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First name: André
Last name: Sanchez
Organization: California Wilderness Coalition (CalWild)
Title: San Joaquin Valley Organizer
Comments: Please see the attached. Thank you for your consideration of our comments towards this project.
March 18, 2022Sierra National Forest1600 Tollhouse RoadClovis, California, 93611RE: Creek Fire Restoration Project #60422Dear Supervisor Dean Gould and Planning Team:Thank you for the opportunity to provide feedback towards the Creek Fire Restoration Project proposed within the Sierra National Forest (SNF). The California Wilderness Coalition (CalWild) works to protect and restore the state's wildest natural landscapes and watershed on public lands. We recognize the need to provide action intended to meet several goals including reestablishing forested conditions and/or promoting public safety particularly along forest roads that may lead to recreation access points. The achievement of public safety, however, must be balanced with protection of sensitive resources.We recognize and thank the Forest Service (FS) for avoiding any project activities within designated wilderness, inventoried roadless areas, designated wild and scenic river corridors, and research natural areas. While this is a great start, it should be considered a minimum level of consideration for special protected places within the SNF. We ask that the following issues, information, and analysis be considered, addressed, and disclosed in the environmental review process for this proposed project.I. Ecological Importance of treesWe thank the forest service for keeping in mind that trees play an integral role in the forest in that dead or dying trees can provide important habitat for a variety of species including those that are sensitive, threatened, or endangered. We additionally want to highlight that burned and dead or dying trees contribute to the recycling of nutrients and ecological health. While we do recognize that these trees can harm people and may cause damage to roads, and as such, we urge the restoration efforts find a balance between the two, particularly in cases where trees are on the fringes of roadless areas and wilderness areas and can instead be left to fall on their own.II. Project action in or near special status designations or managed areasWe request that the FS please keep in mind and demonstrate consideration of other ongoing planning efforts, namely the efforts currently underway in the Sierra Forest Land and Resource Management Plan process. With this in mind, we ask that the FS please consider this project's impact on the Recommended Wilderness areas within Alternatives C and E, eligible Wild and
Scenic River Corridors within Alternative B through E, or Backcountry Management Areas in Alternative E. Being that the selection of these areas within the Final Plan is yet to be settled, it is integral to keep these locations in mind as to not compromise the integrity of these areas or their features. Based on the maps currently provided on the Proposed Project document, several of the listed project actions appear to occur within the suite of Recommended Wilderness areas, eligible Wild and Scenic River Corridors, or Backcountry Management Areas.Any further action in the planning process for this restoration project should include analysis around this. If such attention is not clearly demonstrated, we believe that the combination of an Environmental Analysis and Finding of No Significant Impact are not adequate in this situation. In such a case, we request that the Sierra National Forest conduct a full Scoping and Environmental Impact Statement process.III. Information to Provide on Project Website As Soon As PossibleWe request that the FS please provide updated maps and/or GIS data related to the project's efforts on the website as soon as possible. As acknowledged earlier, we appreciate that the FS is excluding certain areas within the proposed project boundary but this does not include areas currently being considered within the Sierra Forest Land and Resource Management Plan process such as the Recommended Wilderness areas within Alternatives C and E, eligible Wild and Scenic River Corridors within Alternative B through E, or Backcountry Management areas in Alternative E. We kindly ask that you also please provide updates around this in advance of issuing the next environmental document so that we can track the development of the draft EA or EIS and provide early feedback if we have concerns about those site-specific project actions.Closing remarksWe once again thank you for considering our comments as part of this planning process. If you have questions, please contact Andr[eacute] Sanchez by email (asanchez@calwild.org) or telephone (559-975-5097).Sincerely,Andr[eacute] SanchezSan Joaquin Valley OrganizerCalifornia Wilderness Coalition (CalWild)Email: asanchez@calwild.orgPhone: 559-975-5097Mailing Address:104 Clemmensen AveMadera, CA 93637