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RE: Letter of Comment for "Creek Fire Restoration Project" Draft EA

I am writing to offer some comments on the draft analysis for upcoming restoration activities on the Sierra National Forests. As a former employee of the High Sierra District, long time resident of Big Creek, CA, and former employee of Southern California Edison (in both forestry and hydropower operations); I would like to offer perspectives as someone deeply familiar with the San Joaquin watershed. My primary concerns are supporting post-fire habitat and biodiversity in the area, and the associated ecosystem services necessary to sustain cultural practices, especially forage crops and basketry materials. An over arching theme in this concern is the proposed use of herbicides, and heavy reliance on salvage logging or other mechanical site preparation techniques throughout the plan.

That brings me to my foremost concern. Three "Reforestation Pathways" are listed in this plan, and all three call for the use of mechanized fuel reduction and use of herbicides for conifer release. No one 'pathway' calls for a nature-based solution regeneration supported by hand thinning and fire use, the sole techniques that shaped this forest for thousands, even tens of thousands, of years prior to European settlement through the practice of Traditional Ecological Knowledge. At a minimum, pathway three should be modified by 1) disallowing use of mechanized heavy equipment > 15,000 pounds gross vehicle weight off of established roadways 2) removing all use of herbicides 3) specifically calling for all forms of fire use including management of natural ignitions and Tribally lead cultural burns. Criteria for expanded use of Pathway 3 should then be considered, based on slope or distance to water courses. This could reduce sediment and herbicide impact to the San Joaquin watershed from project activities.

Along these lines, the 'Alternatives Considered' section (pg. 17) does not seem to consider the option of utilizing TEK. This section equates a plan without the use of salvage logging and herbicides to a no-action alternative. In other words, it sounds like there are no other options when it is obvious throughout this section that several other options were provided in the last round of public comments, including the use of cultural burning and prescribed fire. When asked to consider these options, the reply is simply "However, increasing prescribed fire to replace all of the proposed herbicide use for site preparation and release treatments would not be feasible." This statement is made plainly with no supporting evidence or documentation. I would argue that this summary dismissal displays an un-scientific bias against Traditional Ecological Knowledge and is nowhere near an adequate justification for ignoring the concerns about the reliance of this plan on use of herbicides.

The note on compliance with the Clean Air Act pg. 58 has some wording that can be unnecessarily limiting to use of prescribed fire. Reads "Burning would only be initiated on "burn days" designated by the Air Pollution Control District". However, as a land management agency, the forest can request a burn approval on any day of the year, and it would be at the discretion of the SJVAPCD if any temporary smoke impacts from those ignitions would be beneficial to overall smoke impacts mitigated by the work. This wording is outdated and could be corrected to "Burning would only be initiated under an approval for ignitions from the Air Pollution Control District." This would allow for additional burn windows to be utilized under this plan.

Comments on specific Project Design Features:

Silviculture 3 unnecessarily limits precommercial thinning treatments, while oxymoronically allowing commercial thinning with mitigations during the same periods. Rather than disallow pre-commercial thinning for the spring season, mitigate for beetles by requiring immediate chipping of materials or the same cut to 3' length mitigation

used for the commercial harvests.

Support for Silviculture 8 and 9 as written.

Soils 2 Suggests that crushing of brush prior to piling would leave woody remnants for soil stability. That has not been my experience with use of dozers for brushing in the project area's vegetation types, especially in post-fire conditions. Anywhere that equipment works is going to lose soil stability, and little organic material is left behind from brush rakes or especially blades. The best solution here is simply to limit the footprint of machine operations, especially limiting the use/footprint of Reforestation Pathways 1 and 2.

Soils 3 is a good mitigation but allows operations on to steep of slopes. 50% should be the maximum slope allowed for regeneration harvest.

Soils 14 is a great mitigation, however the lack of a quantified metric limits it's applicability. A good metric would be "Duff fuel moisture must exceed moisture of extinction at a depth of 2 inches" or "soils are visibly dark and moist to the touch at a depth of two inches."

Soils 16 calls for up to 30 tons/ac of course woody debris to be retained, however the proposed action state a goal of <22 tons/ac of all fuels to remain after treatment. These two goals are in direct opposition to one another. I concur that 30 tons/ac of coarse materials is both a fire safe (due heavy fuels having less influence on fire spread and intensity than lighter fuels) and ecologically sound goal but recommend fixing the unreasonable and unrealistic estimate of fuel reduction effects estimated for the proposed action. As discussed on page 30 and utilized in Table 9, pg. 61, there is a suggestion that projected conditions after treatment would be 22 tons/ac, which is unrealistic in the most heavily treated mixed conifer stands when considering standing dead as part of the fuel loading (which is done throughout this assessment). Additionally, a no-action alternative is estimated to be in the hundreds of tons per acre, using a slash model. Why are we using a slash model if no-action (no logging) is taking place to generate slash? The narrative used in the assessment assumes that post-fire tree kill would create these additional fuels, however on the same table we see that Creek Fire conditions, 5 years post beetle kill epidemic, are modeled using 74-121 tons/acre under the mixed conifer model. This table is clearly gaming the numbers to make the project activities look better while unfairly overselling the impacts of a no-action alternative.

Support for Tribal 1 as written.

Lastly, I want to comment on the over-use of the WUI treatment area(increased treatments/high reduction of fuels for protection of urban areas). These areas are clearly (and necessarily) drawn arbitrarily on the map and raise some questions. For example, thousands of acres of undeveloped private timberlands around Stevenson Mt. are surrounded on their borders by the WUI treatment type, along with areas surrounding Mammoth Pool, No.2 and No.8 Powerhouses that have little need for additional fire protections due to both hardened construction and existing SCE vegetation management policies. Meanwhile the interface community of Big Creek, largely leased Forest Service land, is left out of this protective treatment type. What are these treated areas meant to do if they are not protecting interfaced communities? It creates the appearance that they are instead intended to chase commercially valuable timber strands.

Thank you for taking the time to read and consider these comments on post-fire activities. I hope that we will learn from the 150-year history of forest commercialization and Indigenous displacement that led up to the Creek Fire and avoid the repetition of this history. We can choose to manage these lands for what they are, rather than force upon the land vast monocultured plantations that have since failed such as those planted after the Big Creek Fire of 1994.

-Chuck