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Mr. Benjanin Cossel
Public Affairs Officer
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Sonora, California 95370

To whom it may concern:

Reference: Ebbetts Pass Forest Watch (EPFW), Public Comments, MAC Draft Environmental Impact Statement (DEIS)

We must recognize that the principal purpose of this forest restoration project is to protect those communities in the Wildlife Urban Interface (WUI) from the threat of wildfire. It is acknowledged and well documented by scientific studies that real protection to homes and structures in the WUI can only really be provided by hardening homes against wildfires. Wildfire protection can also be provided and enhanced when whole communities are encouraged to harden their homes as promoted in Fire Wise communities.

It has also been found that when forest restoration occurs outside of the WUI in remote areas, this work will have limited effect in protecting those WUI communities. Additionally, this restoration work in remote locations if not done properly could actually help the spread of wildfire by removal those trees that traditionally would have provided a windbreak, dampening the effect of wind driven wildfires.

Page 9. Forest thinning will occur where stand conditions have a high likelihood of high-severity fires.... due to bark beetles, disease and drought.
In Daniel Mathews book, Trees in Trouble, page 80; it was noted that trees that killed by beetles or drought, during its "Red Stage" (needles still on the tree) the tree is only slightly more flammable than the live forest. Whereas when the dead tree enters the gray stage (needles have dropped to the ground) the tree becomes less flammable than the live forest. Those forest areas identified as having many dead trees, likely have been dead many years and probably pose no real threat to wildfire.

EPFW believes fuel reduction treatments should be limited to areas located in the WUI, close to communities in order to strategically protect these communities. These fuel reduction treatments should not be utilized to thin/log tree stands removed from human developments.

Page 9 (forest thinning) areas in dense conifer-dominated stands.... Canopy cover exceeds 40 percent...
EPFW has concerns that the reduction of forest canopy could have a reverse effect in that it has a drying out effect of the forest floor and will reduce the snowpack with more sunlight. All of this could make this forest treatment more susceptible to wildfires rather than reducing them. We strongly support the retention of large trees wherever possible to maintain shaded fuel breaks due to their fire and wind resistance and the benefits they provide for wildlife habitat, cooler temperatures, and water storage. We concur with the intention stated in the plan to maximize old growth tree retention.

Page 10. Forest thinning will include the thinning of commercial trees greater than 10 inches DBH. Also, trees up to 35 inches DBH may be harvested for the purpose of creating landings.
The larger DBH trees are most fire-resistant trees when exposed to wildfire. Removing these trees could likely increase the threat of fire. We support the limitation on removing the large DBH trees in the plan and that any removal of trees over 30 DBH should be avoided.

Page 14. Biomass will be hauled offsite to a biomass facility for energy production and/or other uses such as manufacturing of biochar.
Although we support the manufacture of biochar as soil amendment, the burning of biomass purely for the production of energy will have severe environmental and climate impacts unless facilities are properly equipped with state-of-the-art filtration systems. Biomass processing plants without this investment is much more polluting than coal-fired plants that increase CO2 in the atmosphere. Those cogeneration facilities without these safeguards can also cause serious health issues breathing of this polluted air.

EPFW supported the West Point Biomass facility that was designed with the "3-legged stool" plan of protecting air quality with state-of-the-art filtration, producing local energy to benefit local rural communities, and providing local employment opportunities. EPFW opposes the use of large-scale biomass facilities out of the area with the negative impacts of transporting this biomass material, impacting local roads yet providing no benefit to local communities.

EPFW strongly supports the plan to utilize biochar for processing biomass. We are concerned that existing biomass cogeneration facilities in California are not equipped to manufacture biochar, especially at the volume that you are projecting. We support all efforts to increase the use of this method. This process is beneficial to the environment as it sequesters carbon, it provides local employment and produces a beneficial product that has commercial value as a soil amendment.

Page 19. Mastication is a useful treatment type in fire-prone ecosystems....
While there is enthusiasm for mastication, this is still a relatively new treatment with an as yet unknown long-term benefit to forest health. Bob Keane of the Fire Lab in Missoula did a broad experiment and issued a harsh warning: if a wildfire hit masticated wood chips, they can make

the fire more deadly to trees. Keane's study found very little decay in the chips over ten years. Masticated chips can burn in ways that kill trees by cooking their root system. And there is the maintenance problem as the masticated area regrows. If the wood chips from mastication are too deep, they can suppress flowers and grasses from growing. Mastication can increase noxious weeds to some extent due to the decomposing wood chips temporarily rob the top underlying soil layer of nitrogen.

While we recognize, appreciate, and support the desire of the USFS to reduce high intensity fires, there are still many questions as to best practices of mastication that include the dual goals of fire prevention and for forest health. EPFW is concerned that large scale use of mastication is an experimental treatment and strongly support the involvement of researchers in this project to both inform the current best practices techniques used, and to study the outcomes across the landscape. We support the use of mastication in WUI areas as part of a plan to then transition to controlled burns to control the undergrowth.

EPFW appreciates the work of USFS resource staff and their community partners on this project, and the effort to integrate and balance protecting communities from wildfires, improving forest and watershed health, and concerns for wildlife habitat. Although not a part of the current plan, EPFW would encourage the USFS to incorporate the promoting of beaver habitat restoration and relocations as another important means to achieve the goals identified for this project. We encourage you to review the research that has been done by Emily Fairfax regarding the benefits of beaver in the watershed in restoring wetland meadows and creating wet fire breaks, stopping or reducing wildfire intensity, providing wildlife refuge during fires, and filtering streams from ash and erosion post fire.

We appreciate the opportunity to comment on this project but object to the limited amount of time given for public review of this MAC DEIS document. We have concerns that the 14-day public comment period was inadequate and insufficient for serious thorough review given the 300 page length of the document that reflects years of planning and research.

Thank you for your consideration,

Perry Metzger

Perry Metzger, President
Ebbetts Pass Forest Watch