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14 February 2013

Mike Hathaway
Fish Creek State Park
Montana FWP
3201 Spurgin Road
Missoula, MT 59801

Re: Fish Creek State Park

Dear Mike:

Thanks for the opportunity to comment on a proposed management plan for Fish Creek State Park. Montana Trout Unlimited represents more than 3,400 conservation-minded anglers organized into 13 TU chapters statewide. We have more than 550 members in our Westslope Chapter, whose home waters include those of the lower Clark Fork River and Fish Creek.

Montana TU actively supported the Nature Conservancy's purchase of the former Plum Creek Lands in Fish Creek. We also advocated for sale of those lands to Montana FWP for protection and restoration of important fish and wildlife habitat, and to ensure public access for recreational purposes in perpetuity. Staff from our national organization have subsequently partnered with TNC and FWP in several restoration efforts in the drainage, including decommissioning of sediment-bleeding roads and removal of barriers at road crossings that harmed fish. Many of us hunt, fish and camp in the Fish Creek watershed. We have an investment in ensuring the watershed is managed appropriately.

Given the extraordinary fish, wildlife and recreational values in the drainage, including the lands now owned by FWP as both a wildlife management area and state park, we recommend that the park tracts be managed similarly to those parks the Montana Legislature has designated as "primitive parks" (see MCA 23-1-116). That is, improvements at Fish Creek State Park should be limited to the minimum necessary to protect the natural resources of the parks while still providing recreational access. We are especially concerned about recreational development that could potentially reduce the value of the park and WMA as critical winter range for big game, a crucial corridor for movement of forest carnivores, and, as important habitat for resident and migratory populations of bull trout and cutthroat trout. We

recommend development and recreational promotion occur only at levels that will not create potential recreational conflicts, overcrowding along Fish Creek, or which demands large investments in long-term maintenance and management.

Basically, preserving or improving upon the area's current natural values should be the primary objective of park management. With this in mind, we are reluctant to endorse construction of a developed campground. It would be a mistake to construct a campground within the park to accommodate overnight users who are in the area primarily to float the Alberton Gorge. To accommodate this type of use, more appropriate sites are available and potentially for sale along the Clark Fork River. Keeping Alberton Gorge use within Alberton Gorge, or, along the Clark Fork River should be a goal of FWP's. The Fish Creek drainage, and the Fish Creek road, simply cannot withstand the amount of users currently focused on the Gorge.

If a campground must be constructed within Fish Creek, it should be small and located at the lower end of the park and away from the stream. Facilities should be limited to those appropriate to FWP primitive parks. Site location must have the full support of FWP's fishery and wildlife staff. Certainly any campground location should not inadvertently steer more anglers to lower Fish Creek, where migratory bull trout congregate and are susceptible to inordinate angling pressure and mortality.

Most of the items FWP's Parks Division previously suggested might be appropriate for Fish Creek State Park should not be approved, for instance:

1. Campground development at the Forks FAS focused on equestrian users would be inappropriate because, 1.) It is not within the boundaries of the park; 2.) It would promote more large vehicle and trailer use on the Fish Creek road; and, 3.) It is inconstant with the purpose of FWP FASs, which have mostly been purchased with license dollars and matching Dingell-Johnson dollars. If any D-J dollars have been expended for the Forks site, it would be inappropriate, and possibly illegal, to convert it to a Montana State Parks campground.
2. Development of any sort within the Rock Creek drainage, which has long been identified as important for wildlife. This should be managed primarily for primitive dispersed recreation.
3. Any sort of development, aside from that necessary to protect the site from resource damage, at Big Pine FAS.
4. Motorized trail use, at least not without the explicit approval of FWP's Wildlife Division. The park is small enough that a well-planned system of open roads – one that considers wildlife -- should be more than adequate to provide access throughout the area for folks who don't want to hike, ride horses, ski or use bicycles.
5. A hut-to-hut or yurt-to-yurt hiking system. This idea would simply be too expensive and complicated to manage. And there would probably be too little demand for it in this small an area.

In summary, aside from habitat restoration that the park tracts need, after years of heavy industrial logging, there is no reason to invest in significant development at Fish Creek State Park. A small campground of the sort contemplated in Montana's primitive park system (i.e., no need for power or RV sanitary facilities), located only after consultation with wildlife and fishery staff, and not intended to accommodate float traffic from the gorge, should be the most that should be developed. Trail and some road improvements, with minimal signing, would certainly be appropriate. Mainly, the park should be maintained for the current types of uses it supports, those affiliated with healthy fish and wildlife habitat, including wildlife viewing, hunting, angling and berry picking. We believe this would accommodate most of the public's expectations and result in a park that didn't require a growing need for larger investment for future O and M.

Thank you again 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