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March 13, 2017

Jeff Kwasny
Strategic Community Fuelbreak Project
Los Padres National Forest
406 S. Mildred Ave.
King City, CA 93930

RE: Strategic Community Fuelbreak Improvement Project DEIS

Sent via: comments-pacificsouthwest-los-padres-monterey@fs.fed.us

Dear Mr. Kwasny,

The following comments on the Strategic Community Fuelbreak Improvement Project Draft Environmental Impact Statement (DEIS) come from Wilderness Watch. Wilderness Watch is a national wilderness conservation organization focused on the protection of the entire national Wilderness Preservation System, which of course includes the Ventana Wilderness.

The 237,000-acre Ventana Wilderness straddles the Santa Lucia Mountains south of the Monterey Peninsula in the Big Sur country of southern California. All but 720 acres lie in the Los Padres National Forest and are managed by the Forest Service. Originally designated as Wilderness in 1969, Congress has added more land to the Ventana Wilderness four additional times—in 1978, 1984, 1992, and 2002.

Fire has had a frequent presence in the Ventana Wilderness, as it has in many Wildernesses. But with the Ventana Wilderness, Congress included special language in the additions bills allowing the Forest Service to conduct some undefined but “acceptable” “pre-suppression” activities in those wilderness additions “consistent with wilderness values” to keep fires from burning outside the Wilderness.

In the new DEIS, the Forest Service proposes to re-establish and permanently maintain 10.4 miles of “fuelbreaks” or firelines within the Wilderness. To its credit, the agency proposes to not use bulldozers to reconstruct the fuelbreaks, but it would allow chainsaws and other

motorized tools to build the fuelbreaks. These motorized tools are prohibited in designated Wildernesses under the 1964 Wilderness Act.

Wilderness Watch supports Alternative 1, the No-Action Alternative, for the following reasons:

1. The 1964 Wilderness Act directs the U.S. Forest Service to preserve the wilderness character of the Ventana Wilderness. Congress defined “Wilderness” as follows:

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

16 U.S.C. § 1131(c).

Congress stated that Wilderness areas “shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness” *Id.* § 1131(a).

Accordingly, “...each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such areas for such other purposes for which it may have been established as also to preserve its wilderness character.” *Id.* § 1133(b).

Therefore the primary directive of the Wilderness Act requires the Forest Service to preserve the wilderness character of the Ventana Wilderness.

2. Alternative 1 best protects the wilderness character of the Ventana Wilderness.

This alternative best protects the wilderness by allowing the old firelines to heal over time. Permanently maintaining artificial firelines within the Wilderness significantly degrades wilderness conditions, even if the special provisions give the Forest Service the pre-suppression authority that the agency believes they provide.

Even if the Forest Service has appropriate authorization for “acceptable” pre-suppression activities within the original Ventana Wilderness or subsequent additions “consistent with wilderness values”, all of the alternatives in the DEIS will degrade wilderness character except for Alternative 1.

Wilderness Watch believes that the preferred alternative in the DEIS is not “consistent with wilderness values.”

3. The DEIS does not adequately delineate which segments of the proposed fuelbreaks are subject to which special pre-suppression language in the various pieces of legislation that added areas to the Ventana Wilderness.

Some of the proposed fuelbreaks may be in the original Ventana Wilderness or other sections of the Ventana Wilderness that do NOT have the same or any special fire pre-suppression language. Until the public knows specifically which segments of proposed fuelbreaks are subject to which, if any, special provisions, we do not have the ability to adequately assess whether some or any segments of fuelbreaks are legally allowed. The Final EIS must contain this analysis.

4. Fuelbreaks and firelines are often ineffective in stopping wildfires.

Fuelbreaks are often ineffective in stopping wildfires. The 2016 Soberanes Fire in this Wilderness, for example, “spotted” or jumped ahead a mile and a half in front of the flames, a much greater distance than the width of the firelines. Research shows the best way to protect structures is to control vegetation and other flammable products within 100-200 feet of the structure.

It doesn’t make much sense to degrade the wilderness character of the Ventana Wilderness to build permanent fuelbreaks and firelines that won’t necessarily be effective in stopping wildfires.

5. The FEIS should clarify under which alternatives bulldozers would be prohibited.

In an apparent effort to make Alternative 1 appear less desirable, the DEIS indicates that there is no guarantee that bulldozers won’t be used during the next fire to scrape the fuelbreaks down to bare mineral soil. This seems to be something of a confusing threat, however, since there does not appear to be a prohibition on the use of bulldozers in the event of a fire in any of the other alternatives. The DEIS only indicates that bulldozer use will be “reduced or eliminated,” but not prohibited. (DEIS, p. 27.)

The FEIS should clarify under which alternatives the use of bulldozers during a fire will be prohibited.

6. The Forest Service should work with local landowners to focus fire control in the structure protection zone, the area immediately adjacent to homes and other structures.

Research shows that reducing flammable material within 100-200 feet of structures is far more effective for protecting homes from wildfire, and it does so without the damage to wilderness caused by building firelines on adjacent public lands.

The research by Forest Service fire researcher Jack Cohen, as well as by others, shows that the best way to fireproof homes is to remove flammable materials within 100-200 feet of the structures. Some of this research can be found in the following articles, which I will also attach:

- Jack Cohen. 2010. The Wildland-Urban Interface Fire Problem. *Fremontia* 38:2/38:3, April 2010/July 2010, pp. 16-22.
- Menakis, J.P., J. Cohen, and L. Bradshaw. 2003. Mapping wildland fire risk to flammable structures for the conterminous United States. Pages 41-49 in K.E.M. Galley, R.C. Klinger, and N.G. Sugihara (eds.). *Proceedings of Fire Conference 2000: The First National Congress on Fire Ecology, Prevention, and Management*. Miscellaneous Publication No. 13, Tall Timbers Research Station, Tallahassee, FL.
- Jack D. Cohen. 2000. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface. *Journal of Forestry* 98(3), pp. 15-21.

The Final EIS must analyze these three research papers and others in this field and determine why this research cannot be used in the structure protection zones near the Ventana Wilderness, rather than degrading the Ventana Wilderness with permanent firelines.

Again, Wilderness Watch supports Alternative 1 in the DEIS for the reasons stated above. Please keep our organization informed of further steps in this project.

Sincerely,



Kevin Proescholdt
Conservation Director