



Draft Environmental Assessment Smith River State Park and River Corridor Recreation Management Plan Update



November 10, 2021

PART I. PROPOSED ACTION AND DESCRIPTION

A. Type of proposed state action

Montana Fish, Wildlife and Parks (FWP) is proposing to update the 2009 Smith River State Park and River Corridor Recreation Management Plan targeting four main management concerns. This plan is 12 years old and staff members identified the need for updates due to growing recreational use and an interest in upholding the agency's commitment to protecting natural, cultural, and historic resources.

B. Agency authority for the proposed action

There are numerous statutes, rules, and policies that apply to management of the Smith River. Those most frequently referenced are listed below:

- Smith River Management Act (23-2-401, MCA)
- Rules for Use of Lands and Waters (87-1-303, MCA)
- Montana Stream Access Law (23-2-301 & 302, MCA)
- Montana Trespass Law (45-6-201, MCA)
- Smith River Biennial Fee Rule
- FWP River Recreation Management Rules (ARM 12.11.401 through 12.11.455)
- FWP Commercial Use Rules (ARM 12.14.101 through 12.12.170)
- FWP Public Use Regulations (ARM 12.8.801 through 12.8.824)
- Smith River Motorized Watercraft Closure (ARM 12.6.901)
- FWP Heritage Resource Management and Protection Policy (ARM 12.8.501)
- Smith River State Park and River Corridor Management Plan (2009)

C. Anticipated Schedule

Some of the management actions proposed in this EA would require administrative rulemaking by the Parks and Recreation Board; implementation of rules would likely occur beginning with the 2023 float season. For those proposed actions that don't require rulemaking to enact, implementation could occur beginning with the 2022 float season.

D. Location affected by proposed action:

The Smith River is located in west-central Montana and is formed by the junction of the South Fork, which drains a portion of the Castle Mountains, and the North Fork, originating from the south end of the Little Belt Mountains. These two forks join to form the main stem just west of the town of White Sulphur Springs. The Smith River Corridor flows through both Meagher and Cascade Counties.

See the map of Montana state parks in Figure 1.

MONTANA STATE PARKS & FWP ADMINISTRATIVE REGIONS

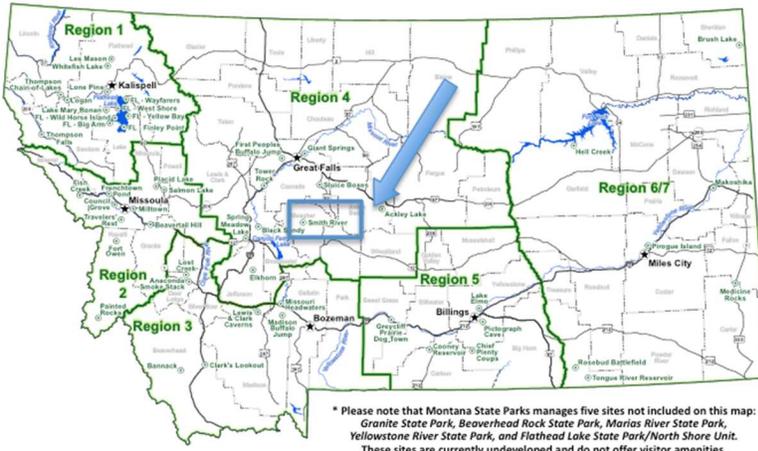


Figure 1. Statewide Map of Montana State Parks and FWP Regions

Smith River State Park is located in FWP's Administrative Region 4. It is a protected river corridor that is approximately 58.8 miles in length. It is comprised of:

- One public put-in access point, also referred to as Camp Baker
- Fifty-two boat camps (27 owned by US Forest Service, 15 owned by FWP, 10 leased) along the river; and,
- One public take-out point, also referred to as Eden Bridge

Beyond the boat camps, put-in and take-out areas, much of the surrounding shore-line area is owned by the US Forest Service, US Bureau of Land Management, and private land owners, not by FWP.

See a map of Smith River State Park in Figure 2.



Figure 2. Smith River State Park Map

E. Scope of Environmental Assessment

This EA focuses on a set of management issues for which conditions have evolved and warrant updating. These issues primarily pertain to management of the Camp Baker put-in, the permit lottery system, user impacts on natural and cultural resources, and management of human waste.

F. Jurisdiction and Management

A summary of jurisdictional and management responsibilities is below:

- FWP owns 13 parcels of land totaling 797 acres within the Smith River corridor. These properties include Camp Baker (near the community of White Sulphur Springs), the river's only public launch put-in (51 acres) and Eden Bridge (near the community of Ulm), the only public take out on the permitted section of the river (4.47 acres).
- FWP leases four parcels (eight boat camps) of land totaling 41 acres from private landowners for purpose of providing public access to the Staigmiller, Ridge Top, Givens Gulch, and Rattlesnake boat camps.
- FWP also leases one parcel from the Department of Natural Resources and Conservation (DNRC) that provides access at Syringa boat camp
- FWP jurisdiction includes use of FWP lands within the corridor, the fish and wildlife resources, and recreation that occurs on the river.
- FWP manages and maintains 27 Boat Camps on U.S. Forest Service land through a cooperative agreement.
- FWP holds a permanent Conservation Easement (Deep Creek) from landowner Mountain Lion LLC.

G. Permits, Funding and Other Jurisdictional Responsibilities

Permits needed to adopt plan: N/A

Funding:

<u>Agency Name</u>	<u>Funding Amount</u>
FWP (FTE & Operations)	\$180,695
<u>U.S. Forest Service</u>	
Challenge Cost-Share Agreement with Helena-Lewis & Clark National Forest	\$7,000
Salary for one U.S. Forest Service River Ranger	\$8,500

Other Overlapping or Additional Jurisdictional Responsibilities:

<u>Agency Name</u>	<u>Type of Responsibility</u>
U.S. Forest Service	Land ownership of portions of the Smith River Corridor
DNRC	Land Ownership of portions of the Smith River Corridor as well as the streambed below the high-water mark

H. Narrative summary of the proposed action

This EA evaluates the predicted impacts of implementing the Updated Draft Recreation Management Plan for the Smith River State Park and River Corridor. The EA examines four key issues in the plan:

- 1) Management of Camp Baker
- 2) Human Waste Management
- 3) Natural and Cultural Resource Impacts
- 4) Floater Opportunities

The EA identifies alternatives for addressing these issues as well as a preferred alternative for each one. The purpose of the EA is to help the public and the decisionmakers carefully consider the advantages, disadvantages, and potential impacts of the preferred alternative before deciding on the best approach.

PART II. PURPOSE AND NEED FOR PROPOSED ACTION

A. Proposed Action

FWP is proposing to update the 2009 Smith River State Park and River Corridor Recreation Management Plan. This plan is 12 years old and staff have identified the need for plan updates due to growing recreational use and an interest in upholding the agency's commitment to protecting natural, cultural and historic resources.

B. Purpose and Need for Action

The purpose of the management plan update is to provide guidance to FWP staff for the day-to-day administration of the river recreation program. The update is also intended to provide rulemaking guidance to the Parks and Recreation Board.

The Smith River has long been one of Montana's premier river recreation destinations. Its spectacular natural features and settings, outstanding fishing opportunities, and moderate degree of difficulty for floaters have all contributed to its popularity. In conjunction with this popularity, FWP has witnessed a notable increase in use on the Smith River and the associated impacts to river resources and the river recreation experience. These observations, coupled with a growing demand for river recreational opportunities in Montana, necessitate further river recreation management planning and direction through an updated management plan. (A copy of the 2020 Smith River Annual Report, which shares recent visitation statistics, is available on the FWP website (fwp.mt.gov/stateparks/smith-river)).

PART III. AFFECTED ENVIRONMENT

A. Physical Environment

Located in west-central Montana, the Smith River is formed by the junction of the South Fork, which drains a portion of the Castle Mountains, and the North Fork, originating from the south end of the Little Belt Mountains. These two forks join to form the main stem just west of the town of White Sulphur Springs. The river flows northwest through a relatively wide valley between the Big and Little Belt Mountains until it enters a deep, narrow canyon several miles below Fort Logan. After emerging from the 50-mile long canyon, the river meanders through rolling grasslands until it joins the Missouri River near Ulm, MT. The river corridor flows through both Meagher and Cascade Counties.

This draft EA pertains to Smith River State Park and the 58.8-mile Smith River corridor between Camp Baker put-in and Eden Bridge take-out. Affected areas include the lands adjacent to the river that are owned, leased, or otherwise administered by FWP.

B. Social Environment

Smith River State Park provides outstanding opportunities for river recreation and represents a highly coveted public resource that is treasured by many. Popular recreational activities include floating, camping, fishing, bird watching, wildlife watching, photography, and enjoying the peace and solitude provided by the river's semi-primitive characteristics and scenic grandeur.

Ranching is an important part of the area's social fabric, with a number of ranches adjacent to the river. Private lands and homes in the corridor are used for seasonal recreation purposes.

C. Biological Environment

The Smith River waterway is a nationally known trout fishery and has been managed as a wild trout fishery since 1974 when the stocking of trout was discontinued. The fisheries resource is classified as high value for the floating section between Camp Baker and the mouth of Hound Creek. Two long-term population-monitoring projects have demonstrated that rainbow and brown trout are the dominant trout species in the reach between Camp Baker and Eden Bridge. The river corridor also provides habitat for a variety of waterfowl; numerous bird species including bald eagle, golden eagle, and numerous raptor species; neotropical bird species; nongame species; big game including deer, elk, black bear, moose, and mountain lion; fur-bearing species including beaver, muskrat, river otter, and wolverine; and other mammals including raccoons, red fox, badger, and coyote. While rare, there have also been reports of lynx, grey wolf, and pine marten in the area. The Natural Heritage Program website includes a list of all sensitive and T/E plant, mammal and bird species (mtnhp.org/default.asp).

D. Cultural Environment

For many centuries prior to non-Indigenous exploration in the Smith River basin, various Native American tribes were attracted to the area. The recesses of the canyon offered shelter from the harsh winters, and concentrations of game animals provided food, clothing and other necessities for life. The Smith River is rich in heritage resources, including stone circles, lithic scatters, and outstanding examples of rock art.

E. Economic Environment

Smith River State Park provides an important economic boost to gateway communities. Visitors to Camp Baker patronize businesses in White Sulphur Springs for gasoline, food, supplies, and lodging and as visitors depart the river at Eden Bridge, they often patronize businesses in Ulm or Cascade for gasoline and food.

At present, there are seven commercial fishing outfitters that provide guide and outfitter services to floaters on the Smith River. Outfitters also provide seasonal employment opportunities for several licensed guides and support staff. In addition, there are two vehicle-shuttle services that transfer floaters' vehicles between Camp Baker and Eden Bridge, providing seasonal employment to locals living near Ulm and Cascade. Farming and ranching that occurs within the watershed and on private lands along the river are an important contributor to the local, regional and state economy. There are also privately-owned recreation-oriented businesses along the Smith River.

F. Aesthetic Environment

The character of the Smith River is semi-primitive, owing to the rugged physical features of the canyon and limited public access points. Towering cliffs, an active stream channel, and remoteness from population centers and roads accounts for its sparse development and corresponding difficulty of accessing the river. Recreational floaters are afforded outstanding opportunities to experience open space and scenic beauty as the river flows through a rugged limestone canyon. This semi-primitive recreation setting is highly desired by many floaters, particularly as the popularity of river recreation across the country grows and visitor interest has increased.

G. Administrative Environment

The Smith River is a public waterway administered by FWP in accordance with the Smith River Management Act of 1989. The river flows through a combination of public land jurisdictions, with the Helena-Lewis and Clark National Forest making up approximately 18% of the river corridor lands in public ownership.

FWP serves as the lead agency administering the Smith River recreation program and executes this responsibility through a cooperative agreement with the U.S. Forest Service. River management responsibilities include management and administration of the floater permit lottery system, Camp Baker put-in and Eden Bridge take-out facilities, 52 designated boat camps, and an FWP-U.S. Forest Service river ranger patrol program.

Part IV. Issues and Alternatives

A. Issue: Management of Camp Baker

Discussion: At the onset of the 2020 float season, Camp Baker was closed to overnight camping to comply with Covid-19 mandates established by the Governor. Due to the potential for congestion and the confined area of the campground, it was determined that closing the site for camping would minimize health and safety risks to visitors and employees and align with the state's social distancing measures. FWP continued with these precautions in 2021 in the interest of public health and based on positive feedback received from floaters and local communities. FWP simultaneously developed a time-efficient and cost-effective contingency plan to register float groups via phone - a process that had previously taken place in person at Camp Baker. River rangers called permit holders two days prior to their launch date to complete registration, select boat camps, and process payment. A copy of the registration form and other materials then awaited the group upon the day of their launch. In response to these changes, FWP received a high degree of positive feedback, with many visitors encouraging staff to continue operating in this manner due to its efficiency and the customized attention they received.

The 2009 management plan states, "overnight camping will be accommodated in campsites designated and located to reduce congestion and conflicts at the launch area." However, as average group sizes have grown and the number of vehicles with trailers has increased, so has the need for additional space. Recently, overflow parking was established to accommodate additional vehicles, but this in turn caused even greater congestion as well as negative resource impacts to soil and vegetation.

Managing Camp Baker for both day-use and overnight camping has become increasingly challenging. Limiting Camp Baker to day-use only worked well, and floaters have been able to find accommodations in White Sulphur Springs or the surrounding area when needed. Some floaters chose to stay in hotels or motels, some chose to camp in other locations, including at nearby FWP Fishing Access Sites (FAS), and some chose to simply drive over on their launch day, instead of staying in the area the night before. Eliminating overnight camping also provides additional space for staging, launching and parking. While eliminating overnight camping at Camp Baker would reduce resource impacts to soil and vegetation at that site, some of the displaced campers are likely to use other campgrounds in the area, which could in turn result in resource impacts at those sites. White Sulphur Springs reported a positive increase in business activity in the town's restaurants and hotels that could be attributed to the closure of camping at Camp Baker, but it is unknown whether this was due to that change or to the overall increase in outdoor recreation that occurred across Montana in 2021.

Current Conditions: Camp Baker has become increasingly congested due to larger group sizes and vehicle/trailer size and numbers. The congestion occurs in both the camping and launch areas, and negatively impacts user's experiences and the natural and cultural resources of the area. While Camp Baker has been temporarily closed to overnight camping due to COVID restrictions, in the future camping would be allowed again unless a decision is made to manage the site for day-use only.

Desired Conditions: FWP will manage Camp Baker to best accommodate floaters and provide for the safe and efficient flow of traffic through the site while protecting the important natural and cultural resources in this area.

Alternative A (No Action): *Return to allowing overnight camping while registering groups and assigning boat camps on site.*

Description: FWP would return to pre-Covid-19 protocols followed before the 2020 float season and again allow overnight camping at Camp Baker. Staff would register groups, receive payment, and assign boat camps at Camp Baker on the day of their scheduled launch.

Alternative B: *Return to allowing overnight camping but continue to register groups via phone or online.*

Description: FWP would return to pre-Covid-19 protocols, in place prior to the 2020 float season, and again allow overnight camping at Camp Baker, but continue registration, payment, and boat camp assignment via phone or online.

Alternative C (Preferred Alternative): *Manage Camp Baker for day-use only and continue to register groups and assign boat camps via phone or online.*

Description: FWP would no longer allow overnight camping at Camp Baker and would continue handling registration, payment and boat camp assignments via phone or online. Floaters would need to find accommodations in or around the local community of White Sulphur.

Evaluation of the impacts of the Preferred Alternative of managing Camp Baker for day-use only to the physical environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Geology and soil quality, stability and moisture			X			a)
Air quality or objectionable odors			X			a)
Water quality, quantity and distribution (surface or groundwater)				X		
Existing water right or reservation				X		
Vegetation cover, quantity and quality			X			a)
Unique, endangered, or fragile vegetative species				X		
Terrestrial or aquatic life and/or habitats			X			a)
Unique, endangered, or fragile wildlife or fisheries species				X		
Introduction of new species into an area				X		
Changes to abundance or movement of species				X		

- a) Managing Camp Baker for day-use only would help to improve soil quality, stability, and moisture; improve air quality by reducing vehicle exhaust and eliminating campfires, improve vegetative cover, quantity and quality; and, improve habitat for terrestrial organisms at Camp Baker itself. Some overnight camping and aforementioned impacts would likely be displaced to other sites such as Fort Logan and Newlan Creek FAS and Smith River WMA.

Evaluation of the impacts of the Preferred Alternative of Managing Camp Baker for day-use only to the human environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Noise and/or electrical effects			X			a)
Land use			X			b)
Risk and/or health hazards			X			c)
Community impact			X			d)
Public services/taxes/utilities				X		
Potential revenue and/or project maintenance costs				X		
Aesthetics and recreation			X			e)
Cultural and historic resources				X		
Evaluation of significance				X		

- a) Managing Camp Baker for day-use only would reduce noise generated by campers at Camp Baker and late-night driving on local roads. Some overnight camping and aforementioned impacts would likely be displaced to other sites such as Fort Logan and Newlan Creek FAS and Smith River WMA.
- b) Managing Camp Baker for day-use only would free up space for staging, launching and parking.
- c) Managing Camp Baker for day-use only would result in a safer, more usable river access point for all members of the public. Camp Baker was becoming increasingly congested and crowded prior to the temporary camping closure before the 2020 float season. As average group sizes have increased over the years, so have the number and size of vehicles and trailers and it has become increasingly difficult to fit all such vehicles into established campsites and overflow parking areas. The congestion and exhaust have become an irritation and hazard to all users. In addition, it would save staff at Camp Baker time by eliminating the workload of managing overnight camping alongside of assisting groups of floaters as they get ready to embark. Some overnight camping and aforementioned impacts would likely be displaced to other sites such as Fort Logan and Newlan Creek FAS and Smith River WMA. These sites are currently not as congested and crowded as Camp Baker is, so they may be able to absorb additional use without notable ill effects. If use continues to grow rapidly as it did from 2020-2021, the sites could become as crowded as Camp Baker and experience similar impacts.
- d) Managing Camp Baker for day-use only is expected to continue to positively impact the economy and community of White Sulphur Springs. The temporary closure of Camp Baker to overnight camping due to COVID-19 precautions in 2021 resulted in increased patronage of area restaurants, hotels, and other businesses.
- e) Overall, the department has received mostly positive feedback on the temporary camping closure and implementation of phone registration. The ability to register and select boat camps via the phone eliminated the need to arrive at Camp Baker a day or more in advance to secure a place in line. Some users have expressed frustration about the closure and would like to see overnight camping reinstated. These users enjoyed staying at Camp Baker

the night before their float to get organized with other members of their party and socialize with other floaters. While these activities could take place at other locations where camping is allowed, FWP recognizes that some of the social aspects of camping at Camp Baker would be lost. FWP believes that the benefits to be gained by this management change would outweigh these potential ramifications. Some users may choose to camp at area FWP-managed Fishing Access Sites (FAS), which, depending on the degree of use, could have a negative impact on these resources and on other users of those sites.

B. Issue: Human Waste Management

Discussion: FWP and the U.S. Forest Service began providing pit latrines at all boat camps on the Smith River in 1983. There are currently 52 in use. These are hand-dug by river rangers during weekly river patrols. Once full, they are covered with soil and new ones are dug. Approximately 500 pit latrines have been dug during the past 15 years (2006-2020) and roughly 1,200 since 1983, which is equivalent to an average of 34 pits dug each season. The pit latrines help mitigate health and sanitation problems associated with human waste management in the river corridor. However, several cumulative impacts have become more evident as use on the river continues to increase. These include:

- Health and sanitation concerns
- Groundwater quality concerns
- Soil and vegetative disturbances
- Improper disposal of trash in latrines
- Decreasing availability of suitable locations for digging new pits (topography, lack of space, slow decomposition rates)
- Natural and cultural resource impacts
- Staff time and labor required to dig latrines (at the expense of performing other duties)

During 2018-2020, the average number of floaters per year increased by nearly 25% as compared to the previous three seasons of 2015-2017. With the increase in use there is an increase in impacts from human waste. The 2021 legislature granted FWP spending authority for implementing a human waste pack-out system. To comply with this legislative direction, FWP intends to use this planning process to determine what method would be most suitable to safely and efficiently pack out and dispose of human waste. The U.S. Forest Service and DEQ strongly support the preferred alternative of mandatory pack-out of human waste.

Current Conditions: The current system of pit latrines is not sustainable into the future. Few suitable locations exist for new latrines, and existing latrines can cause offensive sights and odors. The continued use of pit latrines is a potential human, fishery and river health concern. The Smith River corridor is the only permitted river in the lower 48 states that does not require human waste pack-out.

Desired Conditions: Human waste disposal on the Smith River would be managed with a long-term stewardship approach that is guided by the following principles:

- Reduce impacts and disturbance to soil, vegetation, and cultural resources;
- Reduce contamination of water resources;
- Reduce risk to public health; and,
- Minimize impacts for the floating public and adjacent landowners.

Alternative A (No Action): *Continue to utilize pit latrines*

Description: FWP and the U.S. Forest Service would continue to provide and maintain hand-dug pit latrines in the boat camps.

Alternative B (Preferred Alternative): Mandatory human waste pack-out using self-contained toilet systems with disposal at or near the Eden Bridge take-out.

Description: FWP and the U.S. Forest Service would require floaters to pack out solid human waste from the river corridor. This direction is supported by a review of the impacts to land, water, cultural, aesthetic, and public health associated with the existing pit toilets and human waste management practices. A mandatory waste pack-out system would be preceded by education and outreach to familiarize the public with the system and use of related equipment. Appropriate disposal facilities would be identified and/or installed prior to implementation.

Alternatives considered but ruled out:

- **Constructing vault toilets in boat camps:** It would not be feasible to install vault toilets at most of the boat camp locations due to geography, proximity to the river, and in most cases, because of a lack of road access to handle waste removal operations.
- **Providing composting toilets:** It would not be feasible to install composting toilets at several of the boat camps due to geography and proximity to the river. Composting toilets require adequate exposure to sun/heat, which is very limited in the canyon. Further, the removal of composted waste might require packing out waste via helicopter, raft, or livestock if DEQ on-site disposal requirements were not met.

Evaluation of the impacts of the Preferred Alternative of requiring mandatory pack-out of human waste in self-contained toilet systems to the physical environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Geology and soil quality, stability and moisture		X				a)
Air quality or objectionable odors			X			b)
Water quality, quantity and distribution (surface or groundwater)			X			c)
Existing water right or reservation				X		
Vegetation cover, quantity and quality		X				d)
Unique, endangered, or fragile vegetative species				X		
Terrestrial or aquatic life and/or habitats				X		
Unique, endangered, or fragile wildlife or fisheries species				X		
Introduction of new species into an area			X			e)
Changes to abundance or movement of species				X		

- a) The Preferred Alternative would include the closure and rehabilitation of all existing pit toilets, which would improve soil and vegetation conditions at the boat camps.
- b) The Preferred Alternative would result in a reduction of objectionable odors caused by the pit toilets at boat camps.
- c) Closure of the pit toilets and implementation of pack-out requirements has the potential to improve the water quality of the Smith River. Human feces are known to contain over 100 forms of bacteria, viruses and protozoa including Giardia and Escherichia coli (E. Coli).
- d) Removing and rehabilitating the soil scarification of the pit toilets would result in improved vegetative cover, quantity, and quality.
- e) Removing and rehabilitating the soil scarification of the pit toilets would reduce the opportunity for noxious weeds to invade.

Evaluation of the impacts of the Preferred Alternative of requiring mandatory pack-out of human waste in self-contained toilet systems to the human environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Noise and/or electrical effects				X		
Land use				X		
Risk and/or health hazards		X				a)
Community impact			X			b)
Public services/taxes/utilities				X		
Potential revenue and/or project maintenance costs				X		c)
Aesthetics and recreation			X			d)
Cultural and historic resources			X			e)
Evaluation of significance				X		

- a) The Preferred Alternative of mandatory pack-out of human waste would reduce health risks associated with humans using open pit toilets that are not sanitized or otherwise maintained for cleanliness. The preferred alternative would also reduce health risks to the FWP and U.S. Forest Service river rangers, who maintain the pit toilets, from disease-causing pathogens.
- b) The exact method for waste disposal has not yet been determined, however this could present an opportunity for the private sector and lead to economic benefits.
- c) FWP is evaluating project maintenance costs. Once a decision is made regarding a human waste pack out requirement, staff members will be able to estimate such costs and potential revenues per the system that is identified.
- d) Whether a mandatory human waste pack-out requirement would result in positive or negative impacts to the recreational experience on the Smith River is subjective. Those who have used pack-out systems typically describe them as more sanitary than pit latrines and simple to use and maintain. Some people unfamiliar with pack-out systems are hesitant or opposed to the idea of packing out human waste and view the pit latrines as more convenient. FWP would employ education and outreach tools to familiarize the public with the pack-out system and use of related equipment. Many users point out that the Smith

River is the only permitted river in the lower 48 states that does not currently require human waste pack-out systems and believe that implementing this requirement is the only responsible management option. Removal of the latrines would positively impact the aesthetics of the boat camps by eliminating man-made structures and improving the semi-primitive setting.

- e) Due to the number of latrines that have already been dug, and the lack of appropriate locations (topography, space, slow decomposition rates) for new latrines, closure of latrines within the Smith River corridor would protect cultural and historic resources that are currently impacted by the continued soil disturbance of digging pits and the presence of human waste.

C. Issue: Natural and Cultural Resource Impacts

Discussion: FWP and the U.S. Forest Service staff members have observed an increasing amount of natural and cultural resource degradation at the river corridor's boat camps and riverbank landings due to increased visitor use and foot traffic. Such degradation includes:

- Sloughing riverbanks at boat landings
- Loss of vegetative cover and barren core areas
- Erosion
- Soil compaction
- Root exposure
- Growth and prominence of social trails
- Diminished tree seeding
- Depletion of down and dead wood
- Loss of cultural resources

A substantial amount of these resource impacts occurs in March and April when there are often remnants of snow and ice within the boat camps and along the shoreline. This is a time when the ground is beginning to thaw and the soils are saturated and highly vulnerable to disturbance. Although use is typically lower during early spring compared to the peak season (early to mid-summer), relatively small amounts of foot traffic during this critical time can have measurable negative effects on the resource.

Negative resource impacts are also occurring during the peak float season of early to mid-summer. Such impacts have become progressively noticeable as visitation and average group sizes have increased.

The rate of visitation has grown significantly the past several years, but most notably during four of the past five years (2017–2020). During this time, the total number of floaters exceeded 6,000 people for three straight years (2018, 2019, 2020), and in 2020 reached 6,629 people. Prior to 2018, total yearly use had never reached 6,000 people. The average number of private floaters for years 2017-2020 was 5,147, from 2009 – 2016 it was 4,029, and during 1997-2008 it was 3,187. User nights for private groups averaged 15,632 from 2009–2020, as compared to 10,780 from 1997–2008, a 45% increase. During the years of 2017–2020, user nights averaged 18,692, a 20% increase over the 12-year average (2009–2020).

The growth in visitation is caused by two factors: higher early season use and an increase in the average group size for non-commercial groups. From 1997-2008, the average group size was 6.38. Between 2017 and 2020 the average grew to 7.74 people, a 21% increase. Although the

average group size of 7.74 people is well below the allowable maximum group size of 15, there has been a notable increase in resource impacts. Early season use has also grown substantially in the past five years. Milder winters have made river travel during the early spring a more common occurrence.

If use continues to grow, it will likely result in the inability to manage resource impacts to an “acceptable level” consistent with the physical attributes of the semi-primitive setting of the Smith River. Per the Smith River Management Act (MCA 23-401-410) “the department may adopt rules to regulate the activities of recreational and commercial users of the water and land in the Smith River waterway to preserve the experience of floating, fishing and camping in a natural environment and to protect the river’s fish, wildlife, water and canyon resources.” It should also be noted that FWP and the U.S. Forest Service have a legal commitment, via the Montana Antiquities Act and the National Historic Preservation Act, to preserve and protect cultural and heritage resources on the state and federal lands they manage.

There are “*recreation ecology measures*” that can be implemented immediately as part of regular boat camp maintenance operations and would not require changes to the Smith River rules. Additional funding and human resource capacity would be necessary to accomplish these. The measures could include the following approaches or some combination thereof:

- **Site Hardening:** importing materials (ex: gravel or wood chips)
- **Construction of Rock Steps on Boat Landings:** directing foot traffic to specific areas
- **Defining Core Kitchen Areas, Tenting Sites and Boat Camp Boundaries:** limiting site expansion and further loss of vegetative cover
- **Active Re-vegetation:** planting native grasses and forbs
- **Fencing:** fencing off boundaries of boat camps to eliminate impacts from cattle grazing
- **Rest (close) and Rotate Vulnerable Camps:** resting (close) and rotating use at boat camps during sensitive periods to allow natural and/or active restoration
- **Add Additional Boat Camps:** pursuing opportunities for new boat camps in suitable locations to further disperse use and reduce impacts. (It should be noted that these locations primarily exist on private property in the lower river.)

Implementing one or more of these “*recreation ecology measures*” can help to mitigate some of the natural and cultural resource impacts and will require considerable resources and time to realize measurable effects. However, with the increase in use and negative impacts to natural resources already present, additional management actions may be needed to reduce impacts to an acceptable level. Some of these management actions would require rule changes and further public involvement. Examples of additional management actions, or tools:

Less Restrictive

- Use public education and outreach to explain how to reduce impacts through Leave No Trace principles
- Offer incentive-based programs to encourage smaller group sizes

Moderately Restrictive

- Modify or eliminate the practice of re-allocating cancelled launches
- Establish specific dates (season) when the river is open to floating

More Restrictive

- Reduce the number of watercraft allowed per group
- Reduce the number of launches allowed per day
- Reduce the maximum group size

Possessing a suite of management actions (tools) allows managers to incorporate the decision-making process of “Adaptive Management.” Adaptive management approaches are intended to promote flexible decision-making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps adjust policies or operations as part of an iterative learning process. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity.

Ensuring the protection of the natural and cultural resources by implementing recreation ecology measures and/or additional management actions would be achieved through a “management prescription” that links management actions to management *goals, objectives, desired conditions and standards*. Conditions would then be monitored to determine whether the management actions are having the intended effect and are improving conditions. For example, managers could decide to implement a less restrictive management action(s) to address resource impacts. If after a few years of monitoring it is determined that the less restrictive actions have not achieved the desired conditions, then more restrictive actions could be implemented to address concerns. In summary, adaptive management approaches provide flexibility to modify or adapt management actions over time to satisfy the standards and desired conditions.

Current Conditions: The boat camps and river landings within the Smith River Corridor exhibit increasing levels of natural and cultural resource impacts due to higher visitation levels and early season use.

Desired Conditions: Natural and cultural resource conditions at boat camps and associated boat landings are consistent with the direction provided in the Smith River Management Act that calls for FWP to protect the integrity of the river's water and canyon resources for future generations.

Alternative A (No Action): *Continue to utilize recreation ecology measures with no additional management actions.*

Description: FWP and the U.S. Forest Service would continue to utilize recreation ecology measures where implementable and affordable, with no additional management actions taken.

Alternative B: *Create a system of incentives for smaller group sizes.*

Description: FWP would offer incentives to encourage smaller group sizes on a voluntary basis for the purpose of reducing resource impacts (details would be developed as part of the implementation phase). FWP would also implement one or more recreation ecology measures.

Alternative C: *Reduce the maximum group size and/or the number of groups allowed to launch during early spring season (March/April).*

Description: FWP would seek a rule change to reduce the maximum group size and/or the number of groups allowed to launch per day during the early spring when conditions are most sensitive to natural resource damage. FWP would also implement one or more recreation ecology measures.

Alternative D: *Reduce the maximum group size and/or the number of groups allowed to launch per day during the entire season.*

Description: As with Alternative C, under Alternative D, FWP would seek a rule change to reduce the maximum group size and/or the number of groups allowed to launch per day. However, under Alternative D, the reductions would apply for the entire float season. FWP would also implement one or more recreation ecology measures.

Alternative E (Preferred Alternative): Create a system of incentives to promote smaller group sizes throughout the season; close the river to floating for a given period of time during early spring season; reallocate only a portion of cancelled permits during peak season.

Description: Under Alternative E, FWP would seek rule changes that would allow the department to implement a suite of management actions based on the conditions present. FWP prefers this alternative because collectively, these actions would help to reduce resource impacts while employing modest reductions to floating opportunities. FWP could choose to implement some or all the actions. This alternative includes: a voluntary, incentive-based system to encourage smaller group sizes; an official mid-April start date to the float season; and partial reallocation of cancelled permits during peak season (e.g. not re-issuing the first five cancellations occurring during a given week from May 15 to June 30.) FWP would also implement one or more recreation ecology measures.

Evaluation of the impacts of the Preferred Alternative of closing the river to floating for a given period during the early spring season (March/April), promoting smaller group sizes through incentives and not refilling all cancellations during peak season on the physical environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Geology and soil quality, stability and moisture		X				a)
Air quality or objectionable odors				X		
Water quality, quantity and distribution (surface or groundwater)				X		
Existing water right or reservation				X		
Vegetation cover, quantity and quality		X				a)
Unique, endangered, or fragile vegetative species				X		
Terrestrial or aquatic life and/or habitats			X			a)
Unique, endangered, or fragile wildlife or fisheries species				X		
Introduction of new species into an area				X		
Changes to abundance or movement of species				X		

- a) Closing the Smith River to floating in the early spring, promoting smaller group sizes through incentives and not refilling all cancellations during peak season will help to reduce negative impacts to soils, vegetation, and associated habitats in the boat camps. This will pertain during times when soils are saturated and highly vulnerable to disturbance as well as to the peak season when use and associated trampling is highest.

Evaluation of the impacts of the Preferred Alternative of closing the river to floating for a given period during the early spring season (March/April), promoting smaller group sizes through incentives and not refilling all cancellations during peak season on the human environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Noise and/or electrical effects				x		
Land use				X		
Risk and/or health hazards			X			a)
Community impact			X			b)
Public services/taxes/utilities				X		
Potential revenue and/or project maintenance costs				X		
Aesthetics and recreation			X			c)
Cultural and historic resources			X			d)
Evaluation of significance				X		

- a) The closure of the Smith River in early spring could potentially result in a decrease in hazardous floating conditions. Floaters in the early season often encounter ice jams and other obstacles that can be highly dangerous and are sometimes impassable. Those situations can necessitate search and rescue operations from local communities, which compounds the potential danger and is a burden on those responders.
- b) The closure of the Smith River in early spring, promoting smaller group sizes through incentives and not refilling all cancellations during peak season would likely result in a small overall decrease in the number of floaters per year, and could negatively impact businesses in White Sulphur Springs and Cascade. From April 1-15 (2015 - 2021 data), not including river closures due to ice or Covid-19, there were an average of 38 groups and a total of 165 floaters.
- c) The closure of the Smith River in early spring, promoting smaller group sizes through incentives and not refilling all cancellations during peak season would positively impact the aesthetics of the boat camps but would negatively impact some users of the Smith River, especially those who prefer to float the river in the early season. During the period of April 1-15 (2015 - 2021 data), not including river closures due to ice or Covid-19, there were an average of 38 groups and a total of 165 floaters.
- d) The proposal to implement management actions that would likely result in an overall decrease in visitors would have a positive impact on cultural resources.

D. Issue: Floater Opportunities

Discussion: Interest in floating the Smith River continues to increase at a significant rate. For example, permit applications have increased by 146% over the past ten years, with a record number of 15,160 received in 2021. FWP attempted to address growing interest in the 2009 Smith River State Park and River Corridor Management Plan by implementing a one-year wait period for those who drew a permit for a peak season date the previous year. This change

initially increased the drawing odds by a few percentage points. However, as the number of applicants continues to rise, the benefit of the one-year wait period has become negligible. A limiting factor to increasing floater opportunities is the need to do so without increasing the number of permits or launches, which would have negative impacts on the natural and cultural resources as well as the desired semi-primitive float experience. FWP is interested in identifying methods that stay within these parameters and increase floater opportunities for those people who have not floated the river recently or at all. It should be noted that FWP is developing a new and improved licensing system, called Explore-MT that will have the capacity employ changes to the lottery system and other technological enhancements.

Current Conditions: The odds of drawing a permit are decreasing as more people apply. FWP continues to hear from people about the difficulty of drawing a permit and/or getting a chance to float as part of another person's permit.

Desired Conditions: Individuals who have been unsuccessful at drawing a permit, and/or who have not recently floated the river would have additional opportunities to either acquire a permit or float as part of another person's permit.

Alternative A (No Action): Maintain Current System

Description: The current system would be maintained with no adjustments made to increase opportunities for unsuccessful permit applicants or those who have not floated the river in recent years.

Alternative B (Preferred Alternative): Explore development of a system to increase floater opportunities for unsuccessful permit applicants and others who have not recently (or ever) floated the Smith River.

Description: FWP would explore development of a system that increases the odds of drawing a permit for those people who applied unsuccessfully in the past. The system could also provide additional opportunities for those who have not floated the river recently as part of another person's permit. The details of the system would be developed during the implementation phase and include additional opportunities for public involvement prior to decisions being made.

Evaluation of the impacts of the Preferred Alternative of exploring development of a system for increasing floater opportunities on the physical environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Geology and soil quality, stability and moisture				X		
Air quality or objectionable odors				X		
Water quality, quantity and distribution (surface or groundwater)				X		
Existing water right or reservation				X		
Vegetation cover, quantity and quality				X		
Unique, endangered, or fragile vegetative species				X		
Terrestrial or aquatic life and/or habitats				X		
Unique, endangered, or fragile wildlife or fisheries species				X		
Introduction of new species into an area				X		
Changes to abundance or movement of species				X		

Evaluation of the impacts of the Preferred Alternative of exploring development of a system for increasing floater opportunities on the human environment.

Would the proposed action result in potential impacts to:	Unknown	Potentially Significant	Minor	None	Can Be Mitigated	Comments Provided
Noise and/or electrical effects				X		
Land use				X		
Risk and/or health hazards				X		
Community impact				X		
Public services/taxes/utilities				X		
Potential revenue and/or project maintenance costs				X		
Aesthetics and recreation			X			a)
Cultural and historic resources				X		
Evaluation of significance				X		

a) The implementation of a new system would positively impact the statistical odds for drawing a permit and/or floating the river, which is a complaint heard frequently by FWP.

PART V. NARRATIVE EVALUATION AND COMMENT

In the 12 years that have elapsed since the 2009 plan was adopted, the popularity and use of the state park and river corridor have grown substantially, necessitating the proposed changes identified in this EA.

Managing Camp Baker for day-use only is predicted to have a positive impact on natural and cultural resources and reduce congestion at the site. Registering groups and assigning boat camps via the phone or online eliminates the need to stay overnight at Camp Baker to secure a place in line for registration. Feedback from floaters at Camp Baker in 2020 and 2021 indicated that the COVID-19 related closure to camping and associated change to phone registration and campsite assignment was well received. Camping could be displaced to other locations in the area and thus monitoring for potential impacts to these sites would be needed.

Establishing a mandatory human waste pack-out system and discontinuing use of the pit latrines is predicted to have a positive impact on the natural and cultural resources of the Smith River corridor and improve human health and sanitation conditions. Education and outreach regarding this change would be important to help ensure that floaters unfamiliar with pack-out systems aren't discouraged or inhibited from floating the river in the future. FWP anticipates that if a pack-out system goes into effect, there could be local business opportunities to sell or rent the equipment.

Incentivizing smaller group sizes and curtailing use that occurs early in the year are predicted to have positive impacts on the natural and cultural resource impacts at boat camps and landings without having a substantial effect on floating opportunities.

Increasing the opportunities to obtain a permit and/or float the river for those people that have been unsuccessful in drawing a permit or floating the river in the past would address a common complaint. FWP would explore developing a new system that doesn't increase impacts on the natural and cultural resources and doesn't affect the desired semi-primitive float experience.

This Environmental Analysis indicates that the proposal to update the 2009 Smith River State Park and River Corridor Recreation Plan would primarily have positive impacts on the human and physical environment, with some minor negative impacts anticipated.

PART VI. PUBLIC PARTICIPATION

A. Public involvement

The public will be notified in the following manners to comment on this Draft EA, the proposed action, and alternatives:

- Public notices in newspapers throughout the state of Montana
- Statewide press release
- Public notice on the FWP webpage: <https://fwp.mt.gov/stateparks/smith-river/management>

FWP will hold two virtual (online) sessions to provide an opportunity for the public to learn more about the planning process, the proposed management actions, and to ask questions. FWP will not be recording comments at these sessions (see below for opportunities to submit comments). The sessions are scheduled for December 1 and December 7, 2021. Please refer to the FWP website for times, meeting links, and other details.

Notice of this Draft EA will be sent to neighboring landowners and other interested parties to ensure their knowledge of the proposed action.

This level of public notice and participation is appropriate for a proposal of this scope.

B. Duration of comment period

The public comment period will start November 10, 2021 and end December 15, 2021.

C. Submitting comments

Comments may be submitted as follows:

- Electronically through the Smith River Plan Update webpage (<https://fwp.mt.gov/stateparks/smith-river/management>)
- Mailed to the address below:

Montana Fish, Wildlife and Parks
ATTN: Kyan Bishop, Parks and Recreation Planner
PO Box 200701
1420 E 6th Avenue
Helena, MT 59620

PART VII. EA PREPARATION

A. Based on the significance criteria evaluated in this EA, is an EIS required? No

If an EIS is not required, explain why the EA is the appropriate level of analysis for this proposed action.

Based on an evaluation of impacts to the physical and human environment under MEPA, this environmental review revealed no significant negative impacts from the proposed action; therefore, an EIS is not necessary and an environmental assessment is the appropriate level of analysis. In determining the significance of the impacts, FWP assessed the severity, duration, geographic extent, and frequency of the impact; the probability that the impact would occur; or reasonable assurance that the impact would not occur. FWP assessed the growth-inducing or growth-inhibiting aspects of the impact; the importance to the state and to society of the environmental resource or value affected; any precedent that would be set as a result of an impact of the proposed action that would commit FWP to future actions; and potential conflicts with local, federal, or state laws. As this EA revealed no significant impacts from the proposed actions, an EA is the appropriate level of review and an EIS is not required.

B. Person(s) responsible for preparing and reviewing the EA

Kyan Bishop, Parks and Outdoor Recreation Planner

Jay Kolbe, Wildlife Biologist

Kqyn Kuka, Tribal Liaison and Diversity Coordinator

Colin Maas, Smith River State Park Manager

Rachel Reckin, PhD, Heritage Program Manager

Jason Rhoten, Fisheries Biologist

Randi Rognlie, Design and Construction Project Manager

Linnaea Schroeer, Special Projects and MEPA Specialist

Beth Shumate, Assistant Administrator, Parks and Outdoor Recreation Division

Charlie Sperry, Assistant Administrator, Parks and Outdoor Recreation Division

John Taillie, Region 4 Regional Park Manager

C. List of agencies or offices consulted during preparation of the EA

U.S. Forest Service