



March 3, 2026

Forest Supervisor David Fournier

Eldorado National Forest

100 Forni Road

Placerville, CA 95667

Attn: MAC Project

Via: <https://cara.fs2c.usda.gov/Public/CommentInput?project=65796>

Re: Mokelumne Amador Calaveras (MAC) Forest Resilience Project #65796

Dear Supervisor Fournier:

Thank you for soliciting public comments in response to the MAC Forest Resilience Project DEIS and Proposed Action.

Inadequate DEIS and Short Public Comment Period

The amount and quality of information provided in the DEIS is lacking and the extremely short two-week public comment period provided is draconian. Useful public comments are directly proportional to the quality and organization of environmental analysis and the amount of time provided the public to review and comment.

Given the multi-year nature of this project, a standard 30-day public comment period would not have substantively delayed project implementation. In addition, this is compounded by the quality of information in the DEIS, which is more an Environmental Assessment in its scope. In addition, a short 2-week comment period for a document that doesn't even have a table of contents likely restricted the ability of most public members to submit useful and effective comments.

For example, public scoping comments on the proposed action in 2024 must have underscored public concern about possible impacts on WSR corridors. It's not unreasonable to expect the DEIS to provide a map showing in detail the proposed project treatments in the WSR corridors. We understand the agency is under pressure to do less analysis in shorter time periods, but this is a zero-sum game if the agency truly desires useful and site-specific public comments.

Impacts on Eligible and Suitable WSR Corridors

We appreciate that the DEIS recognizes all eligible and suitable WSRs in the project, including the suitable segments of the North Fork Stanislaus and North Fork Mokelumne, as well as the eligible segments of the Middle Fork Cosumnes River, Caples Creek, and the four North Fork Mokelumne tributaries. We particularly appreciate that the Forest Service recognizes and applies appropriate protection to the previously eligible 10.5-mile segment of the North Mokelumne downstream of the Bear River confluence, since under federal guidelines the agency has no obligation to do so. We support the prohibition on construction of temporary roads within the ¼-mile WSR corridors (DEIS pg. 83).

CalWild supports applying prescribed fire within all WSR corridors but the DEIS is unclear as to how much soil-disturbing mechanical preparation will be required to implement this ambitious provision of the project. This is important because the project proposes 18,025 acres of prescribed fire in the WSR corridors. Our concern about mechanical disturbance in WSR corridors is heightened by the fact that the Riparian Conservation Area (RCA) BMP #1 Veg-3/Aq-Eco-2/BMP 1.8 only excludes mechanical harvesting/shredding equipment within 15 feet of perennial streams (Table D-1, DEIS pg. 167).

We recommend that BMP #1 Veg-3/Aq-Eco-2/BMP 1.8 be revised to limit mechanical clearing to the minimum needed to achieve the fire Rx while still protecting the water filtering, habitat quality, and recreational opportunities within RCAs. As demonstrated by the Caples Creek Ecological Restoration Project on the Eldorado Forest, preparation for prescribed fire in sensitive areas such as proposed wilderness and WSR corridors can be accomplished by hand if there is a will to do it. We also recommend that herbicides not be applied within RCAs or at least kept to a minimum to protect water quality, sensitive plants, fish, and wildlife, and to reduce exposure to the visiting public.

Impacts on the Middle Fork Cosumnes WSR Corridor

The DEIS lists the sole outstandingly remarkable value of the Middle Fork Cosumnes as recreation (Table 23, DEIS pg. 79). This is incorrect. The 1988 Eldorado Forest Plan identified recreation and free flowing water as outstandingly remarkable values of the Middle Fork Cosumnes (FEIS Appendix E, Table E-6, pg. E-34). Although the narrative supporting this finding is minimal, it was clearly noted as an outstandingly remarkable value, not just criteria required for eligibility. The appendix notes the history of extensive resource development (primarily logging) along the river and states “With all of this human activity, it is truly unusual that the river has remained in an essentially free-flowing condition.” (FEIS Appendix E, pg. E-28) The North Fork Cosumnes was also identified as possessing an outstandingly remarkable free-flowing water value, while none of the other eligible streams identified in the appendix were not so identified. The Cosumnes River is often cited as one of the few remaining undammed rivers in the Sierra Nevada. The MAC Project FEIS should recognize the free-flowing water value of the Middle Fork Cosumnes and provide assurances that this value will be protected under project implementation.

While ground disturbing project activities are minimal in most of the WSR corridors, this is not the case for the eligible segment of the Middle Fork Cosumnes. The project proposes 2,167 acres of forest thinning, 1,622 acres of fuel reduction, 496 acres of fuelbreaks, and 2,209 acres of prescribed fire within the Middle Fork Cosumnes WSR corridor. We are primarily concerned about the ground disturbing impacts of thinning, fuel reduction, and fuelbreak activities. These activities alone will impact 4,285 acres or approximately 61% of the WSR corridor.

Even more alarming is the lack of essential protection in the Forest Plan for the river. All other eligible WSR corridors are provided a Visual Quality Objective (VQO) of Primitive, Retention, or Partial Retention, but the Middle Fork Cosumnes WSR corridor is primarily managed for Modification VQO.¹ This is perhaps why the WSR corridor is proposed for much more intensive ground-disturbing treatments than other corridors in the project area.

We recommend that to ensure protection of its outstanding recreation and free-flowing water values, the Middle Fork Cosumnes WSR corridor be managed at the minimum for Partial Retention VQO and that most of the ground disturbing activities proposed in the MAC project be moved upslope from the river and its RCA. A lighter touch is needed to ensure protection of river values in this corridor.

Fuelbreaks in the North Fork Mokelumne WSR Corridor

While we recognize that MAC Project disturbance is minimal in the North Fork Mokelumne WSR corridor, there is strange anomaly. Near the river's confluence with Panther Creek, four successive fuelbreaks are shown on the project map reaching south from the Forest boundary to the river's edge, all within about a mile of the river corridor. We have never seen a fuelbreak strategy of this kind. What is the reason for it and how can it be implemented without harming the state-protected extraordinary scenery value of the Mokelumne River? More justification is required for this strange proposal and the FEIS should include measures to mitigate scenery impacts by reducing the number of fuelbreaks.

Summary

In summary, we support the relatively light treatments proposed in the WSR corridors and urge that they be considered for the Middle Fork Cosumnes. We support prescribed fire in the WSR corridors but urge that soil-disturbing mechanical preparation be kept to a minimum and that the use of hand crews be considered as was done in the Caples Creek project. The FEIS should recognize and protect the outstandingly remarkable free-flowing

¹ The MF Cosumnes was found eligible but unsuitable in the final Eldorado Plan. This determination was successfully appealed and the river's eligibility was reinstated, but the more protective VQOs provided other eligible segments were not provided to the MF Cosumnes.

water value of the Middle Fork Cosumnes and its corridor should be managed for a protective VQO of at least Partial Retention. The successive fuelbreaks proposed in the North Fork Mokelumne WSR corridor near its confluence with Panther Creek require justification and mitigation to avoid adverse impacts on the state-protected extraordinary scenery of the river. We also recommend a wider than 15 feet mechanical equipment exclusion zone for perennial streams and that generally, RCAs should be treated by hand and not ground disturbing mechanical equipment.

CalWild members are concerned about this project's impacts on eligible and suitable WSR corridors. We have attached their comments to this letter and hope that you will receive them in the spirit in which they are given.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'SEVANS', written in a cursive style.

Steven L. Evans
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