

## Chris Taggart

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**From:** Ravalli County Commissioners Office  
**Sent:** Wednesday, November 29, 2023 11:45 AM  
**To:** Andrew Amidon  
**Subject:** FW: [EXTERNAL] Comments on CWPP

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**From:** Russ Lawrence <russworks@outlook.com>  
**Sent:** Wednesday, November 29, 2023 11:18 AM  
**To:** Ravalli County Commissioners Office <commissioners@rc.mt.gov>  
**Subject:** [EXTERNAL] Comments on CWPP

Commissioners:

I have read through the updated CWPP, and am pleased that it is finally being updated. I note, however, that it fails to incorporate many of the most cost-effective means of reducing hazards to life and property, and in many cases goes beyond the scope of protecting lives, homes, and structures.

1. The single most effective strategy the County could employ for protecting lives and property would be to require fire-resistant building materials for new structures in the Wildland-urban interface. The next most effective strategy would be to require appropriate landscaping to reduce flammable materials adjacent to and extending outward from homes and outbuildings. Yes, that would be regulation. Yes, that would be leadership. Yes, that would save lives and property.
2. The County and the USFS should make it a priority to help the owners of existing homes in the WUI to make them more fire-safe through landscape modifications and remodeling/retrofitting with fire-safe building materials.
3. The proposed widening of the WUI definition goes far beyond any rational justification for fire hazard reduction, and appears to be more a strategy to enable commercial logging. Logging more than a quarter mile from sensitive areas has been shown to have little or no appreciable effect on reducing hazards to homes and other structures. If the County wishes to promote commercial logging, that's a different issue, and should be addressed elsewhere; the science regarding home ignition and fire hazard reduction does not justify the dramatic expansion of the WUI as proposed in this document.
4. Some of the expanded WUI includes protected areas, such as proposed Wild & Scenic River designation for Lost Horse Creek, and old-growth and roadless areas suitable for protection. Any land currently proposed or eligible for special protection should be considered separately, with site-specific recommendations that would protect that status, consistent with reasonable hazard reduction actions for any nearby residences.
5. I recognize the need for prescribed fire on the landscape, but those prescriptions should more fully take into account predicted air stagnation due to high pressure systems or inversions.
6. Open burning and campfire restrictions should be automatically tied to Very High/Extreme USFS fire hazard levels.

I hope that the committee responsible for the drafting of this update will take these comments under consideration, and report back a more reasonable draft that actually codifies the most effective protection strategies before final adoption.

Respectfully submitted,

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