



REGION 9

SAN FRANCISCO, CA 94105

March 3, 2026

David Fournier
Eldorado National Forest Supervisor
U.S. Forest Service
100 Forni Road
Placerville, California 95667

Jason Kuiken
Stanislaus National Forest Supervisor
U.S. Forest Service
19777 Greenley Road
Sonora, California 95370

Subject: EPA Comments on the Draft Environmental Impact Statement for the Mokelumne
Amador Calaveras Forest Resilience Project, Alpine, Amador, Calaveras, El Dorado, and
Tuolumne Counties, California

Dear David Fournier and Jason Kuiken:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 requires the EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public. The EPA also provided scoping comments on September 22, 2025.

The Forest Service proposes a combination of treatments to reduce wildfire risk, restore ecosystem health and resilience, promote a fire-resilient landscape, maintain watershed integrity, and support local communities across approximately 246,752 acres of the Eldorado and Stanislaus National Forests. The project area spans Alpine, Amador, Calaveras, El Dorado, and Tuolumne counties. Proposed activities include, but are not limited to, prescribed fire, forest thinning, fuel reduction and fuelbreaks, and non-native invasive weed control. The project also includes specific habitat management measures for the California spotted owl. The MAC Project received an Emergency Situation Determination (ESD) on May 1, 2025, based on high wildfire risk and declining forest health conditions within the project area. Consistent with the ESD, the Draft EIS evaluates only the Proposed Action and the No Action Alternative.

The EPA supports the overall goals of the project and recognizes the years of planning required to develop landscape-scale forest resiliency and restoration efforts. We are providing the following recommendations to improve the impact assessment and the environmental outcomes of the proposed action.

The EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is available, please notify us and make an electronic version available. If you have any questions, please contact me at (415) 947-4167 or contact Laney Gordon, the lead reviewer for this project, at (415) 972-3562 or gordon.laney@epa.gov.

Sincerely,

Jean Prijatel
Branch Manager
Office of the Regional Administrator

ENCLOSURE

1. EPA's Detailed Comments

cc: Rick Kuyper
Sierra Cascades Division Supervisor, U.S. Fish and Wildlife Service

Site-Specific Implementation and Documentation

The Draft EIS evaluates a range of differing vegetation treatments across approximately 246,752 acres using a condition-based management framework. The EPA supports efforts to streamline the process and provide flexibility in response to changing forest conditions. However, the scale of the project area and reliance on condition-based management limits the ability to understand how site-specific treatment units may affect resources prior to implementation. While the Draft EIS discloses general potential impacts and identifies management requirements and best management practices (BMP), it does not clearly describe how site-specific environmental effects would be evaluated, documented, and communicated before treatment areas are implemented.

Recommendations: To ensure that site-specific treatments are effective and potential environmental impacts are evaluated and documented, the EPA recommends that the Final EIS:

- Clarify the process that would be used to identify and evaluate site-specific treatment units prior to implementation.
- Describe how site-specific impacts would be documented to ensure consistency with the impacts analyzed in the EIS.
- Identify criteria that would prompt preparation of supplemental NEPA documentation if implementation effects differ from those described in this EIS.
- Clarify how monitoring results would inform adjustments to future treatment activities.

Air Quality and Public Health

Proposed forest treatments, including pile burning and prescribed fire, may periodically affect air quality and visibility and result in short-term exposure for nearby communities. The EPA appreciates that the Forest Service intends to design and implement prescribed fire consistent with national smoke management guidance and coordinate with federal and regional partners to manage smoke impacts. The Draft EIS does not clearly describe the potential short-term public health impacts associated with increased smoke exposure or the procedures for public notification, including whether burn notifications would be provided with adequate advance notice.

Recommendations: To ensure that impacts to air quality and public health from smoke generation are identified and managed, the EPA recommends the Final EIS:

- Clearly describe the potential short-term human health impacts associated with smoke from prescribed fire and pile burning, including impacts to sensitive populations.
- Clarify the smoke management and public notification procedures that would be used during implementation, including advance notice timelines and coordination with state and local air districts, where appropriate.
- Identify protective measures for sensitive populations and wildland firefighters, consistent with applicable public health and occupational safety guidance.

Temporary Roads and Landings

We appreciate the Forest Service's response to our scoping comment regarding potential impacts associated with temporary road construction. The Draft EIS includes a discussion of the potential for

temporary roads and landings to result in long-term disturbances if not properly decommissioned. We support the BMPs listed in Appendix D for road and landing construction and decommissioning, including measures to locate skid trails and roads away from streams and riparian areas, maintain adequate surface drainage, and stabilize disturbed areas (p. 168–170). Given the potential for soil disturbance, erosion, and sediment transport associated with road construction and use, we recommend the Final EIS include additional clarity regarding decommissioning and rehabilitation commitments and verification.

Recommendations: To ensure that potential impacts from erosion, sediment transport, and soil disturbance associated with temporary road roads and landings are minimized, the EPA recommends that the Final EIS:

- Clarify standards and timelines for temporary road and landing decommissioning and rehabilitation.
- Describe how compliance with BMPs would be verified during and after implementation.
- Commit to decommissioning or rehabilitating temporary roads and landings in a manner that avoids increases in long-term watershed disturbance.
- Identify monitoring measures and a general schedule to evaluate the effectiveness of road and landing decommissioning following project completion.

Monitoring and Adaptive Management

The EPA appreciates that the Draft EIS describes management requirements and includes a BMP checklist intended to minimize impacts associated with forest treatments. We note that the Draft EIS does not clearly describe how monitoring programs would evaluate the effectiveness of these measures across the project area or how monitoring results will inform adaptive management where site-specific impacts differ from those anticipated in the analysis.

Recommendations: To ensure that the environmental impacts of forest treatments are evaluated and addressed through monitoring and adaptive management, the EPA recommends that the Final EIS:

- Describe the monitoring framework in greater detail, including indicators, frequency of monitoring, and documentation methods.
- Clarify how monitoring results would be used to inform adaptive management decisions where implementation conditions differ from those analyzed.
- Identify mechanisms that will ensure project-level implementation of management requirements and BMPs, such as onsite verification or compliance monitoring.

The EPA recommends that the ROD:

- Commit to documenting monitoring results during implementation.
- Describe how adaptive management decisions would be recorded and incorporated into future treatment planning.

California Spotted Owl

The Draft EIS indicates that approximately 63 percent of the Project area contains California spotted owl (CSO) habitat, with approximately 30 percent identified as highest-quality habitat (p. 49). The Proposed Action includes management requirements intended to minimize impacts to CSO habitat. It is

unclear how coordination with USFWS has informed the project design or how coordination would be documented during implementation.

Recommendations: To ensure that potential impacts to CSO habitat are clearly addressed and documented through coordination with USFWS, the EPA recommends that the Final EIS:

- Describe how coordination with USFWS to date has informed project design and identified any required mitigation measures.
- Clarify how USFWS recommendations would be incorporated and documented during implementation.

The EPA recommends that the ROD:

- Document how ongoing coordination with USFWS would continue during project implementation, including adaptive management decisions related to CSO habitat.

Herbicide Use and Aquatic Resources

The Draft EIS identified spray drift as a primary pathway for unintended exposure (p. 86) and acknowledges potential risks from spills during storage, transport, and disposal (p. 89). Herbicide treatments may occur in areas that include or are adjacent to riparian habitats and sensitive aquatic resources. It is unclear in the Draft EIS whether buffer areas and verification procedures would be implemented to protect aquatic resources, as well as the health and safety of workers and nearby communities.

Recommendations: To ensure that potential impacts from herbicide application are clearly addressed and managed, the EPA recommends that the Final EIS:

- Identify the herbicides anticipated for use and confirm that all products would be used consistently with label requirements at the time of application.
- Describe applicator training and certification requirements.
- Clarify application methods and buffer measures intended to reduce spray drift and protect nearby waterways, wetlands, riparian habitats, as well as the health and safety of workers and nearby communities.

Tribal Coordination

The Draft EIS states that the Stanislaus and Eldorado National Forests initiated government-to-government consultation with several Tribes in April 2024 (p.125). The scoping Response to Comments further indicates that the MAC Project would incorporate Tribal involvement and Traditional Ecological Knowledge practices into project planning and implementation. We note that the Draft EIS does not describe the scope or outcomes of consultation to date, or how Tribal input influenced project design, avoidance areas, mitigation measures, or monitoring commitments.

Recommendations: To ensure that potential impacts to cultural resources and areas of Tribal significance are clearly identified and addressed through government-to-government consultation, the EPA recommends that the Final EIS:

- Describe the process of government-to-government consultation conducted to date.
- Identify how Tribal input informed project design, avoidance measures, mitigation commitments, or monitoring strategies.

- Clarify whether consultation remains ongoing and how Tribes would continue to be engaged during implementation.

The EPA recommends the ROD:

- Commit to continued Tribal coordination during site-specific implementation planning.
- Describe how Traditional Ecological Knowledge practices would be incorporated into treatment design and monitoring, where applicable.