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First name: Craig

Last name: Thomas

Organization: The Fire Restoration Group

Title: Director

Comments: Attached are the comments on the Creek Fire Restoration Project from Craig the

Fire Restroation Group

Dean Gould, Forest Supervisor March 18, 2022

Sierra National Forest

1600 Tollhouse Road

Clovis, CA 93611

Attn: Christine Handler

Submitted via the internet

The following are comments on the March 3, 2022, Creek Fire Ecological Restoration Project and February 2022 Purpose and Need and Proposed Action.

The Fire Restoration Group has been an active and original member of the Dinkey Collaborative since its onset (as a staff member of Sierra Forest Legacy and since 2019 as the Fire Restoration Group)

General Comments

1. We appreciate the honest characterization of both the significant uncharacteristic (80,000 acres of high severity)) and beneficial effects of this enormous fire. Too often the discussion is simply a statement of the acres impacted and the public is left with the assumption that it is all bad. While having spent the past 15-years working in this area it can easily be characterized as a very tragic event. Making a clear statement that it wasn't all bad and talking about both the good and bad outcomes is the professional way to discuss the situation.
2. President Joe Biden, on January 27, 2021, issued an Executive Order on the use of the Best Available Science and Data. It is not an arbitrary recommendation that can be taken up or ignored by local will or whim. The forest needs to define and explain the pathway forward in land management decisions and decision pathways such as the use of PSW-GTR-270 as the primary approach for reforestation (see more below).
3. We support much of the focus on the scoping letter around hazard tree removal along roadways (Especially Levels 3-4-5) and strategically along level 2 roads that are high use for the workforce. We also support the hazard removal around developed recreation sites. We also want to see the large woody material left on site to meet soil quality standards and biodiversity needs across this landscape.
4. Where will the 700,000 + acre Prescribed Fire project you have been working on for at least 2 years fit into this effort. Where will burning be the tool of first choice to reduce fuel loading and start to rebuild resilience?
5. Please describe in more detail the 53,000 acres of treatments in surviving green forests. Where are these acres and where do these areas land in the prioritization strategy?

Specific Comments

1. Reforestation strategies for the Creek Fire landscape.

The scoping notice suggests 68,000 acres are proposed for reforestation in the scoping letter (p.3).

It is important to discuss, up front, PSW-GTR-270 principles and how they will be applied to this reforestation effort. At last year's Creek Fire public meeting and 2-day field trip starting at Shaver Lake we traveled through portions of the burned landscape both north and south. At the start of day two, during the morning briefing, the High Sierra District Forester mentioned her intention to reforest at an intensity of "200-250" trees per acre (TPA) in the reforestation effort. Rather than talking, as a group, about the principles in the new GTR and key principles like re-establishing key ecological processes and ecological integrity (frequent fire being one of the key missing actions in the past century) it sounded very much like business as usual[mdash]intensive plantation tree farming - which could not be more inconsistent with the ecological integrity, fire resilience, and spatial arrangement of forests in the Sierra Nevada. Are we going to ignore five-years of work by 25 of the best, most talented ecological staff, research ecologists and foresters in the Region?

Please discuss the decision-making framework and why the key authors and the key principles are not front and center in the thinking of how to move forward. I understand that the GTR-270 is not an acre-by-acre instruction manual of where to put trees in the ground BUT the fact that PSW-GTR-270 is not even mentioned in the scoping letter . . . I am floored to be honest!

From PSW-GTR-270:

The postfire restoration framework is rooted in six science-based guiding principles, including: (1) restore key ecological processes, (2) consider landscape context, (3) promote regional native biodiversity, (4) sustain diverse ecosystem services, (5) establish a prioritization approach for management interventions, and (6) incorporate adaptation to agents of change, including climate change. These guiding principles set the stage for the development of postfire restoration efforts on national forests.

Did you use the POSCRPT Tool as described in PSW-GTR-270 and the Forest Service-Region 5--Ecology Program Highlights 2020-2021 p.12-13 assessing the regeneration prediction potential of the burned landscape? Did the forest staff utilize the 2019 Tamm Review: Reforestation for resilience in dry western U.S. forests (North et al. 2019)? The 25 authors (researcher scientists, ecologists, and foresters) refer to the paper as "pines in lines" specifically because the old school plantation forestry strategy regularly fails on several fronts (economics, future management challenges, ecological integrity, fire resilience) and they offer a 3-zone approach to test the suggested planting and silvicultural practices. (See the Abstract of the 2019 paper below).

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Was this approach or the PSW-GTR-270 framework discussed in the planning of the reforestation effort? Neither are mentioned in the Sierra NF March 3rd Scoping Letter, which is a significant concern, especially since the District seems to be heading for the outdated and ecologically flawed, business-as-usual mode of 200-250 TPA and the plant-spray-pray failed pattern of past decades.

If the newer research is not examined in detail, this effort fails on several fronts. 1) The 2012 Forest Planning Rule 36 CFR [sect]219.8 Sustainability (a)(1) the ecological integrity standard is not an optional choice for managers[mdash]the approach in the Scoping letter needs to be explained and defended given its significant diversion from the key ecological principles and BASI. 2) President Biden's Executive Order on January 27, 2021, is not something to dismiss via claims of manager discretion. Nor is the 2019 Reforestation for resilience paper mentioned above.

The history of failure of dense plantations is painful to recite having witnessed 30-years of larger scale fires starting with the Cleveland Fire in 1992 ripping through Forest Service and industry plantations on the Eldorado NF, to the Rim Fire 2013 on the Stanislaus NF and significant burning in replanted burn scars, and the King fire in 2014 and the 30,000 acres of incinerated plantations with multiple reburns in that location also. I could cite numerous additional recent examples, but I think the point is made, both from experience, fire severity reports and recent research.

Please reconsider the idea pathway not to make these above references front-and-center in this Creek Fire planning effort and reconsider placing a robust team from the Regional and local Ecology Shop to oversee this project planning and implementation effort.

Finally, starting in 2007 when Mark Smith reached out to me regarding the Cedar Valley Project, and we started collaborating on ecologically thoughtful marking strategies to the use of PSW-GTR-220 at the beginning of the Dinkey Collaborative in 2010 and throughout the 12 years we have been working together the trust and partnership was build around scientist engagement and the use of best available scientific information. I am certain we did some of the best, collaborative, ecological marking work anywhere in the country. While I realize that these past two years have been very rough given the Creek Fire and the COVID pandemic, but I feel we have lost some of the collaborative glue that we built over the years and the -from day-1 shared proposal development - that was the benchmark of our collaborative work together. I hope I am wrong about that being the case.

Recommendation: Add to the proposed action, or the creation of an alternative that is both socially and ecologically robust using the best available scientific information including the PSW-GTR-270 framework model and one that doesn't ignore the 5-years of work contributed by the Region's own Ecology Shop and other contributing authors. Create a reforestation framework for the Creek Fire landscape that has the support and approval of the Regional Ecology cadre in full partnership, and throughout the implementation and monitoring phase of the project. I think there are many social, economic, and ecological significant impacts associated with ignoring the best available science (not relying of the GTR-270 Postfire Restoration Framework) in the Creek Fire reforestation effort.

2. Expanding fire opportunities in the steep ground/high severity areas

We are requesting a much deeper discussion regarding how the Sierra NF intends to manage and restore that higher mortality, steeper ground throughout the Creek Fire burn. We request deeper engagement with the local CAL FIRE Unit and Southern California Edison (and the community) to assess and implement several larger-scale burn efforts in the areas that won't likely ever see mechanical equipment involved.

During the 2021 Creek Fire field trip it was very challenging to see how much steep ground burned at high severity. I hope we can build a thoughtful collaborative effort to reintroduce fire in some of these areas as a trial to reduce the enormous tonnage of fuels (still standing and on the ground) and do it in full partnership, as the only likely way to get a handle on the post-fire fuel loading and to increase the possibility of having a resilient forest restored in those numerous areas.

Recommendation: We request that the Sierra NF create an alternative or add to the proposed action a large scale, steep ground collaborative fire restoration effort.

Sincerely,

Craig Thomas, Director

The Fire Restoration Group

P.O. Box 244

Garden Valley, CA 95633

craigthomas068@gmail.com