



September 21, 2022

Sierra National Forest Supervisor's Office  
Attention: Creek Fire Project Comments  
1600 Tollhouse Road  
Clovis, CA 93611

Dear Sierra National Forest Team,

Thank you for the opportunity to provide comments on the Environmental Assessment for the proposed Creek Fire Ecological Restoration Project on the Sierra National Forest. The Creek Fire's severe wildfire impacts make recovery critical to the Southern Sierra region due to the area's unique ecological character, social and cultural significance, and adjacency to wildland-urban interface (WUI) and state managed lands.

American Forests is the oldest national nonprofit conservation organization in the U.S. and has been a catalyst for many key milestones in national forest policy and practices, from the founding of the U.S. Forest Service and the national forest system to public education efforts. American Forests' mission is to create healthy and resilient forests from cities to wilderness, in order to deliver essential benefits to climate, people, water and wildlife. Therefore, having reviewed the draft Environmental Assessment for the Creek Fire Ecological Restoration project, and with these goals and interests in mind, American Forests would like to provide the following support, as well as recommendations to consider while developing the analysis and decision document:

**American Forests supports the actions and treatments proposed in the Creek Fire Ecological Restoration Project.** American Forests commends the Sierra National Forest team on developing a robust body of treatments that will restore resilience to the Sierra National Forest, not just from the Creek Fire, but from repeated previous disturbances such as drought-mediated tree mortality and windfall. Building back this resilience is critical for preserving the forest's future as a wildlife connectivity corridor, recreation destination, watershed, and diverse landscape.

**American Forests also appreciates the structure and flexibility of this document to respond to the pace and scale needed.** This plan incorporates broad issues as well as specific treatments, providing needed boundaries and flexibility, so that there are the appropriate checks and balances while keeping restoration efforts moving forward. The structure of the document and supporting materials provides the necessary clarity that will benefit the planning of future implementation

projects on this landscape. The conditions created by the Creek Fire requires a similar pace and scale response, to ensure we can protect and restore these critical forest landscapes.

**American Forests appreciates the inclusion of climate adaptation and resilience strategies as well as potential for innovative techniques into your restoration strategy.** Utilizing a mixture of adaptation strategies will increase forest health and resilience while continuing to support critical forest management infrastructure. As one of the first NEPA processes to be able to incorporate the recommendations from GTR-270, the treatments and actions proposed reflect this new climate-considered framework. In particular we would like to appreciate the inclusion of: prescribed burning after reforestation to reduce competition, experimenting with seedling genotype and planting arrangements, translocation of genotypes based on projected climate conditions<sup>1</sup>, experimentation with planting density, spatial arrangement, and post-planting release.

**Utilizing a partner-centered participatory approach to stakeholder input will support project planning and implementation.** Leaning on partnerships and key partner organizations, with the capacity to contribute meaningfully to planning and implementation, will improve the overall impact of the proposed restoration project. We all know Forest Service capacity is limited – by staff availability, by budget constraints, and by disturbances like fire and insect-mediated mortality. Partners can help take on some of the workload, and potentially increase work completed on the ground annually, by employing partnership tools like the Good Neighbor Authority, Shared Stewardship, and various agreements. Additionally, groups like the Dinkey Collaborative can provide expert technical assistance for collecting project development feedback. By utilizing multiple tools and partnerships, the Forest Service will invariably have many avenues for success in completing the proposed restoration work.

We also recommend incorporating additional community feedback into the project implementation design process, whether through a comment solicitation, publications in media on project progress, field visits, or periodic public meetings. In many ways the catastrophic fire seasons of 2020 and 2021 have been a wakeup call, and there is a lot of social will and financial interest in employing not just reforestation, but reforestation that's sustainable and successful in the long term. There is an opportunity to build a new level of community investment in the mutual management of the Sierra National Forest.

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<sup>1</sup> Meyer et al 2021. Gen. Tech. Rep. PSW-GTR-270. Postfire restoration framework for national forests in California. [https://www.fs.fed.us/psw/publications/documents/psw\\_gtr270/index.shtml](https://www.fs.fed.us/psw/publications/documents/psw_gtr270/index.shtml)



American Forests looks forward to continuing to partner, whether through our Region 5 Master Stewardship Agreement, providing match for critical project work, pursuing grant opportunities on behalf of Sierra National Forest, or building stakeholder engagement through our role as a committed Southern Sierra partner. Once the NEPA is completed, we are excited to provide technical and project management assistance to support implementation of Creek Fire reforestation. Once again, we appreciate the opportunity to provide comments, and we are happy to expand on any of these points as needed with your team.

Sincerely,

A handwritten signature in black ink, appearing to read "Brittany Dyer".

Brittany Dyer  
Senior Director, California & Pacific Islands  
American Forests