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To: Ravalli County Commissioners Office
Subject: [EXTERNAL] Comments on the CWPP update

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Subject: Comments on the CWPP update

First, I want to thank you in writing for your attention to fire risk in our county. It should be a primary concern for all valley residents and your focus on the CWPP will clearly improve public awareness and understanding of our fire risks and what we can do to reduce them. Having the CWPP provide a clear and reliable source of best current understanding of our fire risks and response options is therefore of the first importance. The following suggestions are made in the hope that they will help us have the best possible CWPP guide us in prioritizing our risk reduction efforts.

1. **CWPP monitoring/updating process** (page29). Understanding of fire risk factors is currently a topic of much research which will properly affect risk reduction efforts. The general realities of our current world, disease, climate, etc., are all too evidently unpredictable. A well defined process for the CWPP to be kept current should be included in the draft. This should clearly state: a. when review is required—every year and every five years are both mentioned. b. who decides topics/considerations to be reviewed. c. how public input will be solicited and reviewed/included. d. who has final decision-making responsibility/authority on changes after public review is completed.
2. **Home Ignition Zone.** It is excellent to have the HIZ action details given on pages 22-24. These deserves top billing as this is THE one area of action that all the research indicates can reduce fire risk. It needs to be clearly stated that this is where fuels reduction really matters for community fire risk reduction. The best available fire science is clear. The most effective way to protect homes is to work from the home outward. This includes retrofitting homes to be fire resistant and fire wise landscaping in the Home Ignition Zone, 100 feet around structures. It needs to be made clear that no amount of fuel reduction at a distance beyond the HIZ will give comparable fire risk reduction. This needs to be reflected in the prioritization section on page 26.

Fire Adapted communities should be listed as Goal 1 in Appendix A and this and HIZ mitigation actions should be the lead projects named in Appendix B. The HIZ information should also be presented with graphics in the CWPP story map-- this is what will reduce community fire risk better than the Bitterroot Front Project, etc., and the county can effectively implement actions for this range of projects while the USFS priorities are

beyond its control. The county should clearly commit in the main CWPP to acquiring grants (which having a current CWPP will facilitate) for the community to make homes more fire resistant and support fire resistant landscaping.

- 3. Wildland Urban Interface boundaries.** The established WUI definition covers 40 acres around structures—about .25 mile. Boundaries in the 2004 plan were not mapped and in the intended revision in 2009 they look to basically have included private property. In this proposed draft update they are set at a blanket additional buffer distance of one mile: p.17. This is weirdly justified by the rural lower population density. What does rural population density have to do with this wider everywhere all at once boundary? At the least, a clearer explanation is needed here.

I understand that a lot of thought and discussion was given to this boundary choice, but I'm not finding anything in the draft that really justifies the county wide one mile expansion of the WUI area. HFRA specifies prioritized fire risk reduction projects. The WUI boundary could be mapped to match these. Another logical suggestion could be that the standard buffer of 40 acres be maintained with an additional .25 miles around all private property. Such a property or prioritized project specific based boundary line also reduces the risk of the county being held, by implication, liable for what occurs relating to fire in the wider one mile area. Inventoried roadless areas and existing old growth/undisturbed natural areas should be excluded from the WUI for reasons noted in the fuels treatment and carbon sequestration comments below.

A wider boundary for "risk to potential structures" (RPS p.20) makes no sense as these cannot really be predicted or prioritized as HFRA directs; the evolution of the valley may not be as we expect. Maps can be adjusted as such structures are built. More importantly, consideration needs to be articulated for future structures in high fire risk areas to be restricted and fire resistant design and materials to be rewarded—for our common good and the sake of our fire fighters.

The inclusion of the Lost Horse corridor* and the Rye-Skalkaho cross road do not seem to fit under the name "Wildland URBAN Interface," nor could they be reasonably listed as ingress/egress essential routes. As it is not a regulatory document, the CWPP itself is unlikely to be subject to legal challenge. However, projects using the CWPP to justify funding applications may well be so challenged. A realistic and legally defensible WUI boundary is vital for our CWPP to be a respected and viable document on which our county can reasonably base its actions and funding requests.

*For those who missed my more detailed presentation to the commissioners on the subject of the Lost Horse corridor, here are the main points, minus the personal history:

The "highly valued asset" categorization of this practically unique corridor is truly justified by its near pristine wild nature of a type rarely so easily accessed by vehicle. Including it in the WUI with areas marked as high value for fuels treatment threatens the very quality for which this corridor is appreciated and gives wide latitude to the USFS to actively intervene in its ecosystem with little or no public input. Because of its relatively moist and shaded ecosystem this is largely a corridor that would only burn very infrequently and therefore has been minimally, if at all, impacted by what we now know to have been misguided fire suppression practices. There will eventually be an extreme fire weather year in which an ignition in the canyon will burn out significant parts of the corridor. No doubt this has happened before. As an undisturbed naturally function system it has a far superior capacity for resilience and restoration when such an event occurs. "Treatment," compacting the precious soils evolved on the local decomposing granite base will certainly reduce these recovery capacities. The historically designed cabin and developed campground facilities can be reconstructed if damaged or destroyed by fire. A habitat impacted by "fuels reduction treatment,"

on the chance that fire will occur there, will recover its integrity only in a much longer timeframe. We need to remember how our historical forest management practices have not turned out so well. Unintended consequences seem to rule when we intervene assuming we fully understand natural systems.

The lower canyon has already been greatly altered by logging and then the frequent cycles of thinning to manage the post logging dense regrowth and theoretically reduce fire risk to adjacent community development. The resulting extensive and invasive species laden open savanna type understory may, we are learning, expose properties downstream to higher fire risk, especially given the common down canyon wind pattern; extending such treatment further up canyon will only increase this threat.

4. **Fuels treatment.** Appendix A. 1.1 The document does not provide any clear evidence that widespread types of proposed reduction of fuels loading will reduce our community fire risk. This applies also to Objectives 1.2.1 -1.2.3. A large body of recent research, and some dating back to the 1990's, shows that larger, homogeneous open areas increase fire risk. Projects that increase open savannah type areas increase our fire risk. They result in hotter and dryer areas that, especially after mechanized logging, have weedy, non-native understories which data now indicates have double the speed of fire spread compared to undisturbed native vegetation (which better retains moisture, slowing fire spread). This is especially of concern in our present and predicted climate conditions including more frequent high wind events. Undisturbed old growth also acts as a wind buffer,

There is also strong data showing us that untreated forest areas in the western USA burn with lower fire intensity, in spite of having heavier fuels loading (abstract at <https://esajournals.onlinelibrary.wiley.com/action/doSearch?AllField=does+increased+for+est+protection+correspond&SeriesKey=21508925#>.)

Recent devastating fires in Boulder, CO, Denton, MT (which destroyed more structures than our Roaring Lion Fire), and Maui, illustrate what another recent research paper concluded: "Grassland and shrubland fires burn more land and destroy more homes across the United States than forest fires." (https://www.nytimes.com/2023/11/09/climate/forest-fires-grasslands.html?campaign_id=2&emc=edit_th_20231109&instance_id=107398&nl=today_sheadlines®i_id=59904115&segment_id=149667&user_id=ecbb303f670299141a74bb57ddb963a4). Fuel loading reduction treatments that increase grass and shrubland beyond the HIZ cannot now be assumed to be preferable to shaded, moister, established/undisturbed habitats for fire risk reduction, even if the latter areas have heavier fuel loading.

Research for the USFS also questions the emphasis on fuels treatment not directly adjacent to structures (HIZ): "Research for the Structure Ignition Assessment Model (SIAM) that includes modeling, experiments, and case studies indicates that effective residential fire loss mitigation must focus on the home and its immediate surroundings. This has significant implications for agency policy and specific activities such as hazard mapping and fuel management." (https://www.fs.usda.gov/rm/pubs_other/rmrs_1999_cohen_j001.pdf)

To be convincing the CWPP should have mention of these considerations as essential in prioritizing and establishing parameters for fuel load reduction projects. The CWPP, in line with HFRA, claims to be science based. A lot of relevant research and fire behavior analysis has been done since HFRA was passed. We ignore it at our peril.

5. **Carbon sequestration.** The draft update does mention that climate change is increasing our fire risk. Could we at least have in our CWPP a statement that all projects supported by the plan should prioritize reducing climate fire risk factors. Even HFRA in 2003 suggests carbon sequestration is a desirable goal. Beyond that, twenty years later generally accepted science indicates that digging and pumping up the planet's stored carbon and using it in ways that add heat trapping gasses to our atmosphere is a major factor in the climate changes we are experiencing.

The loss of mature and old growth trees and undisturbed native habitat and soil areas will significantly reduce carbon storage/sequestration in our forests. Science shows that tree saplings take at least 20 years to sequester carbon. Young trees actively emit carbon; mature trees pull carbon from the air and sequester it long term. Heavy equipment, employed for logging efficiency, compacts soils, reducing their carbon and moisture storage capacity. Given even a fair chance that the science on greenhouse gasses contributing to climate change is correct, it would seem sensible for the CWPP to encourage preservation of current carbon storage and sequestration capabilities.

6. **Human caused wildfires.** Since the majority of wildfires in Ravalli County are human caused, our CWPP should include some prominent acknowledgement of this fact and foreground options to reduce this fire risk on both public and private land. Human caused fire mitigation intentions should not be left to the appendices. The outreach and education initiatives discussed are essential, but the numbers indicate they are not adequately reducing this risk factor. We need openly to acknowledge this risk and commit to doing a better job in managing it.

On private land a primary risk factor is open burning. Potential county services for residents to dispose of agricultural debris, needle accumulation, etc., by means other than burning should be mentioned in the body of the plan with a statement of the county's commitment to pursue these in the interest of public safety.

On public lands the main risks appear to be camp fires and sparks from motorized equipment during times of high-extreme fire danger. The CWPP should: a. indicate our county supports restricting public land use in such circumstances which increase the threat of fire to our communities and b. commit publicly to working with agencies to implement such restrictions (however unpopular) promptly for our public safety.

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