

Data Submitted (UTC 11): 9/19/2025 5:12:23 PM

First name: Connor

Last name: Swift

Organization: PCTA

Title: Regional Manager

Comments: Attached are PCTA's comments RE MAC Forest Health and Resilience Response to Scoping Comments and Purpose and Need and Proposed Action. Thank you for considering our comments and recommendations.

Northern Sierra Region

September 19, 2025

Forest Supervisor

Eldorado National Forest

100 Forni Road

Placerville, CA 95667

This letter submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?project=65796>

RE: Mokelumne Amador Calaveras (MAC) Forest Health and Resilience Project Response to Scoping Comments & Purpose and Need and Proposed Action

Dear Supervisor Reid,

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 Eldorado and Stanislaus National Forest's Mokelumne Amador Calaveras (MAC) Forest Health and Resilience Project Proposed Action (PA) and Purpose and Need, as well as the Response to Scoping Comments. PCTA continues to be supportive the purpose and need of the project to restore ecosystem health and resilience to wildfire, insect and disease, drought, and climate change; reduce safety hazards across public lands; reduce the spread of non-native species; maintain and support local economies; and maintain and improve aspen groves, riparian areas, streams, and meadows. The PCTA also supports the proposed actions that will reduce the risks of wildfire within and adjacent to USFS managed lands; improve and maintain safe ingress/egress route for fire personnel, equipment, and the public; maintain and promote plant and wildlife habitat and biodiversity; and reduce the spread of non-native invasive plants. The PCTA supports the suite of treatments identified in the PA, and also supports the management requirements and best management practices included for the PCT.

The PCT is designated a National Scenic Trail by the National Trails System Act. The Act states in section 7(c), "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail... to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established." Part of the PCT's nature and purposes, as described by the newly released PCT Foundation Document approved by the Pacific Southwest Regional Forester, is that, "Collaborative management ensures the Trail is preserved for the conservation, public use, enjoyment, and appreciation of the nationally significant scenic, historic, natural, and cultural quality of the areas through which the

Trail passes." Building upon this, the Pacific Crest Trail Comprehensive Management Plan (PCT Comprehensive Plan) also states, "It is anticipated that even though some resource activities may occur immediately adjacent to or across the trail, the agencies will protect the integrity of the trail proper by modifying management practices as needed." With that said, PCTA supports the PA and believes that the Eldorado and Stanislaus National Forests have incorporated design features and management requirements that will help protect the trail, reduce the visual impacts to PCT users, and carries out the intent of the National Trails System Act and the PCT Management Plan.

916-245-6446

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In addition, the PCTA appreciates that the PCT has been included on the project maps. As a congressionally-designated area, the PCT needs to be identified in order to provide transparency and a clear understanding of the potential impacts to the trail and the surrounding landscape.

We recognize that not all of PCTA's recommended design features were included in the project and we appreciate that this was acknowledged and addressed in the Response to Scoping Comments document. The PCTA supports the purpose and need and proposed action of the MAC Forest Health and Resilience Project, given that the following items remain and are included in the Draft Environmental Impact Statement (2.2 Management Requirements and Best Management Practices, P. To Minimize Impacts to the Pacific Crest Trail).

- * A visual quality objective (VQO) of retention will be maintained for implementation activities within the immediate foreground viewing distance zone (300 feet) from the Pacific Crest Trail (PCT).

- * VQO of partial retention will be maintained for implementation activities within the foreground viewing distance zone (300 feet/0.5 mile) from the PCT.

- * If used as a control line for prescribed fire and/or under burns, restore the trail tread to USDA Forest Service PCT standards.

- * Fire lines created for use of prescribed fire should not be straight lines but should meander to follow topography or vegetation masses that remain. Lines should utilize natural breaks in topography and vegetation to delineate treatment edges. These lines should not be visible from the PCT.

- * All recreational infrastructure (e.g., directional and informational signs, barriers) will be protected. If any barriers (including natural barriers) or infrastructure are damaged or removed during Project activities, they will be replaced and re-installed in the same location and manner immediately following vegetation management operations.

- * Unit will communicate Project timing and implementation with Pacific Crest Trail Association staff.

Thank you for considering PCTA's comments in response to the Mokelumne Amador Calaveras Forest Health and Resilience Project. We commend the U.S. Forest Service for actively addressing the widespread impacts and needs of the forests and for engaging with the public and stakeholders in the development of the project. We look forward to working with Forest staff throughout the project.

Thank you,

Connor Swift

PCTA, Regional Manager

Cc:

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

Benjamin Cossel, U.S. Forest Service, Stanislaus National Forest, Groveland District Ranger (Acting)

Don Morrill, U.S. Forest Service, Eldorado National Forest, Forest Recreation Officer

Chris Sailor, U.S. Forest Service, Eldorado National Forest, Amador RD, Assistant Resource Officer

Justin Kooyman, PCTA, Director of Trail Operations

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