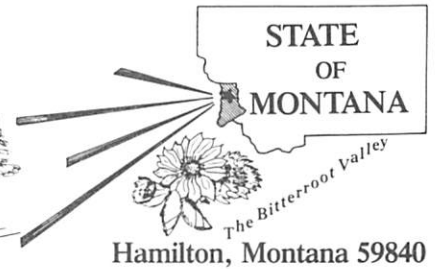
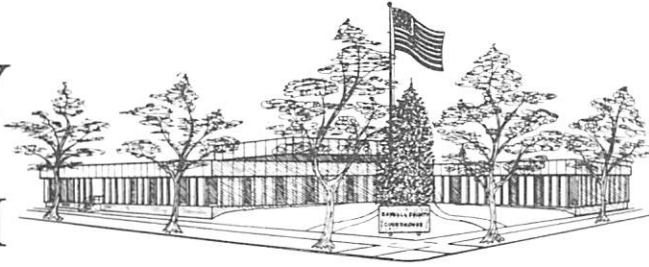


# COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS  
215 S. 4<sup>th</sup> Street, Suite A  
Hamilton, MT. 59840  
406-375-6500  
[commissioners@rc.mt.gov](mailto:commissioners@rc.mt.gov)

March 17, 2017

Eric Winters  
Darby/Sula Ranger District  
PO Box 388  
Darby, MT 59829

## **RE: Objection Letter for the Meadow Vapor Project**

Dear Eric,

The Board of Ravalli County Commissioners (BCC) thanks you, Forest Service staff and Supervisor King for your continued efforts to work with Commissioners and resolve important issues on our National Forest in Ravalli County. The Commissioners also appreciate your consideration of the previous comments in regards to the Meadow Vapor Project.

The Board of Ravalli County Commissioners in general supports the vegetation management as proposed. The Commissioners also support the proposed OHV connector. We agree that our forest is in desperate need of proactive management to prevent catastrophic fires that threaten public health and safety, sterilize the landscape, destroy wildlife habitat, negatively impact fisheries and view shed. Proactive management of our forests will generate revenue for the Forest Service and improve the local economy.

The Board's objections to the Meadow Vapor Project are as follow:

### **Ravalli County Natural Resource Use Policy**

After a lengthy public process, the Ravalli County Board of Commissioners developed and approved the Ravalli County Natural Resource Use Policy in November 2012 (Exhibit A). We object to any Forest Service decision that does not comply with this policy. This policy states under **Roads and Trails: Access and Transportation**, Goal (1), Objective (D) "Decommissioning – Ravalli County is opposed to road and trail closures and/or

decommissioning. There shall be no net loss of Forest Service roads/trails. We support additional roads/trails.” It is understandable that roads cannot be maintained in perpetuity, however, the Board recognizes that roads provide emergency access for responders, fire suppression operations and public access. The Commissioners understand the need to store roads on the National Forest, but oppose storing roads through recontouring. Ravalli County objects to any reduction of public access to public lands and the decommissioning of roads, especially through obliteration and recontouring.

Federal policy and regulations require the Forest Service to coordinate with local resource management plans and cooperate with local governmental agencies in the development and management of our national forests. Based upon our policy, Ravalli County objects to the decommissioning and recontouring of the following National Forest System Roads: 5770B, 13315A, 73573, 73584, 73636, 73637, 73795, 73796, 13362, 13363, 73555, 73563, and 73592.

### **Purpose and Need**

Below is the stated purpose and need in the Environmental Assessment (EA) for the project.

1. Reduce the potential for crown fire behavior in low/mixed severity fire regimes within the Wildland Urban Interface (WUI) by altering fuels in both the amount available to burn and arrangement.
2. Improve forest resilience to natural disturbances such as fire, insects, and disease.
3. Address immediate and long term vegetation concerns in mature and old growth ponderosa pine and Douglas-fir.
4. Provide forest products.
5. Improve watershed conditions and fisheries habitat.
6. Minimize future resource impacts from recreation activities at dispersed camp sites in riparian areas.
7. Implement motorized recreation opportunities

Proposed action elements were developed in response to the purpose and need. The only purpose and need that would justify road decommissioning would be number 5 listed above; “Improve watershed conditions and fisheries habitat.” There were a number of roads observed on the site visit and using maps and other information that are being decommissioned that do not impact water quality or fisheries habitat. We request purpose and need for the proposed action on each road and why other Best Management Practices (BMP’s) would not be equally affective. Based upon no purpose and need as defined for the project, Ravalli County objects to the decommissioning and recontouring of the following National Forest System Roads: 5770B, 13315A, 73573, 73584, 73636, 73637, 73795, 73796, 13362, 13363, 73555, 73563, and 73592.

### **Access and Transportation**

Ravalli County supports maintaining and enhancing public access and the historic right to travel over public lands whenever necessary for human safety, emergency ingress and egress, especially for wildfire control, in the pursuit of farming, ranching, timber harvest, hunting, mining, recreational activities, motorized vehicle use, access to irrigation infrastructure and other historic

uses. The Forest Service is admittedly decommissioning roads based on the potential impact to watersheds if the area were to burn. “Potential impacts” of a future fire event should not be criteria for road decommissioning.

It is stated in the scoping letter that one of the needs of the project is to “Improve watershed conditions through road management activities...”, but there is no detailed explanation of the current conditions in contrast with the desired conditions. According to your Data Table in the scoping document, Road 73573 is the only segment (.2 miles) of the 29.2 total miles slated for decommissioning which contains a reference to runoff and erosion. Even if the potential runoff and/or erosion concerns were not disclosed on your Data Table presented to the public, there are many other Best Management Practices (BMP’s) that could be implemented to achieve the desired goal. Road 73555 is referenced in Table C-1 of the Draft Decision Notice to be “very wet and not appropriate for motorized travel.” Based on the location of this road it does not seem reasonable this road is “very wet”. Alternative methods of closing the road to motorized traffic should be considered as opposed to a complete recontour of the entrance.

Washington D.C. mandates should not be criteria for road decommissioning, as outlined in FSM 7700 – Travel Management. FSM 7734.03, para. 3 states “When congress has included language in annual Forest Service appropriations authorizing use of road construction and maintenance funds (CMRD) for road decommissioning, *prioritize use of CMRD funds for decommissioning projects over needed annual road maintenance*, and include decommissioning projects in the applicable annual road maintenance plan.” Ravalli County opposes any use of road construction and maintenance funds for decommissioning roads, and strongly opposes prioritized use of these funds for road decommissioning.

Based upon access and transportation to public lands, Ravalli County objects to the decommissioning and/or recontouring of the following National Forest System Roads: 5770B, 13315A, 73573, 73584, 73636, 73637, 73795, 73796, 13362, 13363, 73555, 73563, and 73592.

### **Environmental and Aesthetic Impacts of Road Obliteration/Re-contouring**

The Environmental Assessment (EA) discussed effects from the commercial thinning, but did not address the scenic impacts from road obliteration. Road obliteration on most of the roads in the project area will re-contour a naturally restoring road prism causing a significant visual disturbance visible for miles. Exhibits B-1, B-2, B-3 and B-4 are time lapse images demonstrating the natural re-vegetation of a road prism in the Piquett Creek drainage during the time period of 1995 to 2011. Exhibit B-5 is a 2013 image of the same road prism AFTER the road was re-contoured, clearly demonstrating the visual impact and long-term scarring following this action. These disturbances create not only negative visual impacts, but create prime locations for weed infestation, erosion and impacts to water quality.

Based upon environmental and aesthetic impacts of road re-contouring, Ravalli County objects to the decommissioning and/or recontouring of the following National Forest System Roads: 5770B, 13315A, 73573, 73584, 73636, 73637, 73795, 73796, 13362, 13363, 73555, 73563, and 73592.

## **Road Decommissioning – RS 2477**

Ravalli County objects to decommissioning of roads. There are a number of Best Management Practices that can be utilized at road and stream intersections to mitigate erosive impacts at the crossing and still provide public access. Decommissioning a road because of the “potential” erosion impacts to a watershed is not sufficient reason to decommission a road and only strengthens the argument for more commercial harvest, fuels reduction and better vegetation management in general on federal public lands. We believe road decommissioning decisions must weigh the loss of public access against “potential” impacts. If the Forest Service can prove significant adverse impacts to justify a road being decommissioned, they must provide equal or greater public access.

It is Ravalli County’s position that the Forest Service does not have the authority to decommission roads established prior to 1976 under RS 2477. RS 2477 was enacted by the United States Congress in 1866 to encourage the settlement of the Western United States by the development of a system of highways and reads "the right-of-way for the construction of highways across public lands not otherwise reserved for public purposes is hereby granted."

RS 2477 was repealed in 1976 under the Federal Land Policy and Management Act (FLPMA). The repeal was subject to "valid existing rights." The relevant text (Sec. 701. 43 U.S.C. 1701) reads (a) "Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of this Act"

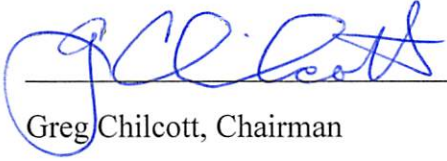
The Ravalli County (Geographic Information Systems) GIS department utilized aerial photos taken in 1970 to compare to existing maps used for scoping purposes to determine if roads proposed for decommissioning existed prior to 1976. The procedure for analysis was as follows: The Meadow Vapor project map was scanned and then geo-referenced to align with existing road and PLSS data. A GIS shape file was created by digitizing the proposed roads from modern orthophotography (see Exhibit C – Meadow Vapor Project Map). The roads are clearly visible in at least one of the data sets. Each road in the Road Data Table was compared to the 1970 geo-referenced photography. Only road segments clearly identifiable in the 1970 photography were considered as RS 2477 eligible (see Exhibit C). (See Exhibit D for Orthorectification Process).

Ravalli County objects specifically to the decommissioning of the following National Forest System Roads based on RS 2477 status: 73573, 73584, 73636, 73637, 73795, 73796, 73563, and 73592.

Thank you for your consideration of these objections and we look forward to your response and solution to these objections.

Sincerely,

Ravalli County Board of Commissioners



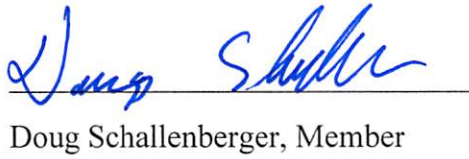
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Greg Chilcott, Chairman



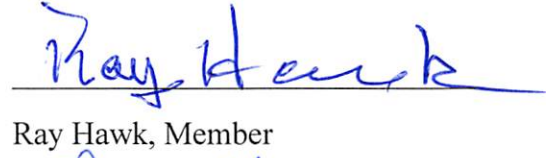
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Jeff Burrows, Vice-Chair



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Doug Schallenberger, Member



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Ray Hawk, Member



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Chris Hoffman, Member

2012

Exhibit A



**BITTERROOT VALLEY  
NATURAL RESOURCE USE POLICY**

*Approved Nov 21, 2012  
Resolution No: 2978*

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## INTRODUCTION

Ravalli County is a general powers county (7-5-2101 MCA) and, as such, is a political subdivision of the State of Montana, having corporate powers and exercising the sovereignty of the State of Montana within its boundaries, as provided in the Montana Constitution, those powers specified by statute and those necessarily implied there from.

Only the Ravalli County Board of County Commissioners (hereinafter referred to as the "Board") can exercise the powers of the County by agents and officers acting under the authority of the Board. The Board serves as the chief elected authority of the County government and is charged by law with performing all duties necessary to the full discharge of these specified and implied executive duties. The Board is charged with governing Ravalli County in the best interest of all its citizens.

The Board is aware that one goal of the County's citizens, and therefore its government, has been the continuation of a lifestyle which assures quiet enjoyment of private property rights and property interests and assures the highest degree of protection of these rights. Property rights and interests are important to the people who live and work in Ravalli County. Many people who live in the County are reliant on the land and its productive use. Private land ownership and incentive provided by private ownership is a driving force that supports the livelihood of many Ravalli County citizens.

Federal and state-managed lands make up approximately 76% of the area of Ravalli County. Moreover, the County's economy is deeply affected and impacted by changes on federal, state, and private lands. State and federal agencies are charged by law governing state and federal lands inside Ravalli County's political boundary, to be managed in the best interest of all citizens. Local, state and federal planning decisions may create benefits for a great many state and national citizens outside the county, but may transfer a disproportionate amount of the costs and responsibilities to local communities and citizens. These decisions must consider impacts to Ravalli County's economy, custom, culture, and historic uses of both public and private property.

The Board believes that the American concept of "government of the people, by the people and for the people" is best served when government affairs are conducted as close to the people as possible (i.e. at the county level). The Board is charged to carry out its specified and inherent duties to operate the government of Ravalli County in the best interests of all its citizens and to protect and preserve the County's tax base. The Board finds it desirable to address the use and management of resources within the political jurisdiction of the County in its comprehensive planning efforts.

The Board believes the use and management of public lands has substantial and significant impact on the economic stability of the County. The Board is, therefore, legitimately interested in full participation in the planning process utilized by appropriate agencies for determining and implementing land use plans and other actions in Ravalli County. The Board's interest extends to land use plans or action formulation, development, and implementation (which include monitoring and evaluation).

It is the intent of Ravalli County government to protect the custom and culture of County citizens through a variety of actions. It is the policy of Ravalli County to invoke coordination with any and all appropriate agencies at the beginning of the scoping process and throughout the process for all areas of natural resource management and use.

Federal and state laws require federal and state agencies to coordinate with local government and consider the local land use plans in the process of planning and managing federal and state lands within the geographic boundaries of Ravalli County, Montana. Federal and state agencies proposing actions that will impact the County, its citizens, and resources therein should prepare and submit in writing, in a timely manner, report(s) on

the purposes, objectives and estimated impacts of such actions, including economic, to the Ravalli County Board of County Commissioners, 215 South 4th Street, Suite A, Hamilton, MT 59840 for review. The Board will then determine appropriate action to be taken by the County and provide input, information and comment on proposed actions or activities. The Board will also notify other government agencies of actions that are proposed by the Board affecting various resources and amenities in Ravalli County and solicit other agency input and comment. The purpose of this exchange of information and input is to minimize impact upon and maximize benefit to the residents of the County as well as other members of the public.

Recognizing the critical tie between use of the public lands and the economic stability of the County, the Board will work to provide a voice for individual citizens and local communities in guiding the future of the County.

## RAVALLI COUNTY

Ravalli County is located in the southwest area of Montana. The county encompasses 1,536,241 acres or 2394.21 square miles. Currently more than 3/4 of the land mass is federal or State managed lands, conservation easement or river floodplain.

The 2010 census shows the county population at 40,212 people. The 2000 census was 36070. As of the year 2010 it was populated with 16.8 people per square mile.

The County is bounded on the north by Missoula County, on the South and west by Idaho, the Bitterroot National Forest and the Selway-Bitterroot Wilderness, on the East by the Sapphire Mountains and Granite County and to the Southeast by Beaverhead County and Lost Trail Pass.

Ravalli County is primarily forested land with the main Bitterroot Valley floor as agricultural (farming and ranching) interspersed with cities, towns, and urban areas of habitation.

The County's economy and social aspects were predominately and historically based on agriculture, forestry, mining, hunting and trapping. Stevensville is the oldest town in Montana. St. Mary's Mission was the first permanent white settlement in Montana and was established in 1841 by Jesuit missionaries. They were led by Father Pierre Jean DeSmet, who was asked by the Salish Indians to come to the valley. The missionaries were responsible for establishing agriculture, raising cattle, the first flour mill, the first sawmill, the first distillery of camas root for medicinal purposes, and the first pharmacy. Major John Owen, a trader with the army, established Fort Owen in 1850 and it served as a trading post for trappers, miners, settlers and Indians for 20 years. Hamilton was established by Marcus Daly, the Butte copper mining magnate, in the late 1880's when he came to the valley in search of timber to supply his copper mines on the east side of the Continental Divide. Darby began in 1882 as a mining and fur trading town, gradually changing to logging, agriculture, and cattle ranching. Some mining claims are still evident such as the Curlew mine. There were also attempts to drill for oil and locate coal deposits.

Due to the vast amounts of forests within Ravalli County and the contiguous National Forests, forest management, timber harvest, fishing, hunting and trapping have always been a major factor in the social and economic history, custom and culture history of Ravalli County. Numerous sawmills and wood products processing plants were built from the time of early settlers and modernized through time. Log home building became a large valley industry in the 1980's through the mid 2000's.

Since the early 1980's the Bitterroot National Forest's output of raw timber has dropped from 42 million board feet annually to as low as 0.8 million board feet with an average of 8 million board feet per year since 2000. Consequently many sawmill and logging operations have gone out of business. The annual growth of growing stock trees on non-reserved forest land on the Bitterroot National Forest is estimated to be about 370 million

board feet and net annual growth is estimated to be over 285 million board feet, and the annual mortality is about 80 million board feet. The County economy continues with fluctuations and a conversion away from the use of natural resources to other manufacturing and expanding service sector.

Ravalli County's greatest challenge in the coming decades will be dealing with the economy. Over the past several decades the county's basic economic sectors have been changing rapidly. The goods and service sector expands with a growing population trend. There is less use of local natural resources and a change to importing and manufacturing.

As well as a vast service sector, the County has sizable government and educational employment such as The Rocky Mountain Laboratory, Bitterroot College Program, several public schools, U.S. Forest Service and a wide variety of federal, state, and county offices.

#### RAVALLI COUNTY LAND AREA

	Acres	Percent of Total Land Area
Ravalli County – Total Area	1,575,848	
U.S. Forest Service Administered Land	1,166,425	74.0%
Wilderness Study	101,974	
Wilderness	282,630	
Inventoried Roadless	296,148	
Management Areas (MA) where timber harvest is allowed	485,673	
State of Montana – Department of Natural Resources	29,299	1.9%
Montana Department of Fish, Wildlife and Parks	8,964	0.6%
U.S. Fish and Wildlife Service	2,868	0.2%
Private Land	367,638	23.3%
Total Forested Land (from MT NRIS) includes private and public lands	877,800	56.0%

#### CUSTOM AND CULTURE

The history of Ravalli County is steeped in stories of the ruggedness of early settlers and the use of natural resources in the County to sustain their lives and livelihoods. There are reports of miners and prospectors, hunters, trappers and trading posts, loggers, sawmills, home and business construction, coal mining and oil well drilling, livestock and crops. Establishment of the State and U.S. Forest Service brought roads, trails, telephone lines, ranger stations, work camps, and fire lookouts.

The custom and culture of Ravalli County has always been driven by available technology and the presence of valuable natural resources, timber being dominant. Other factors have included the distance to markets, prices, and forces of marketplace.

Timber harvest and milling, mining, farming, ranching and recreation provided the heritage of the county's residents, and such activities continue today. This is a land in which nature plays the upper hand. Early settlers of this land worked hard to establish their livelihood, and to maintain that livelihood, today's residents must work equally hard.

In recent times the use of natural resources of the Bitterroot National Forest within the County has become less available. Road access for timber harvest and other resource use and management, as well as recreation, hunting, fishing, and trapping has been reduced. There is a reduction in management of timber resources and other management of benefit to all forms of life on the national forest lands within and contiguous to Ravalli County. This has resulted in fire fuel loadings in the forests in addition to insect and disease epidemics. These conditions have been compounded by years of drought resulting in catastrophic wildfires and other negative affects to

critical major watersheds. This has greatly affected and altered the County's economic, social, custom and culture and overall human environment. The Bitterroot National Forest should return to its original direction and mission established by law for managing public lands and forests for the public good. Social and economic aspects of industrial enterprise and the custom and culture of Ravalli County have been greatly impacted.

- I. GOAL Encourage the preservation of our cultural heritage.

## ECONOMICS

A primary purpose of this Policy is to identify the goals and objectives in managing the natural resources on federal and state managed lands in Ravalli County. These interests include but are not limited to farming, ranching, timber, mining, recreation, wildlife and all other activities related to, and reliant upon, the availability of natural resources on federal and state managed, lands.

As noted in other sections of this document, the economy of Ravalli County historically has been closely tied to the availability and management of natural resources. The economic challenge for Ravalli County in the first decade of the 21st Century is finding the right balance between using and conserving natural resources in a way that supports all of the industries of the valley.

The availability and use of these resources impacts the ability of natural resource industries to pay wages and property taxes that support households and services throughout the county. At the same time, conservation of these resources, open space, and working landscapes also impacts the economy by attracting tourism, new residents and entrepreneurs who value access to vast areas for outdoor pursuit and the quality of life associated with a clean environment and abundant wildlife.

According to the U.S. Department of Commerce's Bureau of Economic Analysis, the lumber and wood products manufacturing industry in Ravalli County as a whole has steadily lost jobs over the past decade. Labor earnings have dropped from a high of \$6.6 million in 2001 to \$2.3 million in 2009.

At the same time this industry reduces its contribution to the local economy through wages, it decreases its property tax payments to support county services as it loses its ability to make profits from the land. When unprofitable private land is acquired by federal and state agencies for conservation purposes, it is permanently removed from the tax base, adversely affecting funding for schools, healthcare, law enforcement, fire, and other needed services.

The federal government has several mechanisms to reimburse local government for loss of tax revenue. Payments to support local communities are derived from federal lands through the following mechanisms.

- \* 25% of Forest Reserve Fund (or elected current alternative such as the Secure Rural Schools Community Self Determination Act)
- \* Payments in Lieu of Taxes (PILT)
- \* Taylor Grazing Act Section 3 and Section 15
- \* Refuge Revenue Sharing Act

Although several studies portray the Ravalli County economy in glowing terms as the surge of in-migration has brought in people with money who demand housing and a lot of services, many studies fail to address the negative aspects of this growth. Paramount of these oversights is the relationship and effects of how growth in the service sector along with the decline of natural resource industries has caused Montana's per capita income to decline to 46th in the US. Low wages are a significant problem especially for the large percentage of Montana workers whose job does not require at least a bachelor's degree. Most economic reports fail to address the reasons for the decline in the natural resource industries. Mills have closed due to lack of log supply even during times of high markets. The existing

forest industry in Ravalli County is at extreme risk unless the merchantable timber supply from National Forests can be increased.

The most significant change in the Ravalli and national economy is the decreased portion of income derived from labor. Americans used to move to places to follow jobs. Now people with money and job creation capability migrate to places they find desirable to live. A significant percentage of all personal income in the county now comes from non-labor income, such as transfer payments from investments, retirement accounts, and benefits. This phenomenon is partly a result of an aging society with fewer workers, but also reflects the region's ability to attract new entrepreneurs, the self-employed, and wealthy retirees.

As Ravalli County works with other jurisdictions to make decisions about the use of natural resources, the impact of all the above trends must be taken into account to ensure that the livelihood and quality of life for its 40,000+ residents is enhanced by a strong and stable economy. Changes in the availability and management of natural resources that swing too far in favor of either extraction or conservation of resources adversely affect the delicate balance of jobs, taxes, quality of life, and migration patterns that have sustained the County residents.

1. **GOAL** Improve the economic viability of the natural resource based industries.
2. **GOAL** Provide incentive policies to existing and new natural resource related industries.
3. **GOAL** Promote and expand tax incentives and balanced tax policies to assist existing and new natural resources related industries.
4. **GOAL** Maintain and enhance local influence over natural resource policies.

## CONSTITUTIONAL PRINCIPLES AND PRIVATE PROPERTY

The U.S. Constitution created a form of government characterized by:

1. Limited powers granted to the federal government.
2. Separation of those limited powers into legislative, judicial, and executive branches.
3. Creation of a process where the branches act to check and balance the power of the branches.

The Board and the people of Ravalli County protect and defend the Constitutions of the United States and the State of Montana. The Constitution of the United States, Article 1, Section 8, clauses 17 and 18 limits the authority of the federal government to own only specified lands.

1. **GOAL** Ensure that all public lands in Ravalli County be managed in coordination with the Board and its adopted policies.
2. **GOAL** Protect and preserve private property rights and promote the continuation of private economic pursuits. Law Dictionary: Property: "Every species of valuable right or interest that is subject to ownership, has an exchangeable value or adds to one's wealth or estate. "Property describes one's exclusive right to possess, use, and dispose of a thing, as well as the object, benefit, or prerogative which constitutes the subject matter of that right.

- 3. GOAL** Proposals for government control of property should be evaluated with the goal of no net increase in federally controlled lands.

## PRIMARY PLANNING GUIDELINES

The Board recognizes it is their duty and obligation to enter into official land use planning activities and to participate equitably and fully with the federal and state management agencies. In accordance with state and federal laws regarding land use planning and protection of private property interests, the Board seeks to maintain and revitalize multiple uses of state and federally managed lands. The Board has developed a process to coordinate with the federal and state agencies regarding proposed actions which will alter or impact lands in Ravalli County. This includes, but is not restricted to, private property rights and private property interests, economic stability and historically developed custom and culture of the county, and the provisions of this Natural Resource Use Policy. Such agencies are requested, prior to taking official action, scoping a project, or issuing a report on a proposed action, to coordinate with the Board. The agencies may accomplish this in part by providing the Board or its agents, in a timely manner, with the proposed purposes, objectives, and estimated economic impacts of such action. The Board is committed to a positive planning process with federal and state agencies. The County will consider interests of the people in Ravalli County regarding use of state and federal lands within Ravalli County's jurisdiction.

Ravalli County is committed to seeing that all decisions on natural resources affecting the County will be guided by the following principles:

1. Support multiple use on all public lands in Ravalli County.
2. Protect private property rights and interests.
3. Protect local custom and culture.
4. Protect traditional economic pursuits in the County that form the base for economic stability.
5. Open up new economic opportunities through reliance on free markets.
6. Protect and enhance access to the enjoyment of the public lands in the County.
7. Support amendments to current federal policy to provide the option to use mechanized equipment for maintenance of dams and water delivery structures that predate the Wilderness Act within designated wilderness areas and wilderness study areas.

## INTRODUCTION - WATER AND HYDROLOGY

Water resources are fundamental to the economic future and the quality of life in Ravalli County. Surface water has been and continues to be the primary water source for agriculture, recreation and fisheries. Historically, groundwater has been used for domestic, commercial and agricultural purposes. For the foreseeable future, increased groundwater sources will be necessary for new municipal, domestic, commercial, agriculture, and industrial water supplies. The quality of this resource needs to be protected while providing for increased use.

- 1. GOAL** Watersheds must be managed for water quality and seasonal quantity.
- 2. GOAL** Identify and secure water sources for future uses within the County.
- 3. GOAL** Water rights established historically and beneficially used by the citizens of Ravalli County including, but not limited to, the purposes of agriculture (irrigation and stock water) domestic use, commercial use and industrial uses are recognized as private property rights and are to be protected as such.

4. **GOAL** All management plans and land use practice modifications proposed by government agencies premised on water quality and quantity issues shall be coordinated through local government and shall be consistent with the protection and preservation of private property rights.
5. **GOAL** Support amendments to current federal policy to provide the option to use mechanized equipment for maintenance of dams and water delivery structures that predate the Wilderness Act within designated wilderness areas and wilderness study areas.
6. **GOAL** Enhance upstream water retention and delivery.
7. **GOAL** The County should receive notification of all state, regional, interstate, and federal actions that have any impact on the water of the County at the initiation of the planning stage. It shall be the policy of the County to coordinate with all agencies.

## AGRICULTURE AND IRRIGATION

Agriculture in Ravalli County makes an important contribution to the economic base of the County, and is of critical importance to economic stability. Wheat, barley, flax, alfalfa, grain hays, silage, livestock, pasture and forest products constitute some of the major crops in Ravalli County. Specialty crops such as seed potatoes, mint, lawn sod, canola, mustard, raspberries, strawberries, grapes and vegetable crops are also very important products.

Many crops are enhanced by irrigation to increase productivity. Irrigation is derived from rivers, streams, dams and ditches or from wells. Dams are critical for holding early season runoff and providing water in late irrigation season. Irrigated crops are integral to production of livestock and feed, food sources for livestock and to the custom, culture, social, and the economic stability of the County.

1. **GOAL** Improve the economic climate for farming and ranching by providing a flexible menu of voluntary options for farmers to participate in agriculture.
2. **GOAL** Assure adequate water supply for irrigation and agriculture.
3. **GOAL** Enhance reserved water supply to increase agricultural use opportunities.
4. **GOAL** Maintain and enhance water storage facilities, conveyance structures and diversion points.
5. **GOAL** Support amendments to current federal policy to provide the option to use mechanized equipment for maintenance of dams and water delivery structures that predate the Wilderness Act within designated wilderness areas and wilderness study areas.

## LIVESTOCK GRAZING

Agriculture production in various forms in Ravalli County is necessary to the livelihood and well being of all its citizens and to the land. The County must strive to protect its ranching and farming cultural heritage and the vital natural resources needed to keep farming and ranching families in business.

The Bitterroot National Forest and the State of Montana have lands contiguous to and intermingled with private lands of various ownerships in portions of Ravalli County. The Bitterroot National Forest also manages and controls the headwaters and watersheds of the major rivers and streams in Ravalli County which are necessary

for agriculture to exist in the County. Historically, there have been permits issued to ranchers grazing on federal and state lands.

1. **GOAL** Retain the use of public lands for livestock grazing.
2. **GOAL** Develop and encourage programs to enhance the effectiveness of local government in the public land planning process for grazing.
3. **GOAL** Encourage mechanisms to allow subleasing and transfer of grazing rights or allotments on public lands to preserve and enhance the local grazing industry and the tax base of the County.
4. **GOAL** Ravalli County Commissioners will coordinate with appropriate agencies in formulating or modifying allotment management plans.
5. **GOAL** Oppose the introduction and grazing of wild bison on public lands.

## FOREST MANAGEMENT

Active forest management on Ravalli County lands must be based on sound science, economical decisions, local values and common sense. Forest management practices must include planting, thinning and harvesting of the forest vegetation. Removal of forest materials using mechanical and other harvesting systems will insure continued investment, employment and business opportunities in Ravalli County. We encourage a harvest level that results in a stable and sustainable volume of merchantable and non-merchantable materials being removed each year. The Bitterroot National Forest and the State of Montana Trust Lands have the capability under proactive management to achieve a healthy forest ecosystem while providing clean water, clean air, wildlife habitat, recreational opportunities and economic benefits and stability.

1. **GOAL** Actively manage our forests to ensure a healthy and vibrant forest for current and future generations.
2. **GOAL** Provide a sustainable and continuous supply of forest materials, recreation, wildlife, fisheries and water.
3. **GOAL** Insure a stable output of materials from the forest that utilizes the resources and provides for community stability.
4. **GOAL** Public lands timber harvests will be planned in coordination with local governments using the best available science.
5. **GOAL** Coordinate with the Bitterroot National Forest in implementation of the National Fire Plan Strategy to strive to achieve fire-fuels reduction to acceptable standards on all public lands.
6. **GOAL** Discourage the Forest Service "Let Burn" policy on all public lands during periods of high fire danger.
7. **GOAL** When "Let Burn" policy is implemented it becomes a "prescribed burn" subject to the NEPA and liability standards which apply during controlled burns.

8. **GOAL** The County expects the Federal Government to follow and obey the same Federally established air quality laws for the air over and that which exits the federally managed forest lands to include those lands which have been designated Wilderness.
9. **GOAL** The air quality in Ravalli County shall be a priority in both forest management plans and wildfire management.
10. **GOAL** Manage the forests to minimize the number or acres burned each year.
11. **GOAL** Permanent vehicular access to major non-wilderness forested watersheds is necessary to promote public health, safety, and general welfare through economically and ecologically sustainable management of forest health and fire hazard buildup. No existing public transportation system roads should be decommissioned unless there is demonstrated public support that the road is not needed for public recreation or for economically efficient management and fire protection purposes.
12. **GOAL** Ravalli County will facilitate coordination for designation and management of wilderness areas in Ravalli County.

#### **Permit and promote timber harvest in Inventoried Roadless Areas (IRAs)**

- a. No portion of an IRA outside Wilderness Study Areas (WSAs) and Recommended Wilderness Areas (RWAs) should be identified as unsuitable for timber harvest.
- b. Helicopter logging and the construction of temporary roads in IRAs for timber extraction will be permitted and encouraged outside WSAs and RWAs.
- c. Ravalli County endorses sunset provision in the recommendations submitted to Congress in 1985 for the management of WSAs.
- d. Salvage logging will be permitted within IRAs.

## **ENERGY AND MINERAL RESOURCES**

Ravalli County recognizes that the development of its abundant mineral resources is desirable and necessary to its economic well being. Utilization of biomass from public forests would reduce fire-fuels to acceptable standards, lessen the risk of catastrophic wildfires and provide an economic boost for the County, state, and nation. Energy and mineral resource extraction is consistent with the local history, custom and culture.

1. **GOAL** Encourage energy resource research, exploration and development.
2. **GOAL** Encourage mineral resource research, exploration and development.

## **ROADS AND TRAILS: ACCESS AND TRANSPORTATION**

- 1. GOAL** Maintain the historic right to travel over public lands whenever necessary for human safety and emergency ingress and egress, especially for wildfire control, in the pursuit of farming, ranching, timber harvest, mining, recreational activities, motorized vehicle use, access to irrigation infrastructure and other historic uses..

**Objective A:** Adopt the provisions of RS 2477 which states "The right-of-way for the construction of highways across public lands not otherwise reserved for public purposes is hereby granted" as Ravalli County policy". Any roads existing prior to the implementation of the FLPMA Act in 1976 are still recognized under RS 2477.

**Objective B:** Keep rights of way going to and inside public lands open for cultural, economic, social, recreational, hunting, fishing and public safety purposes, including access for suppression of wildfires and safety of fire fighters.

**Objective C:** Outside Designated Wilderness areas, new roads and trails should be considered for human safety and emergency ingress and egress, especially for wildfire control, in the pursuit of farming, ranching, timber harvest, mining, recreational activities, motorized vehicle use, access to irrigation infrastructure and other historic uses

**Objective D:** Decommissioning – Ravalli County is opposed to road and trail closures and/or decommissioning. There shall be no net loss of Forest Service roads/trails. We support additional roads/trails.

- 2. GOAL** Protect private property rights in Ravalli County

**Objective A:** Access to and/or across federal and state managed lands within the County should not entail encumbrances or restrictions on private property.

- 3. GOAL** Promote maintenance of a comprehensive inventory of all existing and historic Forest Service system and non-system roads/trails, and rights-of-way in Ravalli County

**Objective A:** Share access to databases and GIS systems among the government agencies

- 4. GOAL** Encourage adequate funding of inventoried road and trail maintenance as well as resource and wildlife protections.

**Objective A:** Define needs and funding sources for road and trail maintenance. Discourage reallocation of resources and budgets to other activities.

**Objective B:** Prioritize maintenance for roads and trails.

**Objective C:** Promote the control of noxious weeds on State and Federal lands, easements and rights-of-way.

**Objective D:** Ravalli County will coordinate, when appropriate, with other government agencies to establish seasonal road closures.

**5. GOAL** Allow and encourage the full range of recreational activities in **Inventoried Roadless Areas (IRAs)**.

**Objective A:** Existing recreational uses in Recommended Wilderness Areas (RWAs) and Wilderness Study Areas (WSAs) will continue until such time as Congress finalizes the classification.

**Objective B:** No road or trail in an IRA will be designated for non-motorized use without meaningful coordination with Ravalli County, local interested parties, and appropriate agencies.

## RECREATION

**6. GOAL** Establish, maintain and improve developed recreation areas on public land.

**Objective A:** Many residents and visitors prefer to recreate, camp, and picnic in developed recreation areas. The establishment, maintenance and locations of these developed recreation areas will be coordinated among Ravalli County and appropriate agencies.

**Objective B:** Existing developed recreation site capacities should be increased to meet increasing public demands.

**Objective C:** New developed recreation sites should be constructed in response to changes in public demand and interests.

**7. GOAL** Encourage and facilitate responsible (as defined by NOHVCC) Off Highway Vehicle (OHV) recreational opportunities.

**Objective A:** Outside Designated Wilderness Areas and some developed recreation facilities, no area, road, or trail should be designated exclusively for non-motorized use. Exceptions to this policy can be made through the coordination process when visitor safety issues can be demonstrated and documented.

**8. GOAL** Promote motorized access for recreational opportunities.

**Objective A:** All non-wilderness areas should be available to over the snow vehicles.

**Objective B:** Modernize the Forest Service definition of an ATV.

**Objective C:** Develop and designate recreational opportunities for high clearance vehicles.

**Objective D:** Seasonal closures of areas, roads, and trails may be desirable for the protection of wildlife, road and trail tread, and watersheds. These seasonal closures will be determined by coordination among Ravalli County and appropriate agencies.

## THREATENED, ENDANGERED, AND SENSITIVE SPECIES

Coordination with local government on the impacts of Endangered Species Act (ESA) actions is required by the laws and regulations of the Endangered Species Act (ESA) and the National Environmental Protection Act (NEPA).

1. **GOAL** Ravalli County will coordinate in the proposed designation, delisting, re-introduction, and management of any species designated in any category or classification for protection or consideration of protection, under the Endangered Species Act or similar designations.

## REFUGES & WETLANDS PROTECTION AREAS

Ravalli County contains wildlife refuges acquired and managed by the Federal Agencies.

These areas remove private land acreage from the County's tax rolls thereby reducing revenues from private land sources. Federal lands are subject to the Weeks Act which provides for Payment In Lieu of Taxes (PILT) to reimburse annually the affected counties for loss of revenue.

1. **GOAL** Ravalli County will coordinate in the designation and management plans of proposed wildlife refuges, wetland protection areas and conservation easements in Ravalli County.

## WILDLIFE

Hunting both big game (including elk, deer, moose, mountain goats and sheep, mountain lion, grizzly and black bear) and waterfowl, and upland game birds has been a traditional part of life in Ravalli County even before the first settlers. In early days, hunting and trapping of fur bearing animals was a necessity for survival. Today it is still essential and still provides a food and income resource for many people living and working in Ravalli County. The County is known for its big game hunting and provides good hunting for County residents and out of state visitors.

Income for County residents is provided by activities such as employment for outfitters and guides, selling supplies, and equipment, and providing lodging and meals and other goods and services to hunters, trappers and fishermen. Increased population of wildlife and lack of suitable habitat on National Forest Lands is forcing wildlife to move onto private lands causing damage to private lands and, thus, a negative impact on private property and a hazard to public roads and drivers.

The Board and the people of Ravalli County accept, support and sustain the Constitution of the State of Montana; Article IX Section 7, preserving the right to harvest wild fish and wild game. The Board and the people of Ravalli County accept and support the taking of wild animals. Taking means the pursuit, hunting, trapping, snaring, shooting or killing of a wild animal; and wild animal means a game animal, migratory bird, upland game bird, fur bearing, predatory animal, fish and any other classification established by FWP or MCA.

1. **GOAL** Coordinate improvements to wildlife habitat on public lands in order to sustain viable and harvestable populations of big game and upland game species, as well as wetland-riparian area habitat for waterfowl, fur-bearers, and a diversity of other game and non-game species.
2. **GOAL** Coordinate with the Federal and State Agencies in consultation with all affected landowners, lessees, and permittees to develop specific Wildlife Management Plans.
3. **GOAL** Coordinate with State and federal agencies to protect private property from damage caused by predators.

## FISHERIES

Fishing has been a traditional part of the custom and culture of life in the Bitterroot Valley, starting with the Native Americans and continuing through the arrival of the early European settlers. Paramount to all these early visitors and settlers was the use of fishery resources for food and survival. Even today fishing provides food for many of the valley's residents and visitors, in addition to the recreational sport that has become a regional and national attraction. People from all across the nation know about the Bitterroot River and its reputation as a top, blue-ribbon trout stream. As a result of this reputation, an entire local business network has emerged to accommodate the demand from both visitors and residents alike. This network includes numerous fishing guides, fishing equipment retailers, and it is augmented by the hospitality industry, and all kinds of local retailers from gas-and-convenience stores, to grocery stores, to clothing stores. . Income for County residents is provided by activities such as employment for fishing guides, selling supplies, and equipment, and providing lodging and meals and other goods and services to fishermen.

1. **GOAL** Coordinate with appropriate agencies to maintain and enhance Ravalli County's fisheries resources.
2. **GOAL** Support programs which maintain healthy forests for productive watersheds, so that they can be more suited to withstand the threat of wild fires and insect infestation, as well as minimize erosion into sensitive fisheries habitat.
3. **GOAL** Encourage the maintenance and enhancement of public access to fisheries.

## ANIMAL CONTROL

The Board and the people of Ravalli County accept and support the use of hunting, trapping, snaring and other methods for the purpose of controlling predatory animals.

Ravalli County passed a Large Predator Policy on March 5, 2012 which outlines coordination with appropriate agencies concerning bears, wolves and lions.

1. **GOAL** Control predatory animals to reduce property damage and predation on large game species and domestic animals.
2. **GOAL** Encourage control of disease-bearing vectors, predators and rodents that are a recognized threat to agriculture, domestic animals and public health..

## LAW ENFORCEMENT

Ravalli County law enforcement is dedicated to preserving and protecting the peace and dignity of the people of Ravalli County; protect their rights and privileges established under the Montana Constitution and the Constitution of the United States.

1. **GOAL** Support and develop interagency coordinated agreements to insure full cooperation of federal and state law enforcement agencies with the Ravalli County Sheriff.
2. **GOAL** Obtain the maximum Federal and State funding available to support local law enforcement and related activities which may include fighting fire, search and rescue, and other activities as needed.

## THE CONTINUING PROCESS

The Ravalli County Board of Commissioners recognizes that this policy is a work in continuous progress. It will require the cooperation, work, and dedication of many County residents. Additional policy alternatives, when developed, will be added to this policy. The ongoing policy development will include consideration of all historic and cultural as well as current land uses in Ravalli County.

## REFERENCES

### Water and Hydrology

Table 1-1 (from the DEQ, August 17, 2011 report) lists the 2010 impaired water bodies, causes of impairment, and impaired beneficial uses  
Generalized recommendations for remediating both sediment and temperature impacts are also provided in the DEQ, August 17, 2011 report.

Table II U.S. Geological Survey Data – 2000-2010

Table III USDA-NRCS Weather Data

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Reference: Bitterroot National Forest Records Forest Resources of the Bitterroot National Forest. 1999. USDA. Rocky Mountain Research Station

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## APPENDICIES

### *Appendix A. Water and Hydrology*

The Bitterroot Valley is 80 miles long and 34 miles wide at its widest point. The Valley contains flood plains and river terraces along the Bitterroot River. At higher elevations benches slope toward the river. Foothills and steep slopes flank the benches.

Private land is primarily located adjacent to the West and East Forks and the Bitterroot River from the confluence northward to the Ravalli County - Missoula County line. Mountains occupy west and east sides of the valley bordering Idaho on the west and Granite County, MT on the east. The southern end of the valley is also mountainous, bordering Beaverhead County, MT to the southeast and Idaho on the south.

Elevations on the west side (Bitterroot mountains) range up to 10,157 feet in elevation (Trapper Peak), about 8,500 feet in the Sapphire Range to the east, and 8,000 feet on the hydrologic divide between Idaho and Ravalli County on the south. Most of the southern and western parts of the valley occur on igneous rock (e.g. granitic materials). A large part of the east side and northern end of the valley occurs on modified and unmodified sedimentary rock. Most of the valley-fill material consists of sands and gravels up to 300 feet thick (as determined by the Montana Bureau of Mines and Geology). The West and East Forks as well as the main stem of the Bitterroot River occur on these materials.

Most soils in the bottom lands adjacent to the river are shallow to moderately deep over loose sands and gravel. They occupy a strip along the river of up to 2 miles wide. Deep soils occur on the terraces and benches of the east side. Soils on the west side are also shallow to moderately deep, and formed in granitic parent material (USDA-NRCS).

Ravalli County has major groundwater resources. The greatest water-well yields are developed in gravel aquifers. The most productive is the unconfined aquifer running from the confluence of the West and East Forks of the Bitterroot River to the Ravalli-Missoula county line.

Channel flow, taken from U.S. Geologic Survey data (2000-2010 data):

Table I Bitterroot River Discharge

West Fork of the Bitterroot River near Conner, MT	166,513 acre-ft/year
Bitterroot River near Darby, MT	593,655 acre-ft/year
Bitterroot River near Florence, MT	1,335,725 acre-ft/year

Precipitation is variable in Ravalli County and substantially influenced by elevation. Table II illustrates this effect.

Table II Temperature and Precipitation at Selected Locations in the Bitterroot Valley (1)

Location	Elevation – Feet	January Avg. Temp. oF	July Avg. Temp. oF	Annual Precipitation – Inches
Hamilton, MT T6N-R21W	3,750	26.5	66.6	13.6
Twin Lakes T5N-R23W	6,400	26.4	58.1	58.7

Sec. 32				
Saddle Mountain T2S-R19W Sec. 5	7,940	21.5	56.5	29.5

(1) USDA-NRCS

Annual stream runoff occurs primarily from snowmelt and precipitation in the headwater areas during late spring and early summer. Low flows in the basin occur naturally during the winter. Recharge to aquifers is greatest from April through July due to stream runoff from accumulated snow in headwater areas augmented by an average of about 10 inches of rain as measured at higher elevations for May and June.

The Montana Department of Environmental Quality (DEQ) has prepared a water quality improvement plan for the Bitterroot Valley/River dealing primarily with temperature issues and sediment for stream segments as identified in a publication entitled "Bitterroot Temperature and Tributary Sediment Total Maximum Daily Loads and Framework Water Quality Improvement Plan" (August 17, 2011).

In this plan the Bitterroot River watershed is divided into three separate planning areas:

1. Bitterroot Headwaters (completed in 2005)
2. Upper Lolo Creek (completed in 2003)
3. Bitterroot TPA (2011) which includes the Bitterroot River from the confluence of the West and East Forks to its confluence with the Clark Fork River, and Bitterroot River tributaries.

The Montana DEQ identified sediment related effects as a cause of impairment for the following tributaries of the Bitterroot River:

1. Ambrose Creek
2. Bass Creek
3. Lick Creek
4. Muddy Creek
5. North Fork of Burnt Creek
6. Rye Creek
7. Sleeping Child Creek
8. Sweathouse Creek
9. Threemile Creek
10. Willow Creek

Anthropogenic (man-caused) sources of sediment include:

1. Upland and stream bank erosion associated with removal of riparian vegetation
2. Unpaved roads
3. Culvert failure
4. Logging
5. Disturbed ground on small and large acreage ranches
6. Agriculture
7. Storm water from construction sites
8. Forest management practices
9. Wildfire

Montana DEQ identified temperature related effects as a cause of impairment for the following stream segments:

1. Middle and lower Bitterroot River (from confluence with Skalkaho and 8-mile Creeks)
2. Sleeping Child Creek
3. Willow Creek

Anthropogenic sources of temperature problem include:

1. Reductions in shade from small and large ranching operations
2. Crops
3. Suburban land use
4. Timber harvest
5. Irrigation withdrawals and return flows
6. Waste treatment plants
7. Urban runoff from rain and snow events
8. Wildfire

Most of the headwater streams occurring on U.S. Forest Service administered land are functioning properly (not impaired). Streams that are "impaired" are undergoing active and passive restoration (Bitterroot National Forest Watershed Condition Class Rating – 2012).

### *Appendix B. Forest Management*

Wood products are one of our basic industries and one of our only renewable resources. Wood provides food, clothing, heat and housing for our citizens as well as the basis for our local, state and national economy. The health of our families, communities, state and nation are dependent upon the active management of our forestland to ensure they are healthy and vibrant. There are 1,166,425 acres of public lands managed by the Bitterroot National Forest located within Ravalli County. Healthy forest ecosystems require that the growth and mortality be managed. If this growth and mortality were harvested, it could employ sawmill workers and other associated workers, equating to millions of dollars in direct sawmill worker and associated worker payrolls.

Objective A: Provide known stable outputs so that the industry may make the necessary investments to fully utilize these outputs.

Objective B: Public lands managed by the Bitterroot National Forest that are non-wilderness and are available and potentially suitable for production should be managed and administered for water and watershed protection, recreation, timber harvest, wildlife, air quality and livestock grazing. They should be classed as suitable for sustained timber production to promote forest health, protection, and maintain sustained economic returns.

Objective C: On Federal lands suitable for timber harvest, a minimum average annual long-term harvest to capture the equivalent of 80% of the annual mortality shown by the most recent forest inventory is necessary to maintain and improve forest health, control hazardous fuel buildup, and support the local economy and local government. The maximum allowable harvest level should be equal to the average annual gross growth per acre shown by the inventory applied to suitable timberland acres.

Objective D: There must be a reasonable level of Federal revenue sharing with local governments. No more than 20% of the sawtimber sale volume on a 5 year running average will be "Stewardship Contracts" where all the revenues are retained by the Forest Service and no revenue is shared with local government.

### *Fire-Fuels Management*

Since the 1930's and 40's, fuels management was increasingly addressed in relation to timber harvest on private, state, and federal lands. Laws and regulations were brought into effect that required reduction and disposal of what is referred to as slash (limbs, unmerchantable stems, and debris) left following logging activities. This was

a common sense move in the practice of sound forestry principles and aided in the reforestation and perpetuation of the forests by reducing the fuel-fire hazard on private, state and federal lands.

From the 1950's to the early 1990's the National Forest lands within Ravalli County saw timber harvest of mature and immature timber stands. The resulting tonnages of fuels (slash & debris) prone to fire were disposed of. The harvesting of timber stands created a mosaic in the forests that eventually regenerated into young vigorous stands that are less susceptible to fast moving wildfires as fire-fuels had been reduced. These areas serve as barriers to wildfire and serve as control barriers to surrounding maturing forest stands. In addition, a network of forest access roads served as access and aided as wildfire control lines.

Beginning in the early 1990's, forest management by harvesting, regeneration, and thinning of timber stands was significantly reduced on the National Forest Lands in Ravalli County. This was due to laws, regulations and litigation. These restrictions have affected management ability to deal with fire-fuel loading and have also affected the custom, culture, social and economic situation in Ravalli County.

The suitable timber base acreage on the Bitterroot National Forest is 485,673 acres of the 1,166,425 acre forest. In recent years, the allowable sale quantity has not equaled the annual mortality rate. Unless the sale quantity is equivalent to the annual mortality rate, the buildup of fire fuels leads to catastrophic fire conditions that have been evident in the last five years.

The trend has been compounded by moderate to severe drought and the onset of disease and insect infestations of epidemic proportions throughout Ravalli County and which is prevalent in the Rocky Mountain Region and Pacific Northwest. Many timber stands are dead and dying, creating fire-fuel conditions that has not existed since the early settlement years. These events and conditions have lead to large catastrophic fires consuming thousands of acres in individual uncontrollable wildfire events.

The declining timber production trends on National Forest Lands within Ravalli County have shifted the demand for timber onto private lands. It has also forced the closure of many timber processing mills, a reduction of forest products and supporting industry jobs. This has resulted in the loss to the economy and revenue to all government agencies thereby increasing the economic burden on the County.

Private timberlands within Ravalli County are experiencing the effects of reduced timber harvest on National Forest and are filling the demand for timber. Good stewardship of the private timberlands is being demonstrated by hazardous fuel reduction and regeneration of timber stands is occurring. This is an asset to the local economy.

### *Appendix C. Mineral Resources*

Many mineral resources occur on both private and government-owned lands within Ravalli County. These resources have great economic potential for the citizens of the County

Mining, mining claims and prospecting took place in the late 1800's and early 1900's within the Bitterroot National Forest in Ravalli County there are numerous drainages, creeks, mountain peaks and other geographic features that have been named for early day prospectors and miners.

Currently mining in Ravalli County is primarily limited to sand, gravel and rock. Various types of gravel are in demand for road construction. Round rock is used for concrete and asphalt road construction and decorative purposes. Crushed rock is used for fill and road surfaces. The demand for such materials increases as the population and development of the County increases and existing surfaced roads deteriorate. The demand for large fractured and round rock for decorative purposes has increased dramatically in the County in recent years, evidenced by retail yards and a continuous movement by transport on the local highways. Much is sold out of Ravalli County. Recreational mining by gold panning exists in limited fashion in Ravalli County.

#### *Appendix D. Roads and Trails: Access and Transportation*

An adequate transportation system of roads and trails on Federal and State lands is critical to the environmental, social, and economic welfare of Ravalli County and its citizens. This system of roads and trails provides access to public lands in pursuit of farming, ranching, timber harvest, mining, recreational activities, forest restoration projects, fire suppression and management, management of weed and insect infestations, and emergency services. It is the policy of Ravalli County to prioritize the establishment and maintenance of an adequate and sustainable transportation system on State and Federal lands through meaningful coordination with State and Federal Agencies.

##### **Roads and Trails Rights Of Way**

Historical uses of public lands have established official and unofficial rights of access to public lands as well as to private inholdings and mining claims. It is the policy of Ravalli County to preserve these rights of way and to enforce them when it is deemed necessary to do so.

For rights of way that existed prior to 1976, the relevant Federal Law is RS 2477, which Ravalli County adopts as County policy by reference. No closures or other restrictions may be placed on any road, trail, irrigation facility, access to an irrigation facility, or any other travel way that qualifies under the provisions of RS 2477 may be made without meaningful coordination among Ravalli County, Federal and State Agencies.

##### **Road and Trail Closures and Restrictions**

It is the policy of Ravalli County to keep as many roads and trails available yearlong for economic, management and recreational uses as is practically possible. However, Ravalli County recognizes that some roads and trails may necessarily be closed or seasonally restricted for resource and wildlife management purposes. These closures and restrictions should be thoroughly and meaningfully coordinated among State and Federal Agencies, Ravalli County.

##### **Road Decommissioning**

Over the past thirty years, half of the roads that once existed in the Bitterroot National Forest have been decommissioned and, in many cases, "obliterated". This has resulted in serious permanent loss of access to public lands for timber management, fire management, restoration projects, and recreation. In many cases, roads and trails have been decommissioned without adequate consideration of the potential economic and social impacts of those actions. It is the policy of Ravalli County that roads that may appear to have no immediate use should be placed in long-term storage rather than decommissioned or "obliterated".

Roads on public lands which are candidates for long-term storage or decommissioning must be evaluated for their future possible uses as well as their recreational potential through meaningful coordination among State and Federal Agencies, Ravalli County.

When it is mutually determined through the coordination process that a road is suitable for decommissioning, treatment of that road should be limited to culvert removal, restoration of drainage to a more natural condition, remediation of washouts and slumps, weed treatments, and/or reseeding and reforestation. All reasonable effort should be made to preserve reestablished vegetation on the roadway and on the cut and fill side of the roadway during treatment. Ravalli County does not endorse extreme ground-disturbing treatments such as recontouring or decompacting roadways. In all cases, treatments to decommissioned roads should preserve a trail for recreational use by hikers, mountain bikes, stock, OHVs, and/or motorcycles that is consistent with the land use prescriptions for the area.

##### **Road & Trail Maintenance**

Adequately maintained roads and trails have less impact on forest resources such as water quality than roads and trails which are allowed to fall into disrepair. Over that past two decades, Forest Service budgets for road and

trail maintenance for road and trail maintenance have dropped dramatically. The table below documents the decline in the number of miles of Forest Service system roads that have received scheduled maintenance from 2005 through 2011.

MILES OF SYSTEM ROADS MAINTAINED	2005	2006	2007	2008	2009	2010	2011
ML1 -- Roads that are closed and under basic custodial care	39	57.4	17.6	12.4	8.4	29.3	5.6
ML2 -- Roads suitable for high clearance vehicles	164	82.8	95.5	63.3	61.7	47	68.8
ML3 -- Roads suitable for prudent passenger car travel	552	506.8	331	297.4	316.9	216.3	186.3
ML4 -- Roads that provide a moderate degree of comfort and convenience	16	7.9	7.1	6.7	6	7.3	5.2
ML5 -- Roads that provide a high degree of comfort and convenience	19	10.6	18.6	18.7	14.8	10	14.8
TOTAL	790	665.5	469.8	398.5	407.8	309.9	280.7

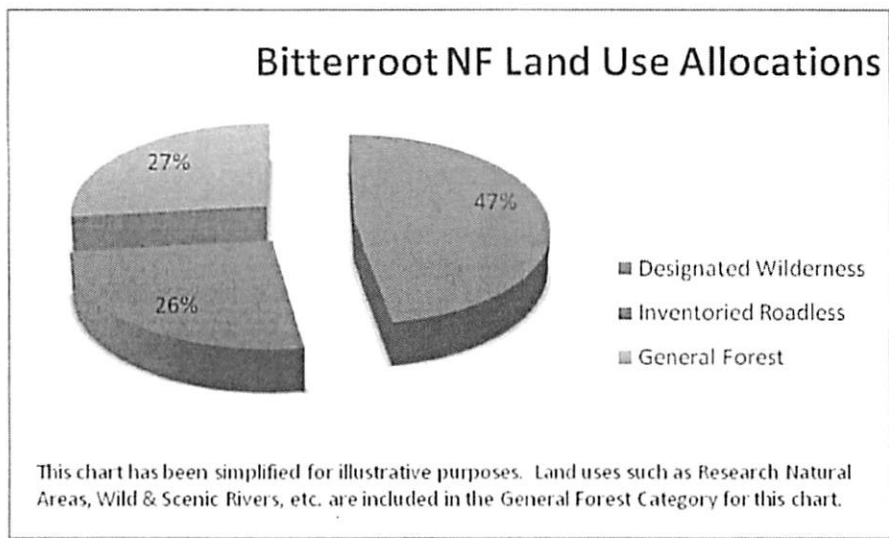
Notes: Figures come from Roads Accomplishment Reports (RAR) from 2005 to 2011  
 Maintenance in 2005 included deferred maintenance condition surveys, miles surveyed are 288.1 miles

Roads and trails which lie within riparian zones need special attention since erosional sediment from roadways and trailways is more likely to end up in our streams, rivers, and lakes.

It is the policy of Ravalli County that priority be given to the adequate maintenance of roads and trails on County, State, and Federal lands. Ravalli County does not condone the diversion of maintenance funds to other activities such as road or trail obliteration.

**INVENTORIED ROADLESS AREAS**

Ravalli County is blessed with abundant opportunities for primitive recreation, with 751,000 acres of Designated Wilderness areas. An additional 406,000 acres of the Bitterroot National Forest are identified as Inventoried Roadless Areas (IRAs). The chart below summarizes a simplified view of the land use allocations for the Bitterroot National Forest.

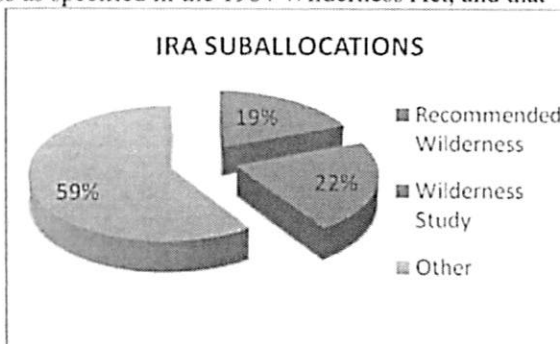


As a result of national policies and litigation, IRAs are, for all practical purposes unavailable for many multiple uses such as timber harvest, fuel reduction, insect control, fire management, and many recreational activities. The allocation of nearly 75% of the Bitterroot National Forest for highly restricted activities places an

impediment to the economic and social welfare of Ravalli County. It is the policy of Ravalli County that IRAs should be available for the full range of multiple uses to the greatest extent possible.

**Recommended Wilderness Areas & Wilderness Study Areas**

Federal statute allows individual Forests to identify portions of IRAs which meet the criteria for wilderness and to recommend those areas to Congress for designation as Wilderness Areas. Within Ravalli County, nearly 77,000 acres have been so designated. It is the policy of Ravalli County that such Recommended Wilderness Areas (RWAs) fully meet the criteria for Wilderness as specified in the 1964 Wilderness Act, and that



management prescriptions for RWAs should allow existing uses to continue and existing routes to be maintained until such time as Congress designates those areas as Wilderness.

The 1977 Montana Wilderness Study Act established two Wilderness Study Areas (WSAs) in Ravalli County (Sapphire WSA and Blue Joint WSA) totaling 89,000 acres. It is the policy of Ravalli County that management prescriptions for WSAs should allow existing uses to continue and existing routes to be maintained until such time as Congress designates those areas as Wilderness.

**Timber Harvest and Restoration Projects**

Some of the County’s most valuable timber reserves lie within those portions of IRAs that are not RWAs or WSAs. It is Ravalli County’s policy that timber harvests should be utilized in IRAs and that temporary roads should be constructed when necessary for timber harvest in IRAs.

Like most of the County’s forests, IRAs contain over-mature stands, are adversely affected by insect infestations, and have accumulated dangerous levels of combustible fuels. Ravalli County encourages thinning and fuel reduction projects within IRAs as a necessary means to reduce the potential for unnaturally intense wildfires and to restore a vibrant, stable and resilient ecosystem to these areas.

**Roads and Trails**

All IRAs contain some system roads and many unclassified roads. And all IRAs contain system trails and some unclassified trails. In many cases, these unclassified roads and trails are legacy routes from past timber harvest, fire suppression efforts, and mining exploration. It is the policy of Ravalli County that none of these routes should be closed or decommissioned except when justified for resource purposes through the coordination process among State and Federal Agencies, Ravalli County, and local interested parties.

**Recreation**

The current Bitterroot National Forest Plan identifies IRAs to be suitable and desirable for motorized and non-motorized semi-primitive recreation. It is Ravalli County’s policy that this recreational designation for IRAs be carried forward in all future Bitterroot National Forest projects and plans. Ravalli County does not endorse

setting aside any area of any IRA for the exclusive use of non-motorized recreation; recreational roads, trails and areas in IRAs should specifically be designated for multiple use.

### *Appendix E. Recreation*

Recreational opportunities are abundant in Ravalli County and tend to be focused in state and federal lands within the County. Activities such as camping, picnicking, hiking, boating, fishing, rafting, berry picking, photography, stock use, auto and OHV use, hunting and fishing, snowmobiling, downhill skiing, cross country skiing, mountain biking, and sight seeing are all readily available in the County. Indeed, many residents of the County forego more financially lucrative opportunities elsewhere in order to enjoy forest-related activities. There are over 880,000 recreational visits to the Bitterroot National Forest every year. These recreational activities inject over \$88 million into the local economy. It is the policy of Ravalli County to facilitate and encourage recreational opportunities on county, state and federal lands.

However, over the past three decades there has been a decrease in opportunities for motorized visitors (autos, OHVs, jeeps, snowmobiles) and this has negatively impacted the social and economic benefits to the County. It is the policy of Ravalli County to encourage and extend opportunities for motorized recreation on county, state, and federal lands.

The National Visitor Use Monitoring (NVUM) program is a statistically valid national protocol for monitoring how the public uses their National Forests for recreational purposes. It is the policy of Ravalli County that coordination efforts should rely heavily on these data when developing Forest Plans, policies, and projects. Some of the results of the most recent NVUM survey for the Bitterroot National Forest are:

1. There are approximately 880,000 recreational visits to the BNF every year. On average, each visitor spends \$100 within 50 miles of their access point, mostly in Ravalli County. Recreation on BNF lands accounts for nearly \$88 million to the economy of Ravalli County.
2. 97% of all BNF visitors are from Ravalli, Missoula, and Lemhi Counties. However, the 3% of visitors from other counties, states, or countries account for a disproportionate amount of the spending in Ravalli County. These visitors typically stay at guest ranches, resorts or motels for multiple-day stays and are more likely to take advantage of outfitted activities. This accounts for the difference between average spending per visit (\$100) and the median spending per visit (\$17).
3. Only 5% of all BNF visits access Designated Wilderness Areas in spite of the fact that about 50% of the BNF is designated as Wilderness.
4. Satisfaction levels by visitors to the BNF are very high, with more than 95% reporting a "satisfied" visit. Virtually no one reported an unsatisfactory experience or incident.
5. Visitors were asked what they would do if their particular activity were no longer available in the BNF. 58% said they would go somewhere else to pursue their interests, and 16% said they would just stay home. In other words, Forest policies or practices that eliminate or restrict a recreational activity would displace the majority of participants in that activity to another location, probably outside Ravalli County.

#### **Management of High Use Areas**

Ravalli County will coordinate with State and Federal Agencies to encourage the development and maintenance of organized high use recreational facilities such as Lake Como, Powder Mountain ski area, Chief Joseph Cross-Country Ski Area, Painted Rocks State Park, and organized Forest Service campsites. Ravalli County encourages the development and maintenance of additional similar high use areas subject to meaningful coordination among Ravalli County, State and Federal Agencies,

#### **Management of Dispersed Recreation**

For dispersed recreational activities such as hiking, camping, hunting, fishing, stock use, mountain biking, motorized recreation, backcountry skiing, snowmobiling, and backpacking, it is the policy of Ravalli County that these activities should be as widely dispersed in the Forest as possible to avoid over-use and crowding. Crowding an increasing population of dispersed recreationists into increasingly smaller and smaller areas is bad forest management and can result in unrecoverable resource damage as well as a less satisfactory experience for the public.

It is especially important that widely dispersed roaded access to Federal and State lands be provided during hunting seasons, since the presence of hunters is the mechanism by which wildlife populations (both prey and predator species) are most effectively managed. Ravalli County will coordinate with State and Federal Agencies to implement this policy.

It is the policy of Ravalli County that no areas of public land outside Designated Wilderness Areas be allocated for the exclusive use of any category of visitor. With some exceptions, all roads and trails outside Designated Wilderness Areas should be designated for multiple recreational uses that are consistent with the physical attributes of the road or trail. Exceptions to this policy may also apply to high use areas such as the Powder Mountain Ski Area, Chief Joseph Ski Area, Lake Como Recreation Area or similar high-density-of-use areas. Exceptions to this policy can be made only after meaningful coordination with Ravalli County, State and Federal Agencies.

#### **Dispersed Camping**

The current Bitterroot National Forest Plan adopts the "300-foot rule" for motorized dispersed camping. This policy allows motorized campers to establish a campsite within 300 feet of any legal road or trail. It is the policy of Ravalli County that this rule should be incorporated into any future Agency plans, policies, or projects. Exceptions to this policy must be justified for resource reasons only after meaningful coordination with Ravalli County, State and Federal Agencies.

#### **Cross-Country Travel**

As a matter of policy, Ravalli County supports the ban on cross-country travel by summer wheeled motorized vehicles as proposed by the 2011 Travel Management Rule (TMR). Ravalli County supports the provision of the TMR that requires the designation of an adequate and sustainable route system for summer motorized travel that meets the current and projected needs of motorized visitors. Also as a matter of policy, Ravalli County supports the provision of the TMR which allows continued cross-country travel outside Designated Wilderness Areas and other high use areas for over-snow vehicles. No area of the non-wilderness portion of public lands can be closed to snowmobiles without meaningful coordination with Ravalli County, State and Federal Agencies.

#### **User Conflict vs. User Preference**

It is the policy of Ravalli County that, during the development of Forest Plans, policies and projects, a clear distinction between user *conflicts* and user *preferences* be made. User *conflicts* typically involve issues of safety or misbehavior. User *preferences* typically involve an intolerance for activities other than the individual's preferred experience. Recreational plans, policies, or projects should be based upon use conflicts and not on user preferences. Enabling user preferences as part of Forest policies and practices simply empowers more intolerance and more extreme behaviors.

#### **Definitions**

As a matter of policy, Ravalli County adopts the following definitions: Note that these definitions have been modernized from those included in the 1987 Bitterroot National Forest Plan:

1. An ATV is a motorized vehicle designed for off-highway travel that utilizes three or more low pressure tires inflated to a maximum of 10 psi and is less than or equal to 50" in width. Street legal ATVs may travel on any route designated for travel by full-sized vehicles as well as Forest roads designated as R4

and R6 roads on the 1985 Bitterroot National Forest map, as well as trails designated for yearlong or seasonal ATV travel.

2. A UTV is a motorized vehicle designed for off-highway travel that utilizes four low pressure tires inflated to a maximum of 10 psi that is greater than 50" in width but less than or equal to 76" in width. Street legal UTVs may travel on any road designated for full-sized vehicles as well as on roads designated as R4 and R6 on the 1985 Bitterroot National Forest map. Travel by UTVs is not permitted on trails.
3. A jeep is a full-sized vehicle that is designed or has been modified to be capable of off-highway travel. "Jeeps" are allowed to travel on any road designated for full-sized vehicles plus any roads designated for travel by jeeps. There are no such roads designated for travel by jeeps in the Bitterroot National Forest at the present time, and it is the policy of Ravalli County to encourage such designations through the coordination process.

### *Appendix F. Fisheries*

#### *Fire-related Impacts*

Negative impacts on streams occur from the increased soil erosion and debris flow that result from runoff caused by snowmelt and rainfall events. In the Bitterroot Valley some local streams actually turned black, from runoff, following the 2000 fires (Chris Clancy, FWP, verbal, 2012, Mike Jakober, USFS, 2012). Additional research indicates that impacts from sediment and debris flow are particularly significant during the first year, following a forest fire, depending on local weather conditions (Agee 1993, DeBano et al. 1998, DeBano et al. 1996, Robichaud and Brown 1999b).

Jakober's research on fisheries habitat in the Bitterroot National Forest(2012) indicated that sediment (less than 2 mm) increased between 2000 and 2002. Thereafter, it decreased back to the baseline levels between 2003 and 2005. He also noted that studies have shown that large trees, located by streams, fall into and accumulate within stream habitat for approximately 20 years following severe burns. Then, the accumulation of tree debris declines for approximately 30 years, until it reaches pre-burn conditions. Beyond this time frame, the accumulation of tree debris actually decreases for 20-30 years, probably due to the lack of mature trees to fall back into the stream habitat.

Further research by DeBano et al. (1996) demonstrated that following a wildfire in a ponderosa pine stand, sediment yields from a low-severity fire recovered to normal levels after three years, but moderate-and-severely burned watersheds took 7 and 14 years, respectively. Nearly all fires increased sediment yield, but wildfires in steep terrain produced the greatest amounts. Noble and Lundeen (1971) reported an average annual sediment production rate of 2.5 tons/acre from a 900-acre burn on steep river break lands along the South Fork of the Salmon River in Idaho. This rate was approximately seven times greater than hillside sediment yields from similar, unburned lands in the vicinity (Robichaud, 2011).

Such impacts in the Bitterroot River ecosystem have lead to fish kills in areas immediately adjacent to and downstream from the recent fires. Sleeping Child Creek had miles of fish kill after the 2000 fires, and many other tributaries and branches of the Bitterroot River also suffered significant reductions in fish populations. However, experience in the Bitterroot ecosystem also has shown that the native Westslope Cutthroat Trout have a remarkable ability to withstand the impact of increased sediment and debris flow from a burned area. Their population numbers did decline after the fires, but they did recover in subsequent years; and they often exceeded previous population numbers, sometimes exceeding baseline populations by several times (Jakober, USFS, 2012). On the other hand, the Bull trout population in Upper Rye Creek apparently has been wiped out by the negative impacts from the 2000 fire and is showing no signs of recovery (Chris Clancy, FWP, verbal communication, 2012; Jokober, USFS, 2012). In addition, the brook trout have seen a decline from pre-fire populations in many streams, where they have been out-competed by the native Westslope Cutthroat Trout during the recovery process (Jakober, 2012).

Additional impacts from fire-related runoff occur to trout spawning beds, called redds, and also to their primary food source, the macro-invertebrates. In the first case, the redds can be compromised from sedimentation that smothers or restricts oxygen reaching the developing fish eggs or fry. Moreover, the redds can be destroyed completely by the force of a heavy debris flow, brought about by a heavy rainfall event. Macro-invertebrates can be killed or dislodged by heavy sedimentation or debris flow, and their previous population densities do take time to be re-seeded or re-established.

The overall impact of fishing-related business activity is estimated to be up to 12 million dollars per year, provided further negative impacts from reduction of scenic beauty, excessive smoke, and the destruction of fisheries habitat do not accrue from the continual, annual summer fires. Unfortunately, the annual summer fires have inhibited the economic potential of this important local business activity. As a consequence, Ravalli County is determined to coordinate with the U.S. Forest Service to put out these fires as they develop in our "view shed," so that we can maintain, perpetuate and improve this important natural resource and the business and recreational activities that result from its utilization.

### *Existing Fisheries Management*

The Montana Fish, Wildlife and Parks (FWP) has management authority over Montana fisheries, including the lakes of Ravalli County and the Bitterroot River and its tributaries (MCA 23-2-101, MCA 87-1-201, MCA 87-11-301). Exceptions include wilderness areas, where FWP coordinates with the U.S. Forest Service, and the Lee Metcalf National Wildlife Refuge and the state's Bull Trout populations, which are managed by the U.S. Fish and Wildlife Service.

The state's conservation and management plans attempt to maintain and enhance the state's 56 native fish species, including those native game fish found in Ravalli County, such as Arctic Grayling and Burbot, found at higher elevations along the county's southern borders, and Mountain Whitefish, Northern Pike, and Westslope Cutthroat Trout, found in the Bitterroot River drainage. The FWP also grows and plants Rainbow and Westslope Cutthroat Trout for recreational fishing opportunities in the county's lakes. Their stocking policy for 2011 can be found at their website: <http://fwp.mt.gov/fishing/hatcheries/stockingPlans2011.html>

In addition, the Montana Fish, Wildlife & Parks Commission has adopted administrative rules for river recreation management in Montana. The rules went into effect on Nov. 5, 2004. These rules guide FWP when developing river recreation management plans or recommending rules to the commission. The rules identify an analysis-and-decision-making process that the department and the commission can use to prevent or resolve social conflicts on rivers. Citizen advisory committees have been appointed to help develop these management plans and rules.

Most importantly, the fisheries resources of Ravalli County are enjoyed by a multitude of people, including those from this state, as well as other states and countries. The result has been the gradual development of numerous fishing-guide services, located all across the Bitterroot Valley. Their activities are managed by the Board of Outfitters, under the Montana Department of Commerce. The FWP has no role in this oversight process, but some land managers, such as the U.S. Forest Service and the Montana Department of Natural Resources (DNRC), regulate fishing-guide services within their jurisdictions.

### *Appendix G. Animal Control*

Ravalli County contains many predatory animals. Grizzly bears, black bears, wolves, wolverines, mountain lions, bobcats, lynx, and coyotes are the larger variety. Skunks, raccoons, marten, mink, and muskrats are some of the

common smaller varieties. There are other smaller varmints that can and do damage to agricultural lands and other properties.

Grizzly bears and lynx have federal protection under the Endangered Species Act. In previous times they were controlled by hunting and trapping permits. Black bears, wolves, mountain lions and bobcats are currently controlled by applied hunting seasons and limits. Coyotes are subject to elimination on sight.

SUB-STANDARD QUALITY WHEN FILMED

# Exhibit B-1



Google earth



# Exhibit B-2



Google earth



# Exhibit B-3



Google earth



# Exhibit B-4



Google earth



# Exhibit B-5



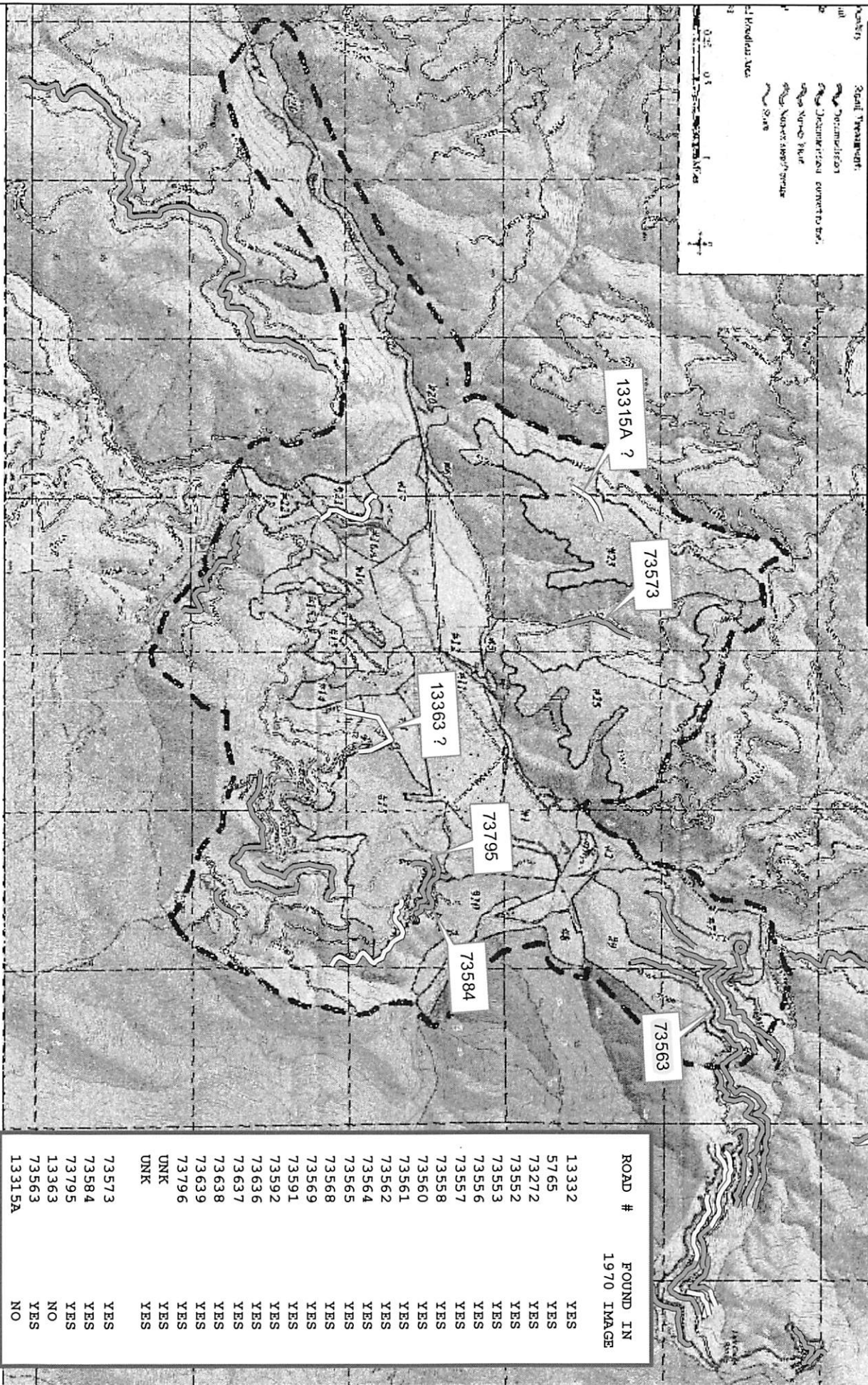
Google earth



# MEADOW VAPOR PROJECT

Roads Found in 1970 Aerial Photos  
 Not Found

March 17, 2017



ROAD #	FOUND IN 1970 IMAGE
13332	YES
5765	YES
73272	YES
73552	YES
73553	YES
73556	YES
73557	YES
73558	YES
73560	YES
73561	YES
73562	YES
73564	YES
73565	YES
73568	YES
73569	YES
73591	YES
73592	YES
73636	YES
73637	YES
73638	YES
73639	YES
73796	YES
UNK	UNK
UNK	UNK
73573	YES
73584	YES
73795	YES
13363	NO
73563	YES
13315A	NO

## Exhibit D – Orthorectification Process

Regarding the USDA Forest Service's Meadow Vapor Project, I utilized materials sent to us to determine if any roads selected for decommissioning existed prior to 1976. Among the items sent to us were a digital copy of the project map and aerial photographs taken in 1970. My procedure was as follows:

I scanned the Project Overview map that showed the roads selected for decommissioning. I then geo-referenced the scanned map to align with our existing road and PLSS data and created an ArcGIS project to begin the overlay analysis.

I created a GIS Shapefile of the roads in question by digitizing them from modern orthophotography that also overlays our GIS data. These roads can be clearly seen in photography from 1995, 2011, and 2015. Please note that the roads were clearly visible in at least one of the data sets. The GIS Shapefile included an attribute column to indicate if the road segment can be seen in the 1970 photography.

I located the aerial photographs that were applicable to the roads in question. I geo-referenced each photograph to the orthophotographs from 2011 and included them in my project with the GIS Shapefile overlain. Please note that because of the nature of the photographs sent and the lack of further materials, I was not able to create orthophotos, but I was able to get a very close spatial match.

I zoomed to each road and looked for evidence of it in the 1970 geo-referenced photography. In the cases where the road segment was clearly identifiable in the 1970 photography, I gave the segment an attribute value of "1970." If the segment was not clearly visible, I gave it an attribute value of "0." From this process, I was able to symbolize the road Shapefile in my project to indicate "Found in 1970" and "Not Found."

Maps from my project are available upon request.

Ken Miller  
Ravalli County GIS  
406-375-6622