



March 3, 2026

Eldorado and Stanislaus National Forest, Attn: MAC Project
Submitted electronically via comment portal:
<https://cara.fs2c.usda.gov/Public/CommentInput?project=65796>

Re: Comments on the Draft Environmental Impact Statement for the Mokelumne Amador Calaveras Forest Resilience Project (MAC Project)

Project Team:

The Center for Biological Diversity submits the following comments on the DEIS for the Mokelumne Amador Calaveras Forest Resilience Project (“Project”) on the Eldorado and Stanislaus National Forests. The MAC Project would impact roughly 250,000 acres, including significant amounts of California spotted owl (CSO) habitat. Blakey et al 2019 notes that “[e]ven where PACs protect nesting stand conditions conducive to successful reproduction, stand-altering activities elsewhere in owl home ranges may reduce occupancy or reproductive success”; here, the MAC Project will not even protect PACs.

We thank Sierra Forest Legacy et al for their detailed comments and analysis. We agree that the Project, by itself, and as part of the serial use of project-specific Forest Plan Amendments, will cause significant harm to the spotted owl and its habitat. For example, as the SFL Letter notes, the differences between existing forest plan direction and the project-specific plan amendments are substantial, including allowing degradation of highest quality nesting and roosting habitat close to nest sites and across the spotted owl’s home range, as well as the degradation of suitable habitat to unsuitable.

The SFL Letter describes how the Project violates NEPA and NFMA. We agree and find it especially telling that the Project documents make no effort to explain compliance with Standard 80 of the Forest Plan (“[c]onduct vegetation treatments in no more than 5 percent per year and 10 percent per decade of the acres in California spotted owl PACs in the 11 Sierra Nevada national forests”). SFL et al found that treatments would be applied on about 32% of the area allocated to PACs, which of course far exceeds Standard 80’s threshold of 10 percent.

We ask that the Forest Service, in light of the detailed information and analysis presented in the SFL Letter, abandon the MAC Project in its current form. Vegetation treatments can occur in spotted owl habitat without the extreme loss of canopy cover that the Project seeks to achieve. Likewise, projects can occur without degrading PACs or annihilating suitable owl habitat.

Sincerely,

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