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First name: Steven

Last name: Brink

Organization:

Title:

Comments:

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Eldorado National Forest Supervisor's Office

100 Forni Road

Placerville, CA 95667

Attn: MAC Project

Re: Mokelumne Amador Calaveras Forest Health and Resilience Project Draft EIS

Dear Supervisors Fournier and Kuiken,

The American Forest Resource Council (AFRC) provides the following comments on the Mokelumne Amador Calaveras Forest Health and Resilience Draft Environmental Impact Statement (DEIS). AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands through the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Eldorado and Stanislaus National Forests, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

Introduction (DEIS pp. 3-4)

A Fuels and Forest Health Emergency Situation determination (ESD) was authorized by the acting Regional Forester, Jason Kuiken on May 1, 2025.

The DEIS is developed under the updated 2025 USDA NEPA Implementing Regulations, Interim Rule.

The MAC Project is located entirely on National Forest System (NFS) land managed by the Amador Ranger District of the Eldorado National Forest (ENF) and the Calaveras Ranger District of the Stanislaus National Forest (SNF). The project area covers 246,751 acres including 120,577 acres on the ENF and 126,175 acres on the STF.

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AFRC appreciates this lead in for the first couple of pages of the DEIS Vol 1. It makes it clear right up front that there is an ESD in place and defines the size and location of the project. We are supportive of the use of ESDs in the face of extreme wildfire risk. Streamlining the implementation of any project that seeks to mitigate the risk of catastrophic wildfire is warranted.

Purpose and Need

The MAC Project has four categories to capture the Purpose and Need:

1) Reduce safety hazards across the public lands (DEIS, Vol. 1, pp. 4-5)

There are 111,226 acres of the Project Area within the wildland-urban interface (WUI).

There are additional assets outside the WUI such as campgrounds, trails, recreation residences, and water storage infrastructure.

The communities and infrastructure current conditions are at an elevated risk from high-severity wildfire. Since 2014, 11 percent of the MAC Project area has burned, of which 41 percent burned at high severity. Strategic application of fuels reduction, thinning and prescribed fire will be used along with constructing a network of fuel breaks to support prescribed fire and wildfire response.

2) Restore Ecosystem Health and Resilience (DEIS, Vol. 1, pp. 5-7)

Forested landscapes are currently too homogeneous, have increased canopy cover, have an abundance of ladder fuels, and are dominated by fire-susceptible white fir rather than fire-resistant pine. The combination creates a stressed condition vulnerable to high-severity wildfire as well as mortality from insects and disease. The impact of natural disturbances on the Project area can also result in reduced water quality, loss of reservoir storage capacity, and cause stream habitat degradation.

3) Promote a Fire-Resilient Landscape (DEIS, Vol. 1, pp. 7-8)

Compared to 100 years ago, Sierra Nevada forests are now uncharacteristically dense, with understory ladder fuels, often coupled with suppressed codominant size trees, and a thick layer of dead and down woody material. Recent research using an inventory of the Sierra Nevada stand conditions of 100 years ago to an inventory of present conditions shows today there are 6-7 times more trees on the landscape (<https://doi.org/10.1016/j.foreco.2021.120004>).

Based on fire return interval departure (FRID) analysis of the MAC Project area, approximately 56 percent is highly departed, 27 percent is moderately departed, and only 4 percent is within the historical range of variability.

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It will require a full suite of management actions at an increased pace and scale to promote a fire-resilient landscape.

4) Maintain and Support Local Communities (DEIS, Vol. 1, pp. 8-9)

Surrounding communities near the MAC Project are smaller, natural resource-based communities. Businesses and industry rely on healthy public lands to support recreation, tourism, wood product revenue, and a predictable flow of wood products. AFRC supports the Purpose and Need of the MAC Project as described in the DEIS at pp. 3-9. Further, AFRC likes the use of the four sub-head categories that make it easy for the reader to understand the Purpose and Need and to know what to expect from the Proposed Action.

The Proposed Action and No Action Alternative

Alternative 1: The Proposed Action

Activities associated with Alternative 1 include forest thinning, fuel reduction, fuel breaks, prescribed fire, targeted grazing, road access including road reconstruction, maintenance and repair, and temporary roads, as needed, and invasive weed control and eradication.

Alternative 1 proposes the following activities (DEIS, Vol. 1, pp. 9-32):

- a) 66,881 total acres of forest thinning,
- b) 50,543 total acres of fuel reduction (typically removal of understory ladder fuels less than 10- inch diameter breast height (DBH)),
- c) 12,591 fuel break acres on ENF and 10,823 fuel break acres on STF,
- d) fuelbreak maintenance using herbicide (up to 300 acres/year/ranger district),
- e) prescribed fire (242,006 acres),

- f) targeted grazing to consume, break off, or trample vegetation to reduce amount or density of fuels,
- g) reconstruction and maintenance of existing roads and up to 76 miles of temporary road construction (up to one mile per 1,000 acres of forest thinning),
- h) Implementation Plan for Eradication and Control of Invasive Plants (currently 1,085 acres identified) of 32 invasive plant species. Treatment methods include manual and mechanical methods, burning, mulching, mowing, girdling, and targeted grazing as well as hand application of herbicide. Throughout the Project life, it is anticipated that newly discovered infestations of invasive plants will occur and become part of the implementation plan for eradication and control.

AFRC finds the list of seven specific types of activities makes it easy to follow the elements that make up the Proposed Action.

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Project-Specific Forest Plan Amendments (DEIS, Vol. 1, p. 32)

There is a suite of proposed MAC Project-specific forest plan amendments in Appendix C listed in Table C.2-1 (DEIS, pp. 158-166). They are all refinements to management for California Spotted Owl home range core areas (HRCAs).

Management Requirements and Best Management Practices (DEIS, pp. 32-47).

AFRC has no comment on the list of Forest Plan Amendments, Management Requirements, and Best Management Practices.

Alternative 2: The No Action Alternative (DEIS, pp. 47-104)

The analysis of Alternative 2 is separated into several distinct parts. The first part is an issue-based analysis comparing the potential effects of Alternative 1 to taking no action (Alternative 2). The DEIS uses a cause-effect approach to nine specific issues to evaluate tradeoffs, risks, and benefits of Alternative 1 and Alternative 2.

1) The Cause-and-Effect Issues addressed are Table 12 (DEIS, Vol. 1, p.48):

Cause and Effect Addressed

Table 12. Cause and Effect

Issues. Issue/Element

Forest Thinning A. The proposed forest thinning has the potential to reduce the quality and quantity of CSO habitat.

B. The proposed forest thinning may impact the amount and distribution of mature and old-growth forests. Analysis Issue 1B

Prescribed Fire Smoke emissions from prescribed fire may adversely affect air quality and human health. Analysis Issue 2

Socio-Economics The proposed DBH limits will impact the Forest's ability to provide timber (wood product) to local and regional communities and the likelihood of treatment implementation. Analysis Issue 3

Inventoried Roadless Areas The proposed action may impact the IRA characteristics and diminish their eligibility for future wilderness designation. Proposed Action ;

See also Response

to Comments

Wild & Scenic Rivers The proposed action may impact the free-flowing character and outstanding remarkable values of Wild & Scenic, Suitable, and Eligible Rivers.

Herbicides The proposed use of herbicides to treat non-native invasive weeds and to maintain fuel breaks may adversely affect water quality, human health and the health and diversity of wildlife.

PCT The proposed actions may impact the watershed along the PCT. Added Management Requirements; See also Response to Comments

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Water Supply The proposed actions have the potential to impact public water supply. comments

Temporary Roads The construction of temporary roads that are not properly decommissioned lead to erosion, unauthorized cross-country travel by wheeled motor vehicles, and introduction of noxious weeds.

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AFRC supports the Cause-and-Effect approach.

2) The DEIS addresses the Ability of the Proposed Action to Meet the Purpose and Need (DEIS, Vol 1, pp. 106-112).

Indicators and measurements used to address each of these were Stand Density Index, Basal Area, Conditional Burn Probability, Conditional Flame Lengths, Fire Type, and Prescribed Fire.

This approach shows that Alternative 1 markedly reduces high risk acres of large-scale tree mortality due to insects, disease, and drought, and increases low risk acres, with the most pronounced improvements where mechanical treatments are paired with prescribed fire (Tables 26 and 27) (DEIS, pp. 107-112).

Alternative 1 delivers substantial improvements in forest resilience and wildfire risk reduction across all six metrics analyzed and concludes pairing mechanical treatments with prescribed fire is "essential" for meeting landscape health goals (DEIS, p. 118).

AFRC supports the use of six indicators (Stand Density Index, Basal Area, Conditional Burn Probability, Conditional Flame Lengths, Fire Type, and Prescribed Fire) to address the ability of the Proposed Action to meet the Purpose and Need.

Diameter Limits

Despite current Plan direction, we remain unsupportive of the use of diameter limits in silvicultural prescriptions. These arbitrary limits hamper the ability for land managers to attain desired end results across a diverse landscape with varying levels of forest structure. The DEIS asserts that diameter limits "ensure compliance with management direction." We continue to be confused why the Forest Service believes there is a need to ensure that their staff complies with Plan direction through the use of diameter limits. This assertion implies that agency foresters are unable to effectively apply silvicultural prescriptions on their own and instead need these arbitrary limits to ensure desired end results on the ground. We urge the Forest Service to explore

avenues to remove these arbitrary limitations from their project analyses and their Land Management Plans and trust their foresters to apply their professional expertise when designing vegetation management treatments to meet Management Plan direction.

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Closing Remarks

AFRC finds that the MAC DEIS is thorough and comprehensive. Thank you for the opportunity to comment.

Sincerely,

Steven Brink
Consultant
Attn: Steve Brink
701 Hawkcrest Circle
Sacramento, CA 95835
sbrink@amforest.org
916-208-2425

cc: AFRC

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