

Amador-Calaveras Consensus Group

c/o Jill Micheau, PO Box 913, Arnold, CA 95223
209-813-7019

November 13, 2017

By email transmission

Mr. Randy Moore
Regional Forester, USDA Forest Service
1323 Club Drive
Vallejo, California 94592

Re: Power Fire Restoration Project

Dear Mr. Moore:

The Amador-Calaveras Consensus Group (ACCG) appreciates the opportunity to comment on the Record of Decision (ROD) for the Power Fire Restoration Project. The ACCG has been actively involved in the development of the project since its very early stages. Please see attached letters beginning in 2014. We appreciate that the staff at the Amador Ranger District have explained their professional perspective regarding the proposed management practices under the project and responded to our questions and concerns.

We appreciate the fact that the USFS responded to each of the five issues or questions the ACCG raised during the scoping process. During the Project's Draft Environmental Impact Statement (DEIS) comment process, the ACCG raised five additional issues or questions. The USFS substantively responded to four of the five. The only item the USFS did not substantively respond to was: *Would the Forest Service consider a combination of the proposed action and other alternatives that could be monitored and used to compare differences between treatment types in terms of efficacy, fire danger, habitat enhancement, diversity and invasive plant recruitment or eradication?* We asked this question because, with the encouragement of the Amador Ranger District, we had developed an alternative to the proposed action with assistance from Forest Service ecologists, and we believe that alternative should also be implemented in some manner and monitored to provide data to inform future projects. For this reason the ACCG objects to the ROD.

The two actions we would like evaluated on the ground are planting density and herbicide use. To resolve this objection, we suggest that consistent with achieving the purpose and need for this project, some units within the project area and other areas within the Power Fire footprint be replanted consistent with our recommended alternative in order to allow the ACCG and USFS to monitor and compare the results with the proposed action. USFS staff have stated that there are a significant number of existing background and monitoring plots within the Power Fire footprint. These, together with some plots within the project area would allow the ACCG to monitor, evaluate and understand the impacts of different management practices on an “apples-to-apples” basis.

The ACCG looks forward to participating in the objection resolution process. Please know that you can count on the ACCG to comprehensively air concerns and develop solutions.

Please contact me to identify which individual or individuals will represent the ACCG during the objection process.

Thank you,

Jill M. Micheau

Jill Micheau
Administrator
For
Amador-Calaveras Consensus Group
Approved: October 10, 2017