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San Bernardino National Forest April 27, 2018

Mountain Top Ranger District

RE: Grass Valley Fire Restoration Project Environmental Assessment

Dear District Ranger Marc Stamer,

We appreciate the opportunity to comment on the Grass Valley Project's Environmental Assessment (EA). The California Chaparral Institute is a non-profit research and educational organization specializing in helping the public better understand and appreciate the chaparral ecosystem. In addition, we have done extensive work analyzing wildland fire behavior as it relates to the chaparral and chaparral/forest intermix and how communities can become more fire safe.

After reviewing the Draft EA, we were immediately struck by the absence of any discussion of Cohen and Stratton (2008) and their in-depth analysis of the 2007 Grass Valley Fire.

Prior to the 2007 Grass Valley Fire, the US Forest Service and the Natural Resource Conservation Service had created several fuel treatments around the community of Lake Arrowhead (Fig. 1). Reportedly, the fuel treatments performed as expected by allowing firefighters to engage the fire directly and reducing the rate of spread and intensity (Rogers et al. 2008). However, the end result for the community was much less positive: one hundred and seventy-four homes were lost (Fig. 2).

The comprehensive analysis of the Grass Valley Fire by Cohen and Stratton (2008) concluded that,

Our post-burn examination revealed that most of the destroyed homes had green or unconsumed vegetation bordering the area of destruction. Often the area of home destruction involved more than one house. This indicates that home ignitions did not result from high intensity fire spread through vegetation that engulfed homes. The home ignitions primarily occurred within the HIZ due to surface fire contacting the home, firebrands accumulating on the home, or an adjacent burning structure.

Home ignitions due to the wildfire were primarily from firebrands igniting homes directly and producing spot fires across roads in vegetation that could subsequently spread to homes.

SEE MAPS IN ATTACHMENT

Figures 1 and 2. The 2007 Grass Valley Fire, Lake Arrowhead, California. Map on the left show fuel treatments as orange and green polygons (Rogers et al. 2008). Map on the right shows location of 174 homes burned in the 2007 Grass Valley Fire (Cohen and Stratton 2008).

As shown in Figures 1 and 2 and as described in Cohen and Stratton (2008), the fuel treatment approach was not effective in protecting 174 homes.

We support the Draft EA's proposal to remove hazard trees and invasive species, and to repair damaged infrastructure from the 2007 fire. We also agree that limited vegetation treatments are warranted immediately adjacent to the community. But the Draft EA's nearly exclusive focus on the clearance of native vegetation to reduce fire risk ignores the lessons learned from the 2007 Grass Valley Fire.

Although the Draft EA holds that "descriptions [of the Forest Plan] are pertinent for this project," the prioritization of fuel treatments over directly protecting homes and communities does not align with the "Program Emphasis" for Arrowhead Place. The first sentence states: "Community protection from wildland fire is of the highest priority, and will be emphasized through public education, fire prevention, and fuels management," (p. 6). In order to protect the community—and thus fulfill the "highest priority" of the Forest Plan—the EA must focus more time and funding into helping citizens fire harden their homes, public education, and efforts to prevent ignitions.

We strongly recommend that the Draft EA be revised in a way that addresses the entire wildfire problem. This must include a parallel effort with vegetation treatments that involves the community in order to encourage the correction of the flammable conditions of the homes themselves. Without such an effort, most benefits of vegetation treatments become moot. We believe that there should be a reasonable expectation that if public lands are to be impacted by vegetation treatments at taxpayer expense, there should also be a concomitant effort by private property owners to conduct their own projects—retrofitting structures to reduce flammability, maintaining a fire safe environment, and maintaining appropriate defensible space. Please see Appendices 1-3 for additional details and suggestions.

We understand that considering the flammability of the community and the suggestions we are offering to reduce that flammability can be seen as "beyond" the scope of this project. We respectfully challenge that assessment, especially in light of the Program's Emphasis and the lessons learned from the 2007 Grass Valley Fire. The Draft EA basically describes a project that replicates much of what was done in the past. The science and experience are showing that we need to think and act differently so as not to repeat what has failed to work in the past.

We are hopeful that our suggestions will help the U.S. Forest Service in finding and implementing a viable solution that is based on scientific analysis, public participation, and collective action.

Sincerely,

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