

Arnold Rim Trail Association
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March 3, 2026

David Fournier, Forest Supervisor — Eldorado National Forest Jason Kuiken, Forest Supervisor
— Stanislaus National Forest

Submitted electronically via: <https://cara.fs2c.usda.gov/Public/CommentInput?project=65796>

RE: Public Comment — Mokelumne Amador Calaveras Forest Health and Resilience Draft Environmental Impact Statement

Dear Forest Supervisors Fournier and Kuiken,

The Arnold Rim Trail Association (ARTA) submits these comments in support of the Mokelumne Amador Calaveras (MAC) Forest Health and Resilience Project. We write not to slow this work, but to establish coordination between MAC implementation and the authorized trail system we steward within the Calaveras Interface.

ARTA's Standing

ARTA is the Forest Service's authorized trail stewardship partner for the non-motorized trail system within the Calaveras Interface on the Stanislaus National Forest, Calaveras Ranger District. The Arnold Rim Trail (ART) system — 57 maintained miles within the 8,000-acre Interface — operates in partnership with the Forest Service since the 2004 Record of Decision. On November 28, 2025, the Forest Service signed the FANEC Finding of No Significant Impact and Decision Notice, authorizing ARTA's 31-mile trail reconciliation project within the same landscape MAC proposes to treat. The ART system falls entirely within the MAC project boundary as shown in the attached figure.

The Calaveras Interface as a Recreational Asset

The Interface sits at the boundary between one of the Sierra's densest residential communities and the Stanislaus National Forest. The ART system serves hikers, mountain bikers, and equestrians — more than half traveling from outside Calaveras County, making ART a regional destination. The system serves ten public trailheads; visitors at the busiest exceed 200 per day on summer holiday weekends. ARTA hosts regularly scheduled public hikes throughout the year and is developing outdoor literacy programming for disadvantaged students from Calaveras County schools.

The Interface's proximity to dense development makes fire resilience a community safety imperative, not just a management priority. MAC's forest health and wildfire resilience work directly protects the communities this trail system serves. ARTA supports this project.

What ARTA Offers

ARTA maintains a complete spatial dataset of the authorized ART system, collected at sub-meter GPS accuracy:

- All authorized trail centerlines
- All infrastructure: trailhead kiosks, directional signs, and trail markers

This dataset is available to the Forest Service to support MAC planning and implementation:

- **Treatment unit planning:** Precise trail locations enable crews to route equipment corridors and control lines with full knowledge of authorized infrastructure
- **Fire line placement:** Where ART trails are used as control lines, the dataset provides pre-disturbance geometry for accurate restoration
- **Authorized vs. unauthorized trail distinction:** Crews can distinguish authorized routes from social trails in the field — directly relevant to MAC's access and rehabilitation work
- **Post-operation verification:** Restoration confirmed against a documented baseline, not approximation

Requests

ARTA makes three requests, modeled on the coordination framework established for the Pacific Crest Trail under Management Requirement P:

1. **Communication Protocol** — Designate ARTA as a coordination partner during MAC implementation within the Calaveras Interface. Advance notice of treatment unit scheduling allows ARTA to sequence its own trail construction work around active MAC operations, adjust public hike schedules, and plan educational programming. The goal is coordination, not accommodation — ARTA will work around MAC, but needs sufficient lead time to do so responsibly.
2. **Restoration Standard** — Where ART trail tread or infrastructure is disturbed by MAC operations — including use as fire control lines, equipment staging, or access — restoration should reference ARTA's sub-meter survey data as the baseline. ARTA will

provide this data to the responsible official upon request and will participate in post-operation verification.

3. **Infrastructure Notice** — ARTA and the Forest Service have jointly invested in trail infrastructure within the Interface (kiosks, directional signs, trail markers). Where MAC operations require temporary removal, relocation, or protection of this infrastructure, ARTA requests advance notice and the opportunity to coordinate directly with the project crew.

Conclusion

ARTA and the Forest Service built the Calaveras Interface trail system together over twenty years. MAC's forest health work will make that system safer, more resilient, and more sustainable for the communities it serves. We ask to be recognized in the Final EIS as a coordination partner for operations within the Interface, and we offer our spatial data and organizational capacity to support successful MAC implementation.

We welcome the opportunity to meet with Calaveras Ranger District staff to establish coordination protocols in advance of implementation.

Respectfully submitted,

Greg Novacek, ARTA Board Chair
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