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Organization: Pacific Crest Trail Association

Title: Regional Representative

Comments: Attached are PCTA's comments/objection regarding the Stanislaus NF Hazard Tree Management Project EA and Draft Decision Notice. Please reach out if you have any questions. Thank you

October 10, 2024

Regional Forester
Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

This letter submitted to: <https://www.fs.usda.gov/project/?project=63553>

RE: Stanislaus National Forest Hazard Tree Management Project Environmental Assessment and Draft Decision Notice

Dear Forester Eberlien,

I am writing on behalf of the 14,000+ 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 Environmental Assessment (EA) and Draft Decision Notice (DN). The PCTA is pleased to see that the EA included Management Requirements (MRs) that 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 that our suggested MRs from the project's scoping period were included in the EA and Draft DN.

Specifically, we support the following MRs included under Recreation and Scenery on pages 63-64 of the EA. The PCTA would object to the project if any of the following MRs were removed 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

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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 improvements are removed or damaged, they must be re-installed in the same location and manner immediately following hazard tree abatement or removal 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 to trail segments to Monday through Friday, excluding Mondays of holiday weekends (Memorial Day, Labor Day, etc.). Weekend closures should only occur when

there is an imminent threat to public health and safety.

* 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.

* RA-17 - When project activities are located in the vicinity of the Pacific Crest Trail, forest personnel will communicate project information and implementation timing with the Pacific Crest Trail Association (PCTA) staff prior to implementation so that PCTA is able to post notice of the activities on their website so that PCT users are aware of the potential disturbance.

Pacific Crest Trail Association

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,

Connor Swift
PCTA, Regional Representative

Cc:

Lindsey Steinwachs, U.S. Forest Service, Region 5, Pacific Crest Trail Program Administrator

Miguel Macias, U.S. Forest Service, Stanislaus National Forest, District Public Service Staff Officer

Justin Kooyman, PCTA, Associate Director of Trail Operations