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Forest Service

Mokelumne Amador Calaveras Forest Health and Resilience Project (MAC Project, #65796)

Central Sierra Audubon generally supports the Forest Service authorizing large landscape forest treatments that are intended to reduce the risk of wildfire damage to forest habitat, watersheds, and recreational values. For the MAC Project that is proposed for the Calaveras District of the Stanislaus Forest and the Amador District of the Eldorado National Forest, Audubon provides these specific comments.

Audubon believes it is very important to protect large trees on national forest lands. We urge that the USFS adhere to the proposed limits in Forest Thinning treatments of generally retaining all trees 30[rdquo] and larger.

Where limited logging is planned in portions of California Spotted Owl PACs to reduce density in order protect large trees from being killed by wildfires, Audubon accepts the lower limit of no logging of trees 20[rdquo] and larger.

Audubon supports the proposal to keep logging and road-construction out of wild, roadless areas.

Audubon has submitted comments in the past opposing the use of herbicides on public forest lands. That is our position for the MAC Project. However, we understand that the ACCG forest stakeholder group came to consensus to reduce the amount of allowed herbicide use on fuel breaks from 3,000 acres per district per year to only 300 acres per district per year. Audubon desires no herbicide use, but the far smaller amount of herbicides that ACCG agreed to is far better than higher levels of use.

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Audubon sees that the MAC Project proposes to authorize prescribed fire anywhere in the massive project area. Audubon asks that in the final plan, that the Forest Service describes detailed protective requirements to minimize risk to threatened and endangered species, riparian habitat areas along streams and rivers, and areas of special recreation values.

The Proposed Action for the MAC Project describes a massive amount of acres that are planned to be authorized for logging, the construction of fuel breaks, fuel reduction actions such as mastication and burning, and other treatments. This appears to be a truly enormous amount of treatments that when completed over many years may combine to cause cumulative impacts to wildlife, or soils, or water quality, or to recreation and scenic values. Audubon asks that the Forest Service design mitigation measures to reduce the risk of cumulative effects from this giant project.

Overall, Audubon urges the Forest Service to carefully adhere to the collaborative agreements of compromise and middle ground that were developed by the ACCG stakeholder group with representatives from the timber industry, conservation groups, tribal interests, businesses, water agencies, and other participants.

Thank you for considering these comments.

Sincerely,

Gail Witzlsteiner

Gail Witzlsteiner

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President

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