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October 20, 2023

Montana Fish, Wildlife & Parks  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, MT 59620-0701  
RE: Fish Creek Recreation Strategy Comments

FWP Staff,

Please accept this comment letter on behalf of Hellgate Hunters & Anglers. HHA is an all-volunteer rod and gun club based in Western Montana, representing over 500 members. Our members regularly hunt, fish and recreate on public lands in the Fish Creek drainage, and we have a keen interest in preserving both wildlife habitat and populations, as well as the unique recreational opportunities in this area. HHA is grateful for the opportunity to comment on this important recreation strategy for the Fish Creek watershed.

### **Impacts to the Stream/Fishery**

HHA supports many of the draft management strategies identified to reduce or mitigate the impacts of dispersed camping on stream health, riparian areas, water quality and fish habitat. Recreational use of the Fish Creek drainage (including camping) has drastically increased, and the draft plan notes that “soil erosion, garbage, and human waste have increased in the Fish Creek drainage as dispersed camping has increased, including new pioneered campsites.” With more and more visitors (both in-state and out-of-state) to the Fish Creek drainage, we can expect these impacts to increase in the future. HHA supports the management strategies identified in Sections 7.1 and 7.2, to reduce the overall level of dispersed camping, eliminate those pioneered sites that are too close to the stream and address the levels of human waste that could negatively impact water quality in the drainage. As outlined in Section 7.10, the HHA encourages FWP to dedicate the resources needed to actively enforce these limitations and ensure that camping is only occurring in designated areas.

HHA supports the goal of preserving woody debris in the stream to enhance fish habitat and promote healthy fish populations. However, the draft plan only identifies one proposed management strategy to preserve instream habitat: a proposed closure to all recreational floating. HHA’s members feel there is insufficient evidence at this time to support a full float closure on

Fish Creek. Indeed, the draft report acknowledges that there is no evidence (anecdotal or otherwise) that recreational floaters are in fact removing woody debris to accommodate floating.<sup>1</sup> Like other stakeholders, HHA would support a ban on the removal of woody debris from the stream (if proposed). HHA would also support a more limited approach, such as a Rock Creek-style float fishing closure after July 1 of each year, or perhaps a ban on fishing from a boat/vessel, like some sections of the Madison River. Nonetheless, without any data to substantiate such a change, HHA cannot support a full float closure on the creek. A closure to all floating limits recreational opportunities beyond fishing and sets a dangerous precedent for river recreation.

Finally, the HHA supports ongoing monitoring of fish habitat and populations within the Fish Creek drainage to ensure that the protective management goals are accomplishing their objectives.

### **Motorized Use**

HHA supports the identified strategies for motorized recreation, including retaining the existing OHV loops, developing strategic parking areas to reduce congestion, weed management and the retention of seasonal road closures to protect wildlife habitat/populations. Overall, HHA supports and increased FWP presence to monitor and enforce regulations and prevent the pioneering of new OHV routes.

### **Monitoring**

As noted above, recreational use has already increased significantly in the Fish Creek drainage and we can expect this trend to continue. As these uses expand, so will negative impacts to wildlife. Therefore, HHA supports the draft strategies identified to improve monitoring of wildlife populations, habitat and recreational use to monitor trends and take new management actions if necessary. HHA strongly supports the strategies identified in Section 8, for long-term habitat monitoring in the watershed with a goal to monitor changing conditions across different habitats (riparian, upland) and disturbances (commercial logging, fires, and recreation use).

Thank you for the opportunity to comment,

Sincerely,

Andrew Gorder  
President  
Hellgate Hunters & Anglers

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<sup>1</sup> Page 44 of the Report states: "When asked, most stakeholders interviewed did not view woody debris removal by floaters as a significant concern in Fish Creek or were unaware of the issue. No stakeholders cited that they had seen woody debris being removed in Fish Creek."