



# CALIFORNIA WILDERNESS COALITION

September 21, 2022

Sierra National Forest  
1600 Tollhouse Road  
Clovis, California, 93611

## **RE: Creek Fire Restoration Project #60422**

Dear Supervisor Dean Gould and Planning Team:

Thank you for the opportunity to provide feedback on the Draft Environmental Assessment (EA) for the Creek Fire Restoration Project (Project) within the Sierra National Forest. 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 continuing to ensure that project activities do not occur within designated wilderness, inventoried roadless areas, designated wild and scenic river corridors, and research natural areas. Likewise, we appreciate the FS for being willing to use beneficial fire (prescribed fire) on the landscape as part of the project efforts. While this is a great start, we request the FS to consider the following:

### **I. Recommended Wilderness**

We thank the Forest Service for acknowledging that the project area would have overlap with recommend wilderness areas that are currently included in alternatives analyzed for the Forest Plan Revision. Further than that, we thank the FS for stating that they would [re]evaluate the proposed action related to the impending decision in the Forest Plan Revision. We ask that any on the ground actions related to the Project be implemented first in locations that are not currently in the Forest Plan Revision alternatives being analyzed. This should not be a heavy request as the Project area is large in nature and there are plenty of subproject locations that would meet the priorities laid out in the EA that could serve as first in line.

### **II. Eligible Wild and Scenic Rivers**

We thank the Forest Service for acknowledging that the project area would have overlap with Eligible Wild and Scenic Rivers. Likewise, we thank the FS for considering Design Features that would minimize impacts to the different Outstandingly Remarkable Values. We ask that this is set as a high priority as it is well known that watersheds and river segments can too easily be impacted by terrestrial management actions if appropriate measures are not taken.

Furthermore, while the nine river segments mentioned in the EA are important to protect, they are not the only ones that should be considered when implementing the Project. Similar to the situation of Recommended Wilderness, there are several stream segments proposed as eligible in the pending objections of the Forest Plan Revision. This includes the San Joaquin River segment 3.233.3 between Mammoth Pool and the Mammoth Pool powerhouse. This stream, along with others, were found eligible in the 2016 Draft but purged from the 2019 Draft and 2022 Final Plan. CalWild's comments and objections on the Forest Plan request an ID Team review of these river segments.

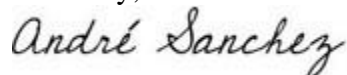
The Project EA refers to language of recommended wilderness under Forest Plan Alternatives C and E, indicating that the Project's impacts on any of these areas will be evaluated if they should be included as recommended wilderness in the Forest Plan/Record of Decision. We request that identical language should be adopted for streams determined eligible in the 2016 but purged from the 2019 and 2022 Forest Plans, including the San Joaquin River segment 3.233.3 between Mammoth Pool and the Mammoth Pool powerhouse.

The EA ignores that CalWild's comments and objection propose additional outstandingly remarkable values for eligible segments identified in the 2022 Final. The EA should provide language similar to recommended wilderness in the objection process, in terms of assessing other ORVs, including the cultural ORV for San Joaquin River segments 3.233.4 and 3.233.6; scenery, geology and prehistory ORVs for Granite Creek and its East and West Forks. The EA virtually ignores potential project impacts on eligible WSR classification. The EA should be revised to avoid or mitigate impacts on eligible WSR classification, and we urge the FS to first initiate subprojects in locations that do have this pending situation.

### **Closing remarks**

We once again thank you for considering our comments as part of this planning process. If you have questions, please contact André Sanchez by email ([asanchez@calwild.org](mailto:asanchez@calwild.org)) or telephone (559-975-5097).

Sincerely,



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