

Chapter I: Overview of this Plan and its Development

1 Introduction

This Community Wildfire Protection Plan for Yellowstone County, Montana, is the result of analyses, professional cooperation and collaboration, assessments of wildfire risks and other factors considered with the intent to reduce the potential for wildfires to threaten people, structures, infrastructure, and unique ecosystems in Yellowstone County, Montana. This Community Wildfire Protection Plan is an amendment to the Yellowstone County Pre Disaster Mitigation Plan, which was approved by FEMA in January 2005. The Yellowstone County Commissioners led the planning team responsible for implementing this project. Agencies and organizations that participated in the planning process included:

- Yellowstone County Commissioners and County Departments
- Yellowstone County Fire Warden
- Yellowstone County Disaster and Emergency Services
- Montana Department of Natural Resources and Conservation
- USDI Bureau of Land Management (also providing funding through the National Fire Plan)
- USDA Forest Service
- USDI Bureau of Indian Affairs
- Yellowstone County Fire Departments
- Town of Broadview
- Big Sky Economic Development Authority
- Yellowstone County Fire Districts and Fire Service Areas
- City of Billings
- Deaconess Hospital
- USDI Bureau of Reclamation
- U.S. Department of Homeland Security
- Beartooth Resource Conservation and Development Council
- Montana Fish, Wildlife, & Parks
- City of Laurel
- USDA Natural Resources Conservation Service
- Montana Disaster and Emergency Services
- Northwest Management, Inc.

The Yellowstone County Commissioners solicited competitive bids from companies to provide the service of leading the assessment and the writing of the **Yellowstone County Community Wildfire Protection Plan**. The Commissioners selected Northwest Management, Inc., to provide this service. Northwest Management, Inc., is a professional natural resources consulting

firm located in Helena, Montana. Established in 1984, NMI provides natural resource management services across the USA. The Project Manager from Northwest Management, Inc. was Dr. William E. Schlosser, a professional forester and regional planner.

1.1 Goals and Guiding Principles

1.1.1 Federal Emergency Management Agency Philosophy

Effective November 1, 2004, a Local Hazard Mitigation Plan approved by the Federal Emergency Management Agency (FEMA) is required for Hazard Mitigation Grant Program (HMGP) and Pre-Disaster Mitigation Program (PDM) eligibility. The HMGP and PDM program provide funding, through state emergency management agencies, to support local mitigation planning and projects to reduce potential disaster damages.

The new local hazard mitigation plan requirements for HMGP and PDM eligibility is based on the Disaster Mitigation Act of 2000, which amended the Stafford Disaster Relief Act to promote an integrated, cost effective approach to mitigation. Local hazard mitigation plans must meet the minimum requirements of the Stafford Act-Section 322, as outlined in the criteria contained in 44 CFR Part 201. The plan criteria cover the planning process, risk assessment, mitigation strategy, plan maintenance, and adoption requirements.

FEMA will only review a local hazard mitigation plan submitted through the appropriate State Hazard Mitigation Officer (SHMO). Draft versions of local hazard mitigation plans will not be reviewed by FEMA. FEMA will review the final version of a plan prior to local adoption to determine if the plan meets the criteria, but FEMA will be unable to approve it prior to adoption. In Montana the SHMO is:

Montana Disaster and Emergency Services
P.O. Box 4789 - 1900 Williams Street
Helena, Montana 59604-4789
Dan McGowen, 841-3911 - FAX: 841-3965

A FEMA designed plan will be evaluated on its adherence to a variety of criteria.

- Adoption by the Local Governing Body
- Multi-jurisdictional Plan Adoption
- Multi-jurisdictional Planning Participation
- Documentation of Planning Process
- Identifying Hazards
- Profiling Hazard Events
- Assessing Vulnerability: Identifying Assets
- Assessing Vulnerability: Estimating Potential Losses
- Assessing Vulnerability: Analyzing Development Trends
- Multi-Jurisdictional Risk Assessment
- Local Hazard Mitigation Goals
- Identification and Analysis of Mitigation Measures
- Implementation of Mitigation Measures
- Multi-Jurisdictional Mitigation Strategy
- Monitoring, Evaluating, and Updating the Plan
- Implementation Through Existing Programs
- Continued Public Involvement

1.1.2 Additional State and Federal Guidelines Adopted

The Community Wildfire Protection Plan will include compatibility with FEMA requirements while also adhering to the guidelines proposed in the National Fire Plan and the Healthy Forests Restoration Act (2004). This Community Wildfire Protection Plan has been prepared in compliance with:

- The National Fire Plan; A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy Implementation Plan–May 2002.
- Northern Rockies Coordinating Group
- Healthy Forests Restoration Act (2004)
- The Federal Emergency Management Agency’s guidelines for a Local Hazard Mitigation Plan as defined in 44 CFR parts 201 and 206, and as related to a fire mitigation plan chapter of a Natural Hazards Mitigation Plan.

“When implemented, the 10-Year Comprehensive Strategy will contribute to reducing the risks of wildfire to communities and the environment by building collaboration at all levels of government.”

- The NFP 10-Year Comprehensive Strategy August 2001

The objective of combining these four complimentary guidelines is to facilitate an integrated wildland fire risk assessment, identify pre-hazard mitigation activities, and prioritize activities and efforts to achieve the protection of people, structures, the environment, and significant infrastructure in Yellowstone County while facilitating new opportunities for pre-disaster mitigation funding and cooperation.

1.1.2.1 National Fire Plan

The goals of this Community Wildfire Protection Plan include:

1. Improve Fire Prevention and Suppression
2. Reduce Hazardous Fuels
3. Restore Fire-Adapted Ecosystems
4. Promote Community Assistance

Its three guiding principles are:

1. Priority setting that emphasizes the protection of communities and other high-priority watersheds at-risk.
2. Collaboration among governments and broadly representative stakeholders
3. Accountability through performance measures and monitoring for results.

This Community Wildfire Protection Plan fulfills the National Fire Plan’s 10-Year Comprehensive Strategy. The projects and activities recommended under this plan are in addition to other Federal, state, and private / corporate forest and rangeland management activities. The implementation plan does not alter, diminish, or expand the existing jurisdiction, statutory and regulatory responsibilities and authorities or budget processes of participating Federal, State, and tribal agencies.

By endorsing this implementation plan, all signed parties agree that reducing the threat of wildland fire to people, communities, and ecosystems will require:

- Firefighter and public safety continuing as the highest priority.
- A sustained, long-term and cost-effective investment of resources by all public and private parties, recognizing overall budget parameters affecting Federal, State, Tribal, and local governments.
- A unified effort to implement the collaborative framework called for in the Strategy in a manner that ensures timely decisions at each level.
- Accountability for measuring and monitoring performance and outcomes, and a commitment to factoring findings into future decision making activities.
- The achievement of national goals through action at the local level with particular attention on the unique needs of cross-boundary efforts and the importance of funding on-the-ground activities.
- Communities and individuals in the wildland-urban interface to initiate personal stewardship and volunteer actions that will reduce wildland fire risks.
- Management activities, both in the wildland-urban interface and in at-risk areas across the broader landscape.
- Active forestland and rangeland management, including thinning that produces commercial or pre-commercial products, biomass removal and utilization, prescribed fire and other fuels reduction tools to simultaneously meet long-term ecological, economic, and community objectives.

The National Fire Plan identifies a three-tiered organization structure including 1) the local level, 2) state/regional and tribal level, and 3) the national level. This plan adheres to the collaboration and outcomes consistent with a local level plan. Local level collaboration involves participants with direct responsibility for management decisions affecting public and/or private land and resources, fire protection responsibilities, or good working knowledge and interest in local resources. Participants in this planning process include Tribal representatives, local representatives from Federal and State agencies, local governments, landowners and other stakeholders, and community-based groups with a demonstrated commitment to achieving the strategy's four goals. Existing resource advisory committees, watershed councils, or other collaborative entities may serve to achieve coordination at this level. Local involvement, expected to be broadly representative, is a primary source of planning, project prioritization, and resource allocation and coordination at the local level. The role of the private citizen is not to be underestimated, as their input and contribution to all phases of risk assessments, mitigation activities, and project implementation is greatly facilitated by their involvement.

1.1.2.1.1 Montana's Endorsement of the National Fire Plan

In May 2002, Montana Governor Martz, as a member of the Western Governors' Association, helped develop the *10-Year Comprehensive Strategy* and an implementation plan, titled *A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment*. With the Western Governors' Association endorsement of the Implementation plan, Montana adopted the national implementation plan as its own.

NFP funding to the states occurs under the community assistance point and is made available through the USFS, state, and private forestry programs. DNRC has responsibility for delivery of

these programs on state-owned and private lands in Montana. NFP funding can also come directly from Department of Interior agencies.

The DNRC NFP Program is implemented primarily within the Forestry Division's Fire and Aviation Management Bureau (FAMB) and Service Forestry Bureau (SFB). The National Fire Plan is delivered, wherever appropriate, through existing state and private forestry programs. These programs are:

- County Cooperative Fire Program (FAMB)
- State Fire Assistance Program (FAMB)
- Private Forestry Assistance Program (SFB)
- Stewardship Program (SFB)

The Volunteer and Rural Fire Assistance (VFA/RFA) Program provides assistance to county fire agencies for equipment, training, and fire prevention materials. Adding National Fire Plan funding resulted in a grant program with more money than ever before. Again in 2003, the Department of the Interior agencies (FWS, BIA, & BLM) contributed their budgeted Rural Fire Assistance Program dollars to be combined with the Volunteer Fire Assistance funds granted by the USDA Forest Service. The total assistance available in Montana exceeded \$1.1 million in 2003. DNRC and its partners were recognized with the Ben Franklin Award, given by the Forest Service annually to one state for excellence in delivering these programs.

1.1.2.2 Northern Rockies Coordinating Group

The Northern Rockies Coordination Group (NRCG) was established to provide an interagency approach to wildland fire management and all-risk support on all land ownerships within the States of Montana, North Dakota, northern Idaho, and a small portion of South Dakota and Wyoming. NRCG is made up of representatives from the Montana Fire Warden's Association, Montana Disaster and Emergency Services Division, Montana Department of Natural Resources and Conservation, Idaho Department of Lands, North Dakota Forest Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, Fish and Wildlife Service, Forest Service, Montana Fire Chief's Association, and Montana Sheriff's and Peace Officer's Association. The purpose of NRCG is to further interagency cooperation, communications, coordination, and to provide interagency fire management direction and all-risk support for the Northern Rockies Geographic Area.

1.1.2.2.1 County Wildland Fire Interagency Group

Each County within the state has been requested to write a Community Wildfire Protection Plan. These plans should contain at least the following five elements:

- 1) Documentation of the process used to develop the mitigation plan. How the plan was developed, who was involved and how the public was involved.
- 2) A risk assessment to identify vulnerabilities to wildfire in the wildland-urban interface (WUI).
- 3) A prioritized mitigation strategy that addresses each of the risks. Examples of these strategies could be: training for fire departments, public education, hazardous fuel treatments, equipment, communications, additional planning, new facilities, infrastructure improvements, code and/or ordinance revision, volunteer efforts, evacuation plans, etc.

- 4) A process for maintenance of the plan which will include monitoring and evaluation of mitigation activities
- 5) Documentation that the plan has been formally adopted by the involved agencies. Basically a signature page of all involved officials.

This five-element plan is an abbreviated version of the FEMA mitigation plan and will be an amendment to the Yellowstone County Pre Disaster Mitigation Plan. To develop these plans each county should bring together the following individuals, as appropriate for each county, to make up the County Wildland Fire Interagency Group. It is important that this group has representation from agencies with wildland fire suppression responsibilities:

- County Commissioners (Lead)
- Local Fire Chiefs
- Montana Department of Natural Resources and Conservation representative
- USDA Forest Service representative
- USDI Bureau of Land Management representative
- US Fish and Wildlife representative
- Bureau of Indian Affairs
- Local Tribal leaders
- Division of Disaster and Emergency Services
- LEPC Chairperson
- Resource Conservation and Development representative
- State Fish and Game representative
- Interested citizens and community leaders as appropriate
- Other officials as appropriate

If requested by the County Commissioners, the local Resource Conservation and Development Councils may be available to assist the County Commissioners in evaluating each County within their council area to determine if there is a community wildfire protection plan in place, or if a plan is currently in the development phase. If no plan is in place, the RC&D's, if requested, could be available to assist the Commissioners with the formation of the County Wildland Fire Interagency Group and/or to facilitate the development of a community wildfire protection plan.

If a plan has been previously completed, the Commissioners will determine if the recommended five elements have been addressed. The Counties will provide a copy of the completed mitigation plan to the Montana Department of Natural Resources and Conservation Fire Plan Coordinator, which will include a contact list of individuals that developed the plan.

1.1.2.3 National Association of State Foresters

1.1.2.3.1 Identifying and Prioritizing Communities at Risk

This plan is written with the intent to provide the information necessary for decision makers (elected officials) to make informed decisions in order to prioritize projects across the entire county. These decisions may be made from within the Board of Commissioners, or through the recommendations of ad hoc groups tasked with making prioritized lists of projects. It is not necessary to rank projects numerically, although that is one approach, rather it may be possible to rank them categorically (high priority set, medium priority set, and so forth) and still accomplish the goals and objectives set forth in this planning document.

The following was prepared by the National Association of State Foresters (NASF), June 27, 2003, and is included here as a reference for the identification of prioritizing treatments between communities.

Purpose: To provide national, uniform guidance for implementing the provisions of the “Collaborative Fuels Treatment” MOU, and to satisfy the requirements of Task e, Goal 4 of the Implementation Plan for the 10-Year Comprehensive Strategy.

Intent: The intent is to establish broad, nationally compatible standards for identifying and prioritizing communities at risk, while allowing for maximum flexibility at the state and regional level. Three basic premises are:

- Include all lands and all ownerships.
- Use a collaborative process that is consistent with the complexity of land ownership patterns, resource management issues, and the number of interested stakeholders.
- Set priorities by evaluating projects, not by ranking communities.

The National Association of State Foresters (NASF) set forth the following guidelines in the Final Draft Concept Paper; Communities at Risk, December 2, 2002.

Task: Develop a definition for “communities at risk” and a process for prioritizing them, per the Implementation Plan for the 10-Year Comprehensive Strategy (Goal 4.e.). In addition, this definition will form the foundation for the NASF commitment to annually identify priority fuels reduction and ecosystem restoration projects in the proposed MOU with the federal agencies (section C.2 (b)).

1.1.2.3.2 Conceptual Approach

1. NASF fully supports the definition of the Wildland Urban Interface (WUI) previously published in the Federal Register. Further, proximity to federal lands should not be a consideration. The WUI is a set of conditions that exists on, or near, areas of wildland fuels nation-wide, regardless of land ownership.
2. Communities at risk (or, alternately, landscapes of similar risk) should be identified on a state-by-state basis with the involvement of all agencies with wildland fire protection responsibilities: state, local, tribal, and federal.
3. It is neither reasonable nor feasible to attempt to prioritize communities on a rank order basis. Rather, communities (or landscapes) should be sorted into three, broad categories or zones of risk: high, medium, and low. Each state, in collaboration with its local partners, will develop the specific criteria it will use to sort communities or landscapes into the three categories. NASF recommends using the publication “Wildland/Urban Interface Fire Hazard Assessment Methodology” developed by the National Wildland/Urban Interface Fire Protection Program (circa 1998) as a reference guide. (This program, which has since evolved into the Firewise Program, is under the oversight of the National Wildfire Coordinating Group (NWCG)). At minimum, states should consider the following factors when assessing the relative degree of exposure each community (landscape) faces.
 - **Risk:** Using historic fire occurrence records and other factors, assess the anticipated probability of a wildfire ignition.
 - **Hazard:** Assess the fuel conditions surrounding the community using a methodology such as fire condition class, or [other] process.

- **Values Protected:** Evaluate the human values associated with the community or landscape, such as homes, businesses, and community infrastructure (e.g. water systems, utilities, transportation systems, critical care facilities, schools, manufacturing and industrial sites, and high value commercial timber lands).
 - **Protection Capabilities:** Assess the wildland fire protection capabilities of the agencies and local fire departments with jurisdiction.
4. Prioritize by project not by community. Annually prioritize projects within each state using the collaborative process defined in the national, interagency MOU “For the Development of a Collaborative Fuels Treatment Program”. Assign the highest priorities to projects that will provide the greatest benefits either on the landscape or to communities. Attempt to properly sequence treatments on the landscape by working first around and within communities, and then moving further out into the surrounding landscape. This will require:
 - First, focus on the zone of highest overall risk but consider projects in all zones. Identify a set of projects that will effectively reduce the level of risk to communities within the zone.
 - Second, determine the community’s willingness and readiness to actively participate in an identified project.
 - Third, determine the willingness and ability of the owner of the surrounding land to undertake, and maintain, a complementary project.
 - Last, set priorities by looking for projects that best meet the three criteria above. It is important to note that projects with the greatest potential to reduce risk to communities and the landscape may not be those in the highest risk zone, particularly if either the community or the surrounding landowner is not willing or able to actively participate.
 5. It is important, and necessary, that we be able to demonstrate a level of accomplishment that justifies to Congress the value of continuing the current level of appropriations for the National Fire Plan. Although appealing to appropriators and others, it is not likely that many communities (if any) will ever be removed from the list of communities at risk. Even after treatment, all communities will remain at some, albeit reduced, level of risk. However, by using a science-based system for measuring relative risk, we can likely show that, after treatment (or a series of treatments); communities are at “*reduced risk*”.

Similarly, scattered, individual homes that complete projects to create defensible space could be “counted” as “households at reduced risk”. This would be a way to report progress in reducing risk to scattered homes in areas of low priority for large-scale fuels treatment projects.

Using the concept described above, the NASF believes it is possible to accurately assess the relative risk that communities face from wildland fire. Recognizing that the condition of the vegetation (fuel) on the landscape is dynamic, assessments and re-assessments must be done on a state-by-state basis, using a process that allows for the integration of local knowledge, conditions, and circumstances, with science-based national guidelines. We must remember that it is not only important to lower the risk to communities, but once the risk has been reduced, to maintain those communities at a reduced risk.

Further, it is essential that both the assessment process and the prioritization of projects be done collaboratively, with all local agencies with fire protection jurisdiction – federal, state, local, and tribal – taking an active role.

1.1.2.4 Healthy Forests Restoration Act

On December 3, 2003, President Bush signed into law the Healthy Forests Restoration Act of 2003 to reduce the threat of destructive wildfires while upholding environmental standards and encouraging early public input during review and planning processes. The legislation is based on sound science and helps further the President's Healthy Forests Initiative pledge to care for America's forests and rangelands, reduce the risk of catastrophic fire to communities, help save the lives of firefighters and citizens, and protect threatened and endangered species.

Among other things the Healthy Forests Restoration Act (HFRA):

- Strengthens public participation in developing high priority projects;
- Reduces the complexity of environmental analysis allowing federal land agencies to use the best science available to actively manage land under their protection;
- Creates a pre-decisional objections process encouraging early public participation in project planning; and
- Issues clear guidance for court action challenging HFRA projects.

The Yellowstone County Community Wildfire Protection Plan is developed to adhere to the principles of the HFRA while providing recommendations consistent with the policy document which should assist the federal land management agencies (US Forest Service and Bureau of Land Management) with implementing wildfire mitigation projects in Yellowstone County that incorporate public involvement and the input from a wide spectrum of fire and emergency services providers in the region.

1.1.3 Local Guidelines and Integration with Other Efforts

1.1.3.1 Yellowstone County Fire Mitigation Planning Effort and Philosophy

The goals of this planning process include the integration of the National Fire Plan, the Western Governors Association Implementation Strategy, the Healthy Forests Restoration Act, and the requirements of FEMA for a countywide Community Wildfire Protection Plan, a component of the County's All Hazards Pre-Disaster Mitigation Plan. This effort will utilize the best and most appropriate science from all partners, the integration of local and regional knowledge about wildfire risks and fire behavior, while meeting the needs of local citizens, the regional economy, the significance of this region to the rest of Montana and the Inland West.

1.1.3.1.1 Mission Statement

To make Yellowstone County residents, communities, state agencies, local governments, and businesses less vulnerable to the negative effects of wildland fires through the effective administration of wildfire hazard mitigation grant programs, hazard risk assessments, wise and efficient fuels treatments, and a coordinated approach to mitigation policy through federal, state, regional, and local planning efforts. Our combined prioritization will be the protection of people, structures, infrastructure, and unique ecosystems that contribute to our way of life and the sustainability of the local and regional economy.

1.1.3.1.2 Vision Statement

Institutionalize and promote a countywide wildfire hazard mitigation ethic through leadership, professionalism, and excellence, leading the way to a safe, sustainable Yellowstone County.

1.1.3.1.3 Goals

- To reduce the area of WUI land burned and losses experienced because of wildfires where these fires threaten communities in the wildland-urban interface
- Prioritize the protection of people, structures, infrastructure, and unique ecosystems that contribute to our way of life and the sustainability of the local and regional economy
- Educate communities about the unique challenges of wildfire in the wildland-urban interface (WUI)
- Establish mitigation priorities and develop mitigation strategies in Yellowstone County
- Strategically locate and plan fuel reduction projects
- Provide recommendations for alternative treatment methods, such as modifying forest stand density, herbicide treatments, fuel reduction techniques, and disposal or removal of treated slash
- Meet or exceed the requirements of the National Fire Plan and FEMA for a County level Wildfire Protection Plan

1.1.3.2 Yellowstone County and City of Billings 2003 Growth Policy Plan

The Growth Policy Plan provides a vision for the County that indicates how it wants to develop and make public investments over the next 20 years. It analyzes land use, natural resources, public facilities, local services, population, economics, and housing to identify local issues and devise appropriate policies that will address those issues in a manner consistent with this vision. It provides the long-range focus to help decision-makers set priorities and evaluate whether development proposals are consistent with this vision. It is a tool to coordinate with other government agencies and to communicate to citizens and developers the vision of the community. The Plan provides the framework for regulatory updates, land use decisions, and public investments and will be an invaluable resource for the County as it enters the 21st Century.

The plan is a dynamic document that represents a continuous process of setting goals and establishing priorities on actions to achieve those goals. This plan provides for periodic updates and review of the plan. These updates will allow the County to reflect changing conditions and take advantage of new opportunities.