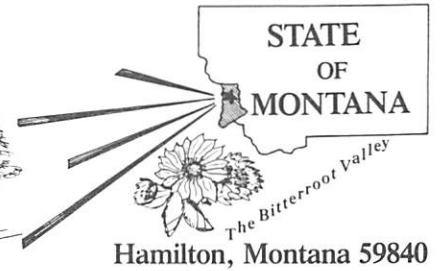


COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS
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January 31, 2018

NEPA Services Group, c/o Amy Barker
USDA Forest Service, Geospatial Technology and Applications Center
2222 West 2300 South
Salt Lake City, UT 84119

RE: Comments on NEPA procedures to increase efficiency of environmental analysis

Dear Ms. Barker and NEPA Services Group,

The Board of Ravalli County Commissioners (BCC) would like to thank you for the opportunity to comment on this important issue. It is vital in our community that the Forest Service is allowed to actively manage our forests, without the cumbersome analysis process and constant threat of litigation. The Bitterroot National Forest in Ravalli County has had multiple projects in the last three years that have burned or threatened to burn. These projects were identified as areas in need of vegetation management due to high wildfire potential.

Below are the Ravalli County Commissioners' comments on the four areas of efficiency in NEPA procedures and environmental analysis:

- 1) Processes and analysis requirements that can be modified, reduced, or eliminated in order to reduce time and cost while maintaining science-based, high-quality analysis; public involvement; and honoring agency stewardship responsibilities.**

NEPA's litigation driven approach has forced the Forest Service into exhaustive NEPA analysis. This exhaustive analysis, along with major shift in Federal policy is why we observed national timber harvest levels drop 73%, from 5.7 Billion Board Feet in 1991 to 1.5 Billion Board Feet in 2002.

NEPA is a procedural law and does not require alternatives that minimally impact the environment. National Forest lands should be treated and utilized as multiple-use natural resources. Currently, short term environmental impacts of a project are prioritized over long term public health and safety, cultural or economic impacts to communities.

Potential endangered species habitat should not be considered in the environmental analysis, unless it can be determined that there is a resident population of an endangered species. Vegetation management projects in areas that are unhealthy and pose a threat to public health and safety or wildlife habitat should have an expedited process.

2) Approaches to landscape-scale analysis and decision making under NEPA that facilitate restoration of National Forest System lands.

The Commission supports landscape-level analysis and decision making provided that project level decisions can be made quickly and do not require additional analysis.

3) Classes of actions that are unlikely, either individually or cumulatively, to have significant impacts and therefore should be categorically excluded from NEPA's environmental assessment and environmental impact statement requirements, such as integrated restoration projects; special use authorizations; and activities to maintain and manage Agency sites (including recreation sites), facilities, and associated infrastructure.

Many Forest Service vegetation management projects undergoing NEPA analysis are on lands that have already been designated as “suitable for timber production”. This designation in forest plans was determined through the NEPA process. Vegetation management projects in these areas should undergo an abbreviated NEPA analysis.

Local Forest Service decision makers should have more flexibility in the use of categorical exclusions (CE). The current CE guidelines are too restrictive and narrow in scope. CE consideration should be given to projects in the Wildland Urban Interface or that pose a threat to public health and safety. Recovery projects located in areas catastrophically impacted by fire, insect infestation or disease should be given CE consideration. There are several CE categories that could be considered:

- A. Restoration CE: Develop a CE to be used in areas where forest stands are infected with disease or infested with insects up to 5,000 acres.
- B. Forest Plan Designation CE: Develop a CE that allows timber harvest in areas that have been analyzed and designated as suitable for timber production in the forest plan up to 5,000 acres.
- C. Fire Salvage CE: Develop a CE that allows for salvage and rehabilitation projects for up to 25% of the total burned area.

- D. Emergency CE: Develop a CE for developed areas (campgrounds, roadsides, parks, residential development) of National Forest or lands adjacent to National Forest that pose a threat to public health and safety from a catastrophic wildfire.
- 4) **Ways the Agency might expand and enhance coordination of environmental review and authorization decisions with other Federal agencies, as well as State, Tribal, or local environmental reviews.**

Standards for including state and local governments as cooperating agencies can vary considerably. This can create a difficult relationship between the federal government and its partners at the state and local levels. Additionally, the move to landscape scale planning can cause local governments to be marginalized in the planning process, and to have their comments treated as a mere formality by the federal government.


To solve this, Ravalli County believes that coordination should be ongoing, and not limited to specific projects or steps within the NEPA process. This could be achieved by holding coordination meetings with state and local officials on a regular basis to ensure transparency and an open line of communication throughout all aspects of the planning process. Additionally, the Forest Service should vest more authority at the Forest Supervisor and District Ranger level so that they may enter into formal coordination agreements with state and local partners, and ensure greater transparency through every step of the planning process.

Another major challenge for counties is the inconsistent application/interpretation of federal policy to ensure coordination with cooperating agencies in a transparent manner. Counties are often treated by federal agencies as though they were any other stakeholder in the planning process, rather than cooperating agencies recognized for having a range of expertise on the impacts of Forest Service actions. Counties possess a unique level of expertise on issues affecting residents, including the socioeconomic impacts of planning decisions, that the federal government should give greater weight than comments from the other stakeholders.

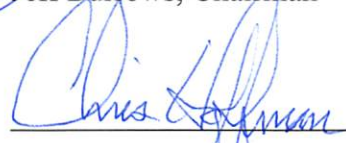
Ravalli County currently enjoys a good working relationship with local Forest Service decision-makers, however this has not always been the case. Oftentimes local government is not notified early enough of potential cooperating agency status. Counties would recommend the Forest Service inform state and local governments of upcoming actions and plans on a regular basis. This would give counties the opportunity to offer input early in the planning process, and at a minimum, ensure the federal government did its due diligence in seeking the active participation of state and local officials.

Ravalli County is also concerned that the federal government's process is duplicative and overly time-consuming, leading to slower, smaller projects and increased potential for litigation. Streamlining the NEPA process and allowing more flexibility through Categorical Exclusions to local forest decision makers will allow the Forest Service to increase the pace and scale of beneficial forest projects.

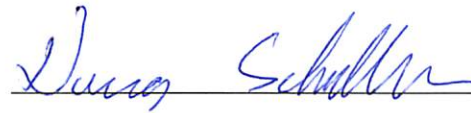
Sincerely,
Ravalli County Board of Commissioners



Jeff Burrows, Chairman



Chris Hoffman, Vice-Chair



Doug Schallenberger, Member



Greg Chilcott, Member



Ray Hawk, Member

CC: US Senator Jon Testor
US Senator Steve Daines
US Representative Greg Gianforte
Secretary of Agriculture Sonny Perdue
Secretary of Interior Ryan Zinke
MT Senator Fred Thomas
MT Senator Pat Connell
MT Representative Ed Greef
MT Representative Nancy Ballance
MT Representative Ron Ehli
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