



August 1, 2022

Eldorado National Forest

Submitted via email to comments-pacificsouthwest-eldorado@usda.gov

Re: Eldorado National Forest Roadside Hazard Tree Mitigation Project Scoping Project 62238

The Foothill Conservancy is a 501(c)(3) non-profit conservation organization devoted to protecting, restoring, and sustaining the natural and human environment in Amador and Calaveras Counties for the benefit of current and future generations. Our organization has a history of involvement in local and regional conservation and watershed advocacy. We participate regularly on the Amador Calaveras Consensus Group and interface with ENF staff through that collaborative on many forest related issues. We support the need to treat hazard trees for public safety along roads on the ENF, and have some suggestions to better protect ecological values while still providing for public safety. Thank you for taking the time to consider our input at the scoping phase.

- 1. The majority of the roads proposed for treatment are high clearance vehicles only and should be closely examined to determine if those roads are necessary before including them for treatment.**

Consideration should be given to whether those high clearance roads are necessary. Given the tremendous amount of erosion that occurs post-fire, it does not make sense to further increase sedimentation issues by maintaining excess roads, especially those that most of the public are unable to access. We encourage the team to cross-reference the ENF Travel Analysis Report, which features an appendix "roads likely not needed for future use" to consider reducing the number of miles of roads to be treated for hazard trees. The Travel Analysis Report offers insights into sensitive resources near roads that might warrant decommissioning of the road as well. We anticipate more and more hazard trees on the landscape as drought and disease further thin the forest. It makes more sense to reduce the footprint of areas needing treatment by decommissioning excess roads rather than continuing to maintain roads that will likely need treatment again in the future.

- 2. There should be a DBH limit for the removal of green trees.**

Given the tremendous amount of standing dead that needs to be removed, providing the option for removal of green trees seems unnecessary. At minimum, a DBH limit of 50" or smaller should be included for green trees. One dead branch on a 60" DBH tree does not warrant removal of the entire tree. We are concerned about the possibility of large green trees being targeted for removal to make the project more financially viable given that most of the hazard trees will no longer be merchantable timber by implementation.

3. There needs to be a DBH limit for felling non-hazard trees.

While we understand that there may be very limited circumstances in which a green tree poses a “mechanical risk” to the felling of hazard trees, there needs to be a DBH limit for felling non-hazard trees. Non-hazard trees larger than 45” DBH should not be permitted to be felled.

4. Strategic felling of trees across the slope to help address erosion should be implemented.

Felling trees across the slope, where it does not pose an access risk for future potential firefighting operations, should be utilized to help alleviate erosion issues.

5. New temporary road construction to support the removal of hazard trees should be quantified and the need for removal instead of leaving the trees should be justified

Are new temporary roads necessary to the project? If temporary roads are required to remove the felled trees, consider leaving those trees in place to avoid construction of new temporary roads. Consider removing trees where access exists, and where it is safe to do so, leave the trees that would require new temporary road construction on the ground.

6. Where there are isolated segments of road, confirm those segments of road are indeed still publicly accessible.

SPI habitually closes public access to their lands during high fire danger, which is the new normal in summer in the Sierra Nevada. It would help prioritize treatment areas to eliminate treatments to isolated road segments that may become inaccessible due to reasons outside of the ENF’s control.

7. There should be a plan in place to address the potential for invasive weed proliferation in the treated areas.

The existing BMP’s are not likely to be enough to prevent the introduction and spread of invasive weeds given the nature of the project. Even if equipment is adequately cleaned per the BMP’s, the potential for the public to introduce weeds still exists. What does the ENF envision these cleared roadside areas to look like five, ten years post-implementation? Leaving bare soil along traveled roadways creates the potential for a number of undesirable outcomes. A plan to promote the vegetation type and density that is desired for roadside areas should be considered.

Thank you for taking the time to consider our input. We look forward to continuing to work with you on this project.

Megan Fiske
Executive Director, Foothill Conservancy



megan@foothillconservancy.org

Meredith Sierra
Watershed Conservation and Land-Use Advocate



meredith@foothillconservancy.org