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Ravalli County Commissioners

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Dear Board of Ravalli County Commissioners:

I received your letter dated May 29, 2015 concerning the Draft Record of Decision on the Bitterroot Travel Plan and the County's lack of standing for objection. I understand the confusion and hope this letter and chronology of events (attached) will help clarify the issues..

I am aware of and support the memo your letter quoted from September 14, 2014, from USFS Deputy Chief Leslie Weldon to Regional Foresters regarding "Public Involvement in the Travel Management Rule." You are correct; there are requirements to notify the public and hold regular meetings with local governments, such as the sheriff and county commissioners, when Travel Planning has been initiated. The chronology attached to this letter will demonstrate that the Bitterroot National Forest met those requirements.

The process for the Bitterroot National Forest Travel Plan was initiated in the fall of 2006, and the comment period for the Draft Environmental Impact Statement (EIS) concluded on November 9, 2009, after being extended an additional 45 days. The Forest provided a total of 135 days for the public, and the County Commissioners, to comment on the proposed plan. During that time the Forest met with the Commissioners specifically to discuss the plan. Approximately 10,000 comments were received during the initial scoping and an additional 3,400 comments were received during the Draft EIS comment period; however, the County Commissioners decided not to provide comments.

The comment period was concluded prior to my appointment as the Forest Supervisor in 2010. I have spoken to three individuals who were on the Board of Ravalli County Commissioners from January 2007 through January 2010, Kathleen Driscoll, Carlotta Grandstaff, and Jim Rokosch. They were each supportive of being referenced in this letter, and each confirmed the coordination by then Forest Supervisor Dave Bull and Stevensville District Ranger Dan Ritter with the Board of Commissioners during the initiation of the Travel Management Plan, both during the scoping period and the open comment period for the Draft EIS.

Your letter references the Code of Federal Regulations (CFR) 219 as setting the stage for the Forest Service to work with State and local governments, however CFR 219 are Forest Planning (Land Management Planning) Regulations and do not apply to Travel Planning which are under CFR 218. Projects under CFR 218 are subject to the following public involvement process "individuals and entities as defined in 218.2 ["entities" including state and local governments] who have submitted timely specific written comments regarding a proposed project or activity that is subject to these regulations during any designated opportunity for public comment may file an objection."

I acknowledged receipt of the "Draft Ravalli County Natural Resource Policy" in a letter dated July 9, 2012, which is attached. The CFR 219 regulations will come in to play when the Bitterroot National Forest initiates the Forest Plan Revision process in 2017. Forest Plans are



programmatic and set the stage for site specific project planning. The Ravalli County Natural Resource Policy is also a programmatic document and the recommendations contained in it can be considered and analyzed during the Forest Plan revision process. I look forward to working with the county during Forest Plan Revision to the fullest extent possible.

Attached is a chronology of events demonstrating the Bitterroot National Forest's communication and coordination with the Ravalli County Board of Commissioners from 2006-2015. I realize most of you were not in office when the comment period on the scoping and Draft EIS were solicited for Travel Planning. In fact, there have been three sets of County Commissioners in place since the project was initiated. Greg Chilcott and J. R. Iman were on the Board then, and should be able to provide for some continuity through that time period. In addition to the following specific meetings with Ravalli County, the Forest's Schedule of Proposed Actions, which lists all projects on the Forest, is sent to the Ravalli County Commissioners on a quarterly basis, detailing proposed actions and asking for input. I also personally attend two meetings with the County Commissioners per year to discuss the Forest program of work.

I am committed to maintaining a healthy and productive relationship with the County. During our Forest Update discussion on January 26, 2015, I asked for your feedback on how we can best work together. Last year, we held monthly, informal meetings to take field trips or get together to discuss specific projects. I found those meetings very helpful. I am willing to meet with you to personally discuss our Schedule of Proposed Actions each quarter to ensure you are aware of the timeframes and comment periods. I also heard from Jeff Burrows that you would like our routine coordination to be similar to how we work together during fire season. I value that working relationship with the county. It is important to understand, though, that fire management decisions are primarily local and specific to an event, and do not involve CFR 218 or 219. However, the Forest Plan does have standards, guidelines and management emphasis items we need to consider and potentially avoid or mitigate in fire management, and I look forward to working with you on those issues.

I will schedule a meeting with you soon to discuss current projects and further discuss ways we can better work together. If you have any immediate questions please call me at 363-7121.


JULIE K. KING
Forest Supervisor
Bitterroot National

Cc: Jeff Burrows, J.R. Iman, Greg Chilcott, Doug Shallenberger, Ray Hawk

Following is a Chronology of Events for Travel Planning and Ravalli County Involvement:

Fall 2006

The public involvement process for the Bitterroot National Forest Travel Management Planning was initiated in the fall of 2006. Over the next year, Forest personnel attended a number of meetings with various user groups to gather input on recreational use on the Forest, listening to their ideas related to non-motorized and motorized recreation, and discussing the process for travel management.

Meetings were also held with the Montana Departments of Fish, Wildlife and Parks and Natural Resources and Conservation, the Ravalli County Commissioners, and elected state officials. Additionally, communication was initiated with the Confederated Salish and Kootenai and Nez Perce Tribes.

Fall 2007

After consideration of public input and initial field reviews by the Forest Interdisciplinary Team, the Proposed Action (*A Starting Point*) was developed, and a scoping letter describing the project and how to comment was mailed to approximately 800 individuals, organizations, businesses, Federal and State agencies, Ravalli County Commissioners, Indian tribes, elected officials, and others on September 24, 2007 {PF SCOPING-004}. A 60 day comment period was provided. A news release was sent to the local media on September 24, 2007. Newspaper articles describing the Proposed Action were published in the *Missoulian* and *Ravalli Republic* on September 28, 2007. The Notice of Intent to prepare an Environmental Impact Statement was published in the *Federal Register* on October 1, 2007. A letter stating that the comment period for the project was to be extended an additional 60 days to January 31, 2008, in response to public request, was mailed to the public on October 22, 2007. A news release concerning the extension was distributed to the local media on October 22, 2007.

Summer/Fall 2009

The Draft Environmental Impact Statement (EIS) was released August 5, 2009 with an initial 45-day comment period. The comment period was then extended an additional 45 days to November 9, 2009. Release of the Draft EIS was followed by a series of meetings with key users and eight public meetings/open houses. Forest Service officials met with Ravalli County Commissioners during the Draft EIS comment period. The Forest received a total of 13,400 comments.

Winter 2011

On February 22, 2011, the Bitterroot National Forest's Leadership Team met with the newly elected Ravalli County Commissioners. Suzy Foss and Ron Stoltz attended the meeting and received a briefing on the status of the Travel Management Planning Project. Julie King included in the briefing that the comment for the project ended in 2009 and no comments had been received from the prior county commissioners to count toward standing for an appeal (at that time we were still under the appeal process).

Spring 2011

On June 11, 2011 Forest Supervisor Julie King and staff gave a Status of Travel Management Planning to the Ravalli County Commissioners during a Forest update to the Board.

Winter 2012

On February 23, 2012, several members of the Bitterroot National Forest's Leadership Team were invited to provide an update on forest activities to the Ravalli County Commissioners. The presentation included information regarding Travel Management Planning.

Spring 2012

On March 19, 2012 Forest Supervisor Julie King, Forest Staff and Regional Economist Krista Gebhardt met with the Ravalli County Commissioners to present an economic study on the impact of Bitterroot National Forest programs and products to the local economy.

On April 17, 2012 Forest Supervisor Julie King gave a presentation to the Natural Resource Committee for Ravalli County (who developed the County Natural Resource Policy) and gave a presentation on Forest programs and answered questions on Travel Planning.

Summer 2012

On July 9, 2012, Forest Supervisor Julie King sent a letter to the Ravalli County Commissioners acknowledging receipt of the "Draft Natural Resource Plan for Ravalli County". The letter explains that the best time to utilize this policy would be during Forest Plan Revision process. (copy attached)

Winter 2013

On February 22, 2013 the Bitterroot National Forest set up a meeting with the Ravalli County Commissioners to provide an update on Forest Projects in general and the Travel Management Planning Process.

Spring 2013

On March 18, 2013, Forest Supervisor Julie King and staff presented the Forest program of work to the Ravalli County Commissioners and provided an update on the status of the Travel Plan.

Fall 2014

On September 26, 2014 Bitterroot Rangeland Management Specialist Gil Gale met with Ravalli County Commissioners concerning a grant for noxious weed control.

Winter 2014

On February 26, 2014 Bitterroot National Forest staff met with the Ravalli County Commissioners to present a proposal for treating fuels on the westside of the valley and in the Wildland/Urban interface.

On December 8, 2014 Forest Supervisor Julie King and Rangeland Management Specialist Gil Gale met with the Ravalli County Commissioners to discuss a decision on a State Grazing Allotment.

Winter 2015

On January 26, 2015 Forest Supervisor Julie King and staff met with the Ravalli County Commissioners to give a Forest update which included status of Travel Planning presented by Dan Ritter, Stevensville District Ranger. Jeff Burrows asked if there was any opportunity for public comment on the Draft decision that would be coming out soon, and Dan told him no, but discussed the amount of public and County involvement that had occurred since the planning process was initiated. Dan also committed to providing Jeff Burrows a courtesy call prior to publishing the draft decision.



File Code: 1020

Date: July 9, 2012

Suzi Foss
Chair
Ravalli County Commission
215 South 4th Street
Hamilton, MT 59840

Dear Suzi:

I am writing this letter to clarify the position of the Bitterroot National Forest (NF) in regards to the "Draft Natural Resource Plan for Ravalli County" which the County Commissioners recently voted to adopt.

The Bitterroot NF has a Land and Resource Management Plan and Final Environmental Impact Statement approved in 1987. Until we go through Forest Plan revision according to regulations with public involvement, this is the document that will govern natural resource management on the Forest.

The County Commissioners voted to pursue a "County Natural Resource Policy" at the June 4, 2012 meeting and I would be interested in working with the County to determine the best ways we can currently work together through this policy.

I do not believe it is productive or will be useful at this time for myself or other Bitterroot NF representatives to edit and attempt to finalize the "Draft Natural Resource Management Plan for Ravalli County" developed by a local citizen group and received by the County Commissioners on June 4, 2012.

The Bitterroot NF will not be going through Forest Plan Revision in the coming year, but when we do engage in this process that will be the appropriate time to coordinate through the National Forest Management Act (NFMA) with the county and consider the county's proposed management for the Forest.

I am including a copy of the Secretary of Agriculture Tom Vilsack's letter on the Forest Service and County coordination efforts. I look forward to determining the best ways we can involve the county in our ongoing program of work on the Bitterroot NF.

Sincerely,

/s/ Julie K. King
JULIE K. KING
Forest Supervisor

