

## **Ravalli County Commissioners Office**

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**From:** Karen and Van <skarevan@hotmail.com>  
**Sent:** Wednesday, May 27, 2015 8:35 AM  
**To:** Ravalli County Commissioners Office  
**Cc:** Glenda Wiles  
**Subject:** Travel plan meeting

Please include these comments for the public record regarding the 5/26/2015 Commissioners' meeting on the Bitterroot National Forest travel plan.

Thank you for allowing me to clarify my comment I made yesterday regarding timing of the comment period, your legal standing, and when your Resource Policy was passed.

I am Van P. Keele. What I said was confusing to the Commission and to Larry Campbell--both you and Larry said I was "wrong."

Here's a better explanation that was verified by multiple FS personnel at last evening's Bitterroot Forest Restoration Committee meeting that I'm a member of: The draft EIS came out in July 2009. Public comment was taken and closed in winter of 2009. Unless the Commission, or any individual, commented on the Draft EIS, then you do not have standing to make an objection on the FEIS/Draft Record of Decision. Though the objection phase is currently open now to those who did comment back in 2009, and so technically there is a public comment period going on, you as a Commission do not have standing, nor does any individual Commissioner, as none of you or the previous commissioners commented back in 2009.

The real crux is that your Resource Policy came out in 2012 (I believe), more than 2 years after the closing of comment on the Draft EIS. Only if the Commission had commented back in 2009 would you now have standing and be able to site your Resource Policy. You could have your partner, the RCORUA, use it in their objection since they do have standing. Problem is, your policy is too generalized, lacking site-specific or other specific info, for it to even make a difference. If there are any specifics in the Policy, they must have been brought up in your (doesn't exist) or the RCORUA comments back in 2009.

Simply put you have no standing, though had ample opportunities over years. Your policy came out 2+ years after the comment period ended in order to have standing now. Whether you're a government agency, an organization, or an individual citizen, we all have to follow the rules, just like at your Commission meetings. The FS has dutifully provided coordination, in good faith, over the years and should be commended. I hope the Commission will respect the huge numbers of hunters, horsemen, anglers, and hikers--out-numbering OHV users by 300% to 2500%--as you pursue your options going forward.

I apologize for my lack of clarity yesterday but hope this message clears it up. I encourage you to fact check my statement with FS personnel. Thanks, Van P. Keele