

From: [Sanchez, Jose -FS](#)
To: ["DAVID E.ORTMAN"](#)
Subject: RE: Information collection: Understanding Value Trade-offs regarding Fire Hazard Reduction Programs in the Wildland-Urban Interface
Date: Monday, November 19, 2018 5:41:00 PM
Attachments: [Choice Experiments.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear David Ortman,

Thank you for your comments.

We agree with you that not all of the communities are in the wildland urban interface. To help capture a better representation of communities that are in higher risk of wildfires, we are proposing a stratified random sample with three fire level strata (high, medium, low fire risk). The plan is to sample at a higher rate from communities in the high and medium fire risk, which are most likely located in the wildland urban interface.

The choice experiment method has been widely used to estimate economic values (individual's willingness to pay) for a set of attributes of environmental goods and services. This method is appropriate to estimate the willingness to pay for the wildfire mitigations programs. Attached is a published chapter with information on the choice experiment method that explains the theory and some of the advantages over other valuation methods.

This research may help forest manager identify the type of wildfire mitigation program preferred by homeowners. Also, this research could potentially help fire managers to identify obstacles to the implementation of efficient wildfire mitigation programs and policies.

If you have further questions or need additional information, please feel free to contact me.

Sincerely,

José J. Sánchez



José J. Sánchez, PhD
Research Economist

Forest Service
Pacific Southwest Research Station

p: 951-680-1560

f: 951-680-1501

jsanchez@fs.fed.us

4955 Canyon Crest Drive
Riverside, CA 92507

www.fs.fed.us



Caring for the land and serving people

From: DAVID E ORTMAN [mailto:DEORTMAN@msn.com]

Sent: Tuesday, September 25, 2018 10:47 PM

To: Sanchez, Jose -FS <jsanchez@fs.fed.us>

Subject: Information collection: Understanding Value Trade-offs regarding Fire Hazard Reduction Programs in the Wildland-Urban Interface

TO: Jose Sanchez, USDA Forest Service, Pacific Southwest Research Station, 4955 Canyon Crest Drive, Riverside, California, 92507

FR: David E. Ortman, 7043 22nd Ave NW, Seattle, WA 98117

RE: Information Collection; Understanding Value Trade-Offs Regarding Fire Hazard Reduction Programs in the Wildlife-Urban Interface

I have reviewed the above referenced notice, which appeared in the September 14, 2018 *Federal Register* (83 FR 46700). The Forest Service and university researches propose to collect information on Understanding Value Trade-offs regarding Fire Hazard Reduction Programs in the Wildland-Urban Interface. The *Federal Register* notice states that a random sample of residents of Arizona, Colorado, New Mexico, and Texas would be contacted via random-digit dialed telephone calls and asked to participate in this research study.

On its face, this type of random survey does not appear to be designed to provide valid information for agency decisionmaking. The vast majority of the population in these states lives in urban centers, not in an interface. It is doubtful that the population random sampled in these four states have even a basic understanding of the wildland-urban interface. It is particularly troubling that the Forest Service would rely on questions related to willingness to pay to implement alternatives presented to them. While contingency valuation may be valid for non-market resources, it is not appropriate when choosing between alternatives that should be designed to get the "urban" out of the wildlands.

In addition, the focus of this research appears to be extremely biased. By focusing on fire hazard reduction, the inference is that the fire hazard must be reduced, i.e., a return to the Smoky Bear policy of putting every fire out as soon as possible. From the information presented, it does not appear to address the real problem, reducing human development and building in fire prone areas. It appears that the Forest Service would have far better ways of spending its budget than continuing this dubious research collection.