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20 November 2014

Maren Murphy
Lead Planner and Process Coordinator
Montana Division of State Parks
1420 East Sixth
Helena, MT 59620

Re: Comments on draft State Parks Strategic Plan

Dear Maren:

Thank you for the opportunity to comment on the draft strategic plan for Montana's State Parks. It is a good stroke of business to develop a strategic plan, and a good time to do it. We agree with many of the general objectives developed in the document. Certainly stabilizing funding for parks should be a priority, as should be taking action -- where demonstrated to be necessary -- to improve public enjoyment of the parks. We also endorse the objective of increasing outreach to develop a better understanding of Montana's park system.

There are a number of things, however, that are left unsaid or otherwise omitted from the document that could have refined the vision for Montana's state park system. First, the document does not include a description of what kind of state park system is desirable in Montana. That is, what should be the ideal spectrum of recreational, natural and historical opportunities -- from well developed to less developed, or "primitive" -- that the Parks system should secure? For example, the Montana Legislature has designated a number of parks in the state as "primitive," yet the strategic plan offers no insight as to how these will be managed. Something that would be helpful for better understanding the challenges presented by managing Montana's state parks would be a description and improved enumeration of the term "visits." Certainly, not all these "visits" are campers. How many are students who are part of a class, or drive-through visitors, or people who only use a park unit to launch a boat? Treating every visitor to the parks as the same, makes it difficult to understand what should be management priorities and what impacts are most concerning.

Much of what is stated or implied in the plan appears to prioritize development. For instance, the only hard example provided of what the public might desire from its parks is the statement, that, “Visitors are looking for a variety of experiences like electrical hook-ups, Wi-Fi and boating facilities.” (p. 13). This conclusion, Parks states, came from something staff heard at its “listening sessions.” Parks provides no summary of what it heard at these meetings, nor how prominent this particular view was. Though there were eight “listening sessions,” they were attended in total by only 117 people – an average of less than 15 people per meeting. This level of participation can hardly produce a representative public consensus of the future direction of our state parks.

The other input, according to the plan, used in its development came from park staffers, parks board members and legislators. While important and valuable, these opinions come with a certain level of bias because of the legal or professional obligations these sources have regarding parks management. We believe this document could have been improved, and the vision perhaps more accurately reflective of the Montana public, if there had been additional opportunities for more of the public to weigh in.

We appreciate that Parks plans to increase “partnerships and engagement” (p. 26). However, nothing in the plan indicates the Division will enhance its communication with park users or the general Montana public as to what they desire from the park system, and what they like and dislike. All of the proposed engagement cited will occur through surrogates, such as local government, businesses, tourism organizations, agencies, etc. Some of these will have certain inherent, self-interest biases. Further, it seems like most of the engagement under “awareness and outreach” is simply marketing from Parks extolling the virtues of the resources it manages. And that’s fine. But the Division needs to create mechanisms that track what the general public wants, likes, or dislikes. Certainly getting only 117 people at 8 separate meetings, or holding public meetings on the draft last month on only one date but in 8 locations – if you were busy that night you had no opportunity to get another meeting – indicate the Parks Division could improve its outreach to the general public. We offer this as a constructive criticism. Parks would do well to consult with the wildlife and fisheries divisions on how they attempt to maximize public opportunities to weigh in.

Besides not describing a broad spectrum of recreational opportunities for the parks -- while also leaving unmentioned management of designated primitive parks -- nothing in the plan in “Services and Experience (p. 24) or elsewhere describes how the Parks Division plans on protecting and preserving the natural and historical features that are the primary reasons many visitors seek out some of the state’s parks. For example, though camping and picnicking are often cited as popular tourist activities in Montana, wildlife viewing is just, if not more, popular. Parks provides no information in the plan how it will preserve the wildlife values found in many of its units in the face of a potential increase in visitors.

Similarly, several parks have important cultural resources that are the primary focus of visitors. Yet nothing in the plan spells out a vision on how these resources will be preserved. Finally, angling and hunting are the focus of a lot of use in a number of parks. Yet the strategic plan does not address how these pursuits will be co-managed with FWP's other divisions.

Regarding funding, we support well-thought out approaches that stabilize parks funding and invite budgetary efficiency. But the plan is somewhat oblique about the current budget. For instance, we recognize that the Parks Division receives no income from hunting and fishing license fees. However, the Parks Division does benefit from shared department resources that are funded through license fees, such as facilities, some administrative staff time or river and access sites paid for by fees and matching federal funds. Further, it would be helpful if the plan included specifics on current Parks expenditures. Nothing in the plan indicates what the current budget pays for.

We recognize there is certain value to comparing Montana's State Parks budget with surrounding states, but the contexts are different. Montana has one of the nation's greatest national parks, shares perhaps the nation's most famous national park with Wyoming, has 17 million-acres of national forest that includes a wide spectrum of recreational opportunities, nearly 8 million acres of BLM land, several national monuments and national recreation areas, 15 national wildlife refuges and some 5 million-acres of state land, most of which is open for recreation. Our surrounding states, especially the Dakotas and Idaho, don't have this level of federal and state recreational lands. Montana's state parks system simply can't compete with these federal resources, and thus it's understandable why some other states invest more in their state parks.

It is interesting that the document notes that though these states have larger state parks budgets, they also have higher fees. Though keeping Montana's parks affordable to residents should be a primary objective, it might be that the Parks Division could increase its budget by charging higher fees. If visitation dropped, it could provide a signal on just how much value Montanans and tourists place in our state parks system. It is also worth noting, that a significant number of park units are not "state parks" in the sense that many people think of. A number are simply access points to a recreational resource that is not in the park or managed by the Parks Division (Whitefish Lake Park, Big Arm, North Shore, Wayfarers, Thompson Falls, Yellow Bay, Hell Creek Tongue River, etc.). For these parks, the primary attraction is a lake or river not managed by the Parks Division. The Parks Division only supplies access and perhaps camping.

A number of parks are local recreational sites, more akin to city parks, where in some instances the State took advantage of an abandoned gravel pit (Frenchtown Pond, Beavertail Pond, etc.); several have little or nothing in the way of visitor services by design (Anaconda Smoke Stack, Beaverhead Rock, etc.). One park is

especially curious because it is virtual state park: Smith River State Park. The Fisheries Division purchased the access sites there for boat launching and angling, the bed of the river there below the high-water mark is owned by DNRC, and the campsites are private, federal or state trust lands. The Parks Division doesn't own any of this "park."

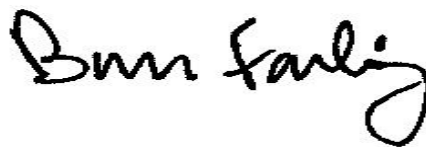
A number of parks are highly valued, hopefully left minimally developed, natural sites, such as Makoshika, Marias River, Fish Creek, Rosebud Battlefield, etc. The value of these sites is their natural context. And of course, there are historical sites, a few which are rightfully popular and require appropriate investment, such as Bannack or Garnet Ghost Towns.

It is good that Montana's state park system has such variety. But the point is: Many units are ancillary access points or camping areas for some well-known natural feature not managed by the Parks Division (Flathead Lake, Fort Peck Reservoir and the Missouri River Breaks, etc.), or, they are not tourist destinations but instead local recreational areas. Once the parks system is evaluated in categories – as valuable as certain units might be to individuals – it might be that Montana's State Park system as currently comprised will never be a hugely popular resource, or one that really requires the kinds of investments other states are making.

We share the Parks Division and its board's pride in our state parks. We only ask that the parks be managed carefully, for the appropriate purposes, with an efficient investment of public dollars, for the benefit of all Montanans.

Thanks for the opportunity to weigh in.

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

cc.
Montana Parks Board
FWP Commission
Director Hagener
Office of the Governor