



10 October 2014

Colin Maas
Parks Division
Montana Fish, Wildlife and Parks
4600 Giant Springs Road
Great Falls, MT 59405

Re: proposed improvements for hosts at Camp Baker and Eden Bridge
Fishing Access Sites

Dear Colin:

Montana Trout Unlimited appreciates the opportunity to comment on the Parks Division's proposal to develop facilities for accommodating hosts at the Camp Baker and Eden Bridge Fishing Access Sites. Montana TU represents more than 3,600 conservation-minded anglers. The great majority has an abiding interest in management and conservation of the Smith River and its recreational, wildlife and fishery values. Over the years a number of TU members have been fortunate enough to float the river. In recent years, the leadership of TU in Montana has become very concerned with the trajectory of development and management that has either occurred or been proposed in the Smith River corridor. These proposals for additional development at Camp Baker and Eden Bridge add to these concerns.

Montana TU opposes the Parks Division's proposals to develop facilities for accommodating hosts at Camp Baker and Eden Bridge. Our reasons are:

1. The improvements are not needed nor necessary.
2. The improvements continue the trend in recent years to increase the development footprint in the corridor, which will in turn create new justifications for additional development in the future.
3. The proposals incur unnecessary capital costs and future costs for operations and maintenance for an agency that regularly points out it already has inadequate funding to do its job.

Montana FWP originally acquired both Camp Baker and Eden Bridge as Fishing Access Sites. Based on the criteria for the funding sources for these acquisitions, the primary purpose of these sites was to provide access for floaters or wade anglers to the Smith River. They should be managed no differently than most typical FASs in Montana, including those that see more intensive use. The primary

purpose of FASs is to provide recreational access to public water. The Smith River sites were not acquired to be recreational hangouts or campgrounds. Yet, this is the inexorable trend that the Parks Division has created for Camp Baker. Further, currently all the use at Eden Bridge is simply limited to people parking vehicles and exiting the river. This is no different than other typical FASs in Montana. In fact, the use at both sites is concentrated in a much shorter period – May into July – than most other FASs.

Our point is this: Parks should be endeavoring to manage these sites first and foremost to simply provide access to and from the river (and to enforce the permit system). The agency's job should then be to move people in and out as expeditiously as possible, and to do it at as low a cost as possible.

Camp Baker proposal

Montana TU sees no need to develop a facility at Camp Baker specifically to accommodate a host. The four staff that are paid to administer the Smith River waterway program have long performed all of the duties Parks claims the host is needed for. In fact, Parks should instead be proposing management changes at Camp Baker that reduce the time the public spends there. This would reduce many of the needs and impacts that Parks cites. Camping should be much more limited, and floaters should be encouraged to arrive the day of their launch (with only nine parties a day, it seems that should not be overwhelming to deal with); or, they should be encouraged to stay overnight in local communities, such as White Sulphur Springs. The Parks Division and some members of the State Parks Board regularly cite the economic benefits of recreation and parks to local communities. By providing camping facilities at Camp Baker, and even incentivizing camping there by allowing people to reserve float camps the day before launch dates, the local community does not benefit. In fact, it actually puts state government in competition with local communities like White Sulphur Springs for recreational dollars. Further, regarding some of the duties Parks cites as requiring a host, there really is no pressing need to have a managed "lost and found program," or somebody hawking Smith River t-shirts, or "assisting floaters," a duty that is not detailed.

If indeed Parks insists a volunteer host is necessary at Camp Baker, it seems the recent improvements and additional buildings constructed at the site are more than ample to accommodate this person. Expanding the development footprint at Camp Baker with features like a gravel pad, as well as new lines for power, water and phone, just to accommodate a volunteer for a few months seems like an extravagant expenditure of up-front and future O and M funds by an agency that is cash-strapped. Certainly the issue of providing extra security for vehicles should not be that necessary at this remote, rural site, where a ranger is almost always available, than it might be at other more accessible high-use FASs around the state that don't have hosts or staff present.

Instead of increasing the development footprint at Camp Baker, the agency should instead alter its management of boat launching at Camp Baker in a fashion that reduces the need for “services” to “customers,” or for warehousing floaters for extended periods.

Eden Bridge

As Parks admits, one or two hosts have been residing at Eden Bridge since the early 1990s. The EA doesn't detail why the agency now needs to create improvements that will require a capital expenditure and future O and M costs in order to accommodate hosts. The primary justification for this development, according to Parks, is to “recruit qualified volunteer hosts.” Otherwise, it would result in “a substandard level of customer service, site security and public safety.” (p. 6). The conclusion we draw is that Parks believes the good-natured volunteers who have been serving at Eden Bridge for nearly 25 years have been doing a bad job of collecting floater and fishing logs, watching vehicles and monitoring people pulling out their boats – all fairly limited and perfunctory duties. Parks is also saying, it appears, it would get better performing volunteers if they didn't have to occasionally drive to Great Falls (where they likely visit anyway to shop) to empty their RV septic tanks. We find that claim dubious.

The role of a host at Eden Bridge is substantially more limited than what the agency says it needs at Camp Baker. Hosts collect float cards and fishing reports. And, we presume, they deal with the occasional hassle a party might present, such as forgetting car keys or fixing a flat tire. However, it is our experience that most floaters are not “customers,” and they attempt to get in and out of this site as quickly as possible. Vehicle security is probably slightly more an issue at Eden Bridge, but it is certainly no more of an issue than it is at many other popular FASs around Montana where hosts and staff are not available.

Montana TU simply does not see the need for either of these development proposals. Parks should instead be focusing its efforts on managing recreation along the Smith River waterway by reducing the need or demand for services at the launch and take-out sites.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive, slightly slanted style.

Bruce Farling
Executive Director