



Sierra Forest Legacy

Protecting Sierra Nevada Forests and Communities



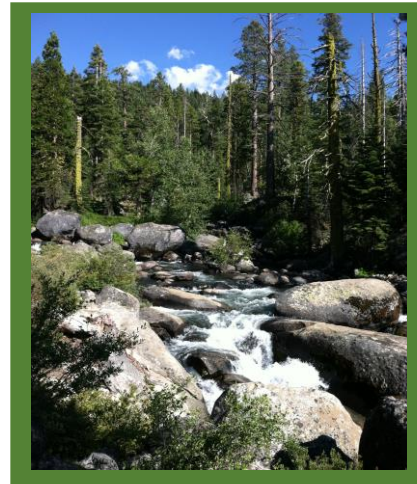
May 1, 2015

Placerville Ranger District
4260 Eight Mile Road
Camino, CA 95709

Sent via internet to: jebert@fs.fed.us

Attn: Jennifer Ebert, I D Team Leader

The following are comments from Sierra Forest Legacy and coalition partners on the Scoping Notice for the Caples Ecological Restoration Project (4-2-15)



Dear Jennifer,

We are extremely happy to see this project coming on line. Not only is the Caples Ecological restoration project critical to implement because of the multiple resources at risk from a century of fire suppression; but it is also critical because of the project's scale, its location in the South Fork American River Demonstration Area, and the desire to increase the scale of restoration treatments on the Eldorado National Forest.

The Caples Creek Watershed has a significant number of exquisite resource values due to its largely pristine ecological nature. These include the intact, roadless condition of the watershed, its Wilderness Study Area and potential Wild & Scenic designation status, the convergence to two pristine watersheds (Caples and Silver Creek), an outstanding fishery, stunning old growth trees and a level of scenic beauty that is unique and accessible for a range of non-motorized recreational activities.

On the social side of the spectrum the Caples Creek and Silver Fork American River make up a significant portion of El Dorado County's water supply and the recreational activities the area offers are unique and important to the local and regional Sacramento area population.

Unfortunately, a hundred years of fire suppression has placed these values at serious risk. The multi-year, 8,800 acre prescribed burn is critical to the restoration of these values and will build the resilience needed to help carry this landscape into the future where climate warming is increasing the risk of large, uncharacteristic fires.

The Proposed Action is suggesting cutting perimeter line where natural barriers do not exist. We support the necessary actions needed to prevent fire escapes, and to protect large old growth trees in the burn perimeter to the greatest degree possible. These old growth structures are rare on the landscape, and are disproportionately important to wildlife and at risk from the duff mounds and deadfall that have built up around the boles of these large trees from a century of fire suppression.

We support the "light on the land" approach inside the IRA, Caples WSA, and potential Wild and Scenic corridor, and understand the need to balance protection of these areas against the risk that a hundred year absence of fire disturbance poses: one of the greatest risks to the values and planning designations we have created and supported with the Forest Service. Outside these designations we ask the Forest Service to maintain as much "light on the land" ethic as possible when cutting fire line, such as tying fire line to rock outcrops where possible. The use of Minimum Impact Suppression Tactics and the mitigation of adverse post-fire impacts near trails is a positive demonstration of "light on the land" restoration in this landscape with high levels of public use. We also support the limits on active lighting in meadow and riparian areas. While fire did occur in these areas historically, a backing fire is less intense and less likely to harm aquatic resources.

We also understand and share concern with the Forest Service regarding the social implications of a fire escape and the need for control of the fire environment and the need to protect worker safety.

Aspen Restoration

We support the aspen restoration in and surrounding existing aspen stands. Aspen in the Sierra Nevada is a rare and important eco-type that is not faring well due to fire suppression, grazing, changes in local hydrology and other factors. We ask the Forest Service to consider the location and age of larger trees up to 30 inches prior to felling or girdling. Larger trees that do not block the sun pathway of the aspen area or large trees that may have not reached 30 inches d.b.h. but display older-tree decadence characteristics should be considered for retention. Girdling and/felling decision should be made in conjunction with wildlife and fire staff based on site specific conditions such as presence/absence of large snags.

While we support the use of native materials to protect emerging aspen sprouts, maintaining the benefit/results of the Caples restoration work and the wilderness nature of this landscape is important and may require a rest-rotation period from cattle grazing pressure in the coming years.

Meadow Restoration

We support the hand thinning work to remove conifers from the 25 acres of meadow habitat. Girdling the larger snags will be important for wildlife habitat. We have witnessed OHV damage in these meadows in the past and have supported the Forest Service in halting OHV use in this landscape. Are grazing and fire exclusion the key factors in the drying of these meadows, leading to conifer encroachment?

We support the re-routing of the half mile of trail out of Jake Schneider Meadow. We'd also like to see as part of the Caples restoration effort a current botanical survey of these meadows and surrounding riparian areas to insure that native plant and shrub diversity and abundance are robust and with positive ecological trends that do not display serious grazing impacts that degrade the ecological integrity or wilderness and wild and scenic values of this landscape.

Ideas to explore during implementation:

- Education and outreach field trips that promote ecological burning as a critical restoration tool; also, a fire restoration kiosk at the trailhead that volunteers could use as an outreach tool during the summer season;
- Burning within the natural range of variation for the Caples landscape;
- Explore the use of air quality monitors to gather data on local air quality conditions during the project burn periods;
- Use of photo points and before-after comparisons of ecological effects of the treatments;
- Use of public surveys and real time education opportunities for the local-regional communities and the media during the various burn periods;
- Use of the collaborative (SFL/Forest Service) public health notification alert system, before, during and after the burn periods;
- Volunteer coordination to support prep work (bole raking, hand piling) prior to burn events;
- Collaboration with PSW and other scientists regarding aquatic and terrestrial effects of the burning, meadow restoration, and aspen regeneration;
- The possibility of creating an ENF Fire Management Action Plan for the Caples WSA (similar to what the ENF Forest Plan-Chapter IV p. 4-23 calls out for Desolation and Mokelumne Wilderness areas) that considers the use of natural ignitions for resource benefit in this project landscape.
- Examine barriers to treatment timing, where possible, to collapse project duration from 15 to 5 years to increase pace and avoid additional NEPA work;
- Field trips that include the adjacent 2011 Long Fire natural ignition area where the Placerville Ranger District used a lightning fire for 728 acres of natural resource benefit.

We look forward to collaborating with you on this important restoration effort.

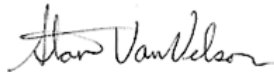
Sincerely,



Craig Thomas, Conservation Director
Sierra Forest Legacy
P.O. Box 244
Garden Valley, CA 95633
(916) 708-9409
craig@sierraforestlegacy.org



Karina Silvas-Bellanca, Fire Policy Coordinator
Sierra Forest Legacy
P.O. Box 244
Garden Valley, CA 95633



Stan Van Velsor, Ph.D.
The Wilderness Society | California Region
250 Montgomery Street, Suite 210
San Francisco, CA 94104

s/ Karen Schambach
Karen Schambach, President
The Center for Sierra Nevada Conservation
P.O. Box 603
Georgetown, CA 95634



Pamela Flick, California Representative
Defenders of Wildlife
1303 J Street, #270
Sacramento, CA 95814



Terry Davis | Director
Mother Lode Chapter Sierra Club
909 12th Street, Suite 202
Sacramento, CA 95814