



CALIFORNIA
CHAPARRAL
INSTITUTE

...the voice of the chaparral

Mr. Darrell Vance
Trabuco Ranger District
U.S. Forest Service
1147 E. 6th Street
Corona, CA 92879
comments-cleveland@fs.fed.us

April 21, 2017

Re: South Main Divide and Greater El Cariso Fuels Management Project

Dear Mr. Vance,

We appreciate the opportunity to comment on the Environmental Assessment for this Project. We also appreciate the District's effort to incorporate some of our suggestions to minimize the environmental impact of the Project including the removal of the expansion of the South Main Divide fuel break into previously untreated areas north and south of Elsinore Peak, the use of habitat islands in treatment areas, clarifying the treatments in and around oak woodlands, and the increased focus on placing treatments along roads and closer to communities at risk.

We concur that the new Preferred Alternative 3 is an improvement over the Proposed Action. However, there remain a number of issues in this alternative that need to be addressed to achieve the goals of the US Forest Service's new approach to chaparral management as described in the [USFS Ecological Restoration Implementation Plan](#). We respectfully offer suggestions to meet those goals.

Old Dominion Mine Segment

We urge to Forest to reconsider the extent of the proposed treatment on the western side of the road in the Old Dominion Mine area. We know significant portions of this area have already been treated over the past few years to create a safer environment for firefighters. However, there is one segment that deserves special care as it contains a significant amount of pristine habitat and offers visitors a stunning visual experience of undisturbed chaparral.

As shown in the photo below (Fig. 1), this is one of the few locations along the beginning portions of North Main Divide Road where an individual can be immersed in a chaparral landscape unblemished by nearby landscape modifications or development.



Figure 1. Pristine chaparral along the curve of North Main Divide Road, within the Old Dominion proposed treatment area.

Morrell Ranch

The same can be said of the short segment on USFS land coming out of the Morrell Ranch development area into the Elsinore Peak area. As can be seen in Fig. 2 on the next page, so much of Elsinore Peak has already been type-converted to non-native grassland, this one short stretch provides an important, undisturbed amount of habitat and valued viewshed (Fig. 3).

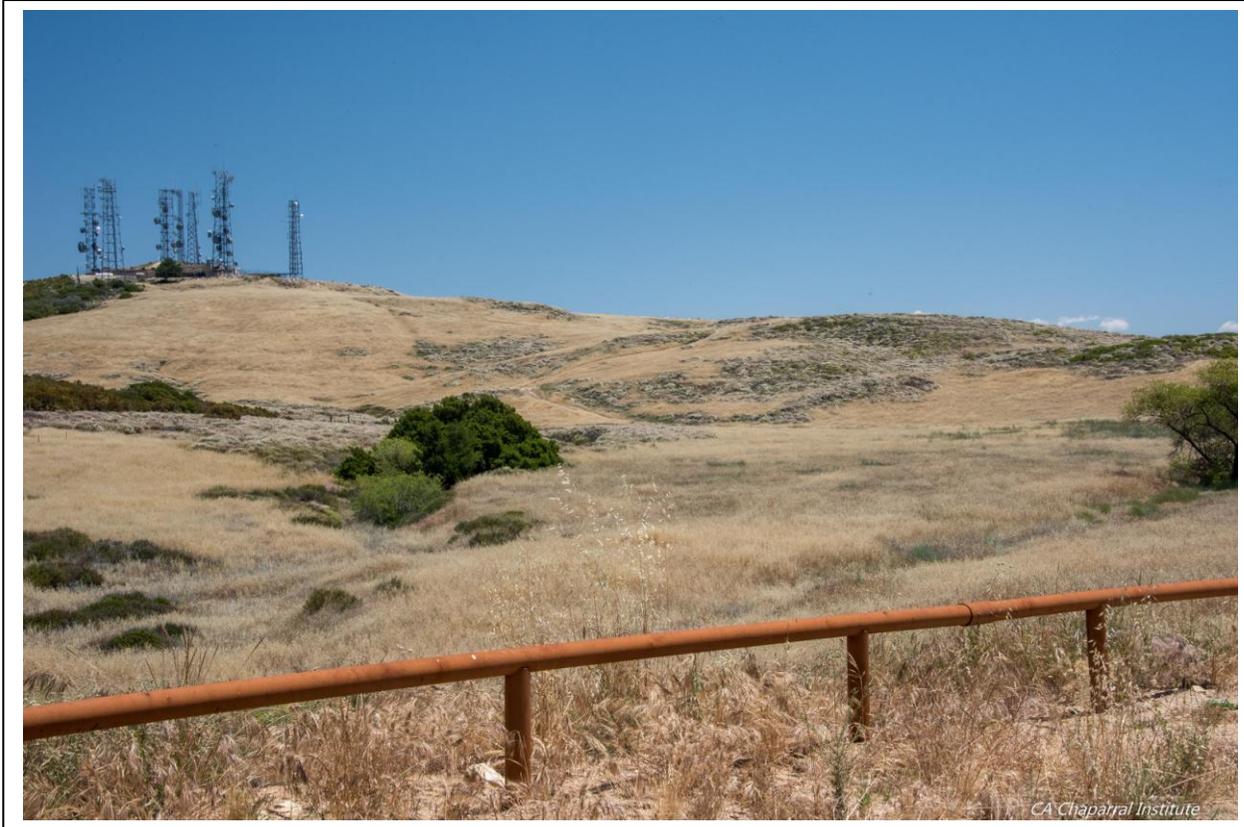
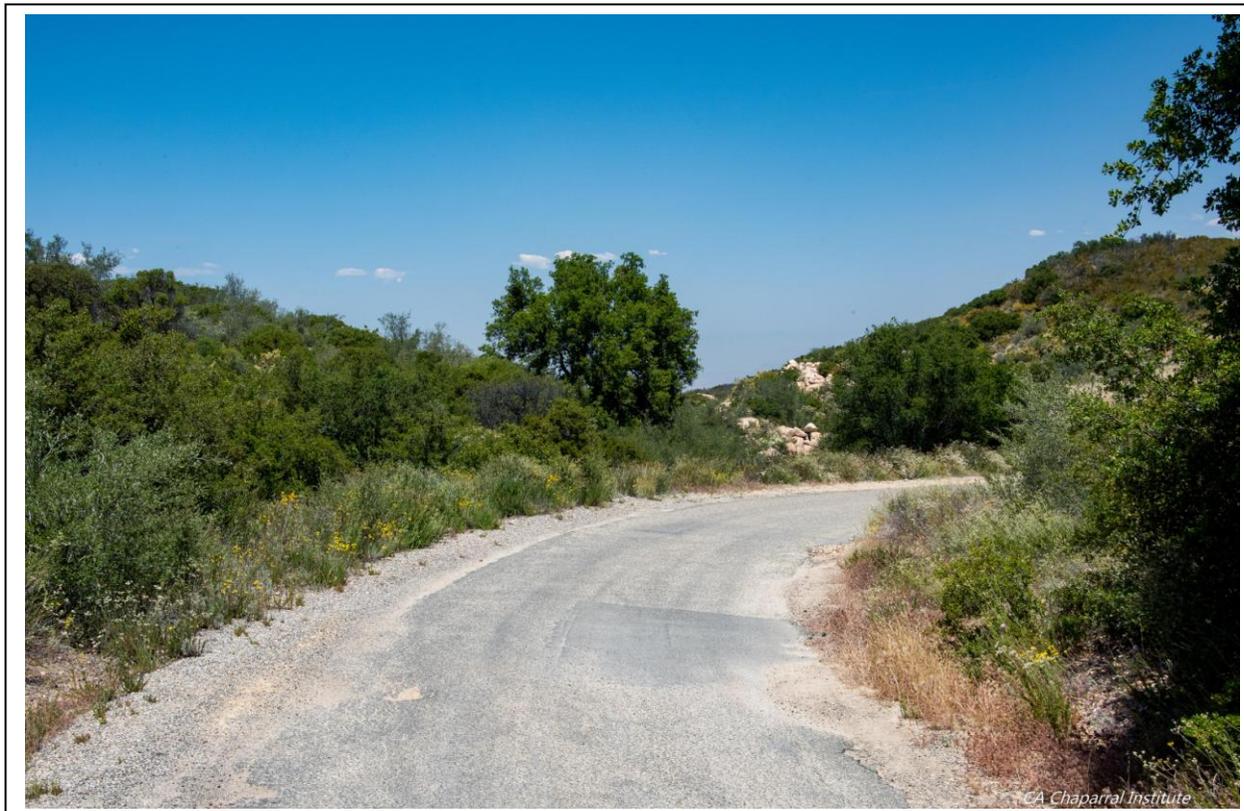


Figure 2 Above. Type converted area around Elsinore Peak.

Figure 3 Below. Chaparral habitat along North Main Divide Road approaching Elsinore Peak from the north.



Response to Comments

We appreciate the responses provided in the Draft EA by the Forest to our comments.

Although we know implementing projects to help communities retrofit structures and otherwise decrease fire risk are outside the scope of this project and that the USFS cannot directly fund structural improvements, we respectfully encourage the agency to initiate efforts that are within its capability to assist nearby communities to engage in fire safe programs. The Greater Alpine Community Defense Project moved in this direction, but more needs to be done.

There are millions of dollars available through FEMA pre-disaster grants to fund communities' fire safe activities such as changing out flammable roofing and installing ember-resistant vents. We have attached an informational sheet (Attachment 1) to this letter that explains how these grants can be awarded and what other communities, in cooperation with the USFS, have done to make homes and lives safer from wildland fire, which is the ultimate goal of projects like the South Main Divide Project. We urge the Forest to include efforts to help communities acquire such grants as part of any future vegetation treatment project.

Field Observations

We would appreciate an opportunity to meet with Forest staff to observe the proposed treatment areas as described in the Preferred Alternative 3 in the Draft EA. We have participated in several on-site observations in the Descanso District and on the Angeles and Los Padres National Forests. These shared experiences have helped develop important collaborative efforts between the environmental, scientific, and fire fighting communities.

We again thank the Forest Service for incorporating some of our suggestions into the Environmental Assessment. Thank you for considering our additional suggestions contained in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Halsey", with a large, sweeping flourish at the end.

Richard W. Halsey, Director
California Chaparral Institute
email: rwh@californiachaparral.org
www.californiachaparral.org

Attachment 1

An Appeal to Fire Agencies

Emphasizing home flammability and the value of nature can save more homes during wildfires and help create healthier communities

Local, state, and federal fire agencies are urged to expand their approach to reduce loss of life and property to wildfires. Currently, the primary, and sometimes the only message citizens hear is to clear native vegetation ("fuel") from around their homes. While creating defensible space is a critical component of fire risk reduction, it fails to address the main reason homes burn - embers landing on flammable materials in, on, or around the home, igniting the most dangerous concentration of fuel available, the house itself.

In addition, by designating native habitat as merely "fuel," citizens are encouraged to see nature as something dangerous rather than a valuable part of their local community. **Intact natural habitat provides vital ecosystem services** that are necessary to maintain the health and well-being of surrounding human communities.

Fire risk reduction efforts must emphasize BOTH how to reduce home flammability and how to create defensible space without demonizing nature. **Many homeowners have complied with defensible space regulations only to see their homes burn in a wildfire.**

Public education materials must make clear that without addressing the entire fire risk reduction equation your home has a greater chance of burning in a wildfire. This includes creating defensible space AND retrofitting flammable portions of homes such as,

- the replacement of wood shake roofing and siding
- installation of ember resistant attic vents
- removal of flammable landscaping plants such as Mexican fan palms and low-growing acacia
- removal of leaf litter from gutters and roofing
- removal of flammable materials near the home such as firewood, trash cans, wood fences, etc.
- roof/under eave low-flow exterior sprinklers

It also must be made clear to homeowners that by having well maintained and lightly irrigated vegetation within the outer 70 foot portion of the 100 foot defensible space zone can play an important role in protecting the home from flying embers and radiant heat. Bare earth clearance **creates a bowling alley for embers** and can actually increase fire risk if invaded by flammable, non-native weeds. In addition, research has shown that there is **no additional structure protection provided by clearing beyond 100 feet**, even on steep slopes, and the most important treatment zone is from 16-58 feet.

Applicable fire research and a comprehensive approach to home protection can be found here:
<http://www.californiachaparral.org/bprotectingyourhome.html>

**Mountain communities learning to use federal grants
to install ember-resistant vents and eliminate wood roofs,
vital to reducing home loss during wildfires**

David Yegge, a fire official with the Big Bear Fire Department, is about to submit his fourth grant proposal to the FEMA pre-disaster mitigation grant program to pay up to 70% of the cost of re-roofing homes with fire-safe materials in the Big Bear area of San Bernardino County. Yegge has also assisted the towns of Idyllwild and Lake Tahoe to do the same. The grant includes the installation of non-ember intrusion attic vents.

Yegge's first grant was for \$1.3 million in 2008. He identified 525 wooden-roofed homes in need of retrofits in the community of Big Bear Lake. Only 67 remain. Helping to push homeowners to take advantage of the program is a forward-thinking, "no-shake-roof" ordinance passed by the Big Bear City Council in 2008 requiring roofing retrofits of all homes by this year. San Bernardino County passed a similar ordinance in 2009 for all mountain communities. Homeowners have until next year to comply. Such "future effect clause" ordinances can be models for other local governments that have jurisdiction over high fire hazard areas. "The California Legislature should adopt such an approach and Cal Fire should incorporate such retrofit programs into its new Vegetation Treatment Program," Halsey said.

In order to qualify for the FEMA grant, a cost/benefit analysis must be completed. "Our analysis indicated that \$9.68 million would be saved in property loss for every \$1 million awarded in grant funds," Yegge said. "FEMA couldn't believe the numbers until they saw the research conducted by then Cal Fire Assistant Chief Ethan Foote in the 1990s. There's a 51% reduction in risk by removing wooden roofs."

"The FEMA application process is challenging, but well worth it," said Edwina Scott, Executive Director of the Idyllwild Mountain Communities Fire Safe Council. "More than 120 Idyllwild homes are now safer because of the re-roofing program."

Additional Information

In California, the state agency that manages the grants is the Governor's Office of Emergency Services (Cal OES), Hazard Mitigation Grants Division. Cal OES is the go between agency and they decide what grants get funded based upon priority established by the State Hazard Mitigation Plan.

The Mountain Area Safety Taskforce re-roofing program:

<http://www.thisisin.org/shake/>

The San Bernardino County re-roofing ordinance:

http://www.thisisin.org/shake/images/DOWNLOADS/ORDINANCES/ord_4059.pdf

FEMA grant program:

<http://www.fema.gov/pre-disaster-mitigation-grant-program>