IV Appendix IV Comments Received During the Committee and Public Review Periods

IV.1 Bureau of Land Management

This comment was researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in appropriate sections of the document.

The following new information should be incorporated into the Idaho County Plan section 3.9 (please follow up with the tribal contact below):

For your information, as of June 7, 2005, anyone conducting any sort of burning (excluding campfires) within the boundary of the Nez Perce Reservation is now required to obtain an air quality permit through the Nez Perce Tribe Air Quality Office. This applies to all land ownership within the reservation boundary. There is a separate burn permitting process for each of the following:

- 1. small residential burning
- 2. large general open burning
- 3. agricultural burning
- 4. forestry and silvicultural burning

This program will eventually be implemented on all 39 Indian reservations within OR, WA, and ID over the next few years, with the Nez Perce Reservation being the first. Information and applications can be obtained from the following website.

http://yosemite.epa.gov/R10/AIRPAGE.NSF/webpage/FARR+Air+Quality+Burn+Permits+on+the+Nez+P erce+Reservation

The Nez Perce Tribe Air Quality Program has been permitting ag burning for the last 4 years, so they have a program to build from. However, they are interested in working with all entities that may be involved/affected to build a strong effective smoke management program that works for everyone. If you want more info, or have questions/concerns, please contact Johna Boulafentis, Environmental Outreach Specialist.

Kristen Sanders Fire Use Specialist Cottonwood Field Office Bureau of Land Management

IV.2 Secesh Resident

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in appropriate sections of the document.

Dear Mr. Schlosser:

I received the copy of the Draft Plan you sent today. I did have the opportunity to talk with Cris Bent over the weekend as well as a number of my neighbors in the Secesh and Warren areas. There are a number of items that are of concern to us.

You list the Community of Burgdorf and the Community of Warren. There is no mention of the Community of Secesh. The Community of Burgdorf consists of one household in full time residence. The Community of Secesh has at least 7 households that I am aware of that are in

full time residences. You might check with the Idaho Co. Tax Assessor to see how many households are tax assessed as full time. I believe you will find a higher number. There are over 100 individuals residing in the area during the summer months. There are a number of residents that are out of the area working during the summer months that are in residence during the winter months. Most of the 16 mile area between Burgdorf Junction and Warren is under the control of the Payette National Forest except for an approximately 3 mile long stretch which is privately owned in the Secesh Meadows area.

I did not see any mention made of the Chinook Campground. It may not need to be included because it is on Forest Service land. It has 9 overnight campsites and additional parking. It is a popular starting point for overnight trips to the Loon Lake area. It is not unusual to find at least 20 vehicles in the parking lot on weekends. Many people park there and leave their vehicles and horse trailers while they are out for the day or longer.

The Secesh Volunteer Fire Department has not received training, nor do I believe they have adequate equipment for fighting structure fires. Your draft shows them as responsible for structural fire control in the Burgdorf and Warren Communities. This summer the fire truck was parked at Cris Bent's home. It is my understanding that there was no water in the tank and that the pump wasn't working. I am not sure by what process he was appointed as the Fire Chief, but he is currently the person in control of the equipment in the Secesh Meadows area. His wife is the president of the Secesh Meadows Property Owners Association, an organization that represents some of the property owners in the area.

Most if not all of the active members of the fire department are not year around residents. I do not know of any plan for fire suppression during the winter months. One cabin burned to the ground 2 winters ago in the area. We were fortunate that it did not spread to other structures.

The Idaho County Sheriffs Department sent several deputies in over the 4th of July weekend this past summer. They left before dark. A number of the residents in the area ignited fireworks which fell on neighbors' roofs, crossed the river and landed on neighbors' properties and could have created quite a fire hazard. There was no water in the fire truck during that holiday. The Fire Chief thought the fireworks were OK and that the Sheriffs Department could do nothing to stop them. The Sheriffs Department told me that they could issue citations if necessary. Communications need to improve as does the response time of the Sheriffs Department to this area.

Who do we call if a fire breaks out in the Secesh area? There is no posted list of numbers to call. I do not believe that there is any schedule of volunteers available or that they coordinate their times away from the area. Certainly, during the winter months, we have not seen Bent in the area.

In you discussion of Warren you mentioned the Unity and Rescue mines. There is a new mine which is starting operation in the area west of Warren. I do not know the name of the mine or the individuals in charge. The Charity mine has also been in operation several of the last summers east of Warren. A number of other mines are working at a much smaller scale.

The Forest Service has contracted the defueling of a ¼ mile strip in part of the area around the Secesh Meadows Subdivisions. The 2000 Burgdorf Burn moved several miles in less than an hour through an area with similar fuel loads. I think that a 3 mile fuel break would be more appropriate given the Forest Services response time, the proposed closure of roads on the west edge of the subdivisions and the current fuel loads. Material that has been cut in the buffer area is scheduled to be burned at some time in the future. Much of it is piled up against live trees. The smoke generated by the burning will keep several of the residents who suffer from asthma from being able to occupy their homes. At least one of those affected is a year round resident.

I wish I had more time to review the draft plan, but was unable to access the plan at the Warren Ranger Station. I've found that they are rarely open. Perhaps you should make a copy of the plan available either at the Back Country Bed and Breakfast or Winter Inn, both of which are open to the public and maintain more regular hours. I believe you would also obtain more local comment if copies of the plan were available at those locations. I had problems with printing the online and copy you sent me on disc. I had no problems printing the Valley Co. Plan. There was no public meeting scheduled in the south end of Idaho County. I think our County Commissioners would have a much better idea of the challenges we face if they were to visit that part of the county.

I believe the Forest Service should be encouraged to treat the area more like Yellow Pine in Valley County. Ingress and egress is similar. Fuel loads are greater in the Secesh area. There are similar patterns of residence and construction in the area.

Defueling in the Secesh area protects more than just private property. One of the last of two wild salmon runs in the State of Idaho spawns in the stretch of the Secesh River lying in within the Secesh Meadows Subdivisions. Salmon counts are down this year, I believe at least in part due to the amount of sediment released by the 2000 Burgdorf Burn. It is important to buffer the riparian area and the only way to effectively accomplish that is to buffer the area surrounding the subdivisions. A quarter mile buffer in not adequate when you consider the fuel loads and the historical movement of fire in the area. The Forest Service should be encouraged to leave all existing roads in place and to consider additional roads and improving roads in order to reduce response time to the area. The road from Burgdorf Junction into Secesh and Warren is very poorly maintained. It is not possible to travel at any speed either to bring equipment and personnel into the area or to evacuate individuals. Keeping roads open and allowing the cutting of burned timber for firewood would help defuel the forests in the area at little to no cost to the Forest Service. Restricting travel to the designated roads and no travel off-road restricts the ability of individuals to cut firewood in the area and remove that potential fuel load.

Thank you for considering my comments.

Sincerely,

Becky Johnstone

IV.3 Glenwood-Caribel Fire District

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in appropriate sections of the document.

Toby,

We have a 1200 gal tender and a pumper truck as well as grant money for start up and communications. Things are really starting to come together for our little fire district.

Thanks for the response on the fire plan,

Dave

Hi Toby,

We were just curious as to what stage the fire plan was at. We had a Glenwood/Caribel Fire District meeting last night and this is kind of my area and I had no clue as to where you were on this project.

We have received some grant money, some used equipment as well as a pumper truck and are at the top of the list to receive more as it becomes available. We gained quite a bit of momentum since I talked to

you last. We have a piece of ground for a fire hall and will build as grant money becomes available. Most of the districts residents are paid subscribers and have shown support for our efforts.

Let me know if the plan is complete and if we will receive a copy. The gal that is doing our grant writing seems to think she needs a copy to pursue some of the grants available.

Thanks,

Dave Woods

IV.4 Idaho County Resident

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. Comment one was included in appropriate sections of the document; however, no changes were made as a result of comment two.

Gentlemen/Mesdames

I commend your efforts. There is no question that Idaho County is threatened by wildfire and that the County/State/Federal governments should have a plan for coping with such an event. I think most of the areas were well covered, but I do have concerns about the following --

1. A major fire will fill the valleys with toxic fume and smoke requiring the evacuation of all (complete villages and all rural residents) in the effected areas. This is a complex task as Katrina has shown. I don't feel that this problem has been adequately addressed in your plan.

2. The setback requirements for rural structures seem arbitrary. Setback requirements should be based, not on judgment, but on engineering models comsidering terrain, foliage, house construction etc. It must be understood that setbacks are costly, both in terms of money and esthetic's. Accordingly, the requirements should be no more than what is needed to do the job.

Thank you for your consideration.

Jack Tallent

IV.5 Idaho Conservation League

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. Several of these comments brought up good discussion points; however, no specific changes were made in the document as a result of these comments.

Dear Idaho County Commissioners:

Thank you for the opportunity to submit comments on the Idaho County Wildland-Urban Interface Wildfire Mitigation Plan (Idaho County Plan). As Idaho's largest state-based conservation organization, the Idaho Conservation League (ICL) represents over 9,000 members, many of whom have a deep personal interest in protecting our air, water, wildlands, and wildlife. The ICL has a long history of involvement with fire management issues around the state, and specifically in Idaho County.

ICL represents numerous households in Idaho County, and staff and members have visited almost every corner of Idaho County, visiting with representatives of federal, state and local agencies, private timber companies, local organizations and citizens on numerous occasions. ICL staff and members have been engaged with fire and forest management at the project, landscape and national scale.

Personally, I was involved in the development of the Western Governors' Association's (WGA) 10-Year Comprehensive Wildfire Strategy and the accompanying Implementation Plan. Further, I am a member of

the Western Governors' Association's Forest Healthy Advisory Committee (FHAC). As a member of the FHAC I have recently been engaged in an effort to expand and clarify direction as it pertains to Collaboration in relation to the implementation of the WGA Wildfire Strategy.

The commission should be commended for producing one of the most thoroughly thought-out and comprehensive plans in the State, and likely the nation. The plan provides for many needed improvements in the delivery of fire awareness and safety in the county.

The ICL is committed to working with Idaho County to identify opportunities to work together to reduce fire risk, and to improve fire management activities throughout the county.

Our specific comments are attached below.

Sincerely,

Jonathan Oppenheimer

North Idaho Associate

Idaho Conservation League Comments on the Idaho County Wildland-Urban Interface Wildfire Mitigation Plan

Defensible Space, Firefighter Safety, Education and Building Codes

We are supportive of the emphasis in the plan on creating and maintaining defensible space around homes and communities. It is this zone, directly adjacent to homes and property at risk, where fuels management has been shown most effective. Significant research has been conducted in areas affected by wildfires, which has demonstrated the importance of reducing fuels in the immediate vicinity of homes. Jack Cohen with the Forest Service's Fire Sciences Lab has demonstrated numerous instances where homes were consumed by fire, even when adjacent trees were unburned.

We appreciate the reference to building codes to ensure that development that occurs in Idaho County incorporates principles of firesafe design. Along similar lines, it is important that the Idaho County Plan consider zoning to prevent construction of new homes in inappropriate locations. Even if homes are constructed with fire-resistant materials, if they are improperly sited on steep slopes, or in inaccessible areas, the risks to homeowners and firefighters will not have been fully addressed.

The recommendation to incorporate the International Fire Code in Idaho County should be expanded to elaborate on which portions of the codes will be enacted.

We are very supportive of efforts to increase fire education to ensure that Idaho County residents are aware of fire risk, mitigation opportunities and actions that can be taken to ensure, and enhance their safety.

Logging

We are concerned that the plan fails to recognize that logging, if not properly conducted, can actually exacerbate fire risk and rate of spread. A recognition that logging, especially if not focused on smaller diameter trees and accompanied by appropriate treatment of slash and follow-up treatments, can actually increase fire risk is both scientifically-accepted and generally understood. This should be readily apparent in Idaho County in the wake of the recent Blackerby Fire. According to unofficial reports, the fire was started in a slash pile left over from logging, and quickly spread through a continuous layer of slash on slopes that had been logged, but not treated to reduce slash accumulations.

Regardless of whether the cause or rate of spread of the Blackerby Fire was associated with past logging, peer-reviewed research indicates that logging, by opening up the forest canopy, leads to increased solar radiation, increased rates of evaporation, and increased wind speeds.

All of these factors can result in increased fire risk and rate of spread and should be incorporated into the Idaho County Plan.

Additionally, it is important to note that following logging, fine fuels (i.e. small diameter twigs, needles, branches, etc.) accumulate, and if not treated (i.e. through removal or burning) can significantly increase fire risk and spread rates.

We do not dispute that thinning, when applied in appropriate fire regimes and forest types, can serve to reduce fire risk and intensity, however it is inaccurate to suggest that any logging, in any location, serves the purpose of fire risk reduction.

We are curious what the basis for the following statement is: "One of the reasons that Idaho County forestlands have not been impacted by wildland fires to a greater degree historically, is the presence and activities related to active forest management, " (Idaho Count Plan, page 214). To our knowledge no research studies have indicated that past logging has effectively reduced the occurrence or risk of wildfire in the county.

Collaboration and HFRA

The Healthy Forests Restoration Act of 2003 (HFRA) lays out requirements for the process and substance of Community Wildfire Protection Plans (CWPP). The Idaho County Plan references the HFRA and states that the Idaho County Plan adheres to the requirements of a CWPP under the law. While the Idaho County Plan contains many of the components of a CWPP, the ICL questions whether the plan was developed pursuant to HFRA direction.

The document, "Preparing a Community Wildfire Protection Plan" (NACO, NASF, SAF and WGA, 2005) lays out a process for developing CWPPs and references minimum requirements for a CWPP. The process by which the Idaho County Plan was developed appears to have skipped a number of the steps, and failed to adequately involve interested parties in the development of the plan.

Instead, the plan appears to have been developed by local governmental authorities. Parties that do not appear to have been involved in the development of the plan include the Nez Perce Tribe, Idaho Fish and Game, U.S. Fish and Wildlife Service, NOAA Fisheries, and interested stakeholders (i.e. the Idaho Conservation League). While we certainly appreciate the consideration of these comments, we do not feel that a public comment and review process meets the requirements of collaboration under HFRA.

Consideration of Federal (USFS and BLM) Timber Sales and Fuel Reduction Projects

The listing of all timber sale and fuel reduction projects that are occurring (or in the planning stages) in Idaho County also fails to meet requirements under HFRA, or the Categorical Exclusions (CE) developed under the Healthy Forest Initiative. While a discussion of these projects in the Idaho County Plan is appropriate to indicate the work that the USFS and BLM are undertaking in the county, it should not suggest that these projects were developed collaboratively simply because they were listed in the Idaho County Plan.

Specific rules have been developed for the development of HFRA and CE projects that require the projects to be developed collaboratively. To our knowledge, none of the projects listed in the Idaho County Plan (sections 5.7.2 and 5.7.3) have been developed pursuant to any collaborative process.

Prioritization

Given the scope of work contained within the Idaho County Plan, it is important to clearly detail the priority of projects. The point ranking process to determine high, moderate and low priority projects is a good step, however it is unclear how specific projects ranked. Further, the scale of the work to be completed is quite large. As a result, clear direction would help to facilitate the potential for grants.

On page 209 of the Idaho County Plan (Section 5.1) a hierarchy of values to be used in the prioritization of mitigation activities is unclear. It is not clear what "Traditional Way of Life" refers to. Does this refer to indigenous sites important to the Nez Perce Tribe?

If this refers to traditional resource industries, i.e. logging, mining, agriculture and grazing, it would appear duplicative with the inclusion of "Local and Regional Economy" as one of the other priority values.

Evacuation Routes and Roadside Treatments

An assessment was conducted on the need to log adjacent to evacuation routes during the Slims Fire. A report, entitled, "Community Structure Protection and Evacuation Plan for Elk City and Surrounding Areas" (USFS, 2003) was conducted. The report concluded that extensive clearing of trees along the highway was not necessary for the purpose of ensuring safe evacuation of Elk City. We encourage you to incorporate the findings of this report in the Idaho County Plan.

IV.6 Avista Utilities

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in appropriate sections of the document.

Section 4.7.3.3.3 is incorrect. Mt. Idaho and Elk City have two separate lines for power. What happens in Elk City or in the South Fork Corridor above the Mt. Idaho Bridge on the S. Fork of the Clearwater does not affect the power in MT. Idaho.

What happens to the power in MT. Idaho does not affect the power to Elk City.

Someone needs to contact the Avista office in Grangeville about this. Eric Robie is the Local Rep. for that area.

There is a geographic area where the two separate circuits are on the same poles....but they are two separate circuits.

Ron Beitelspacher

This email was followed up with a phone call to the Grangeville Avista office. Mr. Robie confirmed Mr. Beitelspacher's account on the current situation of the power lines between Mt. Idaho and Elk City. He also added comments regarding the need to clear fuels from beneath the power poles on Forest Service property. Avista has been unable to gain access to do this type of mitigation due to environmental constraints.

IV.7 Idaho County Commissioner

This comment was researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in appropriate sections of the document.

Toby,

Do we have the Idaho County soil & water conservation district on the fire plan support list? S&WCD is a strong advocate of defensible space efforts. I just read their newsletter and the thought hit me; I wasn't sure I saw the organization on the list.

Jim

IV.8 Idaho County Disaster Management Coordinator

This comment was researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc.; however, it was not included in the document.

Toby:

One comment I did receive from a land owner in the Mt. Idaho/Cove Road area is that the county should take steps to establish a County Fire Department to increase the coverage structure protection and wildland capability. He understands the gaps in fire coverage that exist in the county, and feels a tax based county department would be preferable to the mix of tax and volunteer subscription entities that is currently in place. He also referenced the organization that Nez Perce County is attempting to establish in unincorporated areas there. Thx, Jerry

Jerry Zumalt

Idaho County

Disaster Mgm't. Coordinator

IV.9 Grangeville Resident

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in most of their entirety to appropriate sections of the document.

Commenter: Suzanne Acton, MS Forestry- Fire Science Emphasis CSU

I felt the overall document was generally well organized and researched. I found a few typos that I did not relate, as your word processors and reviewers will catch. However, I did provide substantive comments by section numbers. I hope you find these comments useful. If you need clarification, please contact me at the above phone/address. I would also like to be added to your contact list for information regarding this plan. Thank you!

1.1.3.13 Goals:3rd bullet, Suggest: "...that enhance private property rights..." instead of "diminish"

3.5 Vegetation and Climate Table 3.8- Numerous rows show 0%. I would suggest saying, "The following Vegetation Covertypes represent less than 1% of the county..."

3.9 Air Quality, 3rd paragraph..."The monitoring Unit <u>makes recommendations</u> which may restrict burning..."

3.9 Air Quality: I think it is deceptive to say "smoke management in Idaho County is managed by the Montana/Idaho airshed group". Add "…for federal and state prescribed burning." to make it a true statement. The air quality section should also reflect the agricultural burning that occurs in the **summer** and significantly affects air quality.

3.10.1 It is entirely inappropriate for this level of planning document to use references in which the writers do not have the document. This comment is in reference to the reference "McCoy et al. 2001 as cited in Norton 2002", Please get a copy of McCoy et al, or do not reference it.

3.10.1 I would also suggest using references for WUI definitions from sources other than Bear Valley EA. These definitions can be found in federally published documents. I highly doubt the authors of the Bear Valley EA created these definitions...go to the source. If needed, I have these sources readily available and would be willing to help you locate them.

4.1.2 2nd paragraph: "Slope plays a significant <u>role</u>..."

4.1.2 2nd paragraph, 2nd sentence. Rates of spread are influenced by fuel moistures, and in a drought year, the <u>fastest</u> rates of spread can be found on north aspects. I would suggest changing this sentence to say, "Therefore, we can expect <u>fast</u> rates of spread on steep, warm..."

4.1.3 Last sentence: Delete "the some of"

4.2 Wildfire hazards- Any thoughts to using local federal data, i.e. from BLM and FS Firestat database...easy analysis in FF+ (FireFamily+). ---National data is difficult to relate to Idaho County.

4.3.6 Fuel Models- when is the final version of the plan to be published? You may want to consider the new fuel models, as there are more of them, and would describe the County with more accuracy (also would be more work and might not be necessary at the county level, but should be investigated for specific projects).

4.4.1 There is a list of actions, but no further discussion of building codes.

4.4.1.4 4th paragraph, 4th sentence: "to conduct any type of <u>burn</u> shall..."

4.5.1.1 I suggest adding an example/blank Homesite Evaluation in the appendix.

4.6.3 I would like to see the maps of fire protection responsibilities 1. Structural fires and 2. Wildland fires (by agency or corporation), displayed within the main body of the plan, not the appendix. May be more appropriate in 4.8?

4.7.3 I would like to see stronger language regarding building codes. "Furthermore, building codes <u>shall</u> be established..."

4.12.2 I would like the committee to consider adding a project to the Road Improvements and Fuels Treatment Project list: Butcher Creek and tributaries (a few miles northeast of Grangeville). This area, a mix of state and private ownership, has heavy fuels and steep slopes below numerous subdivisions and unincorporated areas, which could easily lead to significant damage to homes and natural resources if a wildfire were to occur. Butcher Creek was subject to a significant blowout a few years ago, and the watershed is in poor condition. A wildfire could cause significant sedimentation in the downstream areas.

5.1 5th paragraph: Won't the prioritization of projects be facilitated by the Idaho County Wildfire Mitigation Coordinator? What is Jim's title"

5.7.2.3.1 Complete projects: descriptions should be in the past tense: "The Dixie Fuelbreak project has improved firefighter safety..."

6.4.1 Include a signature line for Jim...

Appendix p.8 Rural Fire Districts: Proposed Harpster/Grangeville---The Grangeville label is missing. I also suggest giving a number to these maps for ease of reference.

Thank you for the opportunity to comment!

IV.10 Ridge Runners Fire Department

These comments were researched and reviewed by the Wildland Fire Plan Committee, the Idaho County Commissioners, and Northwest Management, Inc. and included in most of their entirety to appropriate sections of the document.

Greetings,

As promised, here's my proofreading effort(prefaced with a few general notes. It's 23 minutes into 9/12 and I'll be emailing this to you as soon as I finish this sentence, and calling to see that it arrived.

While technically correct, as a rule, the repeated use of a semi-colon; the word "however," followed by a comma, and subsequent text, is a significant stumbling block in the smooth eye/mind digestion of a written work. An egregious example is found at §4.7.3.10 Woodland, Pardee, Caribel, and Glenwood, ¶ 2, lines #8-16. I quote only from lines #8-10:

"...A few homes remain in the area; however, there is no definitive community center. Much of this area has been cleared for agricultural purposes; however, forest vegetation remains...."

I admit that I tended to screw up my face at the above particular practice for the bulk of the text and only in a few cases felt aroused enough to suggest alternatives. I'll leave it to your in-house proofreader to chew over other examples in the final "Plan" product.

I violated your request that I suggest no "substantive editing" in the case of Clearwater and Harpster (found at §4.7.3.2) for several reasons. One glaring example was that while elsewhere you acknowledge Ridge Runner F.D., we were not included under the "Fire Protection" entry (§4.7.3.2.4), although BPC and Harpster F.Ds. were. We receive mutual aid from BPC and Harpster but in many cases (i.e.; during the Blackerby fire and our suggested ¶ 2) their resources are often stretched too thin to help or are too subject to distance and terrain to provide significant primary fire protection. Additionally, we have a total population approaching that of Kooskia larger than Clearwater & Harpster combined. Other suggested inclusions should be self-explanatory.

By way of a handy refresher, here's the sections you recommended I pay particular attention to:

1.1.4 3 4.4 4.8.1 4.10 4.12 5

Cheers, and thanks for all your efforts, -David Bearman

PS: Oops.... Double strike-throughs suggest elimination, <u>underlining</u> suggest inclusions and *italics* are my explanatory notes.

§1.1.4.1, ¶ 1, line 3 -- ...for a county-wide <u>countywide</u> (*like "statewide"*) Wildfire Mitigation Plan, (comma instead of semicolon) a....

Table 3.1, footnotes -- *Remove footnotes #1, 2 & 3, which refer to nothing in the text of the table as printed.*

§3.2.1, ¶ 3, line 4 -- ... the upper Clearwater county <u>country</u>.

§3.2.1, ¶7, line 3 -- ...\$1.25 No spaces btw. \$ and the figure.

§3.2.1.1.1 through §3.2.1.1.5 -- There is no mention that the untold billions(?) of board feet of timber within these forests are an incredible national treasure and are very much threatened by fire of 1910, if not larger, proportions.

§3.2.1.1.3, ¶ 2, line 5 -- ...number of undeveloped <u>camp</u>sites.

§3.2.1.1.9, line 4 -- ...trails attract.... No comma between these words.

§3.2.1.2, ¶ 1, line 5 -- ...<u>c</u>ounties.... Lowercase "c."

§3.2.1.2, ¶ 1, last line -- present and managed grazed.

§3.2.1.2, ¶ 2, line 4 -- ...industry provides <u>a</u> significant....

§3.2.1.2, ¶ 5, line 7 -- ...small log milling side <u>capability to their operation</u>. Not a yard but some machinery. ditto, ditto -- ...is located in Stites outside Kooskia and....

§3.3.1, ¶ 1, line 1 -- ...group of the Northwest Plateau....

Table 3.7, #2 -- I can find no mention of a "Vicory" Gulch in any of my reference works or on any of my maps.

§3.4, ¶ 1, line 9 -- ...relatively well-maintained,.... Eliminate space within hyphenated word.

§3.4, ¶ 4, line 4 -- ... Clearwater, <u>Tahoe Ridge/Big Cedar</u>, Lowell.... *Fire along Leitch Creek or Wilson Roads would severely hamper the arrival of mutual aid or other help*.

§3.7, ¶ 1, item #2 -- ...was <u>formed</u> in....

§3.7, ¶ last, line 2 -- ...Please refer to the Idaho....

§4.1, line 5 -- ...significant affect effect on....

§4.1.3, ¶ 1, line 4 -- ...moisture content and continuity.... Insert comma instead of "and." ditto, line 11 -- ...more energy and burn with.... Also erase comma.

§4.1.3, ¶ 2, line 2 -- ...and potentially potential development....

§4.1.3, ¶ 3, line 1 -- ...often-unexpected affect <u>effects</u> small.... ditto, ditto, line 4 -- ...research the some of.... *Also erase comma*.

§4.2.1, ¶ 4, line 1 -- ...have burned in the region of Idaho County....

§4.4, ¶ 1, line 1 -- Idaho County is comprised by of three....

§4.4, ¶ 3, line 6 -- ...dominate at mid-elevations middle elevations....

§4.4.1.1, ¶ 1 -- The black-lettering-on-a-yellow-background "No Burn Season" signs put up by Idaho Dept. of Lands are small, frequently set back from the road a bit, and the text amounts to a long-winded paragraph at posted speedlimits (which often serve as a <u>minimum</u> for drivers). In contrast, the "CALL 911 TO REPORT WILDFIRES" (or however they¹re worded) signage is large and colored to stand out well against the backdrop of local vegetation and geology. A simple, "SEASON CLOSED TO **ALL** OPEN FIRES," perhaps followed by a smaller "CALL [local IDL phone number] FOR PERMIT INFO," would be more of an attention-getter if sized like the above-mentioned "CALL 911..." signs. Fewer signs would be needed if they were comprehensible, while what to do with them in the "other" season is a question.

4.4.1.1, 2, line 2 -- ... contributed to the reduction....

§4.4.1.1, ¶ 3, line 2 -- ...expansion of the #FIRE program.... As mentioned above, there already exist large, white-on-blue-background "CALL 911 TO REPORT WILDFIRES" signs. It's hard enough teaching everyone to report fires by calling 911 and Sheriff's Dispatch serves quite well in disseminating information to the appropriate agency/organization in Idaho County(not to forget that a law enforcement component is frequently needed during wildfire response.

§4.4.1.1, ¶ 4, line 5 -- ...to conduct any type of <u>open burning</u> shall obtain a permit to prescribe <u>which</u> <u>prescribes</u> the....

ditto, ditto, line 7 -- ...suppress the fire (*erase comma*) from a.... ...this is a <u>state-wide</u> regulation.... (*eliminate space*)

ditto, ditto, line 9 -- ... the chief of within whichever fire

4.4.1.2, 1, line 3 -- of <u>and surrounding</u> the home. as to whether the home will survive the passing fire front.

§4.5.1.4, ¶ 1, line 3 -- ...concisely located locate homes....

§4.5.1.4, ¶ 2, line 1 -- Once physical address <u>addresses</u> are established.... ditto, ditto, line 2 -- ...roads and address addresses need to....

ditto, last sentence -- The ability to get local <u>The possession of accurate maps to by</u> the crews will significantly increase the ability of <u>help</u> fire management teams... protection (*erase comma*) and to implement....

§4.6.1, ¶ 1, line 3 -- ...Woodland, on the many of the.... ditto, ditto, line 5 -- ...around the community <u>communities</u> of Clearwater <u>and Tahoe Ridge/Big Cedar</u>.

§4.6.1, ¶ 4, line 5 -- ... these exotics responds respond well to....

4.6.3.1.2, 4, line 5 -- ..., there are a few incidences <u>such incidents</u> each year. ditto, last line -- ..., due to the lack of <u>flat</u> topography....

ditto, ditto, line 2 -- ...currently active; however, but seldom used. On the other hand, my understanding

was that the tracks were in the process of being, or had been, torn out now.

§4.6.3.1.5, ¶ 2, line 2 -- ...recent harvesting operations practices have....

§4.6.3.1.6, ¶ 2, line 2 -- ...from of the Salmon....

§4.6.3.2.2, last 2 lines -- ...risk due to the <u>flat</u> lack of topography....

§4.6.3.2.4, last line -- ...the other departments each other.

4.6.3.3.1, 2, line 6 -- ...landowner's landowners' boundaries; however, but... a few incidences such incidents each year.

§4.6.3.3.3, ¶ 2, line 8 -- ...and impacts to degradation of....

§4.6.3.4.1, ¶ 1, line 1 -- ... is typically typical of....

§4.6.3.4.2, ¶ 2, line 4 -- ...are access <u>accessed</u> via narrow....

§4.6.3.5, ¶ 1, line 2 -- ...western slope of the Salmon River....

§4.6.3.5.1, ¶ 2, line 5 -- ... of a torching and crowning wildfire.

§4.6.3.5.2, last line -- ...cleared <u>clearing</u> of hazardous....

§4.6.3.7.1, ¶ 1, line 1 -- ...sites is typically <u>typical</u> of.... ditto, ditto, line 6 -- ...from the both communities are....

§4.6.3.7.1, ¶ 2, line 5 -- ... of a torching and crowning wildfire.

§4.6.3.7.5, ¶ 1, line 1 -- ...area have moderate <u>risk</u> of experiencing....

§4.6.3.7.5, ¶ 3, line 4 -- ...fire behavior characteristics. (*insert comma*) making suppression.... ditto, line 5 -- ...Creek area <u>are</u> dependent on.... ditto, line 7 -- ...Forest Route 672, which, (*insert comma*) because fire....

§4.6.3.7.5, ¶ 4, line 1 -- ... are in danger of becoming threatened by rangeland fires....

§4.6.3.7.6, ¶ 1, line 8 -- ... of Slate Creek, and Lucille and the surrounding....

§4.6.3.7.6, ¶ 3, last line -- ...improvements along and signage of....

§4.6.3.8, ¶ 1, line 5 -- ...but there is <u>are</u> still....

4.6.3.8.1, 3, line 2 -- Due to current <u>recent</u> suppression.... ditto, ditto, line 7/8 -- ...and under conditions <u>in</u> which native....

4.6.3.8.1, ¶ 4, line 6 -- ...escape landowner¹s <u>landowners¹</u> boundaries; however, but... few <u>such</u> incidences <u>incidents</u> each....

§4.6.3.8.2, ¶ 1, line 3 -- ...road <u>off</u> of....

ditto, ditto, line 6 -- ...rangeland fuels; however, but it is....

§4.6.3.8.2, ¶ 2, line 2 -- ...narrow and winding, (insert comma) traveling through....

§4.6.3.8.2, ¶ 3, line 1 -- ...accessed by Deer Creek Road....

4.6.3.8.5, ¶ 1, line 5 -- ...compromised, resident <u>residents</u> would.... ditto, ditto, line 6 -- ...or to take....

§4.6.3.8.5, ¶ 2, line 3 -- ...area, <u>and</u> on four....

§4.6.3.8.5, ¶ 3, line 4 --which is <u>are</u> not....

§4.7.1, ¶ 3, line 7 -- ... years of fuel accumulation fuel <u>lead to</u> large,....

§4.7.1, ¶ 4, line 1 -- Idaho County is very unique in....

 $4.7.2, \P$ 1, line 3 -- ...conifer needles (*remove comma*) and homesites <u>structures themselves</u> are all.... ditto, line 5 -- ...all have an affect <u>effect</u> on fire....

4.7.2, 2, line 2/3 -- Eliminate second sentence (it's already said in the preceeding and succeeding sentences.

§4.7.2, ¶ 3, line 1 -- ...often-unexpected affect effect small....

 $4.7.2, \P 4$, line $1/2 - \dots$ communities are along a spectrum from subject to low.... ditto, line 9 -- ... due to the use....

§4.7.3.1, ¶ 2, last line -- ...users, fisherman <u>fishermen</u>, and explorers.

§4.7.3.1, ¶ 3, last line -- ...fire season, (insert comma) complete with....

4.7.3.1.1, 2, line 1/2 -- ...1910 fires; however, and evidence of more recent fires is visible surrounding....

§4.7.3.1.2, ¶ 1, line 7 -- ...population; however <u>but</u> only....

4.7.3.1.3, 3, line 1 -- ...do not have access to <u>commercial</u> electricity; however <u>but</u> underground.... ditto, line 6 -- ...McCall; however, <u>so</u> many residents....

§4.7.3.1.6, ¶ 1, line 8 -- ...Burgdorf, (insert comma) and Warren and....

§4.7.3.1.6, ¶ 3, line 1 -- ...activities are likely to include....

§4.7.3.2 Clearwater, and Harpster and Tahoe Ridge/Big Cedar

§4.7.3.2, ¶ 1, lines 1-2 -- The community town of Harpster is located.... The small town community of Clearwater.... *The definition of these two communities seemed to ve been inadvertently reversed* (Harpster has "city services" such as food/shopping and fuel, while Clearwater has none.

§4.7.3.2, Suggested ¶ 2 -- The community of Tahoe Ridge/Big Cedar lies directly east of Kooskia and

north across the thousand-foot deep valley of Clear Creek from Clearwater. It has no city or community center and its 650 residents live scattered over four drainages; Big Cedar Creek, Leitch Creek, Big Horse Canyon, and Tinker Creek. In addition to a growing population of retirees, resident income is derived mainly from employment outside the community. A few families are still involved with historic agriculture and timber pursuits, and Bennett Forest Industries has large timber holdings within the community boundaries.

§4.7.3.2.1, ¶ 2, line 1. ...two miles of both Harpster and Clearwater, <u>and forms the entire eastern and</u> part of the southern boundary of the Tahoe Ridge/Big Cedar community. Additionally, Tahoe Ridge/Big Cedar¹s northern boundary is the Middle Clearwater Wild & Scenic River corridor along the Middle Fork of the Clearwater River.

§4.7.3.2.1, ¶ 2, line 7 -- ...Big Cedar Creek, Leitch Creek, <u>Big Horse Canyon and Tinker Creek</u>, have denser....

§4.7.3.2.1, ¶ 4, lines 2 -- ...encompassed by the Nez Perce National Forest <u>and the Middle Clearwater</u> <u>Wild & Scenic River corridor</u> near <u>the</u> Clearwater, and Harpster, <u>and Tahoe Ridge/Big Cedar</u> <u>communities</u>.

§4.7.3.2.2, *Suggested addition at end of* ¶ 2 -- <u>Tahoe Ridge/Big Cedar community is accessed from</u> Kooskia by Leitch Creek Road (paved) and Wilson Road (gravel). Both roads are steep, narrow, winding, and travel through brush- and timber-type fuels which have received little or no fire mitigation management in many years. It is conceivable that spot fires from an incident along Battle Ridge paralleling and west of Clear Creek would close these evacuation routes.

§4.7.3.2.4, ¶ 1, line 3 -- *insert between existing sentences* <u>Ridge Runner Fire Department provides</u> residents of the Tahoe Ridge/Big Cedar community with wildfire and minimal structure fire protection. While Ridge Runners are working quickly to become fully equipped and trained to handle structure fires, Kooskia Fire Department is automatically paged-out when a structure is involved. Due to conditions and distances along Leitch Creek Road, Kooskia Fire Department is severely time-restricted in even getting into the Tahoe Ridge/Big Cedar community with its big engines, and response to farflung homes can take as long as an hour.</u>

§4.7.3.2.4, *Suggested* ¶ 2. <u>Nez Perce National Forest, Idaho Department of Lands, and Kooskia, Stites,</u> Harpster, BPC and Ridge Runner fire departments, all have an excellent working relationship with each other and in many cases have trained with each other. Mutual aid agreements between the various departments and agencies have either been formalized or are in-process. In addition, an Idaho County Fire Department Association has recently been formed with the intent of even further improving interagency communication and collaboration.

§4.7.3.3.1, ¶ 3, line 6 -- ...boundaries; however but there are a few incidences such incidents....

§4.7.3.3.3, ¶ 2, line 3 -- ...corridor effects affects the entire....

§4.7.3.4.2, ¶ 2, line 4 -- ...rocky and windy winding.

§4.7.3.4.2, ¶ 3, line 2 --a few, (*replace semicolon w/ comma*) gated drives are not common. This trend helps....

§4.7.3.4.6, ¶ 4, line 2 -- Designation <u>Designating</u> and posting of....

§4.7.3.5, ¶ 3, line 4 -- ...outbuildings, there is are several....

§4.7.3.5.2, ¶ 1, line 2 -- ...narrow and windy winding.

§4.7.3.5.3, ¶ 1, line 2 -- ...other recreationalists recreationalists into....

§4.7.3.5.5, ¶ 2, line 5 -- ...conditions and on private....

§4.7.3.5.5, ¶ 4, line 2 -- ... This These bovine <u>livestock</u> serve to eats.... Surely the grazing animals aren¹t all cattle.

§4.7.3.5.7, sub-head "Property Protection...," Aug. hardcopy page 147, line beginning "Some monies need to be...." -- <u>generator</u>, not generation *And by the way, it is <u>very</u> hard to single out an individual line for correction/consideration in the present (Aug.) format.*

Same as above, last ¶, line 2 -- ...organize a community service....

§4.7.3.6.1, ¶ 2, line 1 -- ...fuel types are highly variable....

§4.7.3.6.2, ¶ 1, line 1 -- ...serve as a potential....

§4.7.3.6.2, ¶ 2, next to last line -- ...function as an escape routes....

§4.7.3.6.3, ¶ 1, line 3 -- ...<u>recreationalists</u>

§4.7.3.6.5, ¶ 2, line 4 -- ...opposite side, (insert comma) thus compounding....

§4.7.3.6.6, ¶ 3, line 2 -- Designation Designating....

§4.7.3.7.1, ¶ 1, line 3 -- ...and Douglas-fir are

§4.7.3.7.2, ¶ 2, line 3 -- ...roads my <u>may</u> not be....

§4.7.3.7.3, ¶ 1, last line -- ...snowmobilers. (Period.) recreating in the Lolo pass area.

§4.7.3.7.5, ¶ 1, line 1 -- Homes are built....

§4.7.3.7.5, ¶ 2, line 4 -- ...opposite side, (insert comma) thus compounding....

§4.7.3.7.6, ¶ 3, line 2 -- Designation Designating....

§4.7.3.8, ¶ 1, line 6 -- ...noteworthy (remove comma) is....

§4.7.3.8.2, ¶ 1, line 2 -- ...narrow and windy winding....

§4.7.3.8.2, ¶ 2, line 1 -- ...narrow, windy winding....

§4.7.3.8.3, ¶ 4, line 4 -- has <u>have</u> been....

§4.7.3.8.5, ¶2, line 3/4 -- ... opposite side, (replace semicolon with comma) thus (remove comma)

compounding....

§4.7.3.9.1, ¶ 4, line 7 -- ... fireworks; thus increasing....

§4.7.3.9.1, ¶ 5, line 1 -- ...County, (replace semicolon w/ comma) but are....

§4.7.3.9.2, ¶ 2, line 4 -- ...serve as a potential...

§4.7.3.9.3, ¶ 1, line 2 -- ...has been the one of....

§4.7.3.9.3, ¶ 3, line 4 -- ...<u>recreationalists</u>

§4.7.3.9.6, ¶ 2, line 2 -- designation designating

§4.7.3.10.2, ¶ 4, line 9 -- windy winding ditto, ditto, line 10 -- Range <u>Ridge</u>

§4.7.3.10.3, ¶ 1, line 1 -- Residents <u>of</u> in the

§4.7.3.10.3, ¶ 4, line 3 -- ...there has <u>have</u> been....

§4.7.3.10.4 -- *I* notice no mention is made of the startup fire department in the Glenwood community, although Glenwood is part of this section.

§4.8.1, Ridge Runner Fire Department -- Leigh Davis Ben Anderberg, Chief.

§4.8.1, sub-head "Unsafe or Illegal Burning Practices," line 2 -- ... be aggressively and <u>implemented and</u> aggressively enforced....

§4.8.2.1, first entry -- 1956 pumper. Does not conform to NFPA standards....

§4.8.3, under "District Summary," line 6 -- ...responses nave <u>have</u> been.... ditto, line 7 -- ...job get <u>gets</u> more....

§4.8.4, sub-head "Priority Areas," sub-sub-head "Personal Protective Equipment," line 3 -- ...grant was and were able....

§4.10.2, line 2 -- ...appears as though many....

§4.12.1, sub-head "Ridge <u>Runner</u> Fire District" -- "Sally Ann Ck/Silt Creek Estates" are not within our Fire District; they are in the Clearwater/Harpster region.

§4.12.2, sub-head "Kooskia Area" -- Add <u>Wilson Road</u> as it is one of our (Ridge Runner FD) two primary evacuation routes, and <u>Red Fir</u>, Crane Hill, <u>Big Cedar</u>, Long Bluff & Mulledy Roads, and all "Private Drives."

§5, lines 1/2 -- ...identification of, and implementation of....

§5.1.1.2, line 5 -- ...directly affects effects the....

§5.1.1.3, line 7 -- ...directly affects property....

Table 5.1, entry 5.1.a -- The explanation under "Goals and Objectives" does not relate to the "Action Item."

ditto, entry 5.1.b -- *The explanation under "Goals and Objectives" does not relate to the "Action Item."* ditto, entry 5.1.d -- *The explanation under "Goals and Objectives" does not relate to the "Action Item."* §5.4, **bold** entry "**Forest Management**," line 6 -- ...these lands(*remove comma*) and the federal agencies, (*insert comma*) are generally....

§5.4, **bold** entry "**Agriculture**," whole sentence line 3/4 -- *No clue what this was intended to say.* ditto, line 7 -- *Remove first two commas.*

Table 5.2, §5.2.h, sub-head under "Defensible Space Project Areas" -- Leitch Creek Defensible....

Table 5.2, §5.2.i -- Add Wilson Road, one of our two primary evacuation routes. Also add Wilson Road on the next page under "Roadside Fuels Projects."

Table 5.4, §5.4.d, under "Action Item" -- Add handheld radios, personal protective equipment Either we overlooked adding PPE to our "wish list" that was the basis for Table 4.12 or it was missed when you folks typed in the text.

Table 5.4, §5.4.1 (lowercase "L") -- I'd suggest adding <u>Recruitment</u> to the mix(a biggie for all fire departments in Idaho.

§5.7.2.3.2.4, end of line 2 -- Add comma after ... condition

§5.7.2.3.2.6, line 1 -- ...fuels be <u>by</u> prescribed.... Nation<u>al</u>.... ditto, ditto, line 4 -- ...underburning, (*insert comma*) fuel....

§5.7.2.3.2.7, line 4 -- ...underburning, (insert comma) fuel....

§5.7.2.3.2.10, lines 2 & 3 -- Replace all three semicolons with commas.

§5.7.2.4.1.7, line 1 -- ...project includes....

§5.7.2.5.1.1, 2, 3, & 4 -- It¹s suggested one contact several individuals in all these entries, but no contact info is provided.

§5.7.2.6.1.1, 2, 4, & 5 -- It¹s suggested one contact several individuals in all these entries, but no contact info is provided.

§5.7.2.6.2.1, 2, & 3 -- It's suggested one contact several individuals in all these entries, but no contact info is provided.

§5.7.3.1, ¶ 2, line 1 -- This <u>The</u>

§5.7.3.2, ¶ 2, last line -- ...would also <u>include</u>:

§5.7.3.3, line 9 -- ...continue an and upward....

§5.7.3.7, line 3 -- ...that include (*remove comma*)

§5.7.4.1, ¶ 2, line 3 -- ... The treatment (*singular*)

§6.4.3, first department listed -- Leigh Davis <u>Ben Anderberg</u>, Chief *and* Ridge Runner Rural Fire Department

Finally, I¹d suggest defining "Activity Fuels" in the Glossary.

Greetings,

My scanner wouldn't do the trick so I'm left trying to get this to you "overnight." In an ideal world, it should arrive Tuesday, Sept. 13—yes, a day late.

Our map being hand-colored in the style of the Draft Plan maps, all the highlighted roads' rights of way could do with a bit of checking by the Idaho County Road Department—especially Wilson Road, one of our district's two primary potential evacuation or mutual aid response routes. Several of them seem to have potential problem-trees.

All of the "Private Drives" (5 in number in our district) preclude any excitement on the part of Ridge Runner Fire Department to enter them in time of emergency. All present a special problem because their maintenance is dependent on homeowners associations, and at least four of these associations seem reluctant to improve accessibility or safety.

All of the yellow crosshatched areas represent areas in which we would like to do extensive home assessments and see mitigation work completed.

Hoping that our "day late" doesn't translate as a "dollar short," we remain grateful for your work,

David Bearman, Ass't. Secy.-Treas. Ridge Runner Fire Department (208) 926-4381

