

Chris Taggart

From: Richard Donovan <rpdonova8@gmail.com>
Sent: Friday, December 1, 2023 3:42 PM
To: Ravalli County Commissioners Office
Subject: [EXTERNAL] Comments on the CWPP update
Attachments: RavalliCoCWPPUpdate_rpd_critique.pdf

Dear Commissioners,

I am submitting these comments as a resident of Ravalli County. In the following paragraphs I will summarize my concerns about the document. I have also attached a detailed annotated draft of the CWPP that contains many (over 80) specific comments relative to the draft CWPP. I have endeavored to provide these comments and the summary below from the perspective of over thirty years of scientific and engineering experience in a variety of disciplines that includes: civil engineering, mechanical engineering, chemical engineering, sustainability science and complex systems science. I am also a voting member of the Fire in the Root Council and as such have a high degree of familiarity with the development of the current draft of the 2024 CWPP. In addition, I am providing this commentary from the perspective of a lifelong association with the Bitterroot River Watershed. In general I recommend that the commissioners do not endorse this current draft of the CWPP. In my professional opinion it is critically deficient with respect to the purposes of the Healthy Forest Restoration Act (which is the defining authoritative act for the CWPP) and associated Implementation Plans referenced in HFRA, The current draft is critically deficient with respect to providing for monitoring of outcomes of the CWPP Implementation Plan. The current draft is critically deficient with respect to providing for accountability of the outcomes associated with the CWPP implementation plan. Finally, the current draft of the CWPP is in need of some important technical editing to provide for more clarity as to the purpose, goals and objectives of the CWPP. We have only one chance to produce a high quality, actionable initial implementation of the CWPP (I do not count the 2006 version referenced in this 2024 CWPP draft which was critically deficient and never adopted or implemented).

I very much appreciate the time and effort that the core team has invested in developing this current CWPP draft. However there are fundamental aspects of this document that must be improved in order for it to serve its intended purpose which includes serving as the seed of a " living document" (e.g. paragraph 2 of the executive summary). This is particularly true since one of the critical deficiencies of this draft is the absence of a defined process for updating and reauthorizing this document. We are for sure in a perilous time regarding vulnerability to catastrophic wildfire and time is of the essence to get a high quality CWPP in place for Ravalli County and the Bitterroot Watershed. However, if we do not have the time to do this right then we do not have the time to do it twice. The following paragraphs provide an overview of my critiques and I have attached an annotated version of the Draft CWPP that has numerous specific comments and suggested edits for consideration of a new and improved draft.

The purpose of the HFRA is:

- 1) reduce risk of wildfire through a collaborative process of planning, prioritizing and implementing hazardous fuels reductions programs,
- 2) authorize grant programs to enhance the commercial value of forest biomass,
- 3) enhance efforts to protect watersheds and address threats to forest and rangeland health,
- 4) promote systematic gathering of information to address the impact of insect and disease infestations and other damaging agents on forest and rangeland health;
- 5) to improve the capacity to detect insect and disease infestations at an early stage; and
- 6) to protect, restore and enhance forest ecosystem components-
 - a) promote the recovery of threatened and endangered species;

- b) improve biological diversity; and
- c) enhance productivity and carbon sequestration.

HFRA and related enabling policies (e.g. Implementation Plans) require that these purposes are achieved in a manner that

"...considers the best available scientific information to maintain or restore the ecological integrity, including maintaining or restoring structure, function, composition, and connectivity;..."

Implementation Plans associated with HFRA provide a great deal of additional depth with regard to the "best available scientific information" that should be considered. The attached file identifies numerous places throughout the current draft where this essential feature is either not present or is minimally addressed. For this summary I will point you to the executive summary, the guide ("How to use this Plan"), the Introduction and Background section, and the Implementation Plan (re: create SMART objectives). To begin, please note that the executive summary makes no mention at all about best available scientific information or science at all for that matter. It references a very minimalist description of the HFRA that largely ignores most of the purposes of the act in favor of a very thin version of the requirements for a CWPP. The executive summary references the notion of a living document but does not describe any process through which the CWPP is updated and/or reauthorized. The executive summary references the successful development of a comprehensive CWPP. The current draft of the CWPP is far from comprehensive and lacks very fundamental features that are required for it to be functional such as describing SMART (specific, measurable, achievable, relevant and time-bound) goals and objectives.

The "How to Use this Plan" section illustrates several common deficiencies. For example the opening paragraph essentially uses this CWPP as a reference to make claims about the intuitive features of the document. There are other self-referential statements scattered throughout the draft that some careful technical editing can improve. This section also refers to the 2024 Draft as an update to a 2006 CWPP which was never authorized or implemented. There is no need whatsoever to refer to the failed 2006 effort. It has no relevance to this effort which is happening 18 years later (a lifetime in the era of advancing climate change impacts). In the paragraph describing section 2 the impacts of a failure to address the best available science is illustrated by the fact that there is no reference to ecology which is broadly representative of the lack of system perspectives throughout this draft of the 2024 CWPP. In section 3 there is a claim that the 2024 CWPP integrates with the National Cohesive Strategy and that there is a CWPP update process. Neither of those claims can be substantiated. The NCS identifies numerous contemporary and historical forest management failures that are not at all acknowledged in this CWPP Draft as well as a host of directives related to consideration of healthy forest ecosystems when developing community wildfire planning/strategies which are largely ignored in this draft. There is no CWPP update process identified in this draft of the 2024 CWPP.

The word science does not appear in this draft of the CWPP until the Introduction and Background section, when it appears on page 7 to claim "...the interdisciplinary team used newly available science to...". However the opening paragraph of this section (see page 2) fails to adequately reflect the best available science. This sentence claims that "Following decades of fire suppression, changing climate and increasing frequency of catastrophic wildfire events, lawmakers identified...". This passive framing ignores the best available science. The best available science is that (my suggested edits for this opening paragraph):

Following a century of mismanagement that excluded natural fires from forest landscapes and the advent of long predicted effects of the anthropogenic components of climate change that drive the rapidly increasing frequency of catastrophic wildfire events, lawmakers identified the need to equip communities with tools and funding to address the growing risk of wildfires. The HFRA outlines a comprehensive program for addressing these critical needs through collaborative processes that include creation of community wildfire protection plans (CWPPs) to guide planning, prioritizing, and implementing hazardous fuel reduction projects.

Note that in the attached file I suggest that the above paragraph replace the current text of the draft CWPP. This framing sets the stage for numerous edits that will align this Draft CWPP with the HFRA as well as Implementation plans which specifically call out anthropogenic impacts (e.g. carbon sequestration, for reducing climate change etc.) and specifically call out management failures. Adoption of this framing will enable the CWPP to develop strategies for SMART objectives as well as to create effective monitoring and data acquisition programs that are essential to establishing accountability for success. The attached document provides many more suggestions for how we can improve this Draft of the CWPP that will serve as the kernel for building a wildfire resilient Bitterroot.

Thank you for taking the time to consider these critiques. If formatting and or software licensing does not allow you to see the comments in the attached file please let me know and I will arrange to have them put into a seperate file.
Best Regards

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