

## **SMR – Wildfire Protection Plan – Notes**

**§ Existing Conditions** – As written, this section provides a one-paragraph, general description of why a Wildfire Protection Plan is important. It does not detail existing vegetative/forested/topographical conditions throughout the SMR area. This section should include a detailed analysis of existing vegetative and forested conditions throughout the development. Because of the size of the development, ideally this section would break down the development into “units”, with each unit including details that provide site specific vegetative health, age class, density, and species composition, as well as slope, gradient and prevailing/dominant winds. We should be able understand what the ground fuel and canopy composition looks like and it should provide us with an adequate foundation as the site specific wildfire risk analysis unfolds later in the document, as well as protective/mitigation measures that may be implemented to reduce risk (also should follow later in the document).

**§ Wildfire Protection Plan Objectives and Strategies** – As written, this section provides general “template” feedback gathered from the CWPP. It identifies the 4 County priorities listed in the CWPP and lists general reasons why it’s important to a plan and strategy in place. However, similar to the rest of the document, it lacks any site specific detail that can inform the reader/community how this plan can be implemented over time to reduce wildfire risk throughout SMR. It should incorporate the existing development layout, and identify how the development plan (i.e., where are the lots located within proximity to slope/vegetation type? What strategies or objectives have been identified to reduce the risk of combustion and increase the viability of safe evacuation, should a wildfire occur?) may be utilized to increase safety and preparedness.

**§ Strategies** – While this section lists appropriate mechanisms that may be implemented to reduce risk, there is nothing in this section (nor later in the document) that grounds these strategies in process or conditions applicable to SMR. For example, what kind of remote sensing technologies will be used to identify high-risk areas? How will areas be prioritized for mechanical treatment and/or controlled burning? Is controlled burning even a viable option for SMR, considering liability? How will homeowners and the HOA know what qualifies as defensible space or what is “flammable vegetation”? Etc.

**§ Landscape Analysis** – We are provided with an overview of what a Landscape Analysis is, and why it’s important, and what factors should be considered when providing the analysis, but there is no analysis provided for SMR. This section should overlay the existing forested conditions and vegetation types with the development plan. Where does vegetation interface with infrastructure? Are there risks associated? What kind of treatment may be implemented to reduce this risk? Etc.

**§ IFTDSS Maps** – The maps provided from the Interagency Fuel Treatment Decision Support System should not replace substantive details of the analyzed site conditions. Modeling is one tool that may be used to supplement (not replace) existing conditions and threats on the ground. Ground truthing the SMR conditions and using that information to assess infrastructure planning is hugely critical in the viability and safety of the community with regard to wildfire threats. Additionally, that maps included from the IFTDSS site do not have an interpretive section so that the reader can understand what vegetation types exist. It provides a legend with Fuel Models listed as “FBFM5, FBFM5...” but does not interpret what kind of vegetation and density – nor the existing health – the FBFM represents. In addition, there is no assessment of ground fuel density, which is a huge contributor to wildfire severity. The results of these maps should be analyzed to interpret potential site specific threats and priorities, which should be outlined in the document.

**§ Fire Behavior Potential** – Similar to the other sections, this section provides general definitions with regard to fuel characteristics, topography, weather conditions, ignitions and fire history. These definitions should then be grounded in detail with regard to SMR.

**§ Wildfire Risk Assessment** – Similar to the other sections, this section provides a one paragraph general overview of what a Wildfire Risk Assessment is. It does not provide any assessment or analysis that reflects SMR, other than mentioning an appendix that includes maps derived from the Colorado Forest Atlas. More information is needed to make it useful.

**§ Emergency Evacuation** – This section provides the County Road routes in proximity to the development, but it does not provide any road systems throughout the development. The ingress/egress for the SMR area needs to be provided.

**§ Required Actions, Guidelines & Procedures** – This section provides references to codes that may be looked up, but does not incorporate the specs/measurements/requirements. Some details are included, but more details should be included.

**§ Requirements for Access Roads** – Similarly, this section should include requirements rather than reference the attached appendices for OCFPD policies.

**§ Defensible Space and Structure Ignition Zone** – This section provides good guidance.

**§ Landscaping Guidelines** – This section provides reasonable high-level feedback. As SMR develops its Design Review Guidelines, these recommendations could be elaborated upon site specifically.

**§ Fuels Mitigation and Vegetation Management Plan** – The “Assessment of Current Vegetation” does not provide an assessment of what is onsite, but rather provides general information with regard to vegetation types, ex: “...identify dominant vegetation types, including forests (coniferous and deciduous), shrublands, grasslands, and riparian areas.” The plan should include an identification of the SMR vegetation types throughout the development.

**§ Vegetation Management Strategies** – Again, the strategies provided are very general and do not include strategies specific to SMR. If this is going to help with SMR planning and preparedness, the strategies for the development should be specific to the site.

**§ Emergency Preparedness** – This section includes three sentences that states SMR needs an evacuation plan, that SMR should create fire breaks, and they should collaborate with fire authorities. That is it. No additional details are included.

**§ Appendices (Summary)** – The appendices are copied/pasted pamphlets from the Colorado State Forest Service website and discuss low-flammability landscape plants, the home ignition zone, some tips for maintenance, description of WUI, and maps generated from the CSFS Forest Atlas that depict additional modeling of fire risk and behavior types for the SMR area. The modeling should be coupled with site specific information. The only summaries included are the summaries provided by the CSFS site that provides information on how the modeling was derived... nothing that grounds us to the place.