



BCC 2013-162
October 29, 2013

PHONE: (406) 258-4877
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Environmental Quality Council
ATTN: Joe Kolman, SJ-15 Survey
Room 171B, Capitol Building
P.O. Box 201704
Helena, MT 59620-1704

Dear Mr. Kolman:

Missoula County has taken the opportunity to review the SJ-15 survey developed by the Environmental Quality Council. We have attached responses to the questions. As requested, we have addressed the complexity of "the risks and concerns associated with federal land management."

The forest, grassland, and aquatic ecosystems in our county are diverse and complex. The goal of managing these ecosystems for a variety of uses, many of which are in direct opposition to one another, is challenging, and we recognize that counties face conflicts regarding federal land management. We strive to deal with these situations by relying on our strong partnerships with federal agencies, which we describe in depth in our response. Through these partnerships, our interests are heard, our rural communities are considered, and we see the results of our work on the ground.

We appreciate the opportunity to share with the Environmental Quality Council our experiences with our federal partners. We hope the Council finds the information helpful. If you have any questions, please contact us, or our Chief Planning Officer, Patrick O'Herren (406-258-4981).

Sincerely,
BOARD OF COUNTY COMMISSIONERS


Michele Landquist, Chair


Bill Carey, Commissioner


Jean Curtiss, Commissioner

BCC/ppr

Attachments

cc: Kali Becher, Rural Landscape Scientist
Pat O'Herren, Chief Planning Officer
Senator Brenden, EQC Chair
Representative McChesney, EQC Vice Chair

SJ-15 SURVEY OF MONTANA COUNTY COMMISSIONS

PUBLIC HEALTH, SAFETY, AND WELFARE: (Attach explanation for each response as needed)

1. Do current wildfire conditions on federal lands within your county pose a significant threat to:
(response applies to wildfire conditions on all lands)

Public Health and Safety Public Property Private Property

Wildfire conditions exist on virtually all timbered lands and grasslands in Missoula County. Missoula County contains a significant amount of timber and grassland under the ownership of a variety of agencies and private landowners. Wildfire conditions on federal, state, and private lands can pose a threat to public health and safety, public property, and private property. In addition to ownership, there are many factors to consider when evaluating fire conditions such as relative humidity, wind, topography, fuel moisture and availability, etc. The factors that influence fire conditions can change on a daily, sometimes hourly basis.

Nearly all of the communities within Missoula County are considered at high risk from wildfire. One way to address the high fire risk is to reduce the available fuels on adjacent federal, state, and private lands. Missoula County is supportive of fuel reduction projects on all lands including our own. We recently partnered with a local homeowners association and a non-profit organization to reduce fuels and harvest commercial timber in a county park and on adjacent private lands in the Seeley Lake area. Additionally, the Missoula County Resource Advisory Council works with the Lolo National Forest to use Title II funds to accomplish a variety of projects, including fuel reduction projects in the county, which can happen on federal and non-federal land. (Please see supplemental information attached for more detail.)

2. Do you believe fire hazards on federally managed lands should be reduced to protect public health and safety within your county?

Yes No Unsure

Yes, along with the fire hazards on state and private lands within Missoula County. Missoula County supports sustainable reductions of fire hazards and maintenance of improved conditions on all lands as long as proper consideration is given to timber harvest, wildlife, water quality, and other forest related issues important to the state's long term economic vitality. (Please see supplemental information attached for more detail.)

3. Regarding the water supply your citizens use, does current federal land management of watersheds:

Optimize water yield Diminish water yield Have no impact

Our constituents have not voiced concerns about federal land management of watersheds affecting their water yield and we are not aware of a problem. We are acutely aware of the vital protection the Forest Service and Bureau of Land Management provide to our water yield and water quality in all of our watersheds.

4. How important is it for people of your county to have motorized access to public lands for sustenance activities such as gathering wood, picking berries, harvesting wild game, etc.?

Very Important Not Important Unsure

Public lands in our county are used for a variety of purposes, including recreation and sustenance activities, some of which require roads and some of which do not. We recognize the value and importance of motorized access and roads on some public lands. These uses should be balanced with other values such as wildlife habitat, water quality, and non-motorized recreational uses.

5. Is there an adequate supply of motorized roads on federal lands in your county to accommodate emergency ingress/egress, facility maintenance, public access, and resource management?

Yes No Unsure

Given our successful partnership with the Forest Service, we have resolved most access issues on a case by case basis as they arise. Due to the legacy of the logging industry on most public lands in our county, there are roads across most hillsides in the area. In fact, there are 2,400 miles of Forest Service roads in Missoula County. This seems sufficient for emergency routes, maintenance, public access, and resource management.

6. Regarding multiple-use recreational access routes on federal lands, does your county desire:

Increased Multi-Use Access Reduced Multi-Use Access Keep Access As Is

See explanation for question 5. We also see a need for multi-use access routes in specific areas to be assessed to determine if the current designations are appropriate.

ENVIRONMENTAL QUALITY: (Attach explanation for each response as needed)

7. Do you believe current fuel loads on any of the federal lands within your county could result in severe, uncontrollable, or catastrophic wildfires? (If so, provide geographic location in attachment)

Yes No Unsure

Fuel loads on federal, state, and private lands can all be contributing factors to large, uncontrollable fires, but they are not the sole reason a fire is uncontrollable or catastrophic. It is a culmination of factors such as wind, terrain, and available fuels that make wildfires uncontrollable. Missoula County recently witnessed the power of wildfire during the Lolo Creek Complex fire. It was very evident that terrain and weather were as much of a factor as the fuel conditions on lands, which are under corporate, private, state, and federal ownership, during that event. (Please see supplemental information attached for more detail.)

8. Is a high intensity wildfire on federal lands likely to cause a loss of important fish & wildlife habitat or harm threatened or endangered species in your county (e.g., grizzly bears, lynx, sage grouse, black-footed ferret, bull trout)?

Yes No Unsure

Missoula County hosts threatened and endangered species on federal, state, and private lands. A high intensity wildfire on any of the lands in Missoula County could have impacts to threatened and endangered species. It is important to note the impacts can be both negative and positive. Although we may not see value in a high intensity fire, there are species that are dependent on those types of fire along with the successional habitat they can provide. For example, studies have shown that the maintenance of high-quality habitat for lynx and snowshoe hare (a primary food source for lynx) is dependent on fire. This is due to the fact that fires can create a mosaic of successional stages on the landscape, providing important foraging and denning areas for lynx.

9. Are environmental threats such as noxious weeds and bark beetle adequately controlled on federal lands within your county?

Yes No Unsure

"Environmental threats" are often exacerbated by human caused changes on the landscape, but it is important to note that some threats, such as weeds, will never be truly controlled. We understand that federal agencies often lack the resources to fully address these problems. Missoula County supports local, state and federal efforts to eradicate noxious weeds and to reduce the spread and infestation on lands in our county through a variety of programs and investments. The Southwestern Crown of the Continent Collaborative, which is a federally funded project, has done extensive work to reduce noxious weeds on Forest Service lands. In our experience noxious weeds and bark beetle infestation on private lands is an area where the State could offer assistance to landowners to help reduce and eradicate weeds and responsibly harvest beetle infested and killed trees. Our residents would benefit from state assistance to help harness local knowledge and expertise in dealing with both weeds and beetles, neither of which know jurisdictional boundaries. The work to reduce both noxious weeds and bark beetle needs to be considered on a landscape level and addressed on all lands, regardless of ownership.

10. Does the air quality in your county fall below acceptable health standards due to smoke originating from fires on federally managed lands?

Yes No Unsure

Missoula County is known to have frequent inversions making it susceptible to smoke inundation from fires that occur on lands under a variety of ownership across the western United States and Canada. Our air quality can fall below acceptable standards from forest fires, but there is no way of knowing who owns the land from which the smoke is originating.

ECONOMIC PRODUCTIVITY AND SUSTAINABILITY: (Attach explanation for each response as needed)

11. Is the Payment in Lieu of Taxes (PILT revenues) your county derives from federally managed lands equivalent to the amount that actual land taxation of these lands would bring?

Yes No Please estimate PILT as a percentage of county budget.

It is very difficult to predict the amount of income that would be generated from these lands if they were private, but the intent of PILT payments is not to provide the full tax equivalence that private property would generate. Instead, PILT payments are one of many federal revenues that are transferred to states, including oil and gas leasing, livestock grazing, and timber harvesting.

In FY2013 Missoula County received \$1,464,767 in PILT payments, which accounted for 1.25% of our total budgeted revenue.

12. Is the amount your county derives from the Secure Rural Schools (SRS) funds equivalent to the amount that your county could derive from responsible harvest or extraction of natural resources?

Yes No Please estimate SRS as a percentage of county budget.

It is difficult to predict the amount of money that would be generated from responsible harvest or extraction of natural resources in our county, but given the current economic and political conditions it is hard to imagine the county could generate more than we receive from the SRS funds. The revenue we would generate would depend on highly variable economic conditions.

In FY2013 Missoula County received \$800,000 in SRS payments, which accounted for .68% of our total budgeted revenue.

13. Is the economic productivity and number of related private sector jobs commensurate with the resource production capacity of the federally managed lands within your county?

Yes No Unsure

We cannot answer this question directly due to the inability to reliably quantify the indirect and direct economic benefits our county receives from public lands. Additionally, there are many more economic benefits from public land than solely resource production, as shown by research estimating the monetary benefits of public lands to local economies (see supplement).

14. Are federal policies for threatened or endangered species adversely impacting private land owners, businesses, industries, or citizens within your county?

Yes No Unsure

We are unaware of policies for threatened and endangered species negatively impacting all land owners and citizens in our county. In fact, some policies actually benefit our tourism economy. It is feasible that these policies constrain resource extraction based industries such as mining and timber, as well as real estate development in our county since threatened and endangered species (as well as variety of other species) have to be taken into consideration. On the other hand, constraints are offset by the positive impacts the presence of these species have on our county. There are a number of unique and rare species found in Missoula County, such as water howellia—a plant whose habitat is only found a few places in the world, the majority of which is known to be in the Swan Valley. We also have critical habitat for grizzly bears, lynx, and bull trout in our county. We have large blocks of relatively undisturbed prime habitat remaining in our area, which has its benefits. For instance, studies have shown that one of the top reasons tourists visit Missoula County is for our wildlife viewing, and their visits contribute considerable money to our economy (see supplement). These species are also the focus of scientific research, and much of the funding for this research is funneled through the University of Montana's wildlife biology program, which is one of the best in the nation.

15. Has federal land management resulted in adverse impacts to your county's economy?

Yes No Unsure

On the contrary, we feel federal land management has positively affected our county's economy due to the amount of tourists drawn every year to the recreational opportunities, the jobs generated, and the ecosystem services federal land management provides (see supplement). While timber mills have closed throughout the west, we retain one of the most productive mills, Pyramid Mountain Lumber. In addition, we have added a wood chipping facility in Bonner.

16. Do you believe changes in federal land management are necessary to increase your county's economy, employment opportunities, or tax base?

Yes No Unsure

If changes were to be made to federal land management, we strongly support the measures proposed by Senators Tester and Baucus in the Forest Jobs and Recreation Act. This act supports responsible forest management and would create valuable jobs in Montana. See supplement

CONSISTENCY WITH STATE AND LOCAL OBJECTIVES: (Attach explanation for each response as needed)

17. Are federal land management actions consistent with your county's objectives?

Yes No Unsure

We actively engage federal land managers to ensure they are aware of our objectives as they relate to jobs, forest health, wildlife habitat, etc. In most instances we agree on management actions, but in cases where we have differing objectives we are usually able to come to a mutual understanding. (Please see supplemental information attached for more detail.)

18. Would your county like state assistance incorporating local government objectives into federal land management actions?

Yes No Unsure

Missoula County is able to convey our objectives to federal land managers through a variety of channels including MOUs, participating in planning efforts and commenting on federal projects. Missoula County is pleased with the current level of involvement and with the current participation options. (Please see supplemental information attached for more detail.)

OWNERSHIP AND JURISDICTIONAL RESPONSIBILITIES:

19. Has your county experienced conflicts with federal ownership or jurisdictional responsibilities?

Yes No (Please attach detailed description of conflicts)

We have not experienced conflicts over federal land ownership or federal management agencies' responsibility to manage lands within their jurisdiction. We have had past disputes with the USFS regarding road access issues that seem to benefit one sector of the public over another.

20. How much influence do you believe special interests have on the ability of federal agencies to develop and implement effective land and resource management plans on federal lands in your county?

None Moderate (please explain) Significant (please explain)

Any party that comes to the table is a special interest and has the ability to help develop, alter, or question management actions on federal lands. We recognize that there are some special interests that seem only to have an interest in stopping all management activities on federal lands. Missoula County is able to support federal land managers and projects in our County that propose sound, science-based land management actions. In our experience, current federal land managers are responsive to our comments and those of a majority of our constituents when developing land management proposals.

21. On a separate sheet, please describe your county's most significant concerns with federal land management, including current and past relations and communications with federal agencies and other relevant factors you believe legislators should be aware of, and provide any ideas that may help reduce risks or resolve concerns.

See the Objectives, Ownership, Jurisdictional Responsibilities, and Our Partnerships section of the supplemental information.

SJ-15 SURVEY OF MONTANA COUNTY COMMISSIONS: SUPPLEMENTAL RESPONSE

Missoula County has a variety of economic, natural resource, and quality of life objectives, which are outlined in a number of County documents including our growth policy. Objectives are rarely identical between jurisdictions since each jurisdiction serves a different public with different needs and values. For these reasons, Missoula County has a Rural Land Manager's Memorandum of Understanding (MOU) which includes the Bitterroot, Lolo and Flathead National Forests, Bureau of Land Management, U.S. Fish and Wildlife Service, Montana Department of Natural Resources, Montana Department of Transportation and Montana Fish Wildlife and Parks. This MOU serves as a platform for discussions related to land management in Missoula County and fosters communication and builds relationships among all land management agencies beyond quarterly meetings.

Public Health, Safety, Welfare and Environmental Quality

Missoula County recognizes that wildfire affects our residents, resources, and economy, and that wildfire has been, and will continue to be, an essential part of the ecosystem. Fuels conditions in Missoula County vary across the landscape. Efforts have been taken at every level of government to reduce and maintain fuels within the Wildland-Urban Interface (WUI). Missoula County recognizes that fuels reduction on federal, state, and private lands within the WUI is essential for protecting property and ensuring the safety of residents and emergency responders. We work with and support the efforts of federal, state, and local land managers in our county to reduce forest fuels. Because growth in this area has stressed local services, impacted critical wildlife habitat, and put residents and emergency responders at risk of the threats from wildfire, the effort to reduce and maintain fuels within the WUI on lands under multiple jurisdictions is and will continue to be an issue.

Federal land management of fire hazards is only one component of landscape level wildfire impacts. Addressing the forest conditions on federal lands alone will prove to be insufficient in fire management on a landscape scale. We urge the State to consider long term programs to assist our residents in creating and maintaining defensible space and reducing fuel loads on private property. Increased funding from the State for technical and implementation support to mitigate fire hazards on private property is necessary to minimize the threats and potential impacts of wildfire on our residents. We suggest that the State first address the issues and the current situation on private and state owned land, which are under its jurisdiction.

Economic Productivity and Sustainability

Limiting the economic contribution of federal land to the local economy to resource extraction capacity is too narrow. Federal lands and their management involve a variety of quantifiable and unquantifiable factors far beyond that of resource extraction. The unquantifiable ecosystem services provided to our county by federal land include clean air, clean water, and scenic open spaces, all of which contribute to an overall high quality of life. Tied to these services are many more quantifiable factors related to public lands' impact on our economy:

- Tourism brought an average of over \$258 million to the Missoula County economy by nonresident tourists alone over 2011 and 2012 according to a study published in 2013 by the Institute for Tourism and Recreation Research.
- In 2011 \$1.4 billion was spent on fishing, hunting, and wildlife watching activities in the state according to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.
- A study on Montana's outfitter and guide industry from 2005 found that there were 318,000 clients in 2005 bringing over \$119 million to the state. The majority of clients were involved in river activities, fishing, or hunting. Fifty-five percent of all trips were on Forest Service land and 32% were on BLM land.
- A study by Headwaters Economics found that between 2000 and 2011 the percent increase in personal income and employment in Montana was nearly twice that of the U.S. This increase was attributed to Montana's natural amenities and recreational opportunities which provide a high quality of life that attracts employers and employees.

Currently agriculture, forestry, and mining represent only around 2% of the total Missoula County economy according to the U.S. Census Bureau. Limiting the discussion of federal lands and economics to resource extraction only considers a fraction of the whole. Non-extraction federal land management activities provide numerous local jobs including wildland fire fighters, contractors involved in implementing best management practices, and restoration professionals to name a few. Our economy benefits both directly and indirectly from the federal land within Missoula County's borders.

Objectives, Ownership, Jurisdictional Responsibilities and Our Partnerships

Missoula County frequently comments on projects being proposed by federal agencies. We are committed to actively participating in the public process and the results have direct and indirect effects to our residents, businesses, and partners. For example, as the Flathead National Forest revises their forest plan, we are updated on their progress and their plans and will be part of the interagency group so that we can effectively provide input in this important process. This allows Missoula County to convey our objectives to land management agencies early in the planning process and hear what others have to say about the proposed actions. We recognize the benefits are not just our own. Special interest groups may have the ability to hinder the outcome of land management projects that don't meet their own objectives, but when the majority of interested parties are supportive of sound, science based land management activities a more reasoned approach usually prevails.

It is the County's opinion that if the State desires to see more effective management of federal lands that it work to address procedural issues at a national level. NEPA efficiencies are currently a topic of concern and the Forest Service is evaluating them at the local, regional and national level. By improving and possibly streamlining the NEPA review process that has become overly burdensome for both the federal government and those who wish to participate in the comment process, land management projects could move from planning to implementation more quickly. As a member of the Southwestern Crown of the Continent Collaborative, Missoula County has witnessed these ongoing struggles and attempts to address the NEPA efficiencies at a local and regional level. Support from state governments

to address these issues on behalf of the citizens and ecosystems that sustain their communities may help escalate the issue at a national level.

It may also be advantageous for the State to find ways in which it can partner with federal land managers on fuel reduction projects. These types of partnerships could have a host of benefits for local residents and businesses as well as state and federal lands. Based on conversations Missoula County has had with our federal partners, the future of federal land management will be shifting its focus to partnerships and cost sharing ventures to accomplish forest management activities.

Mine reclamation work in the Ninemile watershed within Missoula County exemplifies the successful partnership between Missoula County, the State, the National Forest Service, and a conservation organization. This partnership accomplishes important, on the ground work that directly benefits our constituents. The project is funded by Montana DNRC's Reclamation Development Grants Program and Missoula County in partnership with Trout Unlimited. To date, three mine reclamation projects have been completed, with two more slated for next summer, all of which are on Forest Service land. The Forest Service has been a project partner providing technical expertise and project funding. These reclamation projects have addressed problems with floodplain connectivity, mine tailings, excessive erosion, and vegetation and have achieved substantially improved water quality and fish habitat in the watershed. Each project has protected and improved water quality for *all* private property owners downstream from the projects.

Missoula County values its seat at the table with federal land management agencies and works diligently to provide sound, science-based input in land management discussions.



BCC 2013-135
August 22, 2013

PHONE: (406) 258-4877
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RECEIVED

AUG 26 2013

**LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE**

Mr. Joe Kolman
Environmental Quality Council
Room 171B, Capitol Building
P.O. Box 201704
Helena, MT 59620-1704

Dear Mr. Kolman:

Thank you for contacting us about the SJ15 Survey administered by the Environmental Quality Council (EQC). Given the extensive nature of the survey, we have initiated significant research into the issues raised by the document. We will provide you with a full response to the survey prior to the November 1, 2013 deadline.

Missoula County will collect and submit information regarding the "risks and concerns associated with federal land management" in Missoula County. However, federally managed lands are integral to our County's economy in many ways. Forest Service and Bureau of Land Management resources supply us with forest products, grazing, abundant wildlife, significant fisheries, clean water and motorized/non-motorized recreational opportunities. Research during 2011 and 2012 shows that tourists spent approximately \$258M in Missoula County. We are very aware that those tourists come to Missoula County in large part due to the vast recreation resources found across our urban and rural landscape.

We have serious concerns about wildfire, litigation over sound forest management practices, and adverse air quality impacts from activities in and outside of the state of Montana. We have other concerns regarding issues mentioned in the survey. We are also concerned that the survey may not provide you with a complete picture of the impacts of federal (and state) land management, especially in those counties that have an abundance of federal lands within their boundaries. To help address this problem, we will provide the EQC with information illuminating the risks, concerns and outstanding values of federal lands to our economy, culture and citizens. We trust that the information will be included in any analysis of the survey itself. Please note that we are very comfortable with the exceptionally positive working relationship we have built with our state and federal partners. We are not interested in seeing that relationship negatively altered by future legislative actions resulting from the SJ15 interim study.

Thank you for undertaking this important project. If you have any questions, please contact us, or our Chief Planning Officer, Patrick O'Herren (406-258-4981), at your earliest convenience.

Sincerely,
BOARD OF COUNTY COMMISSIONERS

NOT AVAILABLE FOR SIGNATURE

Michele Landquist, Chair



Bill Carey, Commissioner



Jean Curtiss, Commissioner

BCC/ppr
cc: Pat O'Herren, Chief Planning Officer