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Eldorado National Forest

Attn: MAC Forest Project

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Submitted electronically via comment portal:

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

Re: Supplemental comments on the Scoping Notice for the Mokelumne Amador Calaveras Forest Health and Resilience Project (MAC Forest Project) (<https://www.fs.usda.gov/project/?project=65796>)

Dear Project Team,

This letter supplements the comments dated Oct. 25, 2024, submitted by Sierra Forest Legacy, CalWild, and others.

The Management Requirement Considerations for the Wild and Scenic Rivers Resource on page 25 of the scoping package is incomplete. Below is a complete summary of all Wild and Scenic River resource issues that must be considered with this project.

State Wild and Scenic River - The North Fork Mokelumne and its main stem from Salt Springs Dam to a point just downstream of Highway 49 is a state-designated Wild and Scenic River. The project should cooperate with state agencies in the management and protection of the river's appropriate Wild, Scenic, and Recreational classification, as well as ensure protection of the river's free-flowing character and extraordinary scenery and recreation values.

North Fork Mokelumne Federal Suitable Segment - The North Fork from Salt Springs Dam to Bruce Crossing was found eligible as a free-flowing river with outstandingly remarkable cultural values and was determined by the Forest Service as suitable for recommendation to Congress. The free-flowing character and Recreational classification of this segment, as well as its outstanding cultural values, must be protected as required by USFS guidelines and the Wild and Scenic Rivers Act. Changed circumstances, including state designation, improved USFS guidelines for identifying outstanding values, and new information about fish, wildlife, recreation, and other resources, should prompt a reassessment of this segment and identification of additional outstanding values.

North Fork/Main Stem Mokelumne Federal Eligible/Non-Suitable Segment - The North Fork and the main stem from Bruce Crossing to the western boundary of the Eldorado National Forest was determined eligible due to its free-flowing character and outstanding cultural values. Because this segment was found non-suitable, no interim protection of river values is currently in place. However, changed circumstances require the reassessment of this segment in light of the proposed project. The most important changed circumstance is the fact that the proposed Devil's Nose dam project (the reason why the river was not found suitable) is now defunct. Other changed circumstances prompting reconsideration of the river's eligibility/suitability include state designation of the river, improved USFS guidelines for identifying outstanding values, and new information about fish, wildlife, recreation, and other resources.

Eligible Mokelumne Tributaries - Tributaries of the North Fork within the Mokelumne Archeological Special Interest Area were also determined eligible by the Forest Service due to their free-flowing character and outstanding cultural values. The eligible tributaries include the lower Bear River, Cole Creek, Beaver Creek, and Green Creek. Since removal of the small diversion dam on Panther Creek, this stream should also be considered eligible. The project should ensure protection of the free-flowing character, outstanding values, and potential classification of these segments.

Middle Fork Cosumnes River Federal Eligible Segment - This river was found eligible in the 1988 Eldorado Forest Plan due to its free-flowing character and outstanding recreation value. The river was not found suitable and not recommended due to a highly speculative dam project proposed on the river. In response to an appeal

noting that the dam project was defunct, the Forest Service agreed to reverse its non-suitability decision. The Middle Fork remains eligible and the project should ensure protection of its free-flowing character, outstanding recreation value, and potential classification. In addition, changed circumstances should prompt a reassessment of the river and the identification of additional outstanding values.

North Fork Stanislaus River Federal Suitable Segment - The North Fork Stanislaus River from its confluence with Highland Creek to a point downstream of the Middle Fork confluence (except for McKay's Reservoir) was determined eligible and suitable by the Forest Service due to its free-flowing character and outstandingly remarkable scenery, recreation, and fish values. The project should ensure protection of the river's free-flowing character, outstanding values, and potential classification.

Non-Assessed Streams - The MAC project area includes many rivers and streams that may not have been assessed for their Wild and Scenic River eligibility in the Eldorado and Stanislaus Forest Plans. Such river and streams must be assessed and the MAC project adjusted accordingly. For example, the Bear River upstream of Bear River reservoir, as well as the segment of the Bear River downstream of Lower Bear River dam but outside the Mokelumne SIA, do not appear to have been assessed for Wild and Scenic eligibility in the 1988 Forest Plan. It should be in light of the MAC project. Even streams that were assessed but found ineligible deserve reconsideration due to changed circumstances that would likely result in the identification of outstandingly remarkable values.

This concludes our supplemental comments in response to the MAC Project scoping.

Sincerely,

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