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Comments: 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.

We understand that the Draft Environmental Impact Statement (DEIS) for the Mokelumne Amador Calaveras Forest Health and Resilience Project (MAC Project) is still under development and appreciate the efforts made by the Forest Service to seek public input at this stage in the process. We have reviewed the information that will ultimately become Chapters 1 and 2 of the DEIS and thank you for making this information public. In your next iteration, the EPA recommends that the Forest Service consider a thorough analysis of the impacts of utilizing existing roads and building additional roads as part of the proposed project. Roads have long been recognized as one of the primary sources of soil and water disturbances in forested environments, including water degradation in watersheds. Roads can contribute more sediment to streams than any other management activity and interrupt the subsurface flow of water, particularly where roads cut into steep slopes. In addition, roads have been shown to produce elevated volumes of chronic surface sediment runoff from the road surface.

In the Draft EIS, we recommend discussing the Forest Service's use of Geomorphic Road Analysis and Inventory Package (GRAIP)¹ for small-scale sedimentation analysis. The Forest Service's tool can assist in describing the impact of forest roads on aquatic resources and the Forest Service's practices for avoiding riparian areas.

We appreciate the opportunity to review this iteration of the purpose and need and proposed action. When Chapter 3 is completed and/or the DEIS is released for public review, please send an email with a link to the document to laney.gordon@epa.gov.

Thank you.

(1) <https://www.fs.usda.gov/research/rmrs/projects/graip>