



March 18, 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 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 scoping letter 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 Purpose and Need and Proposed Action. American Forests commends the Sierra National Forest team on developing proposed actions that will restore resilience to the Sierra National Forest, not just from the Creek Fire, but from repeated previous disturbances like drought-mediated tree mortality and windfall. Building back this resilience is critical for preserving the forest's future as a wildlife connectivity corridor, a recreation destination, a watershed, and a diverse landscape.

Include climate change adaptation and resilience strategies into your restoration strategy. Utilizing a mixture of adaptation strategies will increase forest health and resilience while continuing to support critical forest management infrastructure. Many of these strategies or tactics are the same or very similar to current practices, but provide valuable climate adaptation

benefits. For instance, recent studies have shown that global reforestation could reduce the atmospheric carbon pool by 25%¹, making reforestation an important tool, particularly in the San Joaquin Valley Airshed. 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 framework. However, the framework also suggests that post fire landscapes are an opportunity to test adaptation strategies, such as prescribed burning after reforestation to reduce competition, experimenting with seedling genotype and planting arrangements, or translocation of genotypes based on projected climate conditions². American Forests recommends building these strategies into the Creek Fire Ecological Restoration Project to help ensure the mixed conifer forests that grow back are resilient in the face of changing conditions.

Use innovative techniques to improve post-fire reforestation success. Fires with large swaths of high-severity wildfire have a limited amount of natural regeneration capacity, as natural revegetation greatly decreases at relatively short distances from surviving trees³. There are several new technological tools that make it easier than ever to plan reforestation, putting the right tree in the right place. A robust seed collection and seedbank program could build a biological library of fire-resistant or drought-resistant genotypes for the appropriate elevation location. Experimentation with planting density, spatial arrangement, and release could help identify new best practices for post-fire reforestation.

Use prescribed fire as a multi-benefit tool. American Forests commends the amount of prescribed fire recommended in the Proposed Action, particularly as a tool not just for vegetation management, but also for reforestation site preparation. Prescribed fire is a lower cost alternative to manual treatment where mechanical treatment cannot be implemented due to site conditions. Although prescribed fire has significant impacts to air quality and GHG emissions, fuel treatments can avoid the much higher costs associated with a catastrophic wildfire⁴. Studies have also shown that prescribed fire has three times less harmful particulates than wildfire,⁵ resulting in an overall lower air quality impact. Finally, tribal ecological knowledge and tribal partners can

¹ Bastin et al 2019. The Global Tree Restoration Potential. <https://science.sciencemag.org/content/365/6448/76>

² 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

³ Long, J. W. (2020). Final Report: Post-fire restoration to avert novel conditions in Sierra Nevada Forests https://www.firescience.gov/projects/16-1-05-20/project/16-1-05-20_final_report.pdf

⁴ Mokelumne Watershed Avoided Cost Analysis, <https://sierranevada.ca.gov/mokelumne-watershed-analysis/>

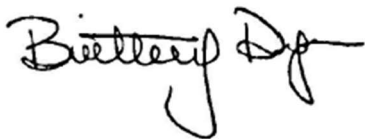
⁵ Liu et al 2017. Airborne measurements of western U.S. wildfire emissions: Comparison with prescribed burning and air quality implications. 6108–6129. Retrieved from <https://doi.org/10.1002/2016JD026315>

provide added cultural and ecological value to prescribed burning projects.

Utilize partners and partnerships to 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 load, and potentially increase work completed on the ground on an annual basis, by employing partnership tools like the Good Neighbor Authority, Shared Stewardship, and various agreements. By utilizing multiple tools and partnerships, the Forest will always have many avenues for success in completing the proposed restoration work. 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.

American Forests looks forward to supporting the development, discussion, and analysis needed ahead of the environmental analysis and eventual decision document. We are excited to continue 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,



Brittany Dyer
Senior Director, California & Pacific Islands
American Forests