

Comments on Ravalli County draft Community Wildfire protection Plan 11/29/23

In my view there are some fundamental flaws with the approach used for the draft CWPP. First is the assumption of obligation by the USFS to protect homeowners from loss of homes. In the Organic Act the USFS is tasked with protecting forests and watersheds, not neighboring private property. The assumption of an obligation to protect homes has led to excessive logging that, in fact often or usually does not protect homes but does often damage forests and watersheds. This damage is not mentioned in the CWPP.

The next most consequential flaw is failure to consistently use best available science. It is well established that the most effective and efficient approach is to start at the home and Home Ignition Zone. Until and unless that is done logging far from homes is not worth the time or money that could be better spent working close to the homes.

I request you reconsider your focus on the wildlands urban interface. The FS (Cohen, 1999) reviewed current scientific evidence and policy directives on the issue of fire in the wildland/urban interface and recommended an alternative focus on home ignitability rather than extensive wildland fuel management:

“The congruence of research findings from different analytical methods suggests that home ignitability is the principal cause of home losses during wildland fires... Home ignitability also dictates that effective mitigating actions focus on the home and its immediate surroundings rather than on extensive wildland fuel management.”

“[Research shows] that effective fuel modification for reducing potential WUI fire losses need only occur within a few tens of meters from a home, not hundreds of meters or more from a home. This research indicates that home losses can be effectively reduced by focusing mitigation efforts on the structure and its immediate surroundings. Those characteristics of a structure's materials and design and the surrounding flammables that determine the potential for a home to ignite during wildland fires (or any fires outside the home) will, hereafter, be referred to as home ignitability.”

“The evidence suggests that wildland fuel reduction for reducing home losses may be inefficient and ineffective. Inefficient because wildland fuel reduction for several hundred meters or more around homes is greater than necessary for reducing ignitions from flames. Ineffective because it does not sufficiently reduce firebrand ignitions” (Cohen, 1999)

The incentive for the FS to misdirect wildfire protection priorities is easy to see. Logging an expansive WUI is just another scheme to get the cut out. The fact that treating the HIZ is the most efficient and only effective approach (Jack Cohen) is discounted because it doesn't produce much timber.

Purporting to the public that logging the WUI protects homes is exaggerated and detracts from homeowner incentives to take actions that might protect homes. Some people will think they are protected and then fail to do what actually works.

CWPP: “This conceptual WUI definition was then translated spatially through the identification and mapping of assets, resources, wildfire risk, and landscape-level data across Ravalli County. These spatially explicit data are represented by distinct ‘WUI Components’ with associated buffers applied

where appropriate to further mitigate wildfire risk.” (p 14) Adding buffers appears arbitrary. Where is the science?

“Highly Valued Resources and Assets Highly Valued Resources and Assets (HVRAs) Areas represent spatially distinct resources or assets of value to Ravalli County. These are areas with moderate to high recreation use with various buffers dependent on use type and include a refined list of hot springs, ski resorts, recreation corridors, historical and/or cultural sites. Various buffers were used based on use type and topography.” (p 17)

On p.10 the CWPP says, “These characteristics, combined with ignition sources, constitute the fire environment.” I do not see analysis of ignitions or mitigation of ignition sources, possibly because it does not fit the logging agenda that dominates the CWPP. Road access increases the likelihood of human caused ignitions, but limiting road access is not recommended in the CWPP, also possibly due to hidden agendas.

Submitted by,

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