



March 12, 2017

USDA Forest Service, Los Padres National Forest
Monterey Ranger District
Attn: Jeff Kwasny
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Submitted via email to:
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RE: Comments on DEIS – Strategic Community Fuelbreak Improvement Project

Dear Mr. Kwasny:

This letter is to comment in support of the Draft Environmental Impact Statement (“DEIS”) for the Strategic Community Fuelbreak Improvement Project with motorized tools and herbicide treatment (“Project”¹). Overall, the Project is a good start to fuelbreak and fuel reduction projects needed on public lands to protect life, property and natural resources. The concept of creating fuelbreaks at strategic ridges to allow access to firefighters during a wildfire for backfiring, other tactical operations, and to control the spread of fire, is fully supported. Accordingly, we ask that the Project be approved and funding be secured as soon as possible to beneficially use the firebreaks that were created during the Soberanes Fire rather than linger in the bureaucratic process and then be forced to re-construct the fuelbreaks in the same locations due to vegetative regrowth. We also ask that funding be set aside for continual maintenance of these key fuelbreaks so that this effort does not go to waste.

Although the Project is fully supported, we would like to bring attention to several other strategies for consideration by the U.S. Forest Service in the near future. These include:

- Utilizing prescribed fire for fuel reduction to limit unnatural high-intensity wildfires;
- To provide the IC team all available tools during fire suppression activities to protect life, property and the environment;
- To construct fuelbreaks along the entire “Big Box,” not only 24 miles of the Big Box;

¹ The Project recommended for implementation is Alternative 4 – Preferred Alternative, which includes the Proposed Action (with use of motorized tools) and herbicide treatment.

- To pursue legislative amendments to more readily allow fire prevention and trail maintenance work to be performed on the ground within the Wilderness; and
- To review and implement the recommendations in the Monterey County Community Wildfire Protection Plan (“MCCWPP”).²
- In order to be consistent with the MCCWPP, the Forest Service should include and analyze an additional project alternative in the EIS that is fully compliant with the recommendations and priority project(s) within the MCCWPP.

The U.S. Forest Service should consider the routine use of prescribed fire to manage forest resources. The Project only proposes eleven (11) miles of prescribed burning at the Chews Ridge Lookout and MIRA unit. As discussed during the recent FireScape Monterey Workshop, abnormal high-intensity wildfire disturbances have had dramatic impacts on the plant composition of the forest. To the contrary, low-intensity fire, such as prescribed burning, protects the natural mosaic of diverse vegetation types and ages of the forest. To limit natural resource impacts, prescribed fire should be further considered as a tool not only for the creation and maintenance of fuelbreaks, but also for fuel reduction to reduce the risk of unnatural high-intensity wildfires.

The U.S. Forest Service should also determine the appropriate role of these Project fuelbreaks, once constructed, during fire suppression activities. Although the notion of fighting fire without the need for dozers by utilizing these fuelbreaks may be conceptually desirable, all tools must be made available to the IC team during fire suppression activities in order to save lives and protect properties and the environment. That is, although the Project as proposed may reduce the need for the use of dozers, the notion that dozers will never be allowed to be used or that there would be a delay in the approval process for the use of dozers in the Wilderness merely due to the presence of these fuelbreaks is misguided. The fuelbreaks may slow down, but as described in the current alternatives to the project, will not likely stop the progression of wildfires, and firebreaks would probably need to be constructed using dozers to protect at-risk communities.

Fuelbreaks should also be constructed along the entire “Big Box” (AKA Ventana Fuelbreak), not only 24 miles of it. The first recommendation in the MCCWPP, at section 9.1.1, is to maintain the Big Box Fuelbreak at a width and in such condition as will allow its safe use for tactical purposes and as will stop the spread of fire, to protect all at-risk communities around the Monterey Ranger District from fires originating in the Los Padres National Forest. Although the U.S. Forest Service received numerous comments requesting for the inclusion of those fuelbreak segments of the Big Box from Devils Peak to Hennicksons Ridge, they were not included as part of this Project. Nor were other key segments of the Big Box.

² The MCCWPP may be downloaded at <https://goo.gl/h8n39tm> or http://www.firesafemonterey.org/uploads/1/0/6/5/10653434/mccwpp_november_2010_v2_signed_wveg-fuelsadd-updated_march_1_2016_v2.pdf

There is concern that without construction and maintenance of the entire Big Box Fuelbreak at the width and in the condition described in section 9.1.1 of the MCCWPP, the Project will not meet its stated purpose of re-establishing and maintaining fuelbreaks at strategic locations in a condition such that they limit the spread of wildfire by providing a strategic and tactical advantage for both ground-based and aerial firefighting personnel and equipment, and will not meet its stated need of increased wildland fire suppression efficiency near communities and infrastructure, and reduction of wildfire risk to life and property in at-risk communities.

One basis for that concern is the wildfire modeling study of the proposed fuelbreak project conducted by Stacey Drury of Sonoma Technology, Inc. of Petaluma CA, at the request of the Monterey Ranger District of the Los Padres National Forest, using the fire behavior modeling tools in the Interagency Fuels Treatment Decision Support System (IFTDSS) fire and fuels modeling framework.

A video of a webinar on that study demonstrates that a fuelbreak of the 150 and 300 foot widths proposed for the Project and alternatives would not stop the spread of fire when spotting is considered, would not be safe for use by fire fighters during a fire, and that gaps in the fuelbreak would let fire burn around it.

The video is located at <https://goo.gl/KnNzmQ> or <https://www.youtube.com/watch?v=iCayBXqrVQI&feature=youtu.be>

The primary speaker in the video is Mr. Drury, who is currently employed at the USDA Forest Service PSW Research Station.

- Starting at 25 minutes 33 seconds into the video Mr. Drury provides IFTDSS screenshots showing that when spotting is considered fire readily passes over the proposed fuelbreak.
- Starting at 27 minutes 54 seconds into the video Mr. Drury provides IFTDSS screenshots showing that when the fuelbreak is expanded to a sufficient width, much wider than the 150 or 300 feet proposed for the current project, the fuelbreak can stop the spread of fire.
- Starting at 22 minutes 54 seconds into the video Mr. Drury provides IFTDSS screenshots showing that fire will burn around the proposed fuelbreak through gaps in it. The Draft EIS on the project acknowledges that gaps in the fuelbreak will defeat its purpose and need at page 26, first paragraph, saying, “Without a continuous fuelbreak, wildfires will burn around short fuelbreak segments...”
- At 24 minutes 39 seconds into the video Mr. Drury comments that due to the nature of the proposed fuelbreak area he would not put firefighters into the area as it would be unsafe to do so.

- The fuelbreak polygon modeled in the video was not 150 or 300 feet wide as in the proposed project, but approximately 1,000 feet wide, which was still not adequate to protect lives and property in at-risk communities when spotting was considered and when gaps were left in it as are left in the proposed project.

Another basis for the concern that the proposed fuelbreak is not as described in MCCWPP section 9.1.1 is that a fire may start too close to the fuelbreak for there to be time to improve the fuelbreak before fire crosses over it. During drafting of the MCCWPP part of the collaborative discussion with the Forest Service was on this concern. Forest Service District Ranger Sherry Tune agreed this was a valid concern, which is part of why the language in MCCWPP section 9.1.1 states that the fuelbreak will be constructed and maintained at all times to be capable of stopping the spread of fire.

The recent Soberanes Fire confirmed this concern, as it regularly overran fire lines before they could be improved sufficiently to stop it, including burning over recently constructed fuelbreaks of insufficient width to stop the spread of fire. As a result, one life and 57 homes and 11 other structures were lost in at-risk communities, and suppression costs ran to \$236,000,000.

A further basis for the concern that to be effective fuelbreaks need to be constructed and maintained as described in MCCWPP section 9.1.1 is that the Forest Service may not act in a timely manner to improve a fuelbreak to an effective width during a fire, even if there is sufficient time.

An example is that during the 2008 Basin Complex Fire, which started approximately 8 miles from the portion of the Big Box in the Skinner Ridge to Post Summit area, the Forest Service waited until the fire was too close to the Big Box for fire fighters to work safely in the area before it could be completed. As a result, the fire burned over the Big Box in that area before significant work could be performed. But for heroic action after the fire had burned out of federal jurisdiction and into state jurisdiction the fire would likely have burned through a hazardously overgrown at-risk community with hundreds of homes and a single evacuation route only one lane wide in many places. Regardless of the reason for that delay it demonstrates it is imprudent to wait to improve fuelbreaks until a fire is burning, as opposed to maintaining them before fire starts, as lives and property in surrounding communities will be at risk in the event of wildfire, which does not meet the proposed project's purpose and need.

As we understand it, some of these fuelbreaks (for example, the northern segment) were not included as part of this Project because other historic firebreaks on private properties exist and have been historically used. The idea that private property owners must utilize their own property for fires stemming from the Los Padres National Forest, when public land is available for the same is injudicious and imprudent. The firebreak on private properties should be considered a secondary line, not a primary line, to be used in the event that the wildfire jumps the primary line. Having multiple lines of protection is essential for protecting at-risk communities. Moreover, the missing segment on the north creates one of the gaps that would allow fire to circumvent constructed portions of the proposed fuelbreak, defeating the purpose and need.

Whereas US government agencies preferentially fund projects recommended within a CWPP, the Forest Service should amend the EIS to include a project alternative that is consistent with the recommendation in section 9.1.1 of the MCCWPP.

The DEIS is in error or misleading when it implies that the only at-risk communities the MCCWPP finds to be at-risk of wildfires spreading from the adjacent national forest are Big Sur, Palo Colorado, Cachagua, and Jamesburg (DEIR page 7, paragraph 2).

At section 9.1.1 the MCCWPP states that the Big Box protects the following at-risk communities from wildfires that start in the Los Padres National Forest: Arroyo Seco, Big Sur, Big Sur South Coast, Bryson-Hesperia, Cachagua, Carmel Highlands, Carmel Valley, Carmel Valley Village, Indians, Jamesburg, Lockwood, Palo Colorado, Pine Canyon (south), Rancho San Carlos, Rancho San Clemente, Reliz Canyon, San Antonio Lake, Tassajara, and White Rock.

The DEIS confuses at-risk communities with communities at-risk, apparently using the terms interchangeably.

At-risk communities are a federal concept, and are communities that meet the definition of an at-risk community at 16 U.S. Code § 6511(1).³ Communities at-risk are a state concept, and are communities that are listed on the list of communities at-risk maintained by CAL FIRE.

Federal at-risk communities should be included in the communities the Forest Service is focused on protecting. The MCCWPP lists communities in Monterey County that meet the definition of an at-risk community pursuant to 16 U.S. Code § 6511(1) in Table 13 starting on page 50. The endnotes below Table 13 on MCCWPP page 52 explain which communities meet which definition. The Forest Service agreed to the list of at-risk communities in Table 13 when it signed the MCCWPP.

The U.S. Forest Service appears to be stymied in performing work on the ground due to onerous laws in place in spite of the special legislative provisions in the Wilderness Act that allow “the Forest Service to take whatever appropriate actions are necessary for fire prevention and watershed protection including, but not limited to, acceptable fire pre-suppression and fire suppression measures and techniques.” (Endangered American Wilderness Act of 1978, Section 2(d); p. 34 DEIS.) Even trail maintenance within the Wilderness cannot occur without an environmental analysis under NEPA. As recommended during the FireScape Monterey Workshop, legislative amendments should be actively pursued to clearly allow for fire pre-suppression, prevention and trail maintenance measures in the Wilderness. It is important to note that the strategy of seeking legislative amendments is a recommendation in the MCCWPP, which was signed by the Forest Service.

The U.S. Forest Service is encouraged to review the MCCWPP, particularly since Forest Service staff actively participated in its development and is a signatory to the final planning

³ <https://www.law.cornell.edu/uscode/text/16/6511>

document. As a partner and neighbor, the U.S. Forest Service should support the at-risk communities by moving forward with implementing pertinent recommendations set forth within the MCCWPP.

Thank you for this opportunity to comment on the DEIS.

Again, we ask that the Project be approved and funding be secured as soon as possible to beneficially use the firebreaks that were created during the Soberanes Fire to avoid any need for reconstruction of the same. We urge the Forest Service to amend the EIS and swiftly initiate and implement additional projects to improve fuelbreaks to be constructed and maintained consistent with the recommendations in section 9.1.1 of the MCCWPP.

Until such fuelbreaks are in place lives and property of people in at-risk communities around the Monterey Ranger District will be threatened by fires in the Los Padres National Forest.

Respectfully submitted,

A grey rectangular box redacting the signature, with the word "COPY" printed in the center.

3-12-17

Rob Thompson, Vice President
Fire Safe Council For Monterey County