United States Department of Agriculture

Mokelumne Amador Calaveras Forest Health and Resilience

Charting a Path to Resilient Forests and Safer Communities

Record of Decision – Stanislaus National Forest



Introduction

The Mokelumne Amador Calaveras (MAC) Project spans both the Amador Ranger District on the Eldorado National Forest and the Calaveras Ranger District on the Stanislaus National Forest. Although the environmental analysis for the Project is documented in a single, joint Environmental Impact Statement (EIS), implementation responsibilities are divided between the two forests. Accordingly, two separate Records of Decision are being issued—one by the Eldorado National Forest and one by the Stanislaus National Forest—each authorizing only those activities that occur within its respective administrative boundary.

This Record of Decision applies solely to the portion of the MAC Project located on the Stanislaus National Forest. As the Responsible Official for the Stanislaus National Forest, I am issuing this decision to authorize the actions described for lands within the Calaveras Ranger District. While this decision tiers directly to the shared MAC EIS for its description of the proposed action and analysis of environmental effects, it governs only the activities occurring on Stanislaus National Forest lands. The Eldorado National Forest will issue a separate decision for the actions occurring on its lands. Together, the two decisions implement the MAC Project across the broader landscape while ensuring that each forest retains authority and accountability for activities within its jurisdiction.

The EIS for the MAC Project analyzes the potential environmental impacts of both the proposed action and the no-action alternative. As the Responsible Official for the portion of the project located on the Stanislaus National Forest, I certify that I have reviewed and incorporate by reference the MAC EIS (including all appendices and supporting documentation) and certify it as the analytical basis for this Record of Decision (ROD) (7 CFR 1b.8(b)(1)). I also certify that all substantive alternatives, information, and analyses submitted by State, Tribal, and local governments, environmental organizations, industry, and the public, during scoping (September 2024), the 14-day Purpose and Need and Proposed Action comment period (September 2025), and the 14-day draft EIS comment period (February 2026) were fully considered in developing the EIS (7 CFR 1b.8(b)(2)).

Decision

Selected Alternative (7 CFR 1b.8(3))

I have decided to select Alternative 1 – the "Proposed Action", as described in Chapter 2 of the EIS. Alternative 1 best meets the project's purpose and need and provides the most effective, balanced strategy for enhancing forest health and resilience. Additional details regarding authorized activities and associated treatment acreages are provided below (see Description of Authorized Actions and Associated Acreages).

Description of Authorized Actions and Associated Acreages

Forest Thinning (37,224 acres)

With this decision, I authorize forest thinning treatments across 37,224-acres consistent with the description in EIS Chapter 2.1 A and EIS Table 3 (MAC STF ROD Table 1, MAC ROD Map 1), including the associated DBH limits (MAC STF ROD Table 2).

Table 1. Authorized Forest Thinning.

Treatment Type	Successional Class[1]	Other Forest	CSO PAC[2]	CSO Territory	IRA[33]	W&S River Eligible[4]	W&S River Suitable[4]	Project Total
Forest Thinning Slope <45%	Mid-Closed	11,312	859	3,710	0	4	0	15,881
	Late-Closed	12,308	1,088	3,465	0	1	0	16,857
	Total	**23,617**	**1,946**	**7,175**	**0**	**5**	**0**	**32,738**
Forest Thinning Slope >45%	Mid-Closed	1,262	190	525	0	10	0	1,978
	Late-Closed	1,344	350	815	0	18	0	2,508
	Total	**2,606**	**540**	**1,340**	**0**	**28**	**0**	**4,486**

Table 2. Forest Thinning DBH Limits

Land Allocation	Tree Type	DBH limit (inches)
CSO PAC	All Trees	≤20; up to 35 for operability
CSO Territories	All Trees	≤30, up to 35 for operability
General Forest	All Trees	≤30, up to 35 for operability

Fuel Reduction (26,998 acres)

With this decision, I authorize mechanical fuel reduction treatments across 26,998-acres consistent with the description in the EIS Chapter 2.1 B and EIS Table 6 (MAC STF ROD Table 3, MAC STF ROD Map 1).

Table 3. Authorized Fuel Reduction

Treatment Type	Other Forest	CSO PAC	CSO Territory	IRA	WSR Eligible[4]	WSR Suitable[4]	Project Total
Fuel Reduction	14,255	7,408	5,335	0	20	0	26,998

Fuelbreaks (10,677 acres)

With this decision, I authorize the construction and maintenance of 10,677 acres of fuelbreak consistent with the description in the EIS Chapter 2.1 C and EIS Table 8 (MAC STF ROD Table 4, MAC STF ROD Map 1).

Table 4. Authorized fuelbreak treatments.

Treatment Type	Other Forest	CSO PAC	CSO Territory	IRA[4]	W&S River Eligible	W&S River Suitable[4]	Project Total
Forest Thinning	**2,446**	**231**	**1,526**	**0**	**0**	**0**	**4,203**
Fuel Reduction	3,450	824	1,631	0	0	0	5,906
Other[5]	357	75	137	251	0	121	569
Total	**6,253**	**1,130**	**3,294**	**251**	**0**	**121**	**10,677**

Note: Some segments of the authorized fuelbreak network will require new construction, while others consist of previously constructed fuelbreaks that now require vegetation maintenance to

[1] See Appendix B, Table B-1
[2] PAC = Protected Activity Center
[3] Inventoried Roadless Areas
[4] IRA and Wild & Scenic River acres do not contribute to project total because they may overlap with CSO PAC, CSO Territory and Other Forest categories. Therefore, these acres are not mutually exclusive.
[5] "Other" = barren areas not needing any vegetation management, or areas with steep slopes where mechanical treatments are not feasible. In these areas, hand thinning may occur.

remain functional. This decision authorizes both the construction of new fuelbreak segments and the maintenance of existing ones, as well as the mechanical treatments necessary to sustain the effectiveness of the fuelbreak network beyond the initial entry.

Use of Herbicides to Maintain Fuelbreaks

Through this decision, *glyphosate and triclopyr* may be used to maintain fuelbreaks on as much as 300 acres per year within the MAC project area on the Calaveras Ranger District, consistent with the description in the EIS Chapter 2.1 D.

Prescribed Fire (123,631 acres)

Under this decision, I authorize the use of prescribed fire anywhere on national forest system (NFS) land within the MAC project area on the Calaveras Ranger District consistent with the description in the EIS Chapter 2.1 E (MAC ROD, Map 1, ROD Table 5).

We will apply prescribed fire strategically. In many areas, mechanical treatments must occur before prescribed fire, whether broadcast burning or pile burning, can be implemented safely. The suite of actions being authorized in this decision are designed to support and expand the use of prescribed fire over time. As mechanical treatments are completed and conditions improve, opportunities for safe and effective prescribed burning will increase. Whenever and wherever conditions are conducive to broadcast burning, my staff will pursue those opportunities. We will utilize all available resources to take advantage of burn windows to apply prescribed fire as effectively as possible.

Table 5. Authorized prescribed fire.

Treatment Type	Other Forest	CSO PAC	CSO Territory	IRA[4]	W&S River Eligible[4]	W&S River Suitable[4]	Project Total
Follow-up Prescribed Fire	46,733	11,024	17,144	251	53	121	74,900
Additional Prescribed Fire	32,030	7,380	9,321	19,863	60	8,175	48,731
Total	**78,763**	**18,404**	**26,465**	**20,115**	**113**	**8,296**	**123,631[6]**

This decision also authorizes multiple prescribed fire entries on the same acres to maintain desired conditions. Landscape-scale prescribed fire—applied at appropriate fire-return intervals and supported by diverse fire resources—is essential for restoring desired fire condition classes and sustaining forest health. Without prescribed fire within 2–5 years of initial treatments, the effectiveness of thinning, fuel reduction, and fuelbreaks will diminish. Because burn windows are limited, large-scale prescribed fire operations covering hundreds to thousands of acres must be implemented whenever conditions allow to ensure long-term success.

Road Reconstruction and Maintenance and Temporary Road Construction

With this decision, I authorize the road reconstruction and maintenance, road reconstruction, temporary road construction, and landing use and construction as described in EIS Chapters 2.1 G.

Non-Native Invasive Weed Control and Eradication

Under this decision, I authorize the non-native invasive weed control and eradication treatments

[6] Lake acres have been omitted from the total acres of prescribed fire.

described in MAC EIS Chapter 2.1 H. This includes the use of manual, mechanical, and cultural methods to control or eradicate known infestations and newly discovered non-native invasive weeds throughout the Calaveras Ranger District.

I also authorize the use of *aminopyralid, chlorsulfuron, clethodim, clopyralid, fluazifop, glyphosate, imazapyr,* and *triclopyr* to control or eradicate both known infestations and any newly discovered infestations, when within the sideboards identified in MAC EIS Chapter 2.1 H and the associated management requirements (MAC EIS Chapter 2.2). Currently, there are approximately 662 acres of mapped known occurrences of invasive plant species within the MAC project area on the STF Calaveras Ranger District (MAC EIS Map 2). New infestations identified will follow the Early Detection Rapid Response (EDRR) approach.

Project-Specific Forest Plan Amendments

With this decision, I authorize the suite of project-specific forest plan amendments presented in EIS Appendix C, Table C.2-1 which revise management direction pertaining to the California spotted owl based on the management approaches and conservation measures presented in the 2019 Conservation Strategy for the CSO in the Sierra Nevada (USDA 2019).

Management Requirements and Best Management Practices

My decision incorporates, in full, the management requirements and best management practices (BMPs) identified in the EIS (MAC EIS Vol. I, Chapter 2.2 and Appendix D, respectfully). These management requirements and BMPs are integral components of the authorized actions and must be strictly followed during all phases of implementation. They are essential to ensuring that project activities meet the environmental protections, resource objectives, and compliance obligations described in the EIS.

Decision Rationale

Over the past year, California has again learned how quickly extreme fire weather can turn a spark into a catastrophe. The Palisades Fire (January 7–31, 2025) burned ~23,448 acres, destroyed ~6,800 structures, and claimed 12 lives across Pacific Palisades, Topanga, and Malibu—driven by powerful Santa Ana winds and tinder-dry fuels—leaving thousands still navigating a long, uneven recovery.

In giant sequoia country, crews worked to protect ancient groves as the Garnet Fire (late August–September 2025) pushed into McKinley Grove—a sobering reminder that even fire-adapted ecosystems can be threatened when burns arrive with unusual intensity. Firefighters deployed sprinklers, protective wraps, and canopy operations to limit mortality, illustrating both the urgency and complexity of managing fires around irreplaceable resources.

These events affirm a simple truth: resilience comes from planned, frequent, lower-intensity fire and sustained fuels work, not from reaction alone. Science and history in the Sierra show that giant sequoia ecosystems—and much of our mixed-conifer forests—depend on regular, ecologically appropriate fire to stay healthy, regenerate, and avoid the ladder-fuel conditions that drive extreme behavior.

As I drive up the Highway 4 corridor, through the MAC project area, the reality of this landscape weighs heavily on me. Mile after mile, I see the stark silhouettes of dead and dying trees—a vivid reminder of how vulnerable these forests have become. The mortality is not just numbers

on a page; it is a visible loss of resilience. Even where trees remain alive, the stands are unnaturally dense, creating conditions that amplify stress, competition, and wildfire risk. This combination of heavy mortality and overcrowded vegetation underscores the urgency for proactive management. Without decisive action, the ecological integrity and the communities that depend on these lands will remain at risk. This view reinforces the need to restore forest health, reduce wildfire hazards, and safeguard long-term productivity for future generations.

The MAC Project is designed to move the Mokelumne–Amador–Calaveras landscape toward that resilience—reducing wildfire transmission into communities and critical infrastructure, improving forest health and habitat conditions, and re-establishing fire at intervals and scales that change how future wildfires burn. It advances a strategic, multi-phased plan and builds a backbone so we learn from each operational season and adapt.

We also have proven models to point to. On the Stanislaus, SERAL and SERAL 2.0 are demonstrating how large-landscape planning, sustained funding, and relentless implementation can improve conditions near values at risk, align mechanical work with Potential Operational Delineations (PODs), and apply prescribed fire at scale. The Stanislaus landscape—identified under the Wildfire Crisis Strategy—has expanded planning across ~305,000 acres, with SERAL/SERAL 2.0 decisions authorizing major components of fuels reduction and fire reintroduction.

Collaboration remains essential—and candidly, complex. The ACCG collaborative and UMRWA have played important roles by bringing local knowledge, accountability, and coordination across ownerships. At the same time, complex multi-party processes can add time, layers, and editorial cycles that may slow the delivery of efficient, high-quality documents and timely decisions. As the Responsible Official, my commitment is to keep engagement inclusive and transparent, while ensuring that decisions are decisive, timely, and implementable. Collaboration should be a force multiplier for resilience, not an obstacle to progress.

Looking ahead, it is critical that partners remain committed to implementing the *full range* (emphasis added) of treatments identified in this decision—including those that may be perceived as more controversial by a small number of individuals. Selectively avoiding certain treatment types because one stakeholder disagrees with a narrow component of the project undermines both the collaborative process and the urgency of reducing wildfire risk across this landscape. Implementation efforts, including partner work planning and funding pursuits, should reflect the full scope of the authorized actions. One individual outlier should not limit treatment options, delay implementation, or restrict partners' willingness to engage in actions necessary to achieve meaningful landscape resilience.

It is my observation based on collaborative conversations with various groups that while full consensus is a valiant goal, modifying decisions to be overly conservative tends to create misalignment with the majority. That is, allowing individual objections to constrain the collective implementation effort would erode more than two years of analysis and collaboration and would hinder our ability to respond effectively to the wildfire risk confronting the landscape today.

I am deeply aware of the smoke impacts, evacuation stresses, and the long shadow of recovery after severe fire. I carry those stories with me when I sign decisions like this one. As the Responsible Official, my charge to our teams is simple: move with empathy and urgency; pair

innovation (data-driven fire modeling, large-unit prescribed burns, and operational readiness) with discipline (clear burn plans, monitoring, and accountability); and seize every safe burn window. The MAC Project is one step—an important one—in a sustained journey to restore forest conditions that support safe communities, healthy watersheds, and wildlife habitat that can persist under a more active fire regime.

We will measure success not only in acres treated, but in the fire we avoid, the fire we use, and the futures we protect—so that when the next disturbances occur, our landscapes can meet them with resilience rather than ruin.

Significance Considerations (7 CFR 1b.8(4))

In evaluating the significance of environmental effects for Alternative 1, I considered the potentially affected environment and the degree of effects, including each component specified in 7 CFR 1b.2(f)(3)(ii).

Short- and long-term effects

For California spotted owl (CSO) habitat, short-term effects include localized and temporary reductions in canopy cover within some PACs and territories, small shifts in stand structure, and other limited disturbances associated with thinning, fuel reduction, and use of prescribed fire. These short-term effects are constrained by treatment design, PAC-specific limitations, and the requirements described in Chapter 2.2 of the EIS. In contrast, long-term effects include maintaining and improving habitat resilience by reducing the likelihood of high-severity wildfire, supporting the development of larger-diameter trees, and promoting a more heterogeneous forest structure—outcomes central to sustaining CSO habitat over time, as described in Chapter 3.1.

For the broader landscape, short-term effects include temporary smoke during prescribed fire, limited access restrictions, minor ground disturbance from equipment use, localized soil displacement, and implementation-related dust and noise. Long-term effects include substantially reduced wildfire intensity and extent, improved forest health and vigor, enhanced watershed function, greater protection of water quality and downstream reservoirs, and increased resilience to drought, insects, and disease. These long-term improvements directly support the Project's purpose and need as discussed in EIS Chapter 3.2.

Beneficial and adverse effects

For CSO and other wildlife species, beneficial effects include increasing the probability that habitat will persist over the long term by reducing the risk of stand-replacing wildfire, improving landscape-scale heterogeneity, and fostering conditions that support prey species and ecological processes. The primary adverse effects to CSO habitat are near-term and localized: reductions in dense canopy in treated areas, short-term habitat disturbance, and temporary changes to structural elements during implementation. As documented in Chapter 3.1, these adverse effects are limited in duration and extent and are offset by the long-term benefits of creating fire-resilient forest conditions that support stable and sustainable habitat.

Across the project area, beneficial effects of Alternative 1 include reducing flame lengths and crown-fire potential, improving firefighter access and public safety, protecting critical infrastructure, and restoring ecological functions through strategically applied thinning, fuel reduction, and prescribed fire. Adverse effects are principally short-term and include smoke, temporary closures, vegetation removal, and minor soil disturbance; these effects are minimized

through the Management Requirements identified in EIS Chapter 2.2 and the BMPs in EIS Appendix D, and they are outweighed by the long-term ecological and community benefits described in the EIS.

Effects on public health and safety

Alternative 1 directly lowers risk to communities and responders, reduces the likelihood of post-fire debris flows and flood hazards, protects critical water storage and hydroelectric infrastructure that serves approximately 1.4 million downstream residents, and implements smoke management practices (burn windows, coordination with air districts and public health messaging) to minimize near-term smoke exposure.

Economic effects

Treatments generate and sustain local jobs and contracting (e.g., commercial timber harvest of sawlogs, biomass removal and utilization, targeted grazing), support regional mills and biomass facilities, and help stabilize tourism and outdoor recreation by reducing catastrophic wildfire closures. While diameter limits constrain removal of the largest trees to protect habitat, the EIS documents that the overall program supports local industry and reduces long-term fire-related economic losses (EIS Chapter 3.1, Issue 3).

Effects on the quality of life of the American people

Alternative 1 improves long-term recreation access and scenic integrity, protects ecosystem services (hunting, fishing, foraging, clean water and air), reduces evacuation risk, and incorporates proactive smoke-ready outreach to mitigate near-term prescribed fire impacts. Design features (e.g., PCT visual quality objectives; infrastructure protection; post-implementation site rehabilitation) preserve day-to-day use and enjoyment of public lands while advancing community safety.

Significance Consideration Summary

While Alternative 1 includes some unavoidable short-term adverse impacts—such as temporary smoke, localized habitat disturbance and reduction in habitat quality, and limited construction-related ground disturbance—these impacts are substantially less severe than the long-term, landscape-scale adverse effects reasonably expected under the No Action alternative, which would maintain hazardous fuel conditions and elevate the likelihood of irreversible losses from high-severity wildfire; moreover, the irreversible and irretrievable commitments of resources associated with Alternative 1 are limited primarily to the use of fuels, equipment operation, and the removal of some vegetation, and do not approach the scale or permanence of resource losses likely to occur under No Action.

Factors and National Policy Balancing (7CFR 1b.8(5))

I balanced multiple factors—including ecological resilience, sensitive species and resources, public and worker safety, economic viability, operability and implementation feasibility, statutory mission requirements, and regulatory compliance.

In reaching this decision, I considered how the selected alternative aligns with the laws, regulations, and policies documented in Chapter 5 of the EIS. That chapter demonstrates compliance with the Clean Water Act, Clean Air Act, Endangered Species Act, National Historic Preservation Act, and the requirements of applicable Forest Plans under NFMA. It also

documents consistency with the relevant Executive Orders addressing wetlands, floodplains, invasive species, Tribal consultation, and migratory birds. These authorities shaped the design and refinement of Alternative 1, including measures to protect water quality, maintain air quality standards during prescribed fire, conserve listed and sensitive species, avoid or minimize effects to cultural and historic properties, and uphold Tribal trust responsibilities.

Balancing these legal and policy considerations with the need to reduce wildfire risk, protect communities, and restore ecological resilience, I determined that Alternative 1 represents the most appropriate and practicable path forward. Its design reflects the full suite of environmental protections required under the governing legal framework, and Chapter 5 confirms that implementation of this alternative will remain compliant with all applicable requirements.

Mitigation of Adverse Environmental Effects (7 CFR 1b.8(6))

The selected alternative includes treatment-specific constraints described in EIS Chapter 2.1, which limit where and how thinning, fuel reduction, fuelbreak construction and maintenance, prescribed fire, targeted grazing, road work, and invasive plant treatments may occur. These design elements include activity-specific diameter limits, canopy retention thresholds, species-specific protections, slope limits, treatment restrictions within CSO PACs and territories, riparian protections, fuelbreak-specific requirements, and operational constraints intended to maintain wildlife habitat, protect soils and water quality, and reduce the risk of adverse effects during implementation.

In addition, EIS Chapter 2.2 (Management Requirements) contains mandatory resource-protection measures that must be applied during all implementation activities. These include seasonal operating restrictions, buffers around sensitive resources, limits on mechanical treatment within riparian areas and meadows, cultural resource protection measures, species-specific operating constraints, snag and down-log retention requirements, herbicide application restrictions, and measures to minimize smoke, dust, erosion, and weed spread. These Management Requirements are enforceable components of the selected alternative and apply across all treatment types.

The Project also requires implementation of Soil and Water Quality Best Management Practices (BMPs) identified in EIS Appendix D, which include erosion-control measures, road maintenance and drainage requirements, restrictions on equipment operations, fuel and chemical handling standards, and protection of riparian conservation areas. These BMPs are designed to prevent or reduce water quality impacts and ensure compliance with applicable environmental laws and policies.

BMP monitoring will occur consistent with Forest Service national and regional requirements. This monitoring will verify whether required BMPs are implemented correctly and are functioning as intended. Enforcement will occur through contract administration and on-the-ground oversight by resource specialists and line officers.

Together, the design constraints in Chapter 2.1, the mandatory Management Requirements in Chapter 2.2, and the BMPs in Appendix D constitute the means included to avoid or minimize adverse environmental effects while allowing Alternative 1 to fulfill the Project's purpose and need.

DBH Limits

The inclusion of diameter-at-breast-height (DBH) limits in the MAC decision are the result of extensive collaboration with the Amador-Calaveras Consensus Group (ACCG) and other stakeholders. These limits provide clear operational guidance across land allocations, including CSO PACs, CSO Territories, and General Forest areas..

I recognize that perspectives differ regarding appropriate DBH limits for forest thinning. Some stakeholders advocate for increasing removal limits up to 40 inches DBH or eliminating thresholds entirely to allow silviculturists the flexibility to prescribe the ecologically appropriate treatments needed to achieve the best results. This view emphasizes professionally informed, site-specific decisions grounded in science, stand conditions, and silvicultural principles—moving beyond past limitations shaped by mistrust and instead relying on current ecological understanding to guide which trees are removed while still meeting the needs of sensitive resources such as the California spotted owl.

Others support codifying the DEIS limits—less than 20 inches DBH in PACs and less than 30 inches DBH outside PACs—into binding forest plan standards. After reviewing the analysis, collaborative feedback, and public comments, I find that the MAC DBH limits represent a balanced, scientifically supported approach for this project. These limits maintain large-tree structure while enabling effective fuels reduction, and they reflect the best consensus achievable through extensive collaboration.

While DBH thresholds have frequently been used as a straightforward mechanism to ensure consistency with habitat protection and forest plan direction, I acknowledge that static diameter limits can be an overly conservative and imprecise proxy for achieving ecological intent. The Forest Plan offers more sophisticated guidance than simple DBH cutoffs, including clearly defined circumstances under which trees exceeding 30 inches DBH may be removed to advance desired ecological conditions, support restoration objectives, or respond to stand-specific needs.

From my perspective as the Responsible Official, effective vegetation management is best achieved by focusing on desired conditions, ecological function, and site-specific outcomes, rather than defaulting to DBH as the primary constraint. While DBH limits can provide a safeguard, they are not a substitute for thoughtful analysis, interdisciplinary collaboration, and professional silvicultural judgment. I support future proposed actions that move away from reliance on diameter-based constraints and instead rely on clearer articulation of ecological objectives, species needs, and restoration pathways.

As we demonstrate successful implementation on the ground—showing that ecologically informed treatments can retain and enhance key habitat features while improving forest resilience—we will be better positioned to address concerns raised by more extreme conservation perspectives. Transparency, monitoring, and tangible outcomes will help build confidence that vegetation management can be both restorative and protective without relying on rigid diameter-based rules. My goal is to support an approach to planning and implementation that fully reflects the flexibility and intent of our Forest Plan while delivering measurable improvements to forest health, habitat quality, and landscape resilience.

I have consistently expressed reservations about using static DBH limits as the primary constraint on forest management. While simple to apply, DBH thresholds do not account for the heterogeneity of forest structure or the complex ecological and operational conditions across the

landscape. A "one-size-fits-all" approach does not capture the nuanced decision-making required to meet multiple resource objectives, including:

- Forest Health and Resilience: In some circumstances, removing larger trees may be necessary to reduce competition, improve vigor, and enhance resilience to drought, insects, and disease.
- Fuel Reduction and Wildfire Risk: In some areas, retaining overly large trees can perpetuate ladder fuels or increase crown fire potential, undermining restoration goals.
- Species and Habitat Considerations: Promoting heterogeneity or restoring historical conditions, may justify selective removal of larger trees.
- Operational Feasibility: Terrain, safety, and stand structure often require flexibility beyond rigid DBH limits.

I strongly support science-based, site-specific prescriptions that integrate ecological, operational, and social considerations rather than relying solely on static DBH constraints. While the MAC decision establishes the framework for *this* project, I emphasizes the continued importance of adaptive management and professional judgment to achieve desired conditions across diverse landscapes.

Forging Resilient Futures in PACs and Territories: Thinning With Purpose, Not Apology

When we talk about PACs and owl territories, we're talking about some of the most ecologically valuable, structurally rich parts of the forest—places that hold the heart of what we want future generations to inherit. And for that very reason, these are also the places that demand courage, clarity, and a willingness to make decisions that look beyond the next nesting season and into the next century. The U.S. Fish and Wildlife Service, in its February 22, 2023 Proposed Rule to list the California spotted owl (88 FR 11702), identifies high severity wildfire as a primary threat to the species, noting that fires in 2020 and 2021 burned more owl habitat at high severity in two years than had burned in the previous three and a half decades, and concluding that the Sierra Nevada distinct population segment is likely to become in danger of extinction within the foreseeable future due to this increasing threat. A threat that emphasizes the need for proactive management in remaining green forest areas that retain key ecological structure but remain at risk under current conditions.

I want to be direct: forest thinning in PACs and territories is not a compromise—it is a commitment. A commitment to long-term habitat persistence, to landscape-scale resilience, and to the California spotted owl itself. The EIS makes this unmistakably clear: left untreated, these stands face a far greater threat from high-severity wildfire, drought stress, and insect-driven mortality than from any carefully constrained thinning treatment we authorized here.

I heard the concerns about short-term impacts. I weighed them seriously. Yes, thinning can cause localized, temporary reductions in canopy cover. Yes, treatment might momentarily adjust some structural attributes. But those effects are dwarfed by what we know—with absolute certainty—about the future of untreated dense forests under today's fire regimes.

The science is unequivocal: high-severity wildfire is the number one threat to the long-term viability of owl habitat—not thinning, not fuels reduction, and certainly not the thoughtful,

precision-guided prescriptions included in MAC.

So, when I made this decision, I made it fully informed by the best available research, including the 2019 California Spotted Owl Conservation Strategy and the U.S. Fish and Wildlife Service's clear conclusions about long-term risks. And what the evidence tells us—loudly—is that doing nothing is not neutral. Doing nothing is a choice to accept increasing losses of old forest structure, of nest stands, of entire owl territories.

And that is not a choice I am willing to make.

The treatments we are authorizing within PACs and territories are designed to retain large trees, protect structural diversity, preserve canopy connectivity, and reduce exactly the ladder and surface fuels that turn a lightning strike into a crown-fire event. Modeling shows that these actions substantially reduce stand density and crown-fire potential—the kind of structural moderation that increases the odds that these habitats will be here for owls in the long run.

And as we continue to implement these treatments—and study their outcomes—we'll keep learning. We'll learn more about short-term responses, long-term trends, vegetation recovery, canopy dynamics, and how treatments perform under real-world fire. And I want to be clear: we are open to adapting and evolving with that knowledge. If the evidence shows that even fewer constraints—more flexibility, more targeted removal, more space to maneuver within PACs and territories—would produce better long-term ecological outcomes, then we should be ready to consider that. Our responsibility is not to cling to today's sideboards forever, but to continuously refine our approach as our understanding deepens. This project is not the endpoint—it is part of an ongoing learning cycle, and we are committed to adapting forward, not backward.

I'm aware that some have called elements of the project "red flags." I understand the instinct—because for decades, our management culture rewarded "do less, disturb less" as the default conservation mindset. But the landscape has changed. The climate has changed. The fire regime has changed. We cannot cling to outdated assumptions simply because they are familiar.

Maintaining static dense forests is not the same as maintaining owl habitat. In fact, under contemporary fire behavior, it can be the fastest path to losing that habitat altogether.

As the Responsible Official, I cannot and will not view the MAC Project through a single-species or single-attribute lens. My responsibility is to steward the entire system—forest structure, watershed function, wildlife viability, community protection, and future ecological resilience. And in that whole-landscape context, these treatments are not red flags; they are lifelines.

Do I acknowledge uncertainty in short-term owl responses to thinning? Of course. That uncertainty is real. But it is tiny compared to the overwhelming certainty we have about the long-term consequences of inaction. We know the trajectory of these forests if we leave them untouched under modern fire conditions. We've watched entire PACs disappear in single fire seasons elsewhere. We know the cost of repeating that mistake.

So, no—I am not choosing fuels over owls.

- I am choosing owls over wildfire.
- I am choosing long-term persistence over short-term optics.
- I am choosing resilience over wishful thinking.

And I am asking our partners, collaborators, and critics alike to evolve with us. Many already have—and I am genuinely grateful for those who stepped into this new way of planning with open minds and honest dialogue, even when timelines were tight and the process felt unfamiliar. Your willingness to adapt, engage, and challenge us constructively made this decision stronger.

For those still reluctant to embrace this shift, I say respectfully: the future is coming either way. And the MAC Project is our commitment to meeting it head-on.

This decision is bold, yes. It is different, yes. And it is absolutely necessary. Because the future of owl habitat—and the resilience of the Sierra Nevada—depends on actions like these. I envision a world where future generations of children, can experience wild places, wildlife, clean air, clean water and so much more. This vision will only become reality through decisions like this one and the aggressive implementation of science-based management. Thank you for joining me in this effort, let's keep moving forward with purpose."

Application of 7 CFR 1b & Fuels and Forest Health Emergency Situation Determination (ESD)

When I look back at the work that went into the MAC Project, one theme stands out louder than any other: we are charting a new path, and we are proving—together—that this agency can adapt, evolve, and deliver the kind of modern, science-driven, wildfire-ready planning the moment demands.

Yes, we used 7 CFR 1b. Yes, we leaned hard into every available authority, updated regulation, and scientific tool we could get our hands on. And frankly, I'm proud of that. These aren't times for timid steps or "business as usual." These are times when we must bring the full weight of our authorities to bear—responsibly, transparently, and urgently—to protect the forests we steward and the communities who depend on us. And let me tell you: MAC is proof that we can do exactly that.

Under emergency authority, we were asked to move fast—faster than many are used to. And still, we went above and beyond what 7 CFR 1b required. We provided opportunities to comment, clarified our analysis, and kept the project record as open as possible.

Was the comment window shorter than what some folks wanted? Absolutely. Did that stop the majority of our partners and collaborators from leaning in and offering thoughtful, substantive, constructive feedback? Not at all. And, I am very glad that I took the optional pathway to have a comment period; these collaborative projects are learning experiences for all, most certainly for me.

To those who embraced the change—who recognized the urgency and adapted with us—I want to say directly: thank you. Your engagement mattered. Your input improved this project. And your willingness to try something different set the tone for what meaningful collaboration looks like in times of high risk.

And yes, a small handful remained critical from start to finish. That's okay. There will always be some who prefer the familiar over the effective. But their resistance didn't deter us, and it certainly didn't define the public involvement process. The broad support and meaningful engagement from our partners speak for themselves.

Despite working under accelerated timelines, we didn't cut corners—we sharpened them. Our team produced documents that were shorter, clearer, and more readable than many traditional

NEPA packages, all while applying some of the most advanced modeling methodologies we've ever used at this scale. Tools like PROMOTe and ForSys helped us go far beyond "where might a fire burn?" to "where do treatments matter most, and why?"

We analyzed tens of thousands of acres of habitat—PACs, territories, general forest—while applying constraints that protected what matters most: large trees, canopy connectivity, nest stands, and long-term viability. We made prescription adjustments where the data told us to (Appendix G is practically a catalog of that transparency), and we disclosed every one of them publicly. This is the new standard: transparent, data-rich, adaptive planning. And it works.

MAC showed us that even in a compressed timeline, we can meaningfully collaborate, communicate clearly, and deliver a project grounded in the best available science and supported by a broad coalition of partners. Are we perfect communicators? Not yet. Are we getting better? Absolutely—and MAC proves it. Every project is an opportunity to grow our muscles for engagement, clarity, and innovation. And that's why I'm genuinely excited for what comes next. Because—spoiler alert—SERAL 3.0 is coming to an inbox near you. And with everything we've learned from SERAL 1, SERAL 2, and now MAC, I'm more confident than ever that we can build on this momentum.

Final Thoughts

This decision is more than a signature on a page. It's a commitment to:

- Use the authorities we have, fully and responsibly.
- Modernize how we plan and implement landscape restoration.
- Honor collaboration while recognizing that forward movement sometimes requires discomfort.
- Protect old forests, wildlife, water, and communities—not through inaction, but through decisive, informed, resilience-based management.

To all who walked this path with us—especially under a compressed schedule—thank you for helping demonstrate what is possible when we refuse to let outdated processes hold us back. To those still on the fence: the door is open. The future of forest management requires all of us. And to everyone: I look forward to building on this progress—one project, one watershed, one partnership at a time.

Onward. SERAL 3.0 awaits.

Public Involvement

Public involvement for the MAC Project occurred at several key points, beginning with the Notice of Intent (NOI) and 30-day scoping period in September 2024, which identified issues and helped shape the scope of analysis. A subsequent 14-day comment period on the Purpose and Need and Proposed Action in September 2025 informed refinement to project objectives, treatment design, and management requirements. Most recently, the Forest Service released the Draft Environmental Impact Statement (DEIS) for a 14-day public comment period from February 17 to March 3, 2026. Input received throughout these stages directly informed updates to the Proposed Action and related components of the analysis. Responses to comments and documentation of how public input influenced the Project are available on the project website demonstrating a transparent process and meaningfully incorporation of public feedback (Scoping Responses: 0-2025-0908_MAC_Response to Scoping Comments; Purpose and Need and

Proposed Action Responses: 2026_MAC_DEIS_Vol.2; DEIS Responses: 2026_MAC_EIS_Vol2_ResponsetoComments.pdf).

Regulatory Review of Other Law, Regulation, and Policy Compliance

Findings required by other laws and regulations applicable to the decision are documented in FEIS Chapter 5.

Administrative Review Opportunities

This decision is not subject to the 36 CFR 218 objections process because an Emergency Situation Determination was granted pursuant to the 2021 Infrastructure Investment and Jobs Act (Secretarial Memorandum 1078-006, April 3, 2025)

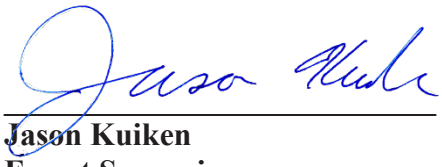
Implementation / Effective Date (7 CFR 1b.8(7))

Upon signature of this decision, implementation may begin immediately.

Contact

For additional information concerning this decision, contact: Benjamin Cossel, Forest Public Affairs Officer, Stanislaus National Forest, benjamin.cossel@usda.gov.

Signature (7 CFR 1b.8(8))



4/17/26

Jason Kuiken
Forest Supervisor
Stanislaus National Forest
Forest Supervisor

Date

Literature Cited

USDA Forest Service. 2019. Conservation Strategy for the California spotted owl (*Strix occidentalis occidentalis*) in the Sierra Nevada. Publication R5-TP-043.

U.S. Fish and Wildlife Service. 2023. Endangered and Threatened Wildlife and Plants; California Spotted Owl; Proposed Endangered Status for the Coastal–Southern California DPS and Threatened Status for the Sierra Nevada DPS with a Section 4(d) Rule [Proposed Rule, 88 FR 11600–11639].