

Community Relations Plan

**Non-Time-Critical Removal Action (NTCRA)
for Fuels and Forest Management Adjacent to the
Libby Asbestos Superfund Site Operable Unit 3 (OU3)**



Image of the Tubb Gulch area, showing dry landscape including areas of open ponderosa pine hillsides adjacent to dense forested stands

November 2023

Prepared for:

**United States Department of Agriculture, Forest Service
Kootenai National Forest
Libby, Montana**

Prepared by:

North Wind Advantage JV, LLC

Contents

COMMUNITY INVOLVEMENT FOR THE NTCRA, NORTHERN REGION, KOOTENAI NATIONAL FOREST	1
1.1 Purpose of the Community Relations Plan	1
1.2 NTCRA Site Overview	1
PLANNED COMMUNITY RELATION PLAN ACTIVITIES	2
2.1 Community Relations.....	2
CURRENT COMMUNITY CONCERNS.....	3
3.1 Community Interviews.....	3
COMMUNICATIONS OBJECTIVES	4
4.1 Community Involvement Action Plan	4
4.1.1 Written Response to Significant Comments.....	4
COMMUNITY PROFILE.....	5
5.1 Population Statistics	5
5.2 Business Community.....	6
5.3 Community Government and Local Services.....	7
5.4 Local News Media Outlets	8
5.5 Education	8

Figures

1	Map of Mitchell-Jackson Project Area	2
2	Response to Comments Flowchart	5

Acronym List

EE/CA	Engineering Evaluation/Cost Analysis
EPA	Environmental Protection Agency
MSU	Montana State University
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NTRCA	Non-Time Critical Removal Action
OU3	Operable Unit 3
USDA	U.S. Department of Agriculture
USFS	U.S. Forest Service

1. COMMUNITY INVOLVEMENT FOR THE NTCRA, NORTHERN REGION, KOOTENAI NATIONAL FOREST

1.1 Purpose of the Community Relations Plan

The purpose of this Community Relations Plan (Plan) is to define the U.S. Department of Agriculture Forest Service's site-specific strategy for informing and engaging with community members during the Non-Time Critical Removal Action (NTCRA) process. The Plan provides a road map to describe outreach and communication activities and address community needs and concerns during the NTCRA process. The Plan will be updated annually, or as needed, throughout the removal action.

Community involvement activities will be conducted before the Removal Action at the Site and will include a Public Notice of a draft Engineering Evaluation/Cost Analysis (EE/CA) available for review, preparation of fact sheets, and a written response to significant comments, as described below.

This Plan satisfies the requirement, as defined by Sections 300.415(m) and 300.820 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), for community relations in removal actions. The Forest Service's community engagement goals are to:

- Increase knowledge about the Forest Service's proposed actions and the basis for decisions,
- Gather input to inform Forest Service decision-making, and
- Answer questions and respond to concerns posed to the Forest Service.

The Plan also describes the activities for communication with individuals and entities impacted by or interested in the Forest Service's NTCRA.

1.2 NTCRA Site Overview

The evaluated action is fuels and forest management adjacent to the Libby Asbestos Superfund Site Operable Unit 3 (OU3). The U.S. Environmental Protection Agency (EPA) has defined a human health risk for firefighters inside OU3 during fire-fighting activities (e.g., dry mop-up). This effort would help reduce the potential for fires to move into OU3 by reducing fuels outside OU3.

The site, referred to as the "Mitchell-Jackson Project Area," is on National Forest System lands outside but adjacent to OU3 (Figure 1). These lands are heavily forested and on varying terrain, including areas that are steep, difficult to access and partially situated such that prevailing winds could more easily spread fire into OU3.

The desired outcome is to reduce hazardous fuels where there are values at risk and create forest conditions with a low risk of large-scale, fast moving, stand replacement wildfires. Through vegetation management, the forest composition, structure, and pattern for each biophysical setting will move towards desired conditions, such as landscape diversity and resiliency to disturbances such as fire and climate change. Another purpose of the action being evaluated is to identify a road system, including access management, that provides for effective fire suppression access and control lines, while minimizing potential environmental effects (e.g., watershed health and grizzly bear habitat management). Proposed vegetation treatments include timber harvest and other vegetation management (i.e., pre-commercial thinning, slashing of small-diameter trees, and underburns), noxious weed treatments, and road use and management.

Asbestos mitigation is not part of this action.



Figure 1: Map of Mitchell-Jackson Project Area

2. PLANNED COMMUNITY RELATION PLAN ACTIVITIES

2.1 Community Relations

The Forest Service is committed to informing community members and other interested parties about this removal action. This section describes the following methods of community engagement:

- **Fact Sheets.** Site-specific fact sheets informing the public of the proposed removal action activities, schedule, and any potential inconveniences (e.g., traffic might impact recreation access along the National Forest Development Road 228 and noise may affect the community during the removal action) will be prepared and made publicly available on the Kootenai National Forest website and Facebook page.
- **Emails.** The Forest Service maintains an email list of individuals, elected officials, and other known entities that may be interested in projects on National Forest System lands. The public is encouraged to sign up for email distribution for this NTCRA at comments-northern-kootenai-libby@usda.gov or <https://www.fs.usda.gov/projects/kootenai/landmanagement/projects>.
- **Public Meetings.** The Forest Service will hold a public meeting to share information about the project and receive public input.
- **Government-to-Government Consultations.** The Forest Service will contact the Confederated Salish and Kootenai Tribes and the Kootenai Tribe of Idaho to inquire whether they wish to hold a government-to-government or staff-to-staff consultation.
- **Website** Information for the NTCRA can be found at <https://www.fs.usda.gov/detail/kootenai/landmanagement/projects/?cid=fseprd1135230>.

- **Media.** Multiple forms of media will be utilized to provide relevant information to the public, including press releases to local newspapers, a project webpage, and the Kootenai National Forest Facebook page found at <https://www.facebook.com/kootenainf/>. News outlets include:
 - The Western News
 - <https://thewesternnews.com/>
 - <https://www.facebook.com/TheWesternNews/>
 - The Montanian
 - <http://montanian.com/>
 - <https://www.facebook.com/The.Montanian/>
 - Kootenai Valley Record
 - <http://www.libbymt.com/news/2008/02/KootenaiValleyRecord9.htm>
 - <https://www.facebook.com/kootenaivalleyrecordlibby/>
- **Administrative Record.** The Administrative Record and information repository on the project webpage will be in electronic format (Adobe Acrobat files).
- **Local Forest Service Office.** Forest Service offices in Libby, Montana, include the Canoe Gulch Ranger Station at 12557 MT Highway 37 and the Kootenai National Forest Supervisor's Office at 31374 US Highway 2.

3. CURRENT COMMUNITY CONCERNS

3.1 Community Interviews

The Forest Service conducted interviews with several community members located in Libby, Montana. The list of interviewees was selected to best represent a broad sampling of the community, which included individuals from the following sectors:

- Local businesses,
- Local government,
- Recreation, and
- Residential – real estate and local landowner.

Below is a summary of what was learned in the interviews (by topic):

1. Some interviewees felt well informed about the Libby Asbestos Superfund Site, particularly about the former vermiculite mine and surrounding forested areas, while others did not feel as well informed.
2. Familiarity with the joint fire preparedness action inside OU3 ranged from no knowledge to full awareness.
3. All interviewees expressed concerns over the potential for fire to spread into OU3.

4. An email was the most desired method of communication for information on Forest Service fuels and forest management activities adjacent to OU3 in the coming years. Some interviewees also suggested newspapers, social media, and use of the local Kootenai Forest Stakeholders Coalition.

4. COMMUNICATIONS OBJECTIVES

Based on the interviews with local community members, and with guidance from EPA's *Promising Practices for Environmental Justice Methodologies in NEPA Reviews*, the Forest Service has developed the following objectives for community involvement and communications for the NTCRA:

1. Offer opportunities (i.e., a public meeting and a comment period) for communication with a diverse set of community members and other interested parties to learn their concerns and priorities and answer questions.
2. Increase awareness of efforts to reduce fire spread inside and outside OU3 through social media and public meetings.
3. Utilize email, local newspapers, and social media to share information with the public and interested parties.
4. Ensure that the Forest Service considers alternatives important to the community members.

4.1 Community Involvement Action Plan

Based on the above community involvement objectives, the Forest Service will carry out the following action plan for community involvement:

- Conduct interviews,
- Make the Community Relations Plan available to the community,
- Hold a public meeting,
- Publish in a local newspaper a public notice of the availability of the EE/CA,
- Hold a 30-day comment period, and
- Prepare written responses to significant comments.

4.1.1 Written Response to Significant Comments

After receiving the comments submitted within the 30-day public comment period, in accordance with NCP 40 CFR 300.415(n)(iv), a written response to significant public comments on the preferred remedy will be prepared by the Forest Service (Figure 2). The response to comments is intended to be concise, complete, and written in a manner that the public can understand. The response to comments will become part of the administrative record and be available to the public at <https://www.fs.usda.gov/detail/kootenai/landmanagement/projects/?cid=fseprd1135230>.

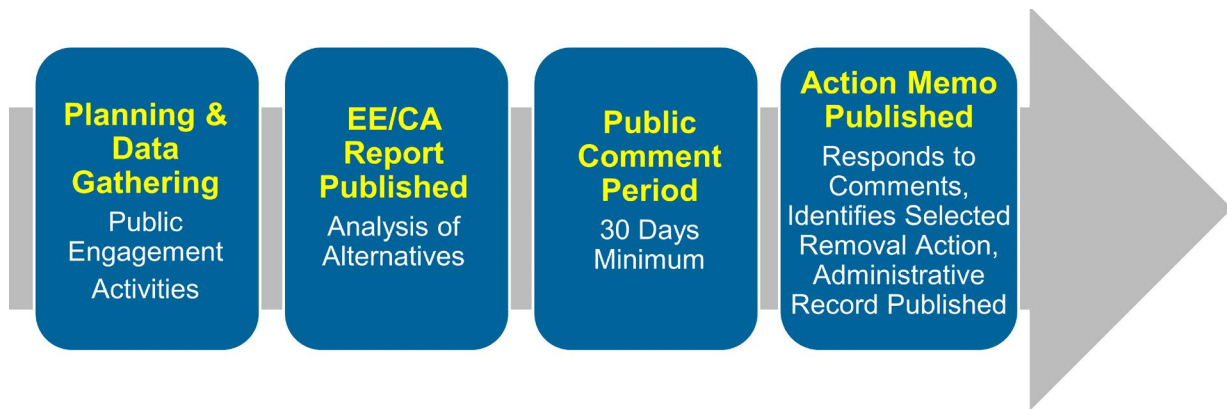


Figure 2. Response to Comments Flowchart

5. COMMUNITY PROFILE

This section provides a snapshot of Lincoln County and Libby, Montana's, demographics and local economy.

5.1 Population Statistics

The following demographic information for locations in vicinity of the Site was obtained from the 2020 U.S. Census¹ and the White House's Council of Environmental Quality's Climate & Economic Justice Tool²:

- **Population:** As of 2020, the U.S. Census Bureau estimated Libby's population at 2,775 individuals comprising 1,297 households.³
- **Race:** The population of Libby is 88% white. Almost 6% of the population is Hispanic or Latino, while 3.1% of the population is two or more races. Approximately 3% of the population is Native American.⁴
- **Education:** Within Libby, 19.1% of the population holds a bachelor's degree or higher.
- **Income:** Libby's median household income (in 2021 dollars) was \$39,044. Approximately 16% of the population is below the poverty line, which meets the criterion for a disadvantaged community.
- **Age and Sex:** People under 18 make up 18% of the population in Libby. Approximately 24% of the population is age 65 or older. The population is almost evenly split between females and males.
- **Computer and Internet Use:** Within Lincoln County, 88% of households have a computer, and of those, 81.2% have a broadband internet subscription.
- **Language:** English is the primary language in Libby.

¹ <https://data.census.gov/all?q=population+in+libby+montana+2020>

² <https://screeningtool.geoplatform.gov/en/#13.18/48.39054/-115.55703>

³ https://data.census.gov/profile/Libby_city,_Montana?g=160XX00US3043450#housing

⁴ <https://data.census.gov/table?q=population+in+libby+montana+2020&tid=ACSDP5Y2020.DP05>

5.2 Business Community

Libby has a rich industrial history that is in the process of transitioning to a more service-based economy. The local timber and mining industries have declined, while tourism and outdoor recreation have increased as economic drivers. In recent years, rental and housing prices have increased as demand has outstripped supply.

1. Tourism and Hospitality

The tourism industry has gained prominence as more visitors are drawn to Libby's natural beauty and outdoor recreational opportunities. Businesses catering to tourists (i.e., hotels, bed-and-breakfasts, camping and recreational vehicle sites, and restaurants) have become vital contributors to the local economy.

2. Outdoor Recreation Services

With its proximity to outdoor attractions (e.g., national forest lands, hiking trails, and water bodies), businesses related to hunting and fishing and outdoor adventures have expanded.

3. Retail and Specialty Shops

As the town's economy diversifies, there is an increased demand for retail and specialty shops, including local industrial supply shops, craft stores, and boutique shops.

4. Healthcare and Services

Local clinics, pharmacies, and other health-related businesses meet the needs of the growing population.

5. Education and Training

Along with the public and private schools mentioned in Section 5.5 below, there is also a Veterans Upward Bound program in Libby that assists military veterans with career exploration and assistance gaining skills, degrees, and certifications.

6. Technology and Digital Services

The Libby area has limited Information Technology services due to its rural location. It has two internet service providers and one office supply store.

7. Real Estate and Construction

Rents, real estate prices, and the demand for new construction have increased in recent years as more people move to the area. While recent increases in interest rates for mortgages may slow demand, prices remain at historic highs.

8. Other

Other local businesses include utilities, legal, finance, transportation, arts and entertainment, and personal services.

5.3 Community Government and Local Services

Libby is the county seat of Lincoln County. As such, it offers a full range of city and county services.

City of Libby

The city government is comprised of a mayor and six elected city council members. The City Council meets weekly in the Council Chambers in City Hall and has a less formal weekly breakfast meeting. City Hall is located at 952 E. Spruce Street in Libby. Office hours are from 8 a.m. to 5 p.m., Monday through Friday, except during holidays.

City departments and offices include City Clerk, Building Inspector, Street Department, Police Department, Libby Volunteer Fire Department, Sewage Treatment Plant, and Water Department. The city also has a Board of Adjustments, an Airport Board, and a Police Commission. The city's website is www.cityoflibby.com.

Lincoln County

The county government comprises three elected commissioners representing the districts of Libby, Eureka, and Troy. The commission meets every Wednesday morning, generally in Libby. The meeting is held in Eureka on the third Wednesday of each month. The county offices are located at the main courthouse (512 California Avenue in Libby) and Eureka's north annex. Office hours are from 8 a.m. to 5 p.m., Monday through Friday, except during holidays.

County departments and offices include Clerk and Recorder, County Nurse, Clerk of District Court, County Attorney, Emergency Management, Environmental Health, MSU-Extension Agent, Personnel, Planning, Schools, Treasurer, Victim and Witness, and Weed Management. The county's website is www.lincolncountymt.us.

The county also has three public libraries. Lincoln County libraries consist of the main library in Libby and two branch libraries in Eureka and Troy. The service area is Lincoln County and northwest Montana (over 20,000 people). The Libby Library is located at 220 West 6th Street; phone (406) 293-2778, email library@libby.org.

State of Montana

Several State of Montana offices in Libby provide services to the local population. These include the Assessor/Appraiser, District Court, Department of Natural Resources and Conservation, Drivers Examiner, Family Services, Fish Wildlife and Parks, Highway Department, Highway Patrol, Juvenile Probation, and Kootenai Job Services. Contact information for these offices is available at www.lincolncountymt.us/state_offices.

Confederated Salish & Kootenai Tribes of the Flathead Reservation

The Flathead Indian Reservation is home to three tribes, the Bitterroot Salish, Upper Pend d'Oreille, and the Kootenai. The territories of these three tribes covered all of western Montana and extended into parts of Idaho, British Columbia, and Wyoming. The Hellgate Treaty of 1855 established the Flathead Reservation, but over half a million acres passed out of Tribal ownership during land allotment that

began in 1904. The tribal government actively participates in environmental stewardship both on and off the reservation.

Kootenai Tribe of Idaho

The Kootenai Tribe of Idaho is located near Bonners Ferry in Idaho. The Kootenai Tribe of Idaho Environmental Department is responsible for projects related to the environmental health of the Kootenai Indian Reservation, community, and Kootenai aboriginal territory. These projects include monitoring environmental health, air and water quality; reducing pesticide exposure; and solid waste management. The Department works with local, state, and regional entities to protect their aboriginal territory.

5.4 Local News Media Outlets

Residents have direct access to media outlets (i.e., newspapers, radio, and television) from Lincoln County and the nearby larger cities of Kalispell and Missoula, Montana, and Spokane, Washington.

- **Newspapers.** There are three local newspapers within the City of Libby. *The Western News* publishes twice weekly, and the *Kootenai Valley Record* and *The Montanian* publish weekly. The Forest Service has accounts with all three papers and regularly places advertisements in them. The Forest Service also occasionally runs an ad in the *Daily Interlake* in Kalispell (90 miles east of Libby). *The Missoulian*, in Missoula, MT, is the newspaper of record where the Forest Service publishes legal notices.
- **Radio.** Libby has a local radio station, KLCB (1230 AM)/KTNV (101.7 FM). The Forest Service has an account with this station and has occasionally run advertisements for public meetings.
- **Social Media.** Facebook has pages for the Lincoln County Sheriff's Office, Libby Dam, Libby, Montana: A Visitor's Guide, Libby, Montana (City's page), and Libby, Montana Travel & Transportation, among others.

The Forest Service's use of these media has generally been limited to the local newspapers. It is unlikely that the Forest Service will use television sources for communications because they are not local, are expensive, and have odd schedules in Lincoln County.

5.5 Education

Libby School District #4 has five public schools in the Town of Libby, Montana. There are approximately 1,165 students in the district.

- **Libby Transitional Kindergarten.** This school is located at 263 Indian Head Road. The school offers transitional kindergarten, an early intervention program for 4- and 5-year-olds to help build their academic and social-emotional readiness for kindergarten.
 - **Plummer Center.** Plummer Center is home to the Libby Transitional Kindergarten and is co-located with Head Start Preschool classes.

- **Libby Elementary School.** This school is located at 101 Ski Road. It serves approximately 640 students in Grades K through 6⁵. The student-to-teacher ratio is slightly higher than the average for Montana (13.96 to 1)⁶ at 15.34 to 1.
- **Libby Central School.** This school is located at 724 Louisiana Avenue. The two teachers work with a small group of students in grades 10 through 12 to offer traditional and non-traditional educational methods to support students on their college and career readiness path.
- **Libby Middle School.** This school is located at 150 Education Way and is co-located with the high school. It serves approximately 180 students in grades 7 and 8. The student-to-teacher ratio is 15.51, slightly higher than Montana's average.
- **Libby High School.** This school is located at 150 Education Way and is co-located with the middle school. It serves approximately 340 students in grades 9 through 12. The student-to-teacher ratio is 16.19 to 1, or about average for Montana.
- **Private Schools:** There are two private schools in Libby, the Kootenai Valley Christian School with an attendance of 92 students and the Libby Adventist Christian School with an enrollment of eight students.

In addition, the Libby Campus of the Flathead Valley Community College offers adult college education courses at 225 Commerce Way in Libby.

⁵ https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&DistrictID=3016530&ID=301653000518

⁶ <https://opi.mt.gov/Portals/182/Superintendent-Docs-Images/Facts%20About%20Montana%20Education.pdf?ver=2021-06-10-162844-327>

ATTACHMENT

Key Messages

1. The EPA has defined a human health risk for firefighters inside OU3 during certain firefighting activities.
2. Reducing wildland fire fuels in the removal action area could assist in reducing flame length and increase the ability for direct attack by ground crews and equipment. This will help reduce the potential for wildfire to move into OU3 by improving the effectiveness of fire suppression tactics.
3. Road system management in the removal action area could also help improve fire suppression tactics.

Interview Questions

1. Do you feel well informed about the Libby Asbestos Superfund Site, and particularly the area known as OU3: the former vermiculite mine and forested areas surrounding the former mine?
2. Are you aware that in 2017 the Forest Service and EPA issued a joint fire preparedness action for inside OU3? This action is still in place today and includes a dedicated fire crew specially trained with respirators, prioritized heavy equipment, and helicopter support specifically for OU3.
3. The EPA does not anticipate a final cleanup decision for OU3 for another 2 to 3 years. Fire preparedness will remain a priority in locations where Libby Amphibole asbestos remains. The Forest Service expects to announce an interim fuels and forest management proposal for Forest Service lands adjacent to OU3. Do you have thoughts or concerns about a fire spreading into OU3?
4. How do you want to be informed about Forest Service fuels and forest management activities adjacent to OU3 during the next few years?
5. Do you have any thoughts you would like to share regarding actions for this area?

Potentially Interested Organizations and Governments

Community interest in this project may include residents; local, state, and federal officials; Tribal Nations; local and regional businesses; and non-governmental organizations. The following list provides a summary of those who may be interested in the project:

- Confederated Salish and Kootenai Tribes,
- Kootenai Tribe of Idaho,
- Residents of Lincoln County,
- Project area landowners,
- The local business community in Lincoln County,
- City Council of Libby,

- Lincoln County Commissioners,
- Montana Department of Natural Resources and Conservation,
- Montana Department of Environmental Quality,
- U.S. Environmental Protection Agency, Region 8,
- Local healthcare agencies and businesses,
- USDA Natural Resources and Conservation Service,
- Kootenai Forest Stakeholders Coalition,
- American Forest Resource Council,
- Bonneville Power Administration,
- Yaak Valley Forest Council,
- Alliance for the Wild Rockies,
- U.S. Army Corps of Engineers,
- Media outlets (see list in Section 5.4), and
- Educational entities (see list in Section 5.5).