

Amador-Calaveras Consensus Group

c/o Jill Micheau, PO Box 913, Arnold, CA 95223
209-813-7019

February 22, 2018

TO: CALAVERAS RANGER DISTRICT
Stanislaus National Forest
Hathaway Pines, CA 95233

ATTN: Ray Cablayan, District Ranger

RE: Ray Cablayan, January 11, 2018, *Last Chance Mastication Project*, Stanislaus National Forest, Calaveras Ranger District

The Amador-Calaveras Consensus Group (ACCG) is a diverse, community-based collaborative that works to create fire-safe communities, healthy forests, functional watersheds, and sustainable local economies. Its members represent diverse interests including local citizens, county, state and federal agencies, the timber industry, and environmental advocacy organizations. The ACCG Planning Group visited the Last Chance Mastication Project in April of 2016 and considers the Last Chance Fuelbreak to be vital in the protection of the upslope communities along the Hwy 4 corridor and the Utica Ditch against wildfire.

The Calaveras Ranger District proposes to mechanically treat ~380 acres of mixed conifer and manzanita on the northern rim of the North Fork Stanislaus River Canyon that is full of dense fire fuel. A fire in the Canyon will quickly climb the steep slopes and threaten the dozen developments on the rim as well as the Utica Ditch that provides domestic water to Greater Angels Camp. Last Chance is a landscape scale fuel break that is strategically located on the Canyon rim along the WUI and will provide the fire services with a substantial anchor for both ground and aerial attacks against wildfire.

It is noteworthy that Last Chance will link with other fuel breaks under development on the WUI around the community of Forest Meadows by the Forest Meadows HOA, CAL FIRE, Calaveras Resource Conservation District and the CalAm Forestry Team (See map). When completed in 2020, there will be a total of 764 acres of continuous fuelbreak along the Forest Meadows WUI.

The ACCG has three concerns:

1. **Utica Ditch.** The proposal does not describe the need for mitigations to protect the Utica Ditch during treatment and one presumes that mastication and hand crews will operate up to the water's edge. There is a need to include a review by the Union Public Utility District focused on the immediate impact of fuels treatment and long-term impacts such as soil erosion and sedimentation from the treated land.
2. **Long-term Maintenance.** There is no discussion of the desired long-term maintenance objectives for the Last Chance Fuel Break. The ACCG would welcome discussions about how to best plan for the long-term maintenance of critical fuel breaks.
3. **NEPA Analysis.** The project proposal refers to a 'CE', but does not cite the specific paragraph in the Code of Federal Regulations that authorizes a Categorical Exclusion for mechanical and hand treatments of hazard fuels. It is confusing that the proposal provides mitigations suggesting that a 'Mitigated Finding of No Significant Impact' applies to this project rather than a Categorical

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Exclusion. Finally, evidence of community support and collaboration with CAL FIRE and the local fire districts should be included in the proposal.

Apart from these concerns, the ACCG endorses the proposal to implement the Last Chance Fuelbreak and truly appreciates the Calaveras Ranger District's focus on WUI projects that link with similar projects sponsored by other stakeholders. It is only through an All-Lands approach that California will escape from large-damaging fires in the future.

Sincerely,

Jill M. Micheau

Jill Micheau

Administrator For

Amador-Calaveras Consensus Group

Approved: February 21, 2018

