January 17, 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 433 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 Angeles 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 are no long-term maintenance plans for the 433-acre Last Chance Fuelbreak. Similarly, there are no maintenance plans for the 326-acre Forest Meadow Fuelbreak system and one wonders about future maintenance of the Forest Meadows golf course that recently closed. Is it time for the Forest Service, State Parks, Sierra Pacific Industries, CAL FIRE, Water Districts and nine HOA’s on the Hwy 4 corridor to create an ‘All Lands Authority for Fuelbreak Maintenance’ to assure that our current investments are not lost from neglect?
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 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 build the Last Chance Fuelbreak and truly appreciate 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 catastrophic fire in the future.

Sincerely,

Jill M. Micheau

Jill Micheau

Administrator For

Amador-Calaveras Consensus Group

Approved: October 17, 2018

