



May 3, 2023

Forest Supervisor
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95370

This letter submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=63553> (STF Hazard Tree Project)

RE: Stanislaus National Forest Hazard Tree Management Project Determination of NEPA Adequacy

Dear Supervisor Kuiken,

I am writing on behalf of the 15,400 member Pacific Crest Trail Association (PCTA). PCTA is the U.S. Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails is rooted in the 1968 National Trails System Act. As such, it is the PCTA's role to work with the U.S. Forest Service to ensure the best possible management of the PCT and the experience it affords trail users, year-round.

We have reviewed the Stanislaus National Forest Hazard Tree Management Project Determination of NEPA Adequacy (DNA). The PCTA is pleased to see that appropriate management for the PCT and Sonora Pass Trailhead were included in the DNA. The associated Management Requirements (MRs) pertaining to Recreation and Scenery help protect the viewshed from the PCT and the trail experience, while also providing for the trail's nature and purposes as addressed in the [PCT Foundation Document](#). Furthermore, the PCTA is pleased to see appropriate management at the Sonora Pass Trailhead that will increase user safety and help protect private property.

Specifically, we support the components and MRs included under Recreation and Scenery within the DNA (pages 56-58). The PCTA supports the following MRs and strongly encourages the forest to include them in the Final Decision.

- **RA-1** - Avoid implementing activities within the boundaries of developed recreational sites during recreation season (May 15 through September 15). Take into consideration the timing to minimize impacts to high traffic recreation sites both day and night. These sites would include concession and Forest run campgrounds and day use areas, popular trails, or trailheads. If hazard tree removal is necessary to address an emergent public safety concern, complete activities prior to opening for the season or issue a temporary closure.
- **RA-2** - Provide safety signing along trails and roads, as well as trail closures in active project areas.
- **RA-3** - Maintain continued public and permit holder access during implementation, whenever feasible. If access cannot be maintained, please consult with District Recreation Staff for coordination and information dissemination to establish alternative routes or temporary closures.
- **RA-4** - Provide visitor information about area, road, and trail closures, or other recreation setting changes caused by project activities in news releases, onsite, and on the Forest website.



- **RA-5** - Completely remove all project related woody material from developed and dispersed recreation sites including logs, branches, slash, etc., in a manner that minimizes disturbance to soil and natural forest duff layers, rehabilitate soil disturbance to natural existing condition. Use local leaf litter and small woody debris to disguise project-related ground disturbance within sight of roads, trails and within campgrounds.
- **RA-6** - For all hazard tree removal treatments in Retention and Partial Retention Visual Quality Objectives: Where high masses or groups of trees will be removed, stump heights should be between 6 to 8 inches (according to timber contract specifications), except in the case of localized situations that make low cutting heights unsafe. Stumps should be angled to the contour of the land. Low stumping shall occur for a distance of 100 feet from the road edge on upslope terrain and on easily visible level terrain areas and anywhere within the corridor of a designated, eligible, and/or suitable Wild and Scenic River. In those same areas where hazard tree removal occurs singly, or in a low volume and dispersed pattern, 8- to 12-inch stump heights are acceptable and should be angled to the contour of the land.
- **RA-7** - In areas within all developed recreation sites (campgrounds, day use sites, trailheads, etc.), flush cut all stumps, unless stumps are designated for grinding.
- **RA-8** - Locate new landings away from developed and dispersed recreation areas (staging areas) where feasible. Avoid placing landings and other centralized project activities near private property.
- **RA-9** - Protect all improvements including trails, roads, campground facilities, water system features, signs, barriers, mines, or bridges. If any signage or barriers (including boulders or fencing) or improvements are removed or damaged, they must be re-installed in the same location and manner immediately following vegetation management operations.
- **RA-10** - Minimize overlaying skid trails and haul roads on non-motorized system trails. If trails are used as skid trails or haul roads, trail cleanup and rehabilitation will be included in the contract. Skid trail crossings across designated forest trails and roads will be kept to a minimum. Any crossings shall be perpendicular to designated forest trails and roads. To reduce the potential for establishment of user created routes, rehabilitation must be completed in a timely manner to ensure the public does not begin using them for motorized or non-motorized recreation. The rehabilitation plan shall include returning to natural contour, scarification, seeding with native mix and installing natural barriers as needed. Trail width shall not be increased. Changes to trail alignment and surfacing will be minimized; the trail will not be straightened, nor its surface changed with an alternate material unless such actions are needed to enhance the trail and protect resources.
- **RA-12** - Recreation areas (designated roads, trails, trailheads, staging areas, and dispersed camp sites) may be temporarily closed to provide for public safety during active tree removal operations, but would otherwise remain open unless specifically agreed to by the Recreation Officer or Trails Manager.
- **RA-13** - Limit all closures of trail segments to Monday through Friday, excluding Mondays of holiday weekends (Memorial Day, Labor Day, etc.). No closures will be authorized on weekends. All trails shall be opened for safe use on weekends and holidays.
- **RA-14** - Provide for public safety and education by posting signs to inform public of project activities. Whenever possible, post notices on forest website prior to hazard tree cutting. Keep information current.
- **RA-15 - Pacific Crest Trail: Forest personnel will work in partnership with Pacific Crest Trail Association to identify site specific hazard trees which pose an imminent threat to the trail facilities and public safety.**

To further protect trail users during implementation activities, the PCTA encourages the forest to also include the following components in the MRs of the Final Decision:

- Unit will communicate project timing and implementation with PCTA staff.
 - PCTA will post project information on their website so that PCT users are aware and can receive information and education regarding the purpose of the project.

Thank you for considering PCTA's comments and for including management requirements that protect the trail experience and provide for the nature and purposes of the PCT. We support the project and look forward to working with Forest staff as it develops.

Thank you,

A handwritten signature in black ink, appearing to read "Connor Swift", written over a light gray rectangular background.

Connor Swift
PCTA, Regional Representative

Cc:

Lindsey Steinwachs, U.S. Forest Service, Region 5, Pacific Crest Trail Program Administrator
Benjamin Cossel, U.S. Forest Service, Stanislaus National Forest, Public Affairs Officer
Miguel Macias, U.S. Forest Service, Stanislaus National Forest, District Public Service Staff Officer
Justin Kooyman, PCTA, Associate Director of Trail Operations