permit system on the Madison, and no guide Priority

Please do not permit the beartrap canyon. This is not a heavily trafficked section of river. Even on nice days on the weekends I generally see zero to up to only two other groups. Permiting would greatly restrict the amount of days I would be able to enjoy this section of river.

no permits are needed in bear trap canyon its a class 4 run that isn't very crowded

Sorry, but I'm not seeing the need to establish this permit system. Would be interested to know who/what is really behind this recommendation. Guessing it's commercial operators who like to believe they have a greater claim to public resources such as Bear Trap Canyon. There is potential for congestion and social conflict at boat launches across the western US. Why is Bear Trap being singled out? In the neighborhood of 6 launches a day is a problem? Not buying it. Perhaps well intended or self serving by someone but guessing the BLM has better things to do than babysit 6 launches a day. The more restrictions on public access, the less money and time I spend in Montana.

I am not in support of permitting private trips on Beartrap. I live in Bozeman and frequently kayak bear trap. This section is NEVER busy. I hardly ever see more than 1-2 other parties on the river. The whitewater nature of the section and the long shuttle keep most boaters off of beartrap.

Restrictive permitting of Beartrap Canyon is unnecessary as this is rarely overused and there is no significant data to support restriction of private citizen use of this wilderness area

I was born and raised in Montana. After completing medical school and training out of state, I moved back to Montana with plans to stay for life. I've been blessed with experiencing a lot of the outdoor recreation Montana has to offer. That's what truly makes this state a wonderful place to live. Creating a permit system for the Beartrap Canyon section of the Madison goes against this spirit of Montana. Our access to the outdoors is what makes this a special place. As a physician I have a very busy work schedule and often do not know when I will be working and when I will have time off. Having a permitted system would make trips down the Beartrap Canyon immensely difficult for people like me to plan. I may only have a few days to plan a rafting trip and if that relies on obtaining a permit last minute, I will likely never be able to experience this beautiful stretch of river again.

Many other Montanas are in a very similar position as I am. We cannot simply plan these trips weeks or months in advance as some of us work a fairly chaotic schedule. I ask that you please decline the implementation of a permit system for the Beartrap Canyon. Thank you. Shea

I totally agree with the recommendations

First, Mont. Admin. R. 12.11.405 requires less restrictive intervention be used first when considering regulations/permitting on the use of rivers, and implementing a limited or restricted use permit on Bear Trap is not less restrictive. Before any restrictive private user permitting is considered for Bear Trap, a daily (unlimited) permit system should be considered to develop use data and understand the use profiles. A couple of outfitters claiming "social conflict" at the put in (only two companies have commercial SRP permits for Bear Trap) does NOT warrant implementing a restrictive private boater permit system. The Bear Trap proposal is incredibly complicated and onerous for a river that has limited use and the only reported complaints are from outfitters. Second, there was no public notice of Bear Trap's inclusion in this planning process. The 2019-2020 user survey and subsequent draft EA explicitly excluded Bear Trap. It's unclear to me how Bear Trap even got ushered into the working group's purview, but it looks like an attempt to bypass MT public notice rules and add scope after the survey and EA were complete which served to hide the inclusion of Bear Trap from the public. These regulations increase commercial access while reducing private access under the guise of "gathering data". Commercial user data included in Work Group documents shows ONE commercial float trip in two years in Bear Trap. How does this warrant an entire permit system to avoid "conflicts at the put in?" Before a restrictive private boaters permit system is implemented, user data needs to be gathered to determine if there is a real issue, or if the working group is attempting to reduce access for all of the public for the sole benefit of commercial operators. If user data was actually gathered, this data could be used to implement an outreach and education program to encourage the public to choose to minimize use on busy days of the year. FWP and BLM should not implement a restricted private boaters permit system without data. Lastly, and what gets most stuck in my craw, is that NO DIY river running or whitewater representatives were consulted by or participated in the working group. This was brought up by a work group member in the April 28, 2022 meeting (1:17:24) that the proposed rules were written primarily by people with a commercial interest and there should be a statement or conflict of interest disclosure (KC Walsh). There is no evidence that such a statement or disclosure was made nor the general public specifically informed of this fact.

As a recreational boater, I am opposed to implementing a permitting system on Beartrap. Often recreational trips are organized last-minute according to flows, weather and availability. Adding a requirement to get a permit ahead of time or use a specific launch time window will make it harder to do these spontaneous day trips. Additionally, I have not observed crowding, littering or any other issues on Beartrap, which makes this proposed change seem unnecessary.

This May be a good idea

As a private whitewater boater I'm shocked and concerned that there's a recommendation to create a permit system for private boaters in Bear Trap Canyon. This section tends to limit traffic by the very nature of the difficulty of the river and I've never seen it crowded. I don't believe there is any baseline data that has ever been collected in that area so how can the work group say that there are crowding issues? At most, the work group should better understand traffic levels in that section before making permit recommendations. I would also encourage the work group to add a private whitewater boater to your group as we aren't represented by any party in formulating your recommendation.

As a kayaker and somebody who teaches kayaking in bozeman losing acces to beartrap whenever i want to paddle would be a huge loss for southwest montana paddling community. I paddle the beartrap no less than ten times bear year (mostly fall and early spring) but a few times in the summer and all of these times ive been suprised to see 1 or even 2 groups if any. Overuse of beartrap is a non issue and yall have collected zero data to show that it is being overused. You have a an entire board of people with interests in commercial fly fishing giving these recomendations that are in their best interests. The permitting system gives zero info on how it would work. Is this permit for the boat ramp and takeout? How long is the permit season? Is it lottery or first come first serve the day before? This is a non issue and would hate to see bozeman lose this amazing resource for the paddling community. Beartrap offers whitewater when everything else is low and is a great spot to practice paddling skills on a class 3/4 river.

Please don't permit bear trap. I'm all for protecting wilderness but most people do the stretch in a day— essentially never leaving their boats and therefore having minimal impact. At the very least rethink your permitting process or try to get a true count on average daily usage. Best, Hayden

I have great respect for our land managers and empathize with their difficult task of balancing the interests of diverse user groups. However, this proposal is an absurd abuse of power and a blatant example of kowtowing to business interests at the expense of the public. The makeup of your working group is wildly skewed to benefit a very small slice of the commercial fishing industry, and your final recommendations reflect this. Based on the documentation you have produced, you have completely ignored the input of the private whitewater community. I understand that we do not have the power and influence that fishing guides and affluent clients do, but that is no excuse to discount our interests. We are public landowners too. Bear Trap is by far the least used section on the Madison, and the least impacted by the public. You admittedly have no, or very little, usage data to back up your proposal. Limiting public use based on almost 0 evidence is inexcusable. You say that the "limited launch area can result in congestion and social conflict", yet provide no evidence of this other than the vague anecdotes of your heavily biased working group. There is certainly much more conflict and damage to the resource everywhere else on the river. Anyone who spends any time on the Madison will find it ludicrous that you say a permit system is needed to limit environmental damage here and not elsewhere. I assume you've visited the section above Bear Trap and the Bear Trap itself. Be honest: which needs more protection? It appears that you actually have no idea how much use there is on Bear Trap and have produced no evidence of the conflicts you seek to avoid. Visit any other ramp and you will find these conflicts. Visit any other section and observe the fire rings, ramp conflicts, and trash. It is irresponsible to single out Bear Trap, especially with no data to back it up. One of your goals for the proposal is to "gather better data...". This is putting the cart before the horse. If you don't have the data, how can you claim that such drastic action needs to be taken? I am not generally opposed to permit systems, but this is emphatically not the time or place. Especially as you have not done any due diligence documenting the need for such a proposal, and not meaningfully consulted with a major user group. This proposal is a major alteration to the status quo. For such action to be taken, you need to go back to the drawing board and broaden your outreach. You need an abundance of evidence to limit our public access. Most importantly, you need to ground your proposal in actual data and science, not merely rubber stamp policy based on virtually nothing. Respectfully,

Bear trap seems to limit itself naturally, this is truly unnecessary

This is absurd. The commercial recreation outfits are pushing everyone out. And by everyone I mean a very specific group of boaters that live nearby and care for the river, land and people. Think of all of the "local" traffic that will eliminate in Ennis and mccallister because we won't be coming over the pass anymore.

No good will come of this. Stop being greedy and let us float in restricted.

I do not support a permit requirement for non-commercial boats on the Bear Trap section of the Madison. While I am not against permit requirements for sections of river that need management, this is not one of those sections. In all my time boating this river over-usage by non-commercial boats has never been an issue. Please reconsider this approach.

Permitting on Beartrap is completely unnecessary. The difficulty of the float is self-limiting. I understand that the crowded parking lots (esp. Warm Springs) is a problem, but that's caused by tubers. The tubing companies have quit bringing their clients from Bozeman, so now we have dozens of vehicles coming there for that. Perhaps Warm Springs should be reserved for Beartrap floats, and non-tubing use, and California Corners reserved for the tubers? I've never seen more than four boats in Beartrap on any of my trips. It's just not heavily used.

et the people and the land regulate the use by sheer capacity of the facilities of the area we do not need more rules. First come first serve that's simple NO MORE REGULATIONS please. Make boaters pack it in pack it our for human waste thats simple

I'm not in favor of this style of permit system, at least not yet. Reasons below: 1. I think this section of the Madison does a good job regulating itself. The large rapids deter most fisherman and beginners. It is also remote and has a long shuttle, etc. 2. Most of the users are whitewater users. For fisherman, more people is nothing but bad and so they are less friendly. For whitewater users, more people means more safety, and so whitewater people are generally more social and cooperative with one another. I don't see much social conflict with whitewater users. 3. If you want to gather data, require permits, but allow them to be self assigned on-site, and don't limit them at first. Then you will have good data to make decisions with. What is the basis for the assertion that it "regularly exceeds the 6 parties per day"? The same information gathering permit as recommended for Non-Commercial Final Recommendations should also be implemented first. If benchmark data from this round then dictates that Social Conflict and Congestion exist at all, then a restrictive reservation float permit system may be implemented. 4. While the Beartrap Canyon whitewater flows through BLM wilderness, the put-in (Powerhouse) is not on land managed by the BLM. Other than scouting the Kitchen Sink rapid and occasionally the White Horses rapid, VERY FEW whitewater floaters even step foot on BLM land until they reach the Warm Springs take-out. If a given number of people launch in a day, why is there no concern with whitewater boaters at the take-out? It's because there isn't social conflict from the whitewater boaters.

This proposal is just another tax on people that want to enjoy the outdoors. We do not need this in Montana. Is this being pushed by management that has moved here from another state? Hmmm.....

Bear Trap is a prized section of white water as it is one of the few Class IV whitewater runs in our State. (We have numerous Class II-III runs and a lot of technical Class IV creeks but very little Class IV.) In my experience, this section of the Madison regulates itself. The rapids are big enough to keep most fisherman and novices away and its seclusion paired with the long shuttle times deem it to be a full day excursion. I regularly see 2-3 boats per day while I'm on this section. 1. The Recommendation states that the limited launch area can also result in congestion and social conflict when multiple float parties arrive simultaneously. I find this to be untrue. Unlike float boaters or fishermen, whitewater boaters tend not to be more social and less prone to conflict. We are a social group and tend to look out for the safety and well-being of others not even in our own party. Launch sites may be limited, but they are on most other whitewater rivers and we tend to cooperate and help get other parties onto the river so we can then have our turn. 1/2hr between groups is a good idea, but is not necessary by regulation. As noted before, this river tends to self-regulate. 2. If permitting is desired for further study, I'd advocate for a self-service Kiosk at the Powerhouse launch site and ask that boaters sign in with the number of people/boats in their party which will allow FWP and BLM to track user data. 3. Since neither FWP or BLM has established any benchmark data (the work group recommendations state that the Permit is recommended to gather use so it is assumed no data exists), a restrictive paid permit is not the best first step. The same information gathering permit as recommended for Non-Commercial Final Recommendations should also be implemented first. If benchmark data from this round then dictates that Social Conflict and Congestion exist at all, then a restrictive reservation float permit system may be implemented. 4. While the Beartrap Canyon whitewater flows through BLM wilderness, the put-in (Powerhouse) is not on on land managed by the BLM. Other than scouting the Kitchen Sink rapid and occasionally the White Horses rapid, VERY FEW whitewater floaters even step foot on BLM land until they reach the Warm Springs take-out. If a given number of people launch in a day, why is there no concern with whitewater boaters at the take-out? It's because there isn't social conflict from the whitewater boaters.

Bear Trap canyon has enough factors that limit its use. High difficulty whitewater, remote wilderness (no chance of timely rescue), long shuttle, etc. Really no need for a permitted system. Keep wilderness wild.

This recommendation is a mess and is going to result in major conflicts and public distrust!

As a kayaker from the neighboring state who frequently travels to Montana to visit family and recreate, I would like to express my concern about the proposed permit requirement for Bear Trap Canyon on the Madison River. In my experience, this section of river does not regularly see the traffic (6 parties per day) sited in the recommendation paper and the restrictions of a permitting system here will severely and unnecessarily limit access to this section of river.

This is he part I vehemently oppose. Please do not implement any such permit system---leave boating access exactly the way it is today.



This proposal does not appear to be supported by any credible usage data or statistics, and it would make it nearly impossible for non-commercial boaters to plan a trip to the Bear Trap Canyon, due to the uncertainty of getting a permit. The timing of launches is also a terrible idea, as it would force some groups to launch too late in the day. This would literally be the most restrictive policy for non-commercial, day-use on any river in the entire United States. The proposal is completely over kill, and was obviously drafted by some one completely ignorant of best river management practices, and of the logistics of floating Bear Trap Canyon. Montana FWP will create serious bad will for itself among the whitewater boating community in the West.

Dear Madam Chair and Commissioners, I support the work group recommendations for a Beartrap Canyon Float Permit.

recreational tubing should not need any permits

ok

if you ban outfitters you wont need a permit system

Good idea

## Comment Letters

Dear FWP Commissioners,

I am writing in response to the recent draft recommendations for Beartrap Canyon non-commercial river users from the Madison River Work Group (MRWG). While I am submitting comments directly to Charlie Sperry on behalf of the Project, I am also contacting you directly because I have serious concerns about the entire process. I have been a Madison River user since I tubed the lower river while attending MSU in the late 80's and continue to use it this day rafting and kayaking Beartrap Canyon.

The concerns I'd like to draw to your attention are regarding the selection of the work group members and the hand-off of the drafting of the non-commercial rules to outfitters:

- Madison River Work Group Conflict of Interest - The membership of the group, outlined in MCA 12.11.6710, identified that there should be THREE commercial outfitters with a current Madison River SRP, but the actual group has no less than seven of twelve members with a financial interest in commercial guiding and outfitting. Three representatives were to be "non-commercial users" along with a private business owner, and a natural resources specialist. However, three of those non-commercial designees have financial interests in commercial guiding and outfitting, Allison Treloar, Daniel Larson, and Mac Minard. There are no apparent representatives of the non-commercial boating public let alone a whitewater boater representative. Anglers are not the only users of this river that should have a seat at the table and a voice in this process. Designations in parenthesis indicate their assigned membership in the WG.

1. KC Walsh - (Chair - MFWP Commissioner) – Executive Chairman of Simms Fishing Products
2. Mike Bias - (Commercial Outfitter rep) - Fishing Outfitters Association of Montana
3. Brian McGeehan - (Commercial Outfitter rep) - owner Montana Outfitter Fly Fishing
4. John Sampson - (Commercial Outfitter rep) - Ruby Springs Lodge
5. Allison Treloar - (Non-commercial river user) - husband (Mike Treloar) owns River Borne Outfitters in Ennis and has been a fishing guide for 25 years.
6. Daniel Larson (business owner)- owner of the Madison Valley Ranch which provides fishing guide services and is an Orvis-endorsed Lodge
7. Mac Minard, (natural resources specialist) - Executive director of the Montana Outfitters and Guides Association and their chief lobbyist.

- The non-commercial private use recommendations were then drafted by commercial fishing guide Brian McGeehan. This is a disturbing decision, both by Commissioner Walsh to not appoint an actual non-commercial user for this task, and for Mr. McGeehan to accept the responsibility let alone to draft suggested regulations that restrict non-commercial users while the group suggests doubling commercial use of Beartrap Canyon. This assignment was given at the January 24, 2022 meeting, and in the April 28, 2022 meeting a MRWG member noted the conflict of interest (1:17:24) and recommended the MRWG make this clear to the public. No such information, statement, or clarification was provided to the public, and there seem to have been no further discussion within the Work Group.

How does the Commission expect non-commercial public users to respond to these extremely biased recommendations for Beartrap? I can understand that everyone is interested in putting a rule in place for the overall Madison River, but these restrictive non-commercial recommendations mean that the entire process will likely end up in litigation and you'll be back to square one. Beartrap Canyon was not considered in any of the MRWG documents, and was never mentioned as being part of the scope of the WG until the subgroup working on non-commercial regulations added Beartrap to their scope of the crowded sections of the Madison River, the Upper River and the Lower below Beartrap. Why was there no public notice that Beartrap was being considered for regulatory change to non-commercial boaters? Why were no non-commercial whitewater users considered in selection of the Work Group if Beartrap was to be among the Work Group outcomes? I don't believe that FWP staff and Commissioner Walsh should have let the Beartrap portion go to a vote when FWP has stated that there has been no staff or legal review for this recommendation, let alone sent on to the BLM. Both FWP and BLM should know that Chris McGrath's comments in the March 24, 2022 MRWG meeting are not to be construed as a request for any formal recommendation from the group or FWP.

I don't understand how non-commercial use of Beartrap got included in the Madison River Work Group's project, but this conflicts with Montana public notice rules, [MCA 12.11.405, \[law.cornell.edu\]](#) and MEPA requirements. FWP's own Madison River Draft EA (Sept 2020) specifically EXCLUDES Bear Trap Wilderness Area, and the 2021 Madison River Scoping Survey omits Bear Trap. This information was included in all Documents for the Work Group (including Commissioner Walsh) to consider.

Without proper scoping or jurisdiction, any FWP discussion on Beartrap Canyon non-commercial use needs to be stricken from the record, and the MRWG recommendation on this matter should be rescinded or the entire process is at risk for litigation.

Dear FWP Commissioners,

I am writing in response to the recent draft recommendations from the Madison River Work Group. While I acknowledge that comments are requested to be directed to Charlie Sperry on behalf of the Project, I feel I must contact you directly with my concerns about the entire process.

The FWP went through the early project correctly—with full Scoping, public comment, draft alternatives, and structured decision-making with a full weighting of all alternatives and their pros and cons. While I can understand the commercial angling industry's concerns with the published 2020 rules, I feel the Commission went way too far in giving the commercial angling industry such a weighty voice in the 2022 work group.

#### Madison River Work Group Selection and Procedures

The Commission is directed in Montana Rule 12.11.6710 - MADISON RIVER WORK GROUP on the membership of the Work Group. Three should be commercial outfitters with a current Madison River SRP, but the actual group has no less than **seven** of twelve members with an interest in commercial guiding.

1. KC Walsh - (Chair - MFWP Commissioner) – Executive Chairman of Simms Fishing Products
2. Mike Bias - (Commercial Outfitter rep) - Fishing Outfitters Association of Montana
3. Brian McGeehan - (Commercial Outfitter rep) - owner Montana Outfitter Fly Fishing
4. John Sampson - (Commercial Outfitter rep) - Ruby Springs Lodge
5. Allison Treloar - (Non-commercial river user) - husband (Mike Treloar) owns River Borne Outfitters in Ennis and has been a fishing guide for 25 years.
6. Daniel Larson (business owner)- owner of the Madison Valley Ranch which provides fishing guide services and is an Orvis-endorsed Lodge
7. Mac Minard, (natural resources specialist) - Executive director of the Montana Outfitters and Guides Association and their chief lobbyist.

The non-commercial private use recommendations were then drafted by commercial fishing guide Brian McGeehan. This is a disturbing decision, both by Commissioner Walsh to not appoint an actual non-commercial user for this task, and for Mr. McGeehan to accept the responsibility let alone to draft suggested regulations that restrict non-commercial users while the group suggests maintaining commercial use at present levels. Note this assignment was given at the January 24, 2022 meeting with no further discussion within the Work Group and recorded for public viewing until the final recommendation was presented on May 15, 2022.

How are non-commercial public users—let alone you as Commissioners—supposed to respond to these extremely biased recommendations? You had it mostly right with your 2020 rulemaking and really threw the baby out with the bath water to let commercial river guides re-write the rules.

At this point, 4 years with two distinctly separate planning processes and thousands of hours have been invested with no change to the regulations, I can understand you'll be pressured to put a rule into place but this current round sounds like it's ripe for litigation and you'll be back to square one.

Bear Trap Canyon Recommendation

Further, and with specific regard to the recommendation on Bear Trap Canyon:

- If Bear Trap was to be a part of this recommendation, why was it not considered in any of the Working Group documents?
- Why were no public non-commercial whitewater users considered in selection of the Work Group if Bear Trap regulation of non-commercial users was to be among the Work Group outcomes?
- FWP staff and Commissioner Walsh shouldn't have let this go to a vote/recommendation from the Work Group when it appears there was no FWP staff/legal review for this recommendation to even move forward or let alone sent on to the BLM.
- There is no evidence of the BLM formally requesting any permit recommendations for Bear Trap, nor have they performed their own Environmental Assessment to even begin to consider it.
- Both FWP and BLM should know that Chris McGrath's comments in the March 24, 2022 Work Group Meeting are not to be construed as a request for any formal recommendation from the group.

Finally, there was no public notice either from the State (FWP) or the Federal (BLM) level that Bear Trap canyon would be a part of the Work Group's recommendations. It is not known how Bear Trap got included in the Madison River Work Group's project, but this conflicts with both Montana public notice rules and NEPA requirements. FWP's own Madison River Draft EA (Sept 2020) specifically EXCLUDES Bear Trap Wilderness Area, and the 2021 Madison River Scoping Survey omits Bear Trap. This information was included in all Documents for the Work Group (including Commissioner Walsh) to consider.

Without proper scoping or jurisdiction, any FWP discussion on Bear Trap Canyon non-commercial use needs to be stricken from the record, and the Work Group recommendation on this matter should be rescinded.

State/Province	
MT	410
CO	25
WY	16
ID	15
UT	11
WA	11
CA	6
FL	5

NC	5
OR	4
TX	3
GA	2
NM	2
SC	2
VT	2
AK	1
IN	1
Italy	1

MA	1
MD	1
MN	1
NJ	1
OH	1
OK	1
France	1
TN	1
VA	1