

Below are comments by Jeff Lonn on the proposed Ravalli County CWPP.

If the goal is community wildfire protection, then the Draft CWPP completely misses the mark. By focusing on fuel reduction in the forested wildlands up to 1½ miles from structures, it ignores the considerable body of science showing that the most effective way to protect communities from wildfires is to work from the home outward for a distance of 100-200'. Wildfire scientists like Jack Cohen have found over and over again, decade after decade, that forest management activities outside the home ignition zone (HIZ) more than 100 feet from the home have little effect on a structure's ability to survive a wildfire. Instead, it is the fire resistance of the home itself and the landscape in the 100 feet surrounding the home that will determine whether or not a home will survive a wildfire. Jack Cohen's 2020 public comments to the Montana Forest Action Plan sum it up: **“home ignition potential can be sufficiently reduced within the HIZ to prevent community destruction without having surrounding fuel treatments and controlling extreme wildfire. This provides an opportunity to more effectively define wildfire community risk as a home ignition problem, not a wildfire control problem.”** Remember that Denton, Montana, Marshall, Colorado, and Lahaina, Hawaii, all burned up without even having any forests nearby. Paradise, California, was devastated despite being surrounded by heavily logged country. Does any of this make you question your Draft CWPP? Are you really using “best available science” as stated on p. 8? CWPP's are required to prioritize **“fuel reduction projects by identifying priority areas and treatment methods to protect at-risk communities and essential infrastructure” (Draft CWPP p. 4)**. The best available science clearly shows that the priority fuel treatment areas are the 100 feet closest to structures, which is most often on private land. Providing on-site evaluation and financial assistance to landowners to accomplish this nearby fuel reduction would also help with another CWPP requirement, to **“reduce structural ignitability” (Draft CWPP p. 4)**.

So far, Draft CWPP does nothing meaningful for reducing structural ignitability; it only makes recommendations. While these are valuable, they were already recommended in the 2006 CWPP. You are going to “Improve public access to existing educational resources” (p. A1). An updated 2024 plan should do more than just make recommendations to reduce structural ignitability because that is the most effective way, by far, to protect communities. For example, Draft CWPP (p. 24) states “there is not currently a grant program available to assist individual homeowners with home hardening”. Why not? Wouldn't financial assistance for home hardening be an important way to protect communities? Regarding new construction, shouldn't you pursue zoning or building codes that would require new homes to use fire-resistant construction and fire resistant landscaping within 100 feet? I see that new subdivisions are required to have a surrounding fuel break that is generally outside this 100-foot home ignition zone. It will not stop embers, the source of 90% of home ignitions, and will only degrade the surroundings. Why would anybody want a within view of an unnecessary clearcut?

What about evacuation routes, shelter-in-place locations, and shelter for evacuees, their pets, and their livestock? Strategy 3.4.1 (p. A-3) is to “develop an evacuation plan that identifies evacuation routes, reception/distribution areas, shelter locations, staging areas, and access control points”. Where is this plan? Shouldn't it be a part of the Draft CWPP? Instead, you only offer a few vague words about how neighborhoods should work on these.

Draft CWPP mentions reducing human ignitions, but fails to recommend any meaningful action. Ways to reduce human ignitions include imposing campfire restrictions immediately when fire danger goes to high. For example, Stage 1 restrictions should immediately and automatically go into effect when fire danger reaches high. Stage 2 restrictions (all campfires) should be in effect automatically when fire danger reaches extreme. Perhaps restrictions like this would have prevented the Roaring Lion fire. Fuel reduction would not have. Many human ignitions occur along roads, so it follows that restricting motorized activity, particularly off-road motorized use, would be another effective way to reduce ignitions. An easy way to start would be to ensure that closed roads are really closed, and to enforce those closures. You mention “working with utility companies to reduce risk” (p. A-2), but in the Bitterroot area, fires have not historically been caused by downed utility lines. And in places like California, where they have, it is almost always because the lines or power poles themselves have failed, not because trees brought them down (Paradise, California, for example). I suppose you include this with the hope that it will facilitate more logging around power lines.

I’m not sure what Objective 1.4 Reduce Insects and Disease (p. A-1) has to do with community protection since many studies show no correlation between insect- and disease-killed trees and fire severity or frequency. Also, the statement that “fuels thinning prevents spread of insects and disease outbreaks ” is not supported by science.

It’s funny that Strategy 3.2.3 (p. A-2) “supports the development of mitigation actions and planning related to wildfire smoke public health issues”. Here in the southern Bitterroot Valley, we have suffered through unhealthy air all fall due to Bitterroot National Forest slash pile burning under stagnant air conditions. This apparently had the approval of Montana DEQ as well as BNF, despite National Weather Service warnings about poor air quality. If smoke cannot be mitigated even from prescribed burning in the fall, what could you (or would you) possibly do about summer wildfire smoke?

I’m unclear on the meaning of the risk map to potential structures. What are potential structures? The Draft CWPP does nothing meaningful to even protect existing structures and communities, let alone potential ones.

The WUI maps include a mile buffer around many forest roads miles and hours away from communities. Most of these are not egress routes—no one, for example, is going to escape a wildfire by driving over Skalkaho Pass to Philipsburg. or drive up the hours-long Skalkaho Rye route from either direction. Including the Lost Horse Road in the WUI “to protect valuable resources” will only result in the degradation of those same valued resources, like scenery, intact forest, and a proposed wild and scenic river. These roads already provide plenty of firefighter access as well as fuel break anchors—they do not need to be “improved” and have nothing to do with community protection.

Instead of taking effective measures to protect communities, the Draft CWPP prioritizes and defines the an excessively large WUI. This WUI boundary is certainly not science based. It does not take into account prevailing wind direction, vegetation type, forest age, forest structure, slope aspect, slope angle, topography, or any other factor important to wildfire spread. Instead, the large WUI appears to be designed to “facilitate access to funding for projects intending to reduce wildfire risk” (CWPP, p. 14).

This doesn't sound like community protection is the goal—it sounds like the real goal of the CWPP is to get federal logging subsidies. That's no surprise given the make-up of the core team. Most have ties to the timber industry. Where are the wildfire scientists? There are several nationally known ones living in the area. Where are the interested citizens who live in the "WUI"? Where are the forest ecologists? CWPPs are required to include collaboration that "engages a broad diversity of stakeholders to ensure the CWPP reflects the best local knowledge, receives broad community buy-in, and accounts for ongoing and planned future projects" (p.2). That diversity of stakeholders is sorely lacking in the CWPPs core team. Public comments on the plan are not even publicly available. Please make public comments available to the public so they can ensure the CWPP "receives broad community buy-in"(p. 2).

It appears that the plan will do less to protect communities than it will do to facilitate obtaining federal grants for taxpayer subsidized logging in Bitterroot National Forest. Perhaps it should be renamed the SLPP—the Subsidized Logging Protection Plan.