

Data Submitted (UTC 11): 12/5/2019 7:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Botello,

Ranger Botello, every other EA or EIS I have reviewed with homes and lives in the WUI at risk should a wildfire burn into the area has analyzed an action alternative in detail that applies Dr. Jack Cohen's fine fuels removal methods. I word searched your Big Creek Hazardous Fuels Removal project pre-decisional EA and the word Cohen was missing.

Your EA at page 3 says

"In summary - if a high intensity wildfire approaches the project area from the surrounding National Forest System lands and it is uncontrollable, it will impact private property and Forest Service administrative sites. These conditions are representative of much of the untreated forested areas within the Big Creek WUI project area."

I have never encountered a USFS line-officer who wasn't aware of Dr. Cohen's groundbreaking research conclusions that describe the most effective way to protect homes and lives on the WUI should a wildfire burn into the area. Some members of the lay public know his methods. Perhaps a few who live in the Big Creek WUI know and expect you to apply them.

Please see the USFS online article called First National Legacy Award presented to FS retiree at the following link:

<https://www.fs.fed.us/inside-fs/recognition/first-national-legacy-award-presented-fs-retiree>

Please see this USFS website centered around Dr. Cohen.

<https://www.fs.fed.us/research/people/profile.php?alias=jcohen>

Ranger Botello, I believe you do know about Dr. Cohen's research conclusions. You also know the USFS has a timber agenda and line-officer success is measured in volume offered. You know Dr. Cohen's methods concentrate on fine fuels removal. You know the application of Dr. Cohen's methods do not produce volume. You know if you don't generate volume your promotion opportunities will suffer.

He has a few things to say about commercially logging fuels near the WUI to reduce or eliminate fire damage to homes. Here are excerpts from one of his many publications that summarize his research findings.

Excerpts:

"As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses." (Pg. 5)

"The results of the diverse analytical methods are congruent and consistently indicate that ignitions from flames occur over relatively short distances--tens of meters not hundreds of meters. The severe-case estimate of SIAM indicates distances of 40 meters or less. Experimental wood walls did not ignite at 10 meters when exposed to experimental crown fires. And, case studies found that vegetation clearance of at least 10 meters was associated with a high occurrence of home survival." (Pg. 4)

"Extensive wildland vegetation management does not effectively change home ignitability." (Pg. 5)

"Home ignitability also dictates that effective mitigating actions focus on the home and its immediate surroundings rather than on extensive wildland fuel management." (Pg. 5)

From Reducing the Wildland Fire Threat to Homes: Where and How Much?

By Dr. Jack Cohen

Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.

http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf

More information is available in Opposing Views Scientific Attachment #11

Ranger Botello, it's easy to understand why you conveniently omitted Dr. Cohen from your EA. Please care more about public safety than your career.

I am expecting you to make appropriate modifications to the Big Creek Hazardous Fuels Removal project. Please contact me via email with your response to this request next week.

If I don't receive a response or if you refuse to modify your EA and send it out for public comments again it will be necessary to explain the situation in a LTE sent to McCall Star News.

Sincerely,

Dick Artley USFS-retired [forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, forest appeals/litigation coordinator]

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ATTACHMENT: Opposing Scientific Views