



May 3, 2022

Chuck Loffland, Acting District Ranger
Amador Ranger District
26820 Silver Drive
Pioneer, CA 95666

Re: Foothill Conservancy comments on Forest Project Plan Phase 1 Preliminary Proposed Action

Dear Chuck:

Introduction

The Foothill Conservancy submits these comments to support and provide feedback for the Forest Projects Plan Phase 1 preliminary proposed action. This project would allow non-commercial vegetation and prescribed burning treatments across a 25,529 acre treatment area within the upper Mokelumne River watershed in order to reduce the risk of high intensity wildfire. There is a critical need to address heavy fuel loads in the forest to help mitigate the impacts of high-severity wildfire and begin to restore the natural fire regime. We are encouraged to see the collaborative effort by the Upper Mokelumne River Watershed Authority (UMRWA) and the United States Forest Service (USFS) to get these treatments done before it is too late. Our comments identify parts of the plan that could use clarification, and identify our main concerns with the project as written, as well as expressing our overall support for the project.

Hand-Thinning

In table 1 it shows the maximum extent of hand thinning as 1,877 acres but this is misleading because there could actually be much more. The footnote 3 in table one says "hand thinning treatments will be utilized wherever mechanical fuels reduction treatments are determined to not

be suitable based on field reconnaissance.” This implies that the maximum extent of hand thinning could be much, much higher, dependent upon the results of field reconnaissance. There are also plans to convert the mechanical fuel treatment areas that do not receive adequate archeological survey coverage into hand-thinning treatments. During an update given to the UMRWA board in April, it was said that it only has the funding and time to complete about 1,500 additional acres of archeological survey coverage for phase 1. **This means that close to 10,500 additional acres of hand-thinning treatments could occur during phase 1, which is a significantly large portion of the overall project.** We do not support this approach because hand-thinning treatments require more time and resources than other treatment options, which would potentially leave thousands of acres untreated. One suggestion would be to put more funding into completing archeological survey coverage, so these areas can get treated with mechanical fuel treatments rather than hand-thinning. The amount of money and time savings from doing mechanical fuel treatments versus hand-thinning might actually make up for the cost of the archeological surveys. You could also save the inadequate archeological survey coverage areas to be treated in phase 2, during which treatments will be more extensive and effective at reducing wildfire risk.

Page 15 states that “ Hand thinning may be followed by chipping, lopping and scattering, and/or prescribed burning.” **We believe that all hand-thinning treatments must be followed by prescribed burning, lopping and scattering, piling and burning, or chipping in order for it to be an effective way to reduce wildfire risk.** If hand-thinning is not followed by any other treatments it does little to reduce the fuel load, it just repositions it to be surface fuel rather than ladder fuel. Therefore, the project would better serve its purpose and need to reduce severe wildfire threat if hand-thinning treatments are required to be followed by one of the other treatments suggested above.

Timeframe of NEPA Decision

The proposed action states that the hand-thinning and mechanical fuel reduction treatments could last more than 10-15 years, which is a lengthy amount of time for the scale of treatments. If phase 1 treatments are expected to take this long, how will phase 2 be achievable within a reasonable timeframe? **Since a CE requires a limited amount of field surveys, analysis, and monitoring, the length of this NEPA decision should not extend beyond 10 years.** Within that time conditions could significantly change and cause the need for different types of treatment.

We understand that the Forest Service has been struggling with staff and resource capabilities, but they shouldn't accept new forest treatment projects if they do not have the resources to complete them. We do not want this project to be added to a backlog of treatments that need to be completed without the resources to do so.

Prescribed Fire

We have a few concerns with the description of prescribed burning treatment activities. Table 1 states that 2,965 acres of prescribed burning treatments overlap with pending mechanical fuel

reduction treatments, but did not clarify what would happen if the archeological surveys were not completed. Would this mean that it would be treated with only hand-thinning instead? **It is our recommendation that if these prescribed fire treatments are dependent on the mechanical thinning treatments being done first, please prioritize these areas for archaeological survey coverage.**

If prescribed burning is allowed in areas without archaeological survey coverage, but mechanical fuel reduction is not, that could cause issues with the project. It is our understanding that most of the prescribed burning treatment areas would benefit from a prior treatment to reduce fuel load. It would be worrisome if the forest service staff had to conduct an additional 2,000+ acres of hand-thinning to prepare for prescribed burning instead of mechanical fuel reduction treatments.

We are very happy to see that more forest projects are incorporating prescribed burning, but are concerned that the Forest Service may not have the resources to implement those treatments. During one of the ACCG planning meetings it was said that over the last 2 years they have treated 0 acres with prescribed burning and have a backlog of projects due to staffing shortages and stress related to the Caldor fire. We were told they would be using new funding sources and tools to help increase the pace and scale of prescribed burning, and would like to see this plan included in the final proposed action. We want to know how they plan on increasing the pace and scale, as well as what problems they expect to encounter along the way. One of these problems would be climate change, which will reduce the burn windows for these types of treatments. We want to clarify how the Forest Service staff plans on being prepared for these burn windows and how they plan to deal with the public who may have concerns about smoke and other issues.

Aspen Stand Clarification

We are relieved to see that the impact of the aspen restoration treatments was scaled down after incorporating feedback from the ACCG. We agree that removing trees up to 12" in diameter will reduce competition and promote aspen growth. **We would still like to see a clear definition of aspen stands.** What criteria will the USFS be using to identify aspen stands? This will be useful to identify especially if the treatments in phase 2 will be more intensive within aspen stands.

Mechanical Fuel Reduction

On page 14 it states that mechanical fuel reduction would be applied to no live trees that exceed 10" DBH and meet minimum merchantable timber specifications. It then clarifies that "Lodgepole pine is not considered merchantable in this project." Does that mean that you will be able to cut any size lodgepole in this project area? Please clarify this detail and the justification for allowing it.

Phase 2 Recommendations

Through participating in ACCG, we are aware that you will be planning phase 2 to treat a much larger landscape and cover more extensive treatments. We have been very pleased with the

plan for phase 1 and are encouraged by the progress that has been made in a short amount of time. Why not do a similar treatment to phase 1 in the Calaveras Ranger District where they have a severe fuel loading issue? Based on lessons learned from the landscape scale SERAL project in the Stanislaus National Forest, phase 2 is going to take an incredible amount of time, effort, and funding to finally get approval for treatments. If we wait to treat the Calaveras Ranger District until phase 2 can be approved, it may end up burning in a severe wildfire before there is a chance to treat it. Perhaps you can plan a phase 1(b) in the Calaveras Ranger District as a way to get treatments on the landscape quickly, then plan phase 2 to build on the treatments of phase 1(a) and 1(b).

Conclusion

We appreciate you collaborating with members of the ACCG and incorporating their input by revising the scale of the project and adjusting the aspen treatments. By making this a collaborative approach it has reduced the controversy of the project and identified priorities we can agree with. Our main concerns with the project are the feasibility of achieving project objectives if a lack of archaeological surveys leads to thousands of acres being hand-thinned instead of mechanically thinned, and the need to ensure follow-up treatments occur after hand-thinning so maximum benefit can be achieved. Thank you for considering our input, we hope these comments will lead to a stronger final project.



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Watershed Conservation and Land Use
Advocate



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