



August 12, 2022

Josh Kursky
PO Box 518
Idyllwild, CA 92549

This letter submitted to: <https://www.fs.usda.gov/project/?project=62444>

RE: Pacific Crest Trail Association Comments on South Fork Prescribe Fire Project Scoping

Mr. Kursky:

We are submitting this letter in response to the South Fork Prescribed Fire Fuels Scoping Notice on behalf of the 15,400 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). PCTA is part of a long-standing partnership with the USDA Forest Service, California State Parks, the National Park Service, and the Bureau of Land Management that is formalized in a Memorandum of Understanding (15-MU-11132424-003). The foundation for this private-public partnership in the operation of National Scenic Trails (NSTs) is rooted in the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11(a), "... 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 you are aware, PCTA and the San Bernardino National Forest have a strong partnership with the management and maintenance of the PCT.

PCTA appreciates the opportunity to work collaboratively with the San Bernardino National Forest to ensure that the project meets the purpose and needs, while still protecting the nature and purposes for which the PCT was designated a National Scenic Trail. We support the goals of the project and appreciate the need to encourage forest health and resilience. Although the PCT is located just outside the project boundary, the project can still impact the PCT experience. Our suggestions are to ensure that project activities and impacts are minimized on the PCT and for the trail's users.

To address both the use of prescribed fire which may take place across the PCT, as well as the timber thinning which may occur in the foreground, middleground and background distance zones as viewed from the PCT, we would like to see these design features incorporated into the project.

- Limit activities in size, scale, and timing so as to minimize impacts to the public. Perform management activities before and after conclusion of main recreation season (after Labor Day and before mid-March).
- Warning signs will be placed on all trail access points and along the PCT alerting the public to the adjacent fire activities. Forest staff will communicate the timing of project activities with PCTA staff. PCTA will disseminate information as appropriate and help to avoid panicking trail users if/when they see smoke from the prescribed fire activities.

- Within the foreground and middleground viewsheds as seen from the PCT, all project activities will meet a Scenic Integrity Objective (SIO) of High as shown on the SIO map in the 2005 San Bernardino National Forest Land Management Plan.

The following design features specifically address the prescribed fire and timber thinning activities, and many of these features were developed collaboratively between Forest Service and PCTA staff and incorporated into other National Forest projects to protect the nature and purposes of the PCT.

- Prescribed fire intensity should be managed sufficiently to limit scorch of canopy vegetation and tree boles. The use of low intensity prescribed fire is a preferred method of fuels treatment and forest regeneration.
 - Fire scarring on tree trunks is an acceptable outcome but keep flame height as low as possible.
- 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.
- Following burning operations, fire lines should be restored by kicking, shoveling, or raking dirt and duff back over the disturbed area. Flush cut stumps and cover with dirt and duff.
 - If any lines are visible from the PCT, these lines must be restored.
- Treatment boundaries should extend up and over ridgelines to avoid the “Mohawk” look. This is especially important along ridgelines silhouetted against the sky.
- Utilize natural breaks in topography and vegetation type to delineate treatment edges.
- Repair or restore hand lines following prescribed fire where hand lines are visible from within 100 feet of a road edge or trail edge.

The greater Big Bear area is important to us, as it is a major resupply stop on the PCT and the wellbeing of the people of Big Bear is an important factor in our review of the project. We are committed to working with the Forest Service to ensure the purposes of this project are met while protecting the PCT experience.

As always, the PCTA wishes to offer our assistance as this project moves forward.

Thank you,



Anitra I. Kass
Southern California Regional Representative
Pacific Crest Trail Association

CC: Justin Kooyman, PCTA, Associate Director of Trail Operations
Lindsey Steinwachs, U.S. Forest Service, Pacific Crest Trail Program Administrator