



Pacific Crest Trail Association

November 12, 2021

U.S. Forest Service
Pacific Southwest Regional Office
Ecosystem Planning, Post Disturbance Hazardous Tree Management Project
1323 Club Drive
Vallejo, California 94592

This letter submitted to: <https://cara.ecosystem-management.org/Public//CommentInput?Project=60950>

RE: Post-Disturbance Hazardous Tree Management Project #60950 with comments pertaining to all three zones

Dear Regional Forester Eberlien,

I am writing on behalf of the 13,800 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. Section 11 of the Act, titled "Volunteer Trails Assistance," states, "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." As such, the PCTA's role is 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 Post-Disturbance Hazardous Tree Management Scoping document and appreciate the purpose and need for the project. 2020 and 2021 brought unprecedented fire seasons to many of our California National Forests and the resulting damages and impacts are widespread. PCTA staff understands that climate change brings new challenges to our National Forests that will necessitate new management actions in size and scale. We largely support the intent of the proposed actions, but we have concerns about the potential for the wholesale removal of trees along the PCT and National Forest system trails, especially in designated wilderness. The following comments are organized to follow the structure of the Scoping document.

Purpose and Need

Page one of the Scoping document describes the chief purpose and need of the project as, "Providing a safe environment for both public and the administrative use of affected roads, trails, and facilities is a priority for the Forest Service." While this is a commendable goal, it is nearly impossible to make all our public lands completely "safe" from hazards. To be sure that project goals are attainable and create realistic expectations for the public, we encourage the project's chief purpose and need to be of **reducing and mitigating identified hazards** to public safety and resources.

Further, different activities carry varying levels of risk and user responsibility. For example, visitors staying in a developed campground with hazard trees nearby have a very different level of risk than a hiker traveling along a trail with hazard trees located sporadically along the trail corridor. It is also



reasonable for visitors to expect that developed facilities, such as campgrounds, trailheads, visitor centers, and staging areas, will be cleared to the extent possible of identified hazards to protect for safety and property. Whereas backcountry trail users, assume a higher level of risk and responsibility when traveling into remote areas, especially designated wilderness. Further, most wilderness travelers understand that there are inherent risks associated with backcountry travel; they go, in part, because of the risks—the need to be aware and vigilant of one’s surroundings enhances the sense of adventure and self-reliance. If large areas are cleared of all fire damaged trees along miles of the PCT and other trails, it would diminish opportunities for people to experience wild, scenic, and natural appearing landscapes, including those affected by wildfires.

It is nearly impossible to make the backcountry and wilderness completely “safe” from overhead hazards, and it is essential not to create a false pretense that areas along trails will be free of hazards. An important distinction to make with levels of risk is that people traveling through an area are exposed to hazard trees for a much shorter period than those spending extended amounts of time in a developed site and therefore tend to have a lower level of risk. It is a reasonable burden of responsibility to expect backcountry and wilderness travelers to be aware of their environment, potential hazards, and plan and adapt their travel and activities accordingly.

Widespread removal of trees along the PCT will significantly degrade the natural-appearing landscape, which is an essential part of the PCT’s nature and purposes, but still not eliminate every possible overhead hazard. As a result, PCTA strongly opposes a carte blanche approach to removing hazard trees along the PCT and other National Forest system trails, both in and outside of designated wilderness. Instead, to meet the purpose and need of reducing and mitigating hazardous trees, the forthcoming EAs, with rigorous analysis and in **partnership with PCTA staff, need to detail the limited, site-specific needs where hazard trees pose an imminent threat to PCT facilities and public safety** and remediation is needed.

Secondary Purpose—reduce fuel loading

Page two of the Scoping document states that, “A secondary purpose of the project is to reduce fuel loading.” PCTA supports this purpose, as we appreciate the need to reduce fuel loads to protect against future, large-scale wildfires. Though, the forthcoming EAs must provide detail as to why, when, where, and how timber will be removed. Connected to this purpose, we strongly support the statement that, “No new temporary or permanent road construction is proposed for this project.” Timber salvage in the PCT corridor should not be the primary purpose of this project, and any timber removal should only be done in the PCT corridor when it can occur immediately adjacent to National Forest roads and will not negatively impact the PCT viewshed or experience.

Proposed Actions

The number one proposed action is, “1) identification, felling, and removal of hazardous trees and removal of trees already felled during fire suppression or rehabilitation activities, along high use roads (Maintenance Level 2, 3, 4 and 5 NFS roads, County roads and Highways) and within and adjacent to developed facilities on NFS lands;” **PCTA supports this proposed action.**

The second proposed action is, “2) maintain roads, trails, and facilities;” It is unclear from this statement exactly what is being proposed to occur along National Forest system trails. The actions detailed in the first proposed action only relate to roads, and *do not seem* to apply to trails. The intent of this second proposed action needs to be clearly explained in the forthcoming EAs.

A blanket approval to remove all potential hazard trees along the PCT, in or outside of designated wilderness, would irreparably impact the trail experience for years to come. The scale and extent to which hazard tree removal is intended to occur is unclear, and as stated above, **we do not support the comprehensive clearing of hazard trees along the PCT in or outside of designated wilderness.** The developing EAs need to clearly document the method in which hazard trees will be identified along trail corridors, in wilderness areas, and in areas removed from roads and developed facilities. PCTA only supports the removal of distinct hazard trees, identified through site-specific analysis, to protect and maintain trail facilities. PCTA staff are ready and willing to work with the Forest Service during the development of the EAs to support this analysis.

Project Design Features and Best Management Practices

The “Recreation and Scenic Resources” design features vary considerably in each Zone. For example, the North Zone has the fewest Recreation and Scenic Resources design features. The Recreation and Scenic Resources design features should be consistent in all three Zones, at least in this initial and high-level overview provided by the Scoping document. We recommend applying all 11 Southern Sierra Zone Recreation and Scenic Resources design features to the North and Central Sierra Zones. The impending EAs will need to develop additional design features to address site-specific and Congressionally designated resources, such as the PCT. PCTA staff are ready to partner with local Forests to ensure the projects accomplish their purpose and needs while protecting the PCT’s fundamental resources and values.

Thank you for considering our comments in response to the Post-Disturbance Hazardous Tree Project Scoping document. We commend the U.S. Forest Service for quickly and actively addressing the widespread impacts from the 2020 and 2021 wildfire seasons. We look forward to working with Forest staff to ensure the PCT’s nature and purposes are thoroughly considered in the development of the EAs.

Thank you,



Justin Kooyman
Associate Director of Trail Operations

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