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October 12, 2023

Fish, Wildlife and Parks (FWP)
Fish Creek Recreation Strategy Development Team
Randy Arnold, Region 2 Supervisor

RE: Comment on the Fish Creek Draft Recreation Strategy

Submitted via: <https://fwp.mt.gov/conservation/fish-creek-watershed-recreation-planning>

Dear Mr. Arnold,

Thank you for the opportunity to submit a comment on behalf of Footloose Montana and our thousands of supporters in Montana. Footloose Montana is a nonprofit organization dedicated to the protection of all wildlife, including predators, with a special focus on ending trapping on Montana's public lands.

We oppose any expansion of human recreational activities and infrastructure to support them. We believe that the protection of wild animals and fish should come first and encourage you to change your proposed recreation strategy to a 'Fish and Wildlife Protection Strategy' to reflect the prioritization of Montana's wildlife and fish.

When FWP purchased approximately 41,000 acres from the 320,000 acres owned by The Nature Conservancy in 2010, taxpayers' money was used to acquire this area, which is surrounded by 140,000 acres of National Forest System lands and is adjacent to the Great Burn Proposed Wilderness and the Ninemile Demographic Connectivity Area for grizzly bears.

FWP designated 5,603 acres as the Fish Creek State Park (making it the largest in Western Montana), while the remaining area, plus land acquisitions added later, were established as the Fish Creek WMA. This decision essentially carved out a large area for human recreation,

essentially imposing a recreation and tourism footprint on an area most people wanted managed and protected for fish and wildlife habitat.

Now, FWP is proposing to increase recreational use and infrastructure throughout the area—Fish Creek State Park, Fish Creek Wildlife Management Area, and Big Pine and Forks Fishing Access Sites—including expanded campgrounds, parking lots and possibly increased trails for ATVs and mountain bikes among other recreational activities.

Wildlife protection first, human recreation second (and with limitations)

Fish Creek consists of habitat for “an estimated 57 mammal species including bobcat, moose, elk, black bear, mountain lions, and wolves, in addition to 115 bird, five amphibian, and five reptile species. Its riparian and upland habitats support a rich diversity of birds, small mammals, amphibians, and reptiles. Equally important, the area serves as a key linkage zone for forest carnivores (grizzly bears, Canada lynx, wolverine, and others), providing connectivity between the Mission and Rattlesnake Wilderness Areas and through the Ninemile Divide to the Selway-Bitterroot Mountains. In addition, “Fish Creek is one of the strongest bull trout spawning tributaries to the Clark Fork River and its location makes it a primary route for grizzly bears migrating from the Northern Continental Divide Ecosystem to the Bitterroot ecosystem.”¹

The predominant concern of the public has been, and continues to be, a strong commitment to fish and wildlife conservation as a priority, with human recreation perceived as secondary and expected to be managed in line with the needs of fish and wild animals.

Pressure from human recreation on wild animals is increasing:

Globally, human population and recreation pressure on wild animals and their homes (habitat) is intensifying, and Montana is no exception. Recreational activities include various types of water and winter sports, hiking, wildlife viewing, climbing, camping, mountain biking, motorized recreation, and hunting, fishing and trapping. Associated with human recreation are illegal activities, waste, littering, noise, light and other types of pollution.

Researchers are increasingly recognizing the multitude of detrimental impacts of non-consumptive recreation on wild animals in addition to pressures from hunting, fishing and trapping. An overall increase in visitation to protected areas is occurring globally (estimated at 8

¹ <https://fwp.mt.gov/binaries/content/assets/fwp/aboutfwp/regions/r2/fish-creek-planning/fish-creek-draft-recreation-strategy-9-18-2023.pdf> (page 24).

billion visits per year). In the United States alone, the number of participants in outdoor recreation increased by 7.5% and total visitor days increased by 32.5% between 2000 and 2009.²

Many of the public land tracts in the US have become massive playgrounds for humans, especially since the Covid-19 pandemic. Indeed, “BLM land clocked 81 million visits in 2022—a jump of 10 million from just three years before, and a 40 percent increase over 2012. Visits to national forests and wilderness areas, too, increased by 18 million from 2019 to 2020.”

The same has occurred in Montana, e.g., more than 3 million people visited Montana state parks in 2022 (51.5% more than in 2012). “Visitation at Glacier National Park grew 34.5% in that same timeframe ...”³

While we recognize the economic benefits from recreation as well as the many benefits to human mental and physical health, we want to emphasize the detrimental impacts of a growing human population, including in Montana, and the associated increased and intensifying pressures on public lands, aquatic lives and the wild animals who depend on these areas, including Fish Creek.

There is a growing awareness that outdoor recreation is a leading factor in endangerment of plant and animal species on United States federal lands, is a threat to 188 at-risk bird species globally and causes changes in animals’ behavioral responses such as a) increased flight and vigilance, b) their use of spatial or temporal habitat, c) declines in abundance, occupancy, or density, d) physiological stress and reduced reproductive success, and e) overall, decreases biodiversity.⁴

Many species respond similarly to human disturbance and predation risk, meaning that disturbance caused by recreation can force a trade-off between risk avoidance and fitness-enhancing activities such as foraging or caring for young ...⁵

Close to home, a study of Glacier National Park showed that even low-impact recreation can create a 'landscape of fear' like other apex predators, changing wild animals’ use of an area simply with their presence. “Researchers found that when human hikers were present, 16 out of 22 mammal species, including predators and prey alike, changed where and when they accessed

² Systematic Review of Recreation Effects on Animals. *PLOS ONE* | DOI: 10.1371/journal.pone.0167259 December 8, 2016 2 / 21

³ All stats in the two para from: *Hiking needs new rules*: <https://12ft.io/proxy?q=https%3A%2F%2Fwww.theatlantic.com%2Fscience%2Farchive%2F2023%2F10%2Fhiking-outdoor-recreation-animal-impact%2F675598%2F>

⁴ Same as footnote 2.

⁵ Same as footnote 2.

areas. Some completely abandoned places they previously used, others used them less frequently, and some shifted to more nocturnal activities to avoid humans.”⁶

Given these concerns, we ask that FWP consider the needs of wild animals and fish first. Purchased with taxpayer dollars, the Fish Creek area was originally designated as a Wildlife Management Area, not a recreation area. Recreation should come last.

We ask that FWP **does not**:

- Increase infrastructure in Fish Creek State Park, Fish Creek Wildlife Management Area, and Big Pine and Forks Fishing Access Sites.
- Expand campgrounds, including the Big Pine and Forks campgrounds.
- Build additional parking facilities.
- Expand any trails or areas used by ATV riders and mountain/e-bikers.
- Allow logging.
- Allow rafting on Fish Creek.

In addition, we request that FWP **does** the following:

- End the commercial and recreational killing of wolves, mountain lions and other predators, and
- End the recreational trapping of any wild animals in the Fish Creek area.

With wild animals, fish and plant communities losing ground everywhere and acknowledging that there is no real balanced use between humans and wild animals, FWP has an opportunity to protect Fish Creek for fish and wild animals first and manage human recreation activities as a secondary interest and with limitations (not allowing human use of certain areas and at certain times).

In closure, the Fish Creek Wildlife Management Area and State Park need more protection not increased recreation and visitor use.

Sincerely, Anja Heister, PhD on behalf of the Footloose Montana Board

⁶ *Low-impact human recreation changes wildlife behavior.*
<https://www.sciencedaily.com/releases/2023/01/230119093130.htm>