



October 8, 2024

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 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). We support 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, but *does not* support the widespread removal of trees along the PCT; doing so would significantly degrade the viewshed and the natural-appearing landscape, which is an essential part of the trail's nature and purpose.

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 but encourages the Forest to incorporate specific Project Design Features (PDFs) 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.



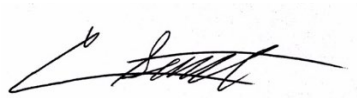
The PCT traverses the eastern edge of the project boundary, with the potential for the project to impact the PCT in the Carson Pass area on the Amador Ranger District. All methods of treatment and thinning, particularly mechanical thinning, will have an impact on the trail, the viewshed from the PCT, and the overall trail experience. In addition, the construction of a network of fuel breaks will have the potential for long-term impacts to the viewshed from the PCT. Given the potential impacts to the trail, it's important that the unit *conduct some level of a viewshed analysis from the PCT* to ensure that fuel breaks align with the USFS Scenery Management System (SMS) direction and do not dominate the landscape and the viewshed from the PCT.

The PCTA requests that the *PCT be identified on project maps and be included as a Specially Designated Area*, similar to that of Wild and Scenic Rivers and Wilderness Areas. In addition, the PCTA encourages the unit to incorporate the PDFs listed below to help protect the trail experience and minimize interference with the trail's nature and purposes.

- A Visual Quality Objective (VQO) of retention will be maintained for implementation activities within the immediate foreground viewing distance zone (300') from the PCT.
- A VQO of partial retention will be maintained for implementation activities within the foreground viewing distance zone (300' – ½ mile) from the PCT.
- Hand thinning will be utilized for treatments within the immediate foreground viewing distance zone (300') from the PCT, or as conditions allow.
- Trees to be removed will be marked and trees remaining will be un-marked within the immediate foreground viewing distance zone (300') from the PCT.
- Cut stumps as low as possible within the immediate foreground viewing distance zone (300') from the PCT.
- Angle cuts away from the trail within the immediate foreground viewing distance zone (300') from the PCT.
- Piles will be placed and burned outside of the immediate foreground viewing distance zone (300') or as conditions allow.
- If used as a control line for prescribed fire and/or under burns, restore the trail tread to USFS PCT standards.
- Fire lines created for use of prescribed fire must 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.
- Ensure the trail's outer/critical edge is not compromised by burned out vegetation that has loosened the downhill side of the trail.
- All recreational improvements (directional and informational signs, barriers, etc.) will be protected. If any barriers (including natural barriers) or improvements 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 PCTA staff.
- Implement treatment activities that are adjacent to the PCT outside of the peak use season (mid-June through mid-August) to minimize project impacts on PCT hikers and equestrians.
 - PCTA will post project information on our website so PCT users are aware, can expect project impacts, and can receive information and education regarding the purpose of the project.
- PCTA recommends the unit include additional safety measures for trail users during implementation (traffic control, signage, detours, etc.).

Thank you for considering PCTA's comments in response to the Mokelumne Amador Calaveras Forest Health and Resilience Project Proposed Action. We commend the U.S. Forest Service for actively addressing the widespread impacts and needs of the forests and look forward to working with Forest staff to ensure the PCT's nature and purposes are provided for throughout the project.

Thank you,

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

Connor Swift
PCTA, Regional Representative

Cc:

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