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Comments: We understand that under the funding mechanism of this project, its scope is limited to fuels treatments. However, as our April 17, 2018 letter addressed, if the majority of the community in which the project is intended to project is as flammable as it was during the 2007 Grass Valley Fire, what's the point of the project? Without addressing the issues raised in the USFS analysis of the 2007 fire (Cohen and Stratton 2008) and our letter, the Grass Valley community remains vulnerable to wildfire.

We believe it would serve both the US Forest Service and the community if the USFS used its leadership and connections to combine fuel treatments with a comprehensive strategy to reduce the flammability of the community. At the very least, the USFS could address the need for a companion flammability reduction program within the Purpose and Need portion of the EA and indicate that such a program is critical if the it intends to satisfy the stated Program Emphasis. Such an effort is the only way to prevent another extensive loss of property as happened in 2007. Discussing the failure of previous fuel treatment projects to prevent the destruction of nearly an entire neighborhood (174 homes burned) in 2007 should have been a significant part of the EA. We found the omission of even a mention of the Cohen and Stratton (2008) as a violation of the Code of Federal Regulations.

As per [sect]219.6, National Forest System Land Management Planning, the responsible official shall:

"Identify and consider relevant existing information in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information."

We are asking the USFS to identify and consider the lessons provided by Cohen and Stratton (2008) and provide how those lessons have been incorporated into the Proposed Actions of the current project in order to satisfy the project's Program Emphasis.

We understand the constraints the USFS is under. However, we believe the USFS has a remarkable opportunity to provide leadership in the area of reducing the flammability of communities. Funds have been made available for such projects in the past as indicated in our previous comment letter.

As we have learned since October 2017, when wildfires have devastated thousands of homes and killed dozens of people, what we have been doing is not working.

We urge the USFS to see the current project, and all future projects involving fuel treatments, in a comprehensive manner that considers all the variables of community flammability. Only in this way can the USFS truly fulfill the project's Program Emphasis in that, "Community protection from wildland fire is of the highest priority, and will be emphasized through public education, fire prevention, and fuels management."