Data Submitted (UTC 11): 11/9/2019 11:00:00 AM
First name: Dick
Last name: Artley
Organization:
Title:
Comments: November 9. 2019

Dear Ranger Winthers,

Your November 1, 2018 "Dear Interested Party" letter indicates some of your logging units are designed to protect homes located in the WUI.

There is no doubt that every USFS line-officer knows about and ignores the groundbreaking science on reducing fire-damage risk to homes done by Dr. Jack Cohen (a retired USFS employee). His methods are used worldwide yet you fail to mention his name on your letter. You reject his research because it downplays the effectiveness of removing merchantable fuels in the vicinity of the WUI. Here are 2 of the many published statements by Dr. Cohen.

"Effective landscape fuel reduction does not necessarily prevent W-UI home fire destruction." (Pg. 10)

"Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive." (Pg.1999)

"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire." (Pg.2000)

Source for quotes above: Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States

Published in Forest Ecology and Management 256, 2008

http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf

"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity."(pg.62)

"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."

Source for quote above: University of California; SNEP Science Team and Special Consultants

"Sierra Nevada Ecosystem Project: Final Report to Congress

Volume 1, Chapter 4 - Fire and Fuels.

https://pubs.usgs.gov/dds/dds-43/

Dr. Cohen has written much more showing why fine fuels removal is far superior to merchantable tree removal to reduce the risk of WUI wildfire damage. Please see Opposing Views Science Attachment #11.

Mister, you will be risking peoples lives if your action alternative does not require the application of Dr Cohen's fine fuels removal methods.

Intelligent, rational, caring land managers who really want to save people's lives and homes in the WUI would apply and depend on Dr. Cohen's fire damage risk reduction methods. There is no legitimate reason to reject Dr. Cohen's fine fuels removal methods. Here's what a normal, caring human would include in their Proposed Action.:

* offer to remove fine fuels near homes in the WUI owned by handicapped and/or elderly residents using USFS employees with written permission.

* distribute handouts to WUI residents describing Dr. Cohen's fine fuels removal methods.

* contact the people living in the WUI and announce fine fuels removal workshops will be held to answer questions. These workshops will present Dr. Cohen's research conclusions that prove commercial hazardous fuels logging farther than 100 yards from the WUI is ineffective.

If you fail to act upon my request you will have the opportunity to read about it in the Missoulian.