

# **Fish Creek State Park**

## Draft Management Plan Public Comment Summary

February 2014



Prepared by Montana State Parks

A Division of Montana Fish, Wildlife & Parks

## **Introduction and Overview**

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This document is a summary of the public comment received by Montana State Parks, a Division of Montana Fish, Wildlife & Parks (FWP), in response to the proposed Fish Creek State Park Draft Management Plan. Fish Creek State Park is the largest state park in western Montana and the second largest in the Montana State Parks system at 5,603 acres. Fish Creek State Park was acquired from The Nature Conservancy in 2010. From the beginning of the FWP acquisition, a total of 5,603 acres were designated as the State Park while the remaining was established as the Wildlife Management Area, which encompasses 35,360 acres. The draft management plan focuses on Fish Creek State Park and proposes recommendations for public safety, recreation opportunities, visitor services, operations and maintenance, tourism and economic opportunities, resource conservation, and education. It proposes a framework to guide management over the next decade. Montana State Parks prepares management plans for state parks to guide quality recreational experiences, enhance park resources, and preserve the park's wildlife and natural assets.

The draft plan was presented to the Montana State Parks & Recreation Board (Board) on December 19, 2013 wherein the Board recommended that Montana State Parks seek public comment on the draft plan. The public comment period was open for 49 days, beginning December 20, 2013 and closing February 7, 2014. This included an extension period of 13 days beyond the original closing date of January 24, 2014. The period was extended based on internal discussions wherein it was agreed upon at the Department level that it would be helpful to extend the comment period to give more time to address fish, wildlife and conservation concerns as well as any concerns from other key stakeholders. The intent of the extension was to ensure an adequate opportunity for the public and stakeholders to review and comment on the draft plan, given the level of interest in this process.

In total, the Parks Division received **572 public comments**, of which 511 contained original language. A total of 61 comments were organized response form letters that articulated the same points nearly verbatim in three different form responses, and a total of 40 comments were submitted by organizations, agencies, elected officials, or identified businesses.

In conjunction with the public comment period, two public meetings were held in early January that were attended by 68 people, as recorded on sign-in sheets provided at each meeting. Any individuals electing not to sign in (although few in number) were unable to be accounted for and are not reflected in the total. A meeting was held at the Superior High School in Superior on January 6 in which 29 people signed in. A second meeting was held at the Holiday Inn Downtown in Missoula on January 8 in which 39 people signed in. The meetings followed similar formats of a 25-minute presentation on the draft plan followed by an open discussion wherein people could provide feedback and ask clarifying questions. Formal public testimony was not taken at the meetings, although paper forms were provided for collecting written public comment. Written comments were also accepted throughout the public comment period on the Montana State Parks website, and via email or mail. All comments must have been submitted in writing to have been incorporated into the public record.

## **Methodology**

Although this summary and accompanying narrative of public comment attempts to capture the full range of public issues and concerns, it is important to understand that respondents are self-selected;

therefore their comments do not necessarily represent the sentiments of the larger public as a whole. However, this summary does attempt to provide fair representation of the wide range of views, themes, and questions submitted. In considering these views, it is important for the public and decision makers to understand that this process is not equivalent to a voting process. Constructive comments whether criticisms or suggestions are recorded, read and evaluated as part of the final assessment.

All responses were summarized through a content analysis process. Content analysis is a method of evaluating comment submissions in order to elicit meanings and derive information. Each comment is read and then summarized by major theme discussed. Comments may contain more than one theme discussed. A common set of themes is identified based on the breadth of the comments received. The themes are then summarized by identifying similar phrases, issues, and concerns of like comments. This summary includes a narrative of public comment by topic and supporting sample quotes.

The process strives to identify all substantive issues, not just those represented by the majority of respondents. The comments are organized to present the views for consideration by decision makers. This process and the resulting summary are not intended to replace comments in their original form. Rather, they provide a map to the letters and other input on file with Montana Fish, Wildlife and Parks in Helena, MT. The summary does not attempt to sway decision makers toward the will of any majority, but simply presents the comments in an organized manner for consideration.

### **Response Representation**

A total of 233 responses indicated an identifiable geographic location. Of the responses with a geographic location, the majority were from Montana (226). Within Montana, the majority of responses were from Missoula (94). In addition, 40 comments were also received from various organizations, agencies and elected officials. The following tables detail the breakdown of representation identified in the responses.

**Table 1. Geographic Representation by State**

<b>State</b>	<b>Number</b>
Montana	226
California	2
Idaho	2
North Dakota	1
Wisconsin	1

**Table 2. Geographic Representation within Montana**

Montana Location	Number
Missoula	94
(blank)	62
Alberton	8
Helena	7
Lolo	6
Superior	6
Trout Creek	5
Bozeman	3
Hamilton	3
Mineral County	3
St. Regis	3
Corvallis	2
Great Falls	2
Ovando	2
Stevensville	2
Thompson Falls	2

Montana Location	Number
Arlee	1
Butte	1
Clinton	1
Columbia Falls	1
Flathead County	1
Florence	1
Hungry Horse	1
Huson	1
Kalispell	1
Lewistown	1
Petty Creek	1
Seeley Lake	1
St. Ignatius	1
Tarkio	1
Three Forks	1
Turah	1

**Table 3. Number of Responses by Organizational Affiliation**

Organization Type	Number
Recreation or Tourism Organization/Business	15
Fish or Wildlife Organization	14
City or County Government Agency/Elected Officials	8
State or Federal Government Agency	3

## Summary Narrative

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This section provides a summary of the comments received on the draft management plan organized into major themes for discussion. There was considerable support received for diverse recreation opportunities combined with a balanced resource conservation approach; there were also a number of concerns raised regarding the scale and scope of the proposed development and potential impacts to fish and wildlife resources. Below is the list of themes identified, followed by the narrative and summary statements for each theme. As a note, each individual comment may address more than one theme, and as such, the number of responses per theme does not reflect the total number of comments received.

- A. Increased Use and Development
- B. Protection of Natural Resources and Character
- C. Diverse Recreation Opportunities and Tourism Potential
- D. New Trails Opportunities
- E. Roads
- F. Costs Related to Development and Maintenance
- G. Coordination and Partnerships
- H. General Management

## **A. Increased Use and Development (309)**

Generally, most respondents who commented were concerned with the level of proposed developments in the draft plan and the potential for increased use and visitation to Fish Creek State Park and the larger Fish Creek drainage. Many responses felt that the area is not capable of serving larger numbers of people without jeopardizing the health of the ecosystem, particularly in regards to the Fish Creek native trout fishery and migrating wildlife. Of the proposed developments in the draft plan, most responses are concerned with the developed campground and trails for motorized recreation. Many feel these proposed developments would increase the risk of environmental degradation, overcrowding, and strain the ecosystem by increasing access to the area. Some respondents felt that there are already too many developed campgrounds in the area that accommodate RVs, and the state park does not need to provide another with those amenities; a few respondents felt that a developed campground could also create undue competition with nearby private campgrounds. A few felt that the location of the proposed campground in proposed Unit A could disrupt hunting opportunities and winter range for elk and deer, and instead felt that the campground should be located along Fish Creek.

For specifics related to increased use and development, respondents were particularly concerned that increased access would lead to increased angling pressure along Fish Creek, impact winter range for ungulates, and increase the potential for noise, erosion, and spread of noxious weeds related to motorized recreation. Many comments urged FWP to consider the important fish and wildlife values and carefully limit any development—in particular extensive motorized access and built facilities—that would damage those important values as the agency moves forward on its management plan for the state park. Some respondents felt the level of proposed development, infrastructure, and recreational use of the park is too rapid and intense, and slower development as demand dictates would be more prudent. Related, many respondents viewed promoting the state park as a regional destination going against conserving and protecting public lands for future generations, and that economic development would not be done in a way that sustains the natural resources or in a way that responds to local input. Some comments stated that the vision provided in the draft plan did not reflect what was heard during public scoping and went beyond the desire for minimal development with a focus on hunting, fishing, and hiking. Many respondents also felt the draft plan failed to analyze and explain the environmental impacts associated with the proposed development and the overall impact on the watershed.

The following summary statements capture the specific issues, concerns, and suggestions:

### *Impacts from Developed Campground and Motorized Recreation*

- There are already enough RV campgrounds in the area. Do not approve of a highly developed RV camping system. The state park is more aligned with smaller RVs with 10 or 12 RV sites at the most, and basic amenities, including no power, no shower, and no flush facilities.
- There are three private RV parks in Missoula and competition is tough. Will this State Park be paying the bed tax fees as the other RV parks in Missoula must do? This plan will potentially take away revenue from local businesses in Alberton.
- A 40 to 60 lot paved campsite with showers and hookups will require major road upgrades and increase power transmission capacity. Does Montana State Parks realize that by

improving Fish Creek Road and Cyr/Iron Mountain Road they will be a primary driver in future subdivisions in the area?

- Resulting hazards from RVs include chemical and petroleum runoff and wastewater storage and disposal, which pose a direct threat to the fish and wildlife resources.
- Urge you to consider the value in solitude and think about the opportunities for some development that would retain this without another RV park. Put more thought into what the area can reasonably accommodate.
- The proposed location of the developed campground offers nothing of value. People want access to water; consider locating the campground along Fish Creek.
- OHVs can impact the aesthetic values of an area, increase erosion, and impact public safety with different user conflicts. OHVs also increase noise and air pollution and the spread of noxious weeds into areas.
- It is well established that once an area becomes a motorized destination, it precludes quiet recreation opportunities. Also, more management resources will be necessary to enforce travel direction and maintain the trails. Management needs to adequately account for the likely unauthorized use that will result from the proposed plan.
- Promoting Fish Creek as an OHV park could mean more illegal off-road driving contributing to increased erosion and many unsightly rutted trails. Do not promote Fish Creek State Park as an OHV park.

#### *Impacts to Fish Creek and the Fishery*

- Fish Creek provides sensitive, fragile habitat and vital spawning ground for native Westslope cutthroat trout and threatened bull trout. The creek received more than 5,000 angling days last year alone. Increased use could create negative impacts by increasing fishing pressure on an already stressed fishery, create water quality issues associated with camping and degradation of streamside habitat, and increase the likelihood of unintentional or illegal angling for federally-threatened bull trout as more inexperienced anglers are introduced to the area.
- Development of a state park of this size and scale will put increased pressure on this vulnerable fishery and undermine the watershed restoration. Unit A and the proposed developed campground is too close to the confluence of Fish Creek and the Clark Fork River.
- By developing more area, and bringing more traffic into the Fish Creek watershed, we will see an increase in sedimentation of the creek due to trails and campgrounds changing surface water flows and more foot traffic around the river. Overcrowding could drive additional traffic to other areas including Petty Creek and Nine Mile.
- In light of climate change with lower water levels in mid to late summer, this proposal will greatly affect the fishery for native species.
- Maintain minimum buffers and aquatic organism passage at all stream crossings to preserve the fishery.

#### *Impacts to Wildlife Habitat, Winter Range, and Migration Corridors*

- The proposed plan does not include analysis on how the park will affect and mitigate impacts to big game or other species, including wintering elk, deer and moose, as well as

wolverines, fishers, and lynx. Trying to increase use without a thorough wildlife assessment study is premature.

- Consider a seasonal closure to protect winter range for ungulates where appropriate. Enforce snowmobile access restrictions to ensure sustainable wildlife habitat.
- Consider linkage zones and the impacts of concentrated recreation development on migration. Consider effects from recreation on saddles, ridges, riparian areas, and other key areas important to wildlife movement.
- Urge focus to remain on ecological characteristics such as critical winter range and the movement of forest carnivores.

## **B. Protection of Natural Resources and Character (223)**

Many respondents felt that Fish Creek is a special place and that management should focus on protecting and enhancing the natural resources and character of the place, including enhancing fish and wildlife resources of the area and providing opportunities for traditional uses and rustic experiences, like hunting, fishing, berry-picking, hiking, dispersed camping and firewood gathering. Many wanted to see the Parks Division preserve the remote and sparsely populated character of the area. Other comments stated that the Fish Creek drainage needs time to heal from past commercial timber harvest and effects of large wildfires, and that an emphasis on resource management should come before recreational development. Some comments felt the plan did not include enough language or analysis on the fish and wildlife resources.

Many respondents familiar with the area expressed a desire to see no change at all, and felt that Fish Creek State Park provides a unique experience as is. A number of individuals, from comments and comments from fish and wildlife organizations expressed a desire for the park to be designated as a “Primitive Park,” which refers to a statutory designation by the Montana Legislature in Montana Code Annotated 23-1-115 through 23-1-118, or be managed in the spirit of that statutory designation. These comments also expressed that the Parks Division should maintain the minimum development necessary for the state park to preserve public access for traditional uses. Additionally, many of the same comments felt that the Parks Division should not finalize a management plan for Fish Creek State Park until FWP has completed a plan for the adjacent Fish Creek Wildlife Management Area to ensure management coordination across the landscape. Other respondents felt there should be minimal development for camping, but a strong emphasis on non-motorized trails for the state park. Some comments viewed the development of backcountry sites, yurts, huts, and/or renting the Williams Peak Lookout as still minimal development. A few respondents wanted to see current campsites enhanced with basic amenities that include better waste management, food storage to reduce conflicts with wildlife, and better stream access for angling.

The following summary statements capture the specific issues, concerns, and suggestions:

- Fish Creek is a critically important ecosystem for fish and wildlife. The emphasis should be on protecting and enhancing those resources. In particular, protect wildlife and winter range, and rebuild the elk and deer herds that once were there. Also, enhance trout habitat with landscape and aquatic restoration, and do not compromise with intense development.
- Identify habitat restoration opportunities in the park and disclose plans to ensure recreational access or features do not undermine them.

- Environmental and ecological considerations are given short shrift in the plan, only mentioned occasionally and not in the foreground. The vision statement gives no sense of where the state park fits into a larger wilderness context.
- Provide a less-developed, smaller vision for the state park that provides the WMA time to evolve, and for the land and resources to recover and heal from past intensive uses and wildfire. Water quality, soil stabilization, and transportation system planning should come first.
- The proposal violates the very attributes of Fish Creek that the transfer of this land was intended to protect: habitat, water quality, natural quality of this place. Urge all those involved to maintain what is currently available, and not to "improve" what is already a magnificent public use area. The area offers ample recreational opportunity already.
- FWP should designate Fish Creek State Park as a "Primitive Park," a designation that the Montana Legislature created to protect parks with sensitive natural and cultural values from overdevelopment.
- FWP should wait to finalize the management plan for Fish Creek State Park until the agency has completed a plan for Fish Creek Wildlife Management Area in order to ensure that the values protected in the WMA are also protected in the State Park.
- FWP should maintain only the minimum development necessary to preserve public access for traditional uses, including fishing, hunting, hiking, paddling, camping, berry-picking, and firewood gathering. Any development for camping, picnicking, or trails should include minimal site-hardening and developed facilities, and it should minimize costs for operations and maintenance.
- Emphasize dispersed, non-motorized recreation activities. Pursuits such as mountain biking, hiking, skiing, hut/yurt systems, and primitive camping should be encouraged. The Williams Peak Lookout could be rented as a rustic overnight destination with non-motorized access.
- I would like to see the current, somewhat isolated campsites improved so that they limit the risk of sediment, sewage, and trash entering the waterway, particularly at Big Pine Fishing Access Site. Provide more primitive toilets, more bear proof trashcans, and better stream access to limit cars parking on non pull-offs.
- Fish Creek State Park is categorized in the Northern Continental Divide Ecosystem Grizzly Conservation Strategy as being in Management Zone 1 and a Demographic Connectivity Area. As such, habitat protections should focus on managing motorized route densities and attractant storage rules should be implemented.

### **C. Diverse Recreation Opportunities and Tourism Potential (118)**

Many comments expressed a desire to see diverse recreation opportunities offered at Fish Creek State Park. These comments referred to multiple use activities, and opportunities for diverse camping, including developed camping, backcountry camping, yurts, huts, cabins, and rental of the Williams Peak Lookout. Some comments felt that a family-friendly state park of this size will be an important asset to the area and help improve the quality of life of residents. A few respondents felt that more emphasis should be specifically given to wildlife viewing and nature observation opportunities as examples of growing outdoor activities. One commenter would like to see zip lines and ice skating rinks developed at the state park. A few comments felt that the park could be used as an outdoor classroom for local schools and universities and encourages a stronger connection with education. A few comments considered the potential of year-round activities.

Many respondents felt that development of the state park could further promote and enhance the local economy and tourism. Many comments focused on the park as a regional destination that could support economic opportunities and bring long-term benefits to communities. In particular, many respondents felt that a trail system could provide revenue and create opportunities for economic development. Conversely, some comments did not feel the economic potential is there for Mineral County. A few suggested that local labor and supplies should be sourced during development to encourage a direct local economic connection.

The following summary statements capture the specific issues, concerns, and suggestions:

#### *Diverse Recreation Opportunities*

- This is a great opportunity to create collaboration among various user groups to accommodate shared recreation, mountain bike, OHV, hiking trails, camping, and conservation and manage as a multiple use destination.
- Fish Creek State Park will provide one more reason why western Montana is considered a destination for outdoor enthusiasts whether they are cyclists, hikers, OHV users, equestrians, anglers, or hunters.
- Hiking and biking trails are good opportunities for getting children outside and active and can help improve the health of Montanans for outdoor exercise.
- The plan is a great foundation and guide to ensure a sustainable area for multiple users and folks seeking recreation, exploration, or solitude. While pressures on wildlife and fisheries may increase, those pressures will be negligible if the guidelines encouraging ethical behavior, stewardship and education are actively promoted.
- Campgrounds are vital components to reducing impacts of undeveloped campsites that result in unsanitary and unsightly debris commonly left behind.
- Is this proposed plan going to offer year round camping and access to public water and toilet facilities when even many of highway rest areas and other campgrounds close?

#### *Tourism Potential*

- Well-designed and developed first class trail systems have proven successful in providing revenue and supporting local economies. A trail system of this sort can create a unique and signature state park destination for residents and visitors bringing economic benefit to local communities.
- A park with mountain biking trails will have a positive impact on the economies of both Mineral and Missoula counties and would make the area a bigger destination and support tourism while also improving the quality of life for residents. There is potential for out-of-state folks to explore new trails at Fish Creek State Park, and the beneficiaries of these visitors would be smaller communities and businesses in Mineral County and hopefully extend into Missoula County.
- Joining the conservation needs of this watershed along with the needs of a county continually working toward economic growth is essential. State parks enhance local residents' enjoyment of recreation allowing for better facilities and access, especially for those who have special needs in an aging demographic like Mineral County.
- There is tremendous opportunity to support sustainable economic opportunities and bring long-term benefits to local economies. This could be developed into a regionally-best track

for competitive recreational events. Could also include opportunities for mountain research and a unique educational setting.

- The economic benefit of having a multiple use area where OHV's are welcome has not been noticed by Montana cities and towns. There are many examples of the economic benefits around the nation that could demonstrate the economic impact.
- I would like to know more about the rationale that a park at this location would stimulate the economies in small towns such as Alberton. With Missoula 45 minutes down the freeway, it seems unlikely that travelers who camp at the proposed campground are likely to significantly contribute to local businesses given that none are located at that exit.
- The implied economic benefit does not seem possible as Mineral County does not have any elements that benefit from a State Park such as ATV, bike or sporting good stores that specifically cater to the outdoor enthusiast. The public fill their gas tanks out of area for day or overnight trips and do not need to purchase locally.
- It has been proven over and over that Mineral County is simply not a destination and it never will be. Montana State Parks will waste a ton of money building this state park. Actual economic benefit would be realized by an RV campground and supporting businesses in Alberton.
- No mention of possible economic opportunities for local communities to provide wage earners gainful employment with a steady salary. I recommend more consideration be given that would encourage "substantial" economic development to benefit nearby local communities and provide significant unemployment relief in Mineral County. Where possible, all supplies used by the park or private entities on the park must be required to purchase locally, including the right to first refusal.
- Overt promotion to encourage visitation in order to collect fees to help pay for park management that is necessitated because of increase use and conflicts generated by the promotion should not occur.

#### **D. New Trails Opportunities (114)**

Many respondents expressed a desire to see development of new trail opportunities at Fish Creek State Park, including non-motorized and motorized activities. Mountain biking in particular was cited by respondents as a highly desired activity for the state park that could make the park a regional destination. A few respondents provided specific details for mountain biking trail design and construction. Many respondents also felt that OHV/ATV trails are a good fit for the state park and are currently limited in scope. In particular, some respondents felt that the park could provide a good opportunity for youth trail loops and a safety track course. A couple of comments addressed the need for more dirt bike and motorcycle trails specifically, while one comment would like to see more snowmobile trails. Other opportunities expressed by respondents include general motorized use, multiple use (non-motorized and motorized), and non-motorized use for hiking, biking, horseback riding, and cross-country skiing. In addition to trail opportunities, some respondents called for the unrestricted use of the roads by all current uses.

The following summary statements capture the specific issues, concerns, and suggestions:

### *Mountain Biking*

- Mountain biking is a growing sport, and many trails and riding areas in the Missoula vicinity are becoming over-crowded and are seeing an increase in user conflicts. This is also creating a negative impact to trails that require additional maintenance.
- Consider development of challenging, long distance loop rides in backcountry and more family- friendly riding opportunities in frontcountry. There is a need for increased unique mountain biking opportunities for a variety of skill levels, including beginning, immediate, and technical/advanced. There is also an absence of bike friendly campground/trailheads within the greater Missoula area.
- A stacked loop design where the trails get progressively technical the farther you go from the trailhead would provide a diverse opportunity for all riders. Narrow, technical single track and directional trails are highly desired. Make sure to rehabilitate roads into narrow trails for the best mountain biking experience and not just open roads.
- It would be good to understand how a system of trails in the new park might be tied to other regional biking trails to make for a cluster of biking opportunities that would be a destination for mountain bikers who could bring money to the local economy.
- While Missoula County and other surrounding counties do have many trails open to bikes, very few meet modern standards for sustainably built trails. Sustainable trails are distinguished by design that promotes excellent drainage, controls bike speed, offers fun and challenge for all rider abilities, demands less ongoing maintenance, and is sensitive to the surrounding ecosystem. The old roadbeds found throughout the park will work well as foundations for new trails and connectors. Include guidelines encouraging ethical behavior, stewardship and education to mitigate conflicts and trail erosion.

### *Motorized Recreation*

- There is not adequate enough ATV trails in the Lolo National Forest with only 3.8 miles of trails designed for ATV use. We need more areas open to motorized sports to prevent further damage from people going places that are not monitored.
- Need more opportunities for youth ATV loops that would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loops offer an alternative to unauthorized routes near camp areas and riding in campgrounds.
- Need specifically designed ATV safety track course for the purpose of offering ATV safety instruction and certification upon completion by youth and adults.
- We recommend developing OHV trails to accommodate dirt bikes, motorcycles, four wheelers, and side by side up to 60 inches. Would like to see a full-circle motorized route developed rather than the proposed one-way route. A 50/50 motorized and non-motorized shared system is fair.
- Consider snowmobile trails as well.
- All road closures should be immediately opened with no restriction of current uses. Single use and motorized trails should be only allowable if newly-created and for a designated purpose.

### *Non-motorized Trails*

- Consider separating non-motorized and motorized trails.
- Consider a hiking, horseback riding emphasis with cross-country skiing in the winter. Limit horseback riding to dryer season. Connect hiking and horseback trails to the trailhead at Clearwater Crossing. Consider having hiking-only trails.
- Explore a dog sled track in the park.
- Consider primitive with trails construction and improvement for non-motorized use that demonstrates a commitment to recreation development that is sensitive to the fragile and recovering local ecosystems, as guided by F&W technical staff.

### **E. Roads (78)**

Many comments focused on the roads within and around Fish Creek State Park. Some comments expressed a concern over limitations to public access. Some respondents, particularly in Mineral County, desired to see all roads opened to multiple uses with no limitations. Many commenters felt that public access for motorized use is continuously being restricted on public lands, and impedes the ability of older citizens and people with physical disabilities and challenges in particular from accessing land. Many respondents expressed frustration by road closures and gates and desired more access to forests. One comment stated that there is a lack of “hunting from a vehicle” access for handicap hunters and expressed a desire to see this offered at Fish Creek State Park. A few respondents expressed a desire for open access to collect firewood for local use and to pick berries.

Many respondents focused on the road conditions in and around the state park. Some comments expressed a concern over the maintenance of roads, including the responsibility and cost associated with maintaining and improving public access roads to accommodate development and use. A few comments expressed concern over emergency access and risks to public safety. Other comments expressed a desire to see the internal park roads rehabilitated and restored to natural conditions to improve wildlife migration and decrease erosion into Fish Creek. Conversely, many respondents felt that all roads should be open to varying degrees of maintenance to allow for unlimited public access, particularly for firewood gathering and fire suppression. A few respondents in particular called for a road assessment and travel management plan to accommodate the draft management plan to identify and assess travel routes for public use. One comment from the U.S. Forest Service expressed that the assessment of roads for public use outside of the park is outside the scope of the draft plan.

The following summary statements capture the specific issues, concerns, and suggestions:

#### *Preservation of Public Access*

- All road closures must be immediately removed and full multi-use (including motorized) access allowed in accordance with the Mineral County Resource Use Plan.
- All RS 2477 road Rights-of-Way in the Fish Creek State Park area are to remain open and unobstructed, as required by federal laws for previously granted Rights-of-Way.
- I am continually frustrated by road closures and gates. This seems like an attempt to deprive elderly and handicapped people of use of our public lands in the name of conservation. Multiple use must include access for the physically challenged.

- Allow for commercial resource management and fire protection by leaving the road system open and available to the public.
- Gated roads should be open from June to October for public recreation.
- There is a profound lack of opportunity for those who are handicap and have a 'permit to hunt from a vehicle'. Setting aside an area like the existing road network above Chicken Creek for handicapped individuals with the appropriate permits would be a great improvement in our opportunity. Propose leaving the main road from the east side of Rock Creek through Chicken Creek open to everyone and restrict spur roads in the Chicken Creek drainage to permitted handicapped individuals.

#### *Road Conditions*

- Many roads are too steep and narrow to accommodate motorized use. The road to Rivulet cannot and should not handle two-way RV traffic. The road to the Williams Peak Lookout is too steep, erosive, and dangerous for unsupervised motorized use. Access should only be through non-motorized means.
- There is a lack of clarity for the responsible party to maintain Fish Creek Road. There is also concern when for emergency response agencies which will have to navigate non-routine maintained interior roads.
- Have the road conditions as a public safety issue been anticipated and what, if anything, is being planned to mitigate it?
- Interior roads should be closed and opened by designation or conversion to trails.
- Instead of increasing use at Fish Creek State Park, I would recommend cleaning up and restoring the miles of logging roads to reduce soil erosion and generally manage the area with respect for its important role as a natural area.
- We would like to see as many roads as possible closed to motorized use to preserve wildlife and fish habitat. Many roads will continue to pose problems for aquatic health due to poorly designed culverts which will not be able to be maintained.
- All roads in the park need to be maintained as viable roads for multiple use and unrestricted access, and for future timber harvest and fire suppression.
- Roads within the park will require assessment and management actions, and some roads should be decommissioned so they are hydrological stable to reduce the chance of culvert failure or chronic sediment input into Fish Creek and tributaries.
- Instead of increasing use at Fish Creek State Park, I would recommend cleaning up and restoring the miles of logging roads to reduce soil erosion and generally manage the area with respect for its important role as a natural area.
- Transportation management plan should be prepared to identify roads that should be removed through re-contouring and reseeded, roads that might be pulled in and repurposed as trails, roads that should be left in place with seasonal or year-round restrictions on motorized use, and the roads that should be open to motorized use as the transportation backbone.
- We request a proper road maintenance plan to include proper drainage measures and sediment controls before a road is authorized for public use. Existing roads not used need to be clearly closed and have unneeded roads in the area properly obliterated. If vehicle use is permitted, clearly defined routes or loops should be established. Roads should be gate and

closed for vehicle use during the winter to protect the winter game ranges and in the fall to promote walk-in-only hunting.

- Management of recreational uses on adjacent lands including development of motorized and non-motorized travel routes which cross multiple jurisdictions is outside the scope of the plan.
- Although the Lolo National Forest currently has jurisdiction of Forest Road #7721 (William Peak Lookout), we do not feel the Forest Service needs to maintain its rights on this road and would be willing to transfer them to the State of Montana.

#### **F. Costs Related to Development and Maintenance (61)**

Many comments felt that the cost to develop the state park is not adequately detailed in the plan. Some respondents called for a detailed cost analysis in the plan for the proposed developments. Many felt that development should actually minimize costs for operations and maintenance, and not increase costs. In particular, many comments focused on costs of road maintenance, law enforcement, emergency services, maintenance of public utilities, and costs related to development of facilities like a developed campground, yurts, huts, and the Williams Peak Lookout. Comments from elected officials in Mineral County expressed a strong concern for the cost of development and maintenance in particular.

The following summary statements capture the specific issues, concerns, and suggestions:

- The plan should include a detailed cost/revenue analysis study that details the cost and funding sources that will pay for development, as well as operations and maintenance that will be needed for implementation. This should include a proposed budget for park management, identifying secured sources of funding and projected expenses, as well as what revenue sources will be, whether the park will be self-sustaining, and what the cost will be to the public long term.
- Where did this plan come from, with the proposal for a highly developed RV campground and network of OHV and mountain bike trails? OHV use requires more expensive, frequent enforcement patrolling and road/trail maintenance. A cost vs. benefit study must be done before bringing the necessary electric, water and sewage to this remote area.
- At a time when other public parks are seeing decreased maintenance because of budgetary problems, why develop a new place that will require additional funding? It concerns me that another park will be developed that will further strain the State's budget.
- Mineral County is financially suffering and cannot afford an increase in costs to services and facilities. The plan needs to consider of costs of emergency services, law enforcement, and road use. How will the County benefit monetarily from this park?
- The Mineral County Sheriff's Department does not have enough resources to handle the County now. Who will provide law enforcement and fire suppression in this state park? Is the Parks Division willing to fund a full time deputy for the county?
- The Williams Peak Lookout is too costly to upgrade, and development costs are out of proportion to any economic benefits. Public safety and the cost to maintain the road is a big concern, particularly for any motorized use to the lookout.
- Money is better spent on fixing ill-designed culverts, habitat improvement, fisheries research and management, and fish and game law enforcement.

- The plan works in generalities and fails to effectively characterize the specific proposed park developments, associated costs, and impacts. Urge Montana State Parks to offer a plan that contains maps of the proposed RV pads, roads, visitor center building locations, wells, bathing facilities, etc.

#### **G. Coordination and Partnerships (25)**

In discussing implementation of the draft plan, many respondents identified a need for continued coordination within FWP and partnerships with external organizations, user groups, and volunteers. Many comments from individuals and user groups expressed a desire to be involved in trail planning, construction, and long-term maintenance of a trail system, particularly among mountain bikers and OHV users. One respondent felt that coordination with the US Forest Service should occur prior to any upgrade of the Williams Peak Lookout. A few respondents encouraged the Parks Division to not just consider user groups during trail design and planning but also fish and wildlife conservation groups to evaluate potential trail locations, alignments, routes, and designations. Some comments focused on the need to enhance coordination within Fish, Wildlife and Parks to ensure proper management of fish and wildlife resources by the Fish and Wildlife Divisions over the entire landscape of the state park and wildlife management area. One comment suggested partnering with the University of Montana for restoration work.

The following summary statements capture the specific issues, concerns, and suggestions:

- Mountain bikers are excited to help plan the trail network for the park and efforts to implement trail construction along with future maintenance.
- OHV user groups can help fund and maintain OHV trails. Consider volunteers during planning.
- Encourage a joint effort meeting with state experts as well as expert representatives from each of the appropriate user groups to quickly lay out what works for trail design in general terms for each group as well as the environment.
- Recommend good analysis of any proposal to make Williams Peak Lookout a rental facility with in-depth discussions with USFS.
- The Parks Division must sign a Memorandum of Understanding with the Mineral County Commissioners to form an understanding of continued coordination, collaboration, input and partnership going forward.
- Relationships with nearby private property owners must maintain an open line of communication and valued input.
- The lack of coordinated internal planning and management was one of our biggest concerns when the acquisition was made. Crafting a draft plan with no perceivable substantive input from the Wildlife and Fisheries Divisions is senseless. The analysis required to do so is clearly a responsibility that Montana FWP is staffed to undertake, and then make available to the public and the Commission. Greater emphasis is needed on coordinating management for the entire property prior to the draft plan being finalized.
- The Parks Division should communicate and collaborate more closely with the Fish and Wildlife Division for this project and future projects in order better ensure impacts to wildlife and habitat can be avoided, as the Fish and Wildlife Division are the acting managers for wildlife.

- There is an opportunity to partner with the University of Montana and other entities to work on watershed restoration, particularly emphasizing road decommissioning.
- Maintaining landscape connectivity needs to be prioritized and the U.S. Fish and Wildlife Service and the Fish and Wildlife Divisions of Montana FWP should be consulted as the plan moves forward with its recreation vision. We encourage an open and public process as the Parks Division moves forward with infrastructure development of the proposed parks.

## **H. General Management (20)**

A number of comments received did not fall into the other themes identified, and as such, are categorized under general management. These comments focused on general discussions of public safety, human-wildlife encounters, law enforcement, timber harvesting and fire suppression, noxious weed control, and permitting processes for proposed developments. A few comments were received addressing the management units specifically.

The following summary statements capture the specific issues, concerns, and suggestions:

- Parks must develop a more detailed approach to timber management up front. Immediately, the Chicken Creek area must be managed to reduce the high risk dense timber in the area. There must also be concessions made to assure that fire-risk timber does not reach too close to the lookout.
- Consider restoring natural patterns of fire dominated ecosystem with a variety of open and closed canopy vegetation conditions. Some areas may need to be thinned, in time, and other areas may need to be planted. The Park can easily provide all of these aspects from its history over the years, and be an excellent opportunity to educate the public by showing the various results of different practices, both from man and nature.
- Allow the harvest of dead and dying timber for local stove fuel. Develop a timber management plan that includes harvesting woody materials for local mills.
- Re-vegetation of timber has been limited, yet shrubs, forbs and grasses are re-establishing on the landscape. Plans for increased recreational use should consider this natural recovery and possible impacts to vegetative communities.
- Fire protection plan that considers natural benefit of fire on the winter range with clearly defined criteria to manage fire.
- Develop a water quality plan to maintain an outstanding fishery.
- Urge the Parks Division to take into consideration impacts that the addition of mountain bike paths will have on grizzly bears and the potential for bear-human encounters. The Parks Division should plan on coordinating with the Fish and Wildlife Division and Communication and Education Division to effectively incorporate Bear Aware presentations, signage and education materials in a consistent outreach program to mountain bikers, discussing the potential for grizzly and black bear-bicyclist encounters. We recommend adding language pertaining to "biking in bear country" safety in the goals. In addition, recommend goals for park-wide wildlife Food Storage Order.

### *Management Units*

- The draft plan lacks clarity regarding justification for uses proposed in each unit. Many areas can handle more intense uses and other areas are more sensitive.

- Recommend a wildlife movement zone similar to Unit D be designated along the east side of the park adjacent to Fish Creek.
- Consider making Unit B a bit larger on the southeast corner to make a better loop ride, which could easily handle at least two looped OHV trails. Consider the option of an ATV loop in Unit C with well-defined riding areas that are properly signed.

## **Form Response Letters**

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A total of 61 form comments were received during the public comment period. Forms are usually defined as five or more responses, received separately, but containing identical text. Once a form is identified, all responses with the matching text are categorized as a form. If a response does not contain all of the text presented in a given form or includes additional text and information, it is entered as an individual comment. The following text represents the three different form comments received and the number of each form submitted.

### **Form Comment 1 (37)**

- Do not finalize a management plan for Fish Creek State Park until the agency has completed a plan for the Fish Creek Wildlife Management Area.
- Designate the park as a “primitive park,” a designation the Montana Legislature created to protect parks with sensitive natural and cultural values from overdevelopment.
- DO NOT promote the park as an “OHV park.”
- Maintain the minimum development necessary to preserve public access for traditional uses, including fishing, hunting and hiking. Any development for camping, picnicking, or trails should include minimal site-hardening and developed facilities, and it should minimize costs for operations and maintenance.

### **Form Comment 2 (6)**

I am concerned by the high level of development proposed by the MT FWP Department Parks Division in the Draft Plan for the 5,300-acre Fish Creek State Park for the following reasons:

1. The Draft Plan does not take into account the fragile Fish Creek ecosystem and the environmental impacts associated with proposed development.
2. The plan for the adjacent Fish Creek Wildlife Management Area (“WMA”) has not been developed, meaning the Draft Plan is premature and incomplete as it does not take into account the management plans for the WMA surrounding the State Park.
3. The Draft Plan does not reflect the vision for the Fish Creek State Park expressed by the public during the scoping phase.

I urge the State Parks division of Montana Fish, Wildlife, and Parks to return to the drawing board and draft a plan that minimizes our collective footprint on Fish Creek.

### **Form Comment 3 (18)**

As an American citizen that enjoys the incredible natural quality of the State of Montana, I'm writing to let you know that I do NOT support the Fish Creek State Park Draft Management Plan. Having experienced this exceptional landscape and knowing its high ecological value for the region, I do not support FWP's plan to dramatically increase recreation and visitation in this area. I am particularly opposed to FWP's plan to offer motorized recreation and a developed campground facility in Fish Creek. The development of a RV friendly campground and motorized trails would greatly diminish the natural quality of the Fish Creek drainage and runs counter to Montana State Parks mission: "To preserve and protect our state's heritage and the natural beauty of our public lands for the benefit of our families, communities, local economies, and out-of-state visitors."

As you surely know, Fish Creek is a stronghold for native fish and wildlife. Fish Creek is an important tributary for our state fish, the Westslope Cutthroat, and also offers critical spawning and rearing habitat for Bull Trout, a threatened species. Fish Creek is also home to a declining moose population that prefers to browse in lush, streamside riparian areas. Increasing recreational infrastructure as planned in the Fish Creek State Park Draft Management Plan, will only serve to decrease the ecological value of this rich and wild landscape.

I believe that Fish Creek offers ample outdoor recreation opportunities already. Hunters comb the hillside in search of trophy mule deer and elk. Anglers ply the waters in pursuit of native trout. Mountain bikers enjoy exploring the vast forest road networks. Hikers, backpackers and packers enjoy the solitude of venturing into the North and West Forks of Fish Creek toward the stateline. This incredible array of recreational opportunities provided by Fish Creek simply does not need the kind of recreational infrastructure that is planned in the Fish Creek State Park Draft Management Plan.

### **Conclusion**

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Public comment is an important part of the public process. In reading this summary, it is important to note that this is not a decision document but a summary of the public comment. This process is not equivalent to a voting process, and constructive comments are recorded, read and evaluated as part of the final assessment. This summary makes no attempt to treat input as if it were a vote, and accommodates consideration of every comment received, not just those represented by a majority of respondents. The comments submitted, and this content summary, now provides the basis to move forward with the development of a final management plan for Fish Creek State Park. Although this summary does not provide formal responses to individual comments, the themes presented above, along with many of the specific questions, details, and ideas provided in individual comments, will be assessed and considered in the preparation of the final document.