



December 19, 2025

Erick Walker, Forest Supervisor
Lake Tahoe Basin Management Unit
35 College Drive
S. Lake Tahoe, CA 96150

In Reply To: Caldor Restoration Project Draft EA

Dear Erick:

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands through the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities within and adjacent to the Lake Tahoe Basin Management Unit, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is pleased to see and support the Lake Tahoe Basin Management Unit's purpose and need and proposed action to restore forest health to the project area.

AFRC supports the Purpose and Need (Draft EA, pages 1-1 through 1-3), which, in part, identifies a need to re-establish forested landscapes burned by the Caldor Fire, reduce hazardous fuels, improve forest health and resilience, restore or improve the vegetation condition and hydrologic function of stream systems, meadows, and riparian areas, and restore and improve habitat conditions and habitat resilience for T&E and locally sensitive wildlife species impacted by the Caldor fire.

We are pleased to see proposed treatments in areas not impacted by the Caldor Fire but that are exhibiting overly dense conditions that would be prone to high intensity wildfire in the future. We urge the Forest Service to design thinning treatments at an intensity necessary to mitigate this risk and to create forest conditions suitable for this landscape.

However, we are disappointed that it has taken the Forest Service four years to consider treatment in fire-affected areas. Most of the damaged timber has lost its value to local industry. Following wildfire, the Forest Service has a short window to capture portions of the damaged timber. Doing so effectively would support local industry, generate funds to contribute to additional post-fire recovery work, and enable effective reforestation of the fire footprint.

Rather than generating funds, implementation of many of the treatments proposed in this project will likely require the *spending* of funds. This outcome is disappointing to AFRC, and we hope that the Forest Service will respond to future wildfire events in a timelier fashion.

AFRC supports the Proposed Action with five noteworthy positive steps regarding Forest Restoration and Forest Thinning and Fuels Reduction

AFRC specifically wants to note the importance of:

- The treatment component on the approximately 5,040 acres proposed that address “green” forest stands not impacted by the fire. (Draft EA p.2-1)
- Including a Forest Plan Amendment to make adjustment vegetation treatments planned on about 1,000 acres of CA Spotted Owl and Goshawk Protected Activity Centers (PACs) outside the WUI.
- Use of herbicide with incorporated safeguards. (Draft EA p. A-20).
- Use of mechanical harvest equipment on slopes generally less than 40 percent and not exceeding 50 percent. (Draft EA p.2-2).
- A full suite of treatments to achieve reforestation including site preparation, planting, and post-planting competition release. (Draft EA p.2-3).

Thank you for the opportunity to comment.

Sincerely,



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