



July 27, 2023

Ravalli County CWPP Committee

E-mailed to Andrew Amidon, County Forester aamidon@rc.mt.gov

RE: Comments on the Community Wildfire Protection Plan (CWPP) information at the Open House

To the CWPP Committee,

Members of Friends of the Bitterroot attended open houses in Darby and Hamilton concerning the CWPP. We have both concerns and suggestions on the proposed plan, fire risk maps, and wildland urban interface (WUI) map. Please make this comment part of the public record.

First and foremost, the CWPP should focus on fire prevention. Consider the following as part of the CWPP.

1. Implement a plan that puts automatic restrictions in place with each level of fire danger using the current methodology for assessing fire danger levels. As soon as fire danger reaches high, all open burning should end in the county. When fire danger reaches very high, stage 1 restrictions should go into effect on the forest. When fire danger reaches extreme, Stage 2 fire restrictions should go into effect. Consider closing all trails with vegetation or encroaching vegetation to motorized travel.
2. Fund an education and enforcement plan that includes patrols of campgrounds and dispersed camping areas to educate campers on putting out fires completely. Patrols should record license plate numbers and issue fines when fires are left smoldering and abandoned.
3. Create an overall County Evacuation Plan that includes locations of shelters for people, pets, and livestock. The plan should also include an information plan and locations to acquire info in the case of an evacuation. Fund work to advise and assist neighborhoods as they create their own evacuation plan. Fund and advise neighborhood watch and neighborhood meetings concerning fire, fire resistant homes, and evacuation plans. These plans should be part of a kit given to home buyers.
4. Fund a plan to inform local homeowners on ways to fire harden homes. Offer grants and incentive plans to encourage this work. Train local people in this work and keep a list of workers who are educated in fire resistant homes and the 100-foot home ignition zone (HIZ). Provide a list of workers who can perform the work needed to harden homes to fire including boxing in eaves, installing fire resistant roofing, and applying landscaping methods that comply with HIZ recommendations. Maintain a list of where fire-resistant home and landscaping materials can be acquired in the county. Encourage local lumber and hardware stores to carry fire resistant materials.
5. Create and enforce county ordinances that require all new home construction to be fire resistant. Offer incentives for areas to harden a certain percentage of homes in their neighborhoods or on their street. Keep a running log of the percentage homes that have been hardened on a county website and include photos.

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6. Work with the Bitterroot National Forest (BNF) to fulfill the standard to bring beavers back to the forest. Beavers are incredible fire fighters (See <https://cedarmillnews.com/article/1022-beavers-natures-firefighters/>). Beaver dams and surrounding wetlands provide refuge for wildlife, humans exploring the wild, and wildland firefighters. They also provide water storage and moist conditions throughout the summer which helps control the spread of wildfires. Instead, the BNF has blown up beaver dams (this occurred along North Rye Creek Road). When technology like beaver deceivers is successful in naturally enticing beavers to more desirable locations, destroying beaver colonies should never happen. Hold the BNF to their commitment to return beavers to the landscape.

Secondly, the CWPP should analyze the relationship between fuel reduction and climate change. Removing trees, disturbing soil, and exposing soil decreases carbon storage and reduces carbon sequestration. Wood products only preserve a small percentage (less than 12%) of a tree's carbon and using timber as a building material is far from carbon neutral. Fire reduces carbon stores by less than 5% because tree boles are left intact and standing even in a severe fire. What are the carbon costs of fuel reduction miles from homes vs community protection via HIZ projects? What are the projected carbon costs of proposed fuel reduction projects on the BNF? Concentrating risk reduction in the HIZ has a much smaller carbon footprint and less impact on the climate than ineffective vegetation management projects far from residential areas.

The maps provided at the open house included a very generous WUI in black and a second area in green that was concerned with continuous fuels. The WUI is the interface between communities and National or State forestlands. We have not seen anything that confirms continuous fuels constitute a WUI. Please be more specific as to how you assessed and determined this green WUI. It seems it is geared toward removing these "continuous fuels" which means logging. If you ask the town of Denton, Montana, they will tell you that grasses are fuels, so the idea of "continuous fuels" is relative. As Jack Cohen states, "community protection is a home ignition problem, not a fuel reduction problem." Reducing fuels on the forest will not protect homes and communities. The "continuous fuels" WUI should be removed from the CWPP.

We are concerned that the makeup of the committee is mostly agency representatives. Agency budgets are tied to timber mandates, so a conflict of interest is in play. This would explain a "continuous fuels" WUI. The CWPP should be focused on community protection which is a home ignition problem. Studies have shown that 98% of homes that burn in wildfire are burned due to embers ahead of a fire, not crown fires or the fire itself. Ember ignitions can be prevented through home hardening and concentration on the 100-foot HIZ which should be the focus of this alleged plan to protect communities. It seems the green WUI is a plan to provide subsidized timber for mills and developers. This is not relevant to community protection.

The black WUI is extremely generous and though the open house hosts discussed home density and infrastructure, they could not provide the specific parameters or the science that justified the black boundaries. Dwelling densities were mentioned as a parameter, but not explained. What constitutes a home density that warrants a WUI designation? There is a small WUI designation on the upper West Fork, just below Sheep Creek. This is a single shack a very long way from the nearest neighbor. Why is this area part of the WUI? The Lost Horse Road is surrounded by the black border as is the Skalkaho/Rye, Sleeping Child and the East Fork cutoff. Presenters at the open house said these roads would be protected by a mile buffer on either side

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to provide ingress and egress. If a fire is raging, people at the cabin or campground at the end of Lost Horse should be helicoptered out. Driving long distance on these roads in a fire emergency would be a recipe for disaster. Lost Horse Creek is slated for Wild and Scenic designation in the Forest Plan. Though the BNF has not fulfilled its commitment to assess the river, it must treat the area as Wild and Scenic until the assessment is completed. Firelines on either side of Lost Horse Road would be in violation of this commitment. What is the use of the other roads within the black WUI border? How is this WUI justified? The WUI depicted in the maps does not resemble the legal definition of the WUI.

There was another map that mapped priority areas. Can you please explain what criteria was used to establish these priority areas.

The open house displayed a map of the Forest Action Plan fire risk areas. Jack Cohen wrote comments concerning this plan and made it clear that commercial logging does not protect communities and should not be a part of a plan to protect communities. Fuel reduction outside of the 100-foot HIZ should not be equated with preventing homes from burning, but your fire risk maps and WUIs strongly imply they are. Furthermore, the Forest Action Plan fire risk map, the updated CWPP fire risk map, and the continuous fuels WUI do not include recent fires or completed logging projects purportedly meant to reduce fuels and fire risk. Why didn't these fuel reduction projects decrease the fire risk? Why did the multiple square mile Darby Lumber clearcuts exacerbate the fire rather than slow it (see photo 1)?



Fire plume over Deer Mountain, August 6, 2000. Photo taken from Highway 93, just north of Darby Ranger Station. The August 6 firestorm over Deer Mountain created a powerful convection which caused eight separate fires to merge into one.

The 213,000-acre Valley/Skalkaho Complex Fire was the largest fire in the nation in 2000.

Bitterroot National Forest photo file:
www.fs.fed.us/r1/bitterroot/fire/valley/images/000806rs.jpg

Photo 1 Fire plume from Darby Lumber Lands area.

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Logging will require road building which will create more access and human fire starts. As this map seems to imply a need for fuel reduction, please identify the benefits vs the risk created by new roads and human access. This should also consider the illegal use of closed and blocked roads on the BNF. As Higuera et al 2023 states, “With millions of structures with high fire risk, reducing human-related ignitions and rethinking how we build are critical for preventing future wildfire disasters.” Nagy et al 2018 also found humans cause most of the fires. In Montana we have many lightning fires, but the larger fires causing private property loss tend to be human caused. Roaring Lion is an excellent example. This summer (2023), we have already experienced a campfire turned wildfire on the BNF. Last fall, the Lolo National Forest did not restrict campfires during extreme conditions and reported that 80% of the wildfire starts were the result of humans.

We are concerned that the continuous fuels WUI includes Inventoried Roadless Areas (IRA), Recommended Wilderness, Research Natural Areas (RNA), and Wilderness Study Areas (WSA). These areas are required to be managed as Wilderness or to preserve Wilderness quality and natural processes. Fuel reduction projects are not a natural process. Ground disturbance would destroy Wilderness quality in these areas and should not be promoted under this CWPP.

Please be clear who the members of the committee creating this plan are. What are their affiliations? Has anyone been denied membership to this committee? How many landowners without agency affiliation are included? How many scientists are a part of this committee creating the maps and plan?

Please consider the following studies when creating the draft plan that will be open to public comment. If you have any trouble with these links, we are happy to provide these references.

1. Baker et al 2023 <https://www.mdpi.com/2571-6255/6/4/146>
2. Bradley et al 2016
<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.1492>
3. Nagy et al 2018 <https://www.mdpi.com/2571-6255/1/1/4>
4. Higuera et al 2023
<https://academic.oup.com/pnasnexus/article/2/3/pgad005/7017542?login=false>
5. Fairfax and Whittle 2020
<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/eap.2225>
6. Baker 2020 <https://datadryad.org/stash/dataset/doi:10.5061/dryad.kd51c5b7s>
7. Birdsey et al 2023 <https://www.frontiersin.org/articles/10.3389/ffgc.2022.1074508/full>
8. Kellet et al 2022 <https://www.frontiersin.org/articles/10.3389/ffgc.2022.1073677/full>
9. Stephenson et al 2023 <http://pubs.er.usgs.gov/publication/70124417>
10. Mills et al 2022 <https://pubmed.ncbi.nlm.nih.gov/36623189/>
11. Arriagada 2020 <https://www.mja.com.au/journal/2020/213/6/exceedances-national-air-quality-standards-particulate-matter-western-australia>
12. Moomaw et al 2019 <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>
13. Law et al 2022 <https://www.mdpi.com/2073-445X/11/5/721>
14. Mildrexler et al 2023
<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.12944>
15. Letter to Congress signed by 700 scientists
<https://www.cutcarbonnotforests.org/scientist-letter-read/>
16. Mackay et al 2022 <https://iopscience.iop.org/article/10.1088/1748-9326/ac661b>

Thank you for the opportunity to comment.
Jim Miller, President

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Friends of the Bitterroot

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