

# Ravalli County Collaborative

Ravalli County Montana

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HAMILTON, MT 59840

November 30, 2023

Ravalli County Commissioners  
215 S 4<sup>th</sup> St. Ste A  
Hamilton, MT 59840

Ref: Draft Ravalli County Community Wildfire Protection Plan (CWPP)

Dear County Commissioners

As you know, The Ravalli County Collaborative is a diverse group of volunteers you appointed who have adopted a mission to promote the wise use and management of public natural resources by local, state, and federal agencies within Ravalli County. The RCC employs a collaborative forum for reviewing and developing natural resource actions and policies that affect our community (Mission Statement RCC Bylaws 2020)

We have reviewed the November 3, 2023, Draft CWPP and appreciate the opportunity to provide the following comments:

Thank you for supporting the need and providing the resources required to update the 2006 CWPP. We feel it is a vital tool to help agency decision makers identify and direct actions to mitigate the high level of wildfire risk that currently exists across the County. We are pleased to see the level of expertise and the extensive use of the most current knowledge, data, and plans incorporated into this update.

In our previous comments to the Bitterroot National Forest, we have recognized the need to focus fire and fuels projects, on both public and private lands, to reduce the risk of property loss to homeowners and to provide for a higher level of fire fighter safety. We have also recognized the need to support an interagency approach focusing on the highest risk areas through cross boundary coordination. The Wildfire Position Statement we adopted on 12/12/2022 is consistent with the information and approach you have taken in this update.

## **Section 1: Introduction and Background**

We suggest adding a "Vision and Values" Introduction.

Living with fire is an ongoing fact of life here. Perhaps the utility of this document could be enhanced by adding an introductory section that describes what our community values and envisions as the desired result of working together on this critical issue.

For example:

Our goal is to work toward sustaining a healthy and natural appearing forest surrounding the community, one that supports a diverse range of benefits including recreation, wildlife, water production, and forest products and is accessible and visually appealing.

Our goal is to have homes built within the highest risk areas in the WUI be “firewise” to the degree possible and that homeowners have the resources they need to do their part to minimize the ignitability of their homes and property.

Our goal is to have a smooth running interagency coordinated effort to prioritize work where landowners are willing to help and where vegetation treatment is needed the most.

While these types of statements are implied in the document, we feel having direct upfront statements might help develop a common vision of what we are collectively trying to achieve.

We suggest adding a definition of a restored landscape.

Since much of the document refers to actions needed to restore the forest through fire and fuels treatments, we think it might be helpful to define the target. When have we achieved a healthy forest? A qualitative description of healthy and resilient forests, seen collectively as the target, could include several characteristics such as:

- Existing plant composition which matches site potential
- Tree, shrub, grasses, forbs, etc. are present in the amounts we would expect to find for that plant community.
- Water quantity and quality
- Absence of invasive species
- Tree stands with diverse ages as reflected in basal coverage and canopy cover
- Aspen clones and groves
- Thriving forest wildlife populations
- etc.

## **Section 1.2 Relationship with other Plans, Policies, and Regulations**

Page 7: Locally Adopted CWPPs

“The County encourages the development of other local CWPPs that provide additional detail not included in this CWPP to further help communities plan for wildfire.”

Actions needed to support the development of local CWPPs should be listed under the proposed projects in Appendix B.

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## **Section 2: Ravalli County Wildland Urban Interface and Risk Assessment**

### **Table 5: Split out the acres and percentage of public and private lands in Ravalli County.**

We think it's important for residents to understand the extent of fuels and acres at risk within the WUI that reside on both public and private lands. That would help the public understand the context of the decisions that need to be made on both sides of the jurisdictional line, especially since the majority (62%) of wildfires start on private lands.

### **Section 2.2 The Wildland Urban Interface**

We support your approach to defining the WUI for Ravalli County, however, it's unclear as to what aspects of these components are "unique".

**Please explain why it is important to describe Ravalli County as "unique"?**

## **Section 3 Implementation**

### **Fire Adapted Communities**

Page 6 described that the current Ravalli County Subdivision Regulations do contain information about building homes in fire prone areas and page 23 first paragraph suggests updating policies and regulations like building and subdivision codes that can ensure fire resilience for future development.

**We suggest that an action item on page A-1 should be added to Goal 2 that calls for a review and update of the Ravalli County Subdivision Regulations to incorporate current knowledge and science for building "firewise" homes in the WUI.**

### **Living with Fire/Recommendations to Reduce Structural Ignitability**

There are numerous programs targeted to assist homeowners to voluntarily reduce their risk. **Increased funding and resources to the agencies who provide these educational programs is needed to increase the rate and level of neighborhood compliance in the highest risk areas.**

Considering the lack of grant funding available to private homeowners to reduce the ignitability of their homes, perhaps more attention to developing incentives would increase compliance.

**Under Goal 2 Fire Adapted Communities, a strategy should be added that addresses the need to develop other incentives, such as tax credits, to achieve 100% compliance or to encourage the designation of Firewise Neighborhoods.**

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### Living with Fire/Education and Outreach

On page 25 it is acknowledged that there are no Firewise/USA communities in Ravalli County, but residents can take action to organize a Firewise community at any time.

We recommend adding to Proposed Projects in Appendix B: Implementation: Explore ways to support or incentivize communities to work toward becoming a Firewise/USA neighborhood.

### 3.2 Implementation/Prioritization Process

Overall, we feel the document is well done and covers all the components needed to prepare and mitigate the risks from wildfire. We agree with the goals and objects as spelled out in Appendix A and the prioritization process as described on page 27 to achieve Goal 1 (Page A-1) Restore and Maintain Landscapes. However, there is no clear discussion about prioritizing between goals or identifying gaps in resources to fully implement the whole plan.

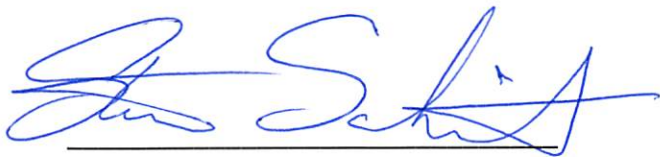
It might be helpful to list the Implementation Actions (Appendix B) under the Goals, Objectives, and Strategies (Appendix A). In other words, combine Appendix A and B. That might help reveal gaps where more resources and projects are needed to meet each of the goals.

Current programs and projects are a patchwork of actions created by funding opportunities that help move us in the direction of reducing our overall wildfire risk. A coordinated plan directs current programs and funding to priority areas. But it can also identify the GAPS where there is no or inadequate funding, programs, or projects to achieve what may be very important parts of the overall goal of improving Ravalli County's fire reliance.

Lastly, before we live through the next "bad fire season", perhaps the sense of urgency would be reinforced if your action plan included measurable targets and a more formal monitoring plan than just simply reviewing progress in the next 5-year update of this plan.

Thank you for the opportunity to comment. You have done a commendable job addressing this important issue.

Sincerely,



Steve Schmidt, Co-Chair



Wayne Rusk, Co-Chair