



September 22, 2025

Mokelumne Amador Calaveras Forest Resilience Project

Attn: MAC Project

El Dorado National Forest Supervisor's Office

100 Forni Road

Placerville, CA 95667

Re: Comments on Purpose & Need and Proposed Action – Mokelumne Amador Calaveras (MAC) Forest Resilience Project

Dear Supervisor Fournier,

On behalf of the Tuolumne River Trust (TRT), thank you for the opportunity to comment on the Purpose & Need and Proposed Action for the Mokelumne Amador Calaveras (MAC) Forest Resilience Project.

We also appreciate the Forest Service's close partnership with the Amador Calaveras Consensus Group (ACCG) and the collaborative effort to shape a project that advances wildfire resilience while protecting ecological and watershed values. We believe this locally developed and supported consensus represents the best strategy for developing significant projects like the MAC and the agreed-upon activities represent the best path forward for meaningful treatments to improve the health and resilience of the subject ranger districts of the El Dorado and Stanislaus National Forests.

Support for Elements of the Proposed Action

TRT strongly supports the Forest Service's effort to reflect areas of ACCG consensus in the Proposed Action, and we wish to highlight the following:

1. **Diameter Limits** – The Proposed Action's limits—protecting trees $\geq 30''$ DBH, with limited exceptions up to $35''$ for operability, and limiting treatments in Spotted Owl PACs to $20''$ DBH—represent a sound balance between wildfire risk reduction and ecological protection. TRT supports these limits, consistent with ACCG's consensus position.
2. **Inventoried Roadless Areas** – We strongly support the prohibition on logging and road construction in inventoried roadless areas, consistent with ACCG agreement.

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3. **Herbicide Use for Fuel Breaks** – We support the ACCG compromise adopted in the Proposed Action to limit herbicide use for fuel break maintenance to 300 acres per district annually, rather than thousands of acres.
4. **Invasive Plant Management** – TRT supports the integrated weed management strategy that prioritizes non-chemical treatments and reserves herbicides as a tool of last resort.

Areas of Concern and Recommendations

While we support much of the Proposed Action, we also have concerns that should be addressed in the EIS:

5. **Temporary Roads** – The allowance of 74 miles of new temporary roads, plus reopening of all currently closed or decommissioned roads, will significantly increase watershed impacts, encourage off-road vehicle use in newly treated areas, and fragment wildlife habitat. We strongly recommend that all temporary roads be **mandatorily closed and naturalized within five years of construction**, with compliance monitoring.
6. **Eligible Wild & Scenic River Corridors** – Nearly 7,000 acres of thinning are proposed in lands eligible for Wild & Scenic designation. TRT requests stronger protections, including prohibiting heavy equipment on slopes >35% within river corridors and adopting mitigation to minimize scenic and riparian impacts.
7. **Fuel Break Widths** – The Proposed Action allows 1,000-foot-wide fuel breaks along highways and 500-foot widths elsewhere. These are substantially wider than those considered effective in other projects, such as SERAL, where 300-foot fuel breaks were determined sufficient in many cases. We urge the Forest Service to reassess widths to minimize unnecessary ecological and scenic impacts.
8. **Cumulative Effects** – At the September 2024 online meeting, when asked whether cumulative impacts across the vast MAC project area would be analyzed, the response was “we haven’t decided if we need to do that.” Cumulative effects of such large scale projects are broadly acknowledged to carry risks and effects larger than the sum of their parts, and a

cumulative effects analysis is essential to catch such risks and mitigate harm in the planning stage.

Conclusion

The MAC Project is a critical opportunity to increase forest and watershed resilience in the central Sierra. TRT supports many of the consensus-driven elements of the Proposed Action but urges the Forest Service to adopt stronger protections for watersheds, Wild & Scenic River values, and wildlife habitat. Narrowing fuel break widths, limiting road impacts, and conducting a robust cumulative effects analysis will ensure the MAC Project delivers on its stated Purpose & Need while protecting the resources that sustain local communities and downstream water users.

We appreciate the opportunity to comment and look forward to continued engagement as the MAC Project advances through the EIS process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick Koepele". The signature is fluid and cursive, with the first name "Patrick" and last name "Koepele" clearly distinguishable.

Patrick Koepele
Executive Director