



---

P.O. BOX 7792   MISSOULA, MT 59807   (406) 241-3121  
[www.hellgatehuntersandanglers.org](http://www.hellgatehuntersandanglers.org)

December 9, 2021

Montana Fish, Wildlife & Parks  
ATTN: Kyan Bishop, Parks and Recreation Planner  
P.O. Box 200701  
1420 East 6th Ave.  
Helena, MT 59620

Re: Comments on 2021 Smith River Management Plan

To Whom it May Concern:

Hellgate Hunters & Anglers (HHA) is a local, all volunteer rod and gun club based in Missoula. We represent over 400 local hunters and anglers. We write to provide comment on the 2021 Smith River Management Plan Environmental Assessment. Many of our members are avid anglers who have a vested interest in protecting opportunities to recreate on Smith for themselves and future generations of Montanans. Our comments on the specific issues identified in the EA are as follows:

#### **A. Management of Camp Baker**

HHA supports FWP's preferred option of managing Camp Baker for day use only and continuing to register groups and assign boat camps via phone or online. As noted in the EA, it has become apparent to users in recent years that overnight camping at Camp Baker leads to a great amount of congestion on launch day. Further, HHA is hopeful and supportive of the idea that eliminating camping at Camp Baker is likely to result in a positive increase in business activity in communities in the surrounding area. HHA would like to provide some additional input on two key aspects of this issue:

First, HHA strongly supports the idea of registering boat camps online. Allowing users to select their boat camps online simply makes sense based on the widespread use of online-based reservation systems in similar applications. One challenge with an online reservation system will be timing the selection of boat camps. HHA would like to see a system that doesn't result in FWP requiring permit holders to log-in at designated time and compete to select sites. A potential solution could be to create an online system that assigns a priority number to the permit holders at random. Each permit holder would be able to make their preferred selections at a given time based on their number, and if they fail to do so within a certain period, the person with the next-highest priority could be bumped up and allowed to select sooner. Regardless of

the specifics, HHA is confident that FWP's general utilization of an online system would be a great leap forward and an effective means for boat camp registration.

Second, FWP would be wise to think and prepare for the eventual possibility of the need for an alternative to camping at Camp Baker. Closing Camp Baker has the potential to result in overuse of the surrounding area. Many people are required to drive long distances in order to float the Smith. As such, they will be forced to find other camping opportunities nearby. This may result in significantly increased use of other campsites close to the launch. Because of this potential outcome, there may be a need for alternative campsites sanctioned by FWP.

## **B. Human Waste Management**

HHA partially supports FWP's preferred option of mandatory human waste pack-out using self-contained toilet systems. HHA recognizes the need to address this issue and the current negative impacts of human waste on the on the river ecosystem and user experience. However, HHA would like to see FWP retain a small number of pit latrines along the river, marked on the river map. This would allow floaters some comfort and peace of mind in knowing that they can rely on making certain stops along their float to access pit latrines.

## **C. Natural and Cultural Resource Impacts**

HHA supports FWP's preferred option of creating a system of incentives to promote smaller group sizes throughout the season, closing the river to floating for a given period during the early spring, and reallocating only a portion of cancelled permits during the peak season. HHA will be interested to see what type of incentives FWP creates to promote smaller group sizes throughout the season. One potential incentive could be for FWP to create a system tied to the river camp selection priority system. Permit holders who agree to have smaller group sizes could be automatically assigned a higher priority in campsite selection.

## **D. Floater Opportunities**

HHA generally supports FWP's preferred option of developing a system to increase floater opportunities for unsuccessful permit applicants and those who have not recently (or ever) floated the Smith. However, HHA has some additional input as to how best to achieve these goals:

First, HHA encourages FWP to develop a bonus point system for the Smith like those utilized by FWP for hunting opportunities. Developing a bonus point system will help ensure that unsuccessful applicants can one day be successful in having the opportunity to float the Smith during peak season in their lifetime. As noted in the EA, HHA will look forward to hearing more about the details of this system during the implementation phase and HHA will look forward to providing additional comments prior to FWP making decisions about this system.

Second, HHA recommends that FWP strongly consider implementing a cap on non-resident permits to 10 percent of the total permits issued, excluding the permitted outfitting. Just like in big game permitting and other areas of land use and recreation, Montanans should have priority

over out of state users when it comes to floating the Smith. FWP has long recognized that resident hunters deserve priority over non-residents when it comes to utilizing the same natural resource. Why should the Smith be any different? Montanans should be able to depend on one day being fortunate enough to draw that coveted peak season Smith permit and enjoy the best that the river has to offer without the fear of losing out to a non-resident floater. Montanans should have the peace of mind of knowing that the odds are in their favor that they will be able to enjoy the Smith themselves, and that they will be able to enjoy it with their kids and grandkids as well. The Smith is a Montana tradition, and Montanans deserve to be prioritized over non-residents when it comes to enjoying all that this great river has to offer.

Thank you for the opportunity to comment and for your thoughtful consideration of our proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Walker Conyngham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Walker Conyngham  
President  
Hellgate Hunters & Anglers