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14 July 2010

Rory Zarling
Fishing Access Sites Manager
Montana FWP
3201 Spurgin Road
Missoula, MT 59804

Re: Draft EA for Harper's Bridge FAS Development

Dear Rory:

Thanks for the opportunity to comment on the Draft EA for the proposed Harper's Bridge FAS Development. Montana Trout Unlimited represents 13 chapters made up of 3,300 conservation-minded anglers statewide. Many recreate on the Clark Fork River. We strongly support thoughtful and safe access to Montana's rivers and streams. However, the alternative proposed for this site raises significant concerns that FWP is not addressing. We therefore oppose the proposed development for this site.

We agree with the department's assessment in the Draft EA that the impacts to the physical environment from construction activities would be minimal. Our concerns, however, focus on need for the project, the complete absence of reach-specific use data and how this project could actually create more problems than it purportedly will solve. Here are our concerns in detail:

Need for the project and reach specific information

A public boat launch currently exists across the river at the mouth of Deep Creek. The Deep Creek site has for years been completely adequate as a take-out for floaters coming from either Kelly Island FAS or Kona Bridge FAS. The statement in the EA (p. 21) that the proposed site creates "access for a float from Kona Bridge FAS..." ignores the fact that Deep Creek is already available and already being used. Deep Creek is also available for anyone wishing to launch and head downstream. Therefore, the proposed site on the north side of the river is redundant.

The Draft EA asserts that the new facility would allow floaters to reach Petty Creek FAS, a reach of 20 miles. Practically, however, floaters take this trip mainly when river discharge is high enough to get them to Petty Creek in a reasonable time. When the river is this high,

however, the river is often unfishable. And thus, it is a self-regulating reach, irrespective of the location of the launch site. Further, floaters currently wanting to make this trip already use the Deep Creek site. Therefore, the value of the proposed site for launching watercraft is negligible, with two exceptions: It would facilitate the increased use of motorized craft to move both upstream and downstream on this reach of river. And, it would make it easier for commercial outfitters to launch from the north side of the river. Commercial users probably comprise a large portion of the float-fishing traffic between Deep Creek and Petty Creek because a number of them have private access sites they lease along this reach. Still, not constructing this site won't prevent either user or the general floating public from doing what they currently do: launch from the Deep Creek FAS or a dispersed site located downriver off the frontage road.

We recognize that one advantage this site has over the Deep Creek FAS is that road access is easier. However, FWP is not obligated to provide easy, paved access to all of its sites. Reaching many sites requires gravel road access (River Junction, Whitaker Bridge, River Bend, Harry Morgan on the Blackfoot, among others). The access to Deep Creek is more than adequate, and it currently accommodates a wide variety of recreationists, including hundreds if not thousands of people who annually use the Deep Creek Rifle Range. Construction of a new access site on the north side of the river will not appreciably reduce traffic on the road out to Deep Creek. In fact, as long as a new site is not developed on the north side of the river, management and enforcement can be efficient and focused one site instead of spread to two.

The EA implies that this new site will serve a significant base of float anglers when it states that 38,000 – 68,000 angler-days occur on the Clark Fork between the confluence of the Bitterroot and the confluence with the Flathead. This is misleading. Only a minority portion of this use occurs in the 13-mile reach between Kelly Island and Harper's Bridge. And, as we've stated, access for this use is adequately serviced using sites on the lower Bitterroot, at Kelly Island, at Kona Bridge and at Deep Creek. No compelling data are provided to demonstrate there is a need for a new access site on this reach, especially one across the river from an existing site.

Unassessed impacts

The EA completely ignores a number of very real potential impacts. And for this reason, FWP could be setting itself up in the future for an explosion of the type of conflicts that currently vex the agency, landowners and users on the Blackfoot River. For instance, it is probable, despite FWP's insistence that this will only be a "day use" area, that the sort of development, with its surplus of parking and easy paved access, will become an attraction for non-floating partiers and become a law enforcement headache. In recent times when the department (or a land management partner) has improved or created fishing access sites near populated areas – Johnsrud, Whitaker Bridge, Poker Joe, etc. – the result has been increased enforcement issues for both FWP and the local county. The EA doesn't seem to acknowledge this, especially in its estimates of how much it will cost to maintain and monitor the proposed site.

The Draft EA states that adjacent landowners have had issues with overuse and congestion at the current access point. This claim, however is never enumerated or otherwise detailed in the EA. We question whether accommodating more use will remedy that problem. Again referencing the improvements to Kona Bridge FAS, on many days there traffic now spills out from the developed parking area to the adjacent county road, causing congestion. The fact that the road to the proposed developed site on the north side of the river at Harper's Bridge is a

dead-end, indicates that the parking problems there today are limited in nature. There is no congestion problem for, say, local landowners who need to travel further south. They can't proceed any farther. The bridge has been gone for years.

The EA states that Montana FWP anticipates use of the new site by both non-motorized and motorized watercraft. With the current liberal regulations for motorized use on the Clark Fork in this reach, it is reasonable to conclude that motorized traffic will continue to increase as a result of construction of a new launch site. This is similar to what has resulted from constructing the new Kona Bridge FAS. An improved launch facility with paved access becomes attractive to motorized users with trailers. FWP does not address in the EA the adverse impacts increased motorized use on the river will have on safety, resource damage and recreational conflicts. Bluntly, if FWP develops the site as proposed – and, importantly, the department continues to allow motorized traffic on this reach -- we predict there will be an increase in user conflicts and safety issues such that they will challenge the agency and its budget much more than it projects in the EA for simple monitoring and maintenance

Some suggestions

Before FWP embarks on additional Fishing Access Site development along the Clark Fork River Corridor, it would be prudent for the agency to engage in thoughtful planning – with the participation of the public and local government -- that could help prevent future river conflicts. The agency should identify existing recreational opportunities along the river and evaluate ways to create a mix of opportunities, such as providing access to reaches that can stand crowding and for reaches where a less-dense recreational opportunity is desired. The planning should consider whether it is wise to allow continued motorized use on river reaches that are seeing increases in float traffic. Further, FWP should analyze how use is displaced or concentrated by different types of access development. Fishery staff should be involved in this effort to help prevent inadvertent harm to important fisheries. This type of exercise could help prevent the complications now facing the Blackfoot River Corridor, where expanded recreational site development has contributed to an increase in recreational conflicts, disgruntled landowners, weed spread, law enforcement, littering and resource damage.

Relative to immediate needs along the Clark Fork River for additional fishing access sites, we believe there are higher-priority areas (and priorities for use of the \$50K in FAS funds targeted for the new site) besides constructing a large, new development across from an existing site. FWP should seriously explore opportunities for a new site between Deep Creek and Petty Creek, or, evaluate and seek out potential sites between Deer Lodge and Clinton. If FWP can make a more compelling case that a site on the north side of the river at Harper's Bridge is essential to meet an important recreational need, we would not oppose a small – perhaps no more than five-vehicle day-use site – that caters to wade-anglers or swimmers. We do believe, however, that the proposed 24-36 unit parking site with a boat launch, vault toilet, on-site signs (and off-site signs that will ensure the site is advertised as a site for party goers) is not a good idea.

Sincerely,

Bruce Farling
Executive Director

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Montana Fish, Wildlife and Parks Commission
Missoula County Commission
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