



August 12, 2022

Deputy Regional Forester Elizabeth Berger  
Objection Reviewing Officer  
U.S. Forest Service, Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592

This letter submitted at [US Forest Service NEPA Projects Home \(usda.gov\)](https://www.usda.gov) with subject line "Sequoia National Forest Plan Revision Objection"

RE: Objection to the Sequoia National Forest Revised Land and Resource Management Plan

Dear Deputy Regional Forester Elizabeth Berger,

I am writing on behalf of the 15,400-member Pacific Crest Trail Association (PCTA). The PCTA is the 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." Sec. 11(b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails."

The involvement of volunteer and private organizations in the operation of National Scenic Trails is re-emphasized in Executive Order 13195, "Trails for America in the 21<sup>st</sup> Century." The Order states, "Section 1. Federal Agency Duties. Federal agencies will, to the extent permitted by law and where practicable—and in cooperation with Tribes, States, local governments, and interested citizen groups—protect, connect, promote, and assist trails of all types throughout the United States. This will be accomplished by: (g) Fostering volunteer programs and opportunities to engage volunteers in all aspects of trail planning, development, maintenance, management, and education as outlined in 16 U.S.C. 1250." Based on this direction, and captured in our [memorandum of understanding](#), it is the PCTA's role to work with the Forest Service to ensure the best possible management of the PCT and the year-round experiences it affords trail users.

We are encouraged that the Sequoia National Forest Pre-objection Land and Resource Management Plan (Pre-objection Plan) includes a Pacific Crest National Scenic Trail Management Area. There is some excellent management direction in the Pre-objection Plan that will ensure that the PCT provides world-class experiences for hikers, horseback riders, skiers, and snowshoers from all over the country and even the world. However, there is also management direction in the Pre-objection Plan that falls short in providing the PCT with the management that is intended with its designation as a National Scenic Trail. We are not confident, as the Pre-objection Plan stands now, that some management activities will not substantially interfere with the nature and purposes for which the PCT is designated a National Scenic Trail. It is to these points that we submit this objection letter in the spirit of partnership.



## Context and Structure of PCTA's Objections:

For consistency in language throughout our objection, we are referring to this version of the Sequoia National Forest Land and Resource Management Plan as the 'Pre-objection Plan.' When addressing what the PCTA would like to see retained or changed after objections are resolved, we refer to the 'Final Plan.' When referencing the 2019 Sequoia National Forest Revised Draft Land and Resource Management Plan, we refer to the 'Revised Draft Plan.' Additionally, when we want to bring attention to language from our own comments, we will bold specific words or phrases. When we want to add emphasis to language that is quoted from legislation or policy, we will italicize the specific words or phrases and add brackets with the phrase 'emphasis added.'

PCTA submitted comments to the Inyo, Sierra and Sequoia National Forest Draft Land and Resource Management Plans (Draft Plans) on August 24, 2016. We also submitted comments in response to the Sequoia National Forest Revised Draft Plan on September 25, 2019. Some of our objections to the Pre-objection Plan are tied to the comments we submitted to the 2019 Revised Draft Plan. In other cases, new language has been introduced or deleted from the Pre-objection Plan that we are objecting to. When applicable, we refer to our initial comments to the 2019 Revised Draft Plan. As part of the PCTA's objection, here is a link to our 2019 Revised Draft Plan comment letter: <https://pcta.box.com/s/ekezvukizqebj2s0iqsyv4v71uom0dix>.

The PCTA's objections are in response to direction in the Pre-objection Plan that does not sufficiently discharge the duties of the Sequoia National Forest in carrying out the [National Trails System Act](#) (NTSA or Act). Key management direction is found in Sections 3 (a)(2) and 7(c) regarding management of the PCT; some of this language is already quoted in the Pre-objection Plan. Of note, Sec. 7(c) provides clear direction regarding "other uses", as well as the "prohibition" of motorized vehicles "along" any National Scenic Trail.

In some cases, direction in the Pre-objection Plan does not carry out the management direction set forth in the Forest Service [1982 PCT Comprehensive Management Plan](#) (PCT Comprehensive Plan) which refers to the role of secondary unit plans, such as Forest Plans, in providing sufficient direction to meet National Scenic Trail planning needs.

The recently released [PCT Foundation Document](#), approved by the Pacific Southwest Regional Forester, serves as a companion to the PCT Comprehensive Plan. The Foundation Document aggregates legislative history, legal and policy requirements, special mandates, and administrative commitments with the management of the trail. The Document also clearly articulates the PCT's "nature and purposes", as well as the trail's significance, and the fundamental values and resources that are essential to maintaining and protecting the PCT experience. The Foundation Document should inform management decisions and planning efforts to ensure that the trail's unique and fundamental resources are appropriately managed to provide for the nature and purposes for which the PCT was designated a National Scenic Trail.

In addition to the National Trails System Act, the PCT Comprehensive Plan, and the PCT Foundation Document, essential direction related to the PCT is found in the [2012 Forest Planning Directives](#). The Planning Directives in sections 24.2b and 24.43 1. b. and f provide direction for managing the nature and purposes for which Designated Areas, including National Scenic Trails, were established.

## The PCTA's objections regarding plan components and management direction specific to the PCT Management Area in and outside designated wilderness (MA-PCTW and MA-PCT)

### Pacific Crest National Scenic Trail in Designated Wilderness

The PCTA supports all language and management direction found in MA-PCTW and objects to the removal or substantive changes made to management direction in the Final Plan. The PCTA urges the Sequoia National Forest to retain all MA-PCTW direction, with the exception of the following objections and proposed remedies.

#### MA-PCTW Standards

##### 2019 Revised Draft Plan MA-PCTW-STD 01

"Prohibit heavy equipment line construction on the Pacific Crest National Scenic Trail, unless necessary for emergency protection of property and safety."

The PCTA's objection and proposed remedy:

We object to the removal of MA-PCTW-STD 01 from the 2019 Revised Draft Plan. This standard has been replaced with MA-PCTW-STD-01 which reads:

"If fire management activities are required within the management area, see FIRE-FW-STD 02."

While we strongly support the direction in FIRE-FW-STD 02, there is no longer any direction prohibiting heavy line construction on the PCT unless absolutely necessary. FIRE-FW-GDL 05 provides strong direction for minimizing the impacts of wildfire management activities on the PCT, but the language is less robust, changing a **prohibition** on heavy line construction to an **avoidance** of line construction within the PCT Management Area.

High-intensity wildfires are occurring on our national forests and on the PCT more frequently than ever. In recent years, numerous miles of heavy line construction have occurred directly atop the PCT tread in national forest lands. This was actualized in Region 5 forests during the Caldor and Dixie Fires, causing significant physical and experiential impacts.

Our proposed remedy is for the Forest to reinsert the 2019 Revised Plan MA-PCTW-STD 01 in the Final Plan, while also retaining FIRE-FW-GDL 05 but incorporating a minor change for clarity (see our comments in FIRE). The Inyo National Forest included MA-PCTW-STD 01 exactly as written in the Sequoia's Revised Draft Plan, as a standard in their 2019 final plan for the PCT both in and outside of designated wilderness. As a Congressionally designated resource that spans multiple units, all three early-adopter forests should include this standard to provide consistent management of the PCT. This is a key issue for the PCTA to ensure that wildfire management and suppression efforts do not substantially interfere with the nature and purposes of the trail.

#### MA-PCTW Potential Management Approaches

Potential Management Approaches (PMAs) are not plan components but contain management direction that is crucial to provide for the nature and purposes of the PCT. As directed by the

2012 Planning Directives, it is necessary to "... include plan components that provide for the nature and purposes of national scenic and historic trails in the plan area ...". As a result, the newly added third and fourth PMAs found in MA-PCTW provide crucial management direction and should be converted to guidelines.

### Third PMA

"As needed, restore areas within the management area damaged by wildland fire suppression efforts after fire suppression efforts have ceased."

The PCTA's objection and proposed remedy:

This PMA should be incorporated as a guideline within MA-PCTW. As wildfires have become more frequent and severe, suppression efforts have understandably responded more forcefully. While more aggressive wildfire suppression activities are necessary in some circumstances, they impact other forest resources, including the PCT and surrounding lands. This will be a growing issue as we continue to experience a warmer and drier climate. As stated on page 646 of the FEIS, "Fire is expected to continue to impact the trail and trail recreationists." Without **required** repair and restoration efforts, associated suppression activities have a high potential to substantially interfere with the nature and purposes of the PCT, as has been seen in recent wildfire events.

As referenced in our introduction, sections 24.43 1. b. and f. of the 2012 Planning Rule Directives direct the Responsible Official to include "plan components" to provide for the nature and purposes of national scenic trails within the plan area. As such, the Final Plan should contain this direction as a guideline (not just a PMA) that addresses the rehabilitation of the PCT tread and restoration of wildfire suppression impacts on the lands within the Management Area. Other sections of the Pre-objection Plan, such as WTR-RCA-GDL 05, contain plan components directing restoration of other forest resources after wildfire management activities; management of the PCT should be given similar consideration and direction.

The PCTA's rationale is supported by the PCT Comprehensive Plan which states, "The entire landscape and its scenic quality are important to the purposes of the Pacific Crest National Scenic Trail." The PCT Foundation Document builds upon this point stating: "The Pacific Crest Trail is located and generally *managed to avoid substantial human modifications of the natural environment* [emphasis added]." While wildfire suppression activities are certainly warranted and necessary, there must be direction to restore the resulting impacts on the PCT tread and trail experience to provide for the nature and purposes of the trail.

The PCTA provided comments on the need to incorporate PCT Management Area plan components relating to wildfire and managed fire restoration on page 9 of our response to the 2019 Revised Draft Plan. This is a key issue for the PCTA to ensure that future wildfire management and suppression efforts do not have long-term impacts that substantially interfere with the nature and purposes of the trail.

### Fourth PMA

"As needed, restore areas within the management area after prescribed fire or wildland fire use projects."

The PCTA's proposed remedy:

This PMA should be incorporated as a guideline within MA-PCTW. Future vegetation and ecosystem management will incorporate the use of prescribed and managed fire along the PCT. While the PCTA fully supports the use of fire as a management tool, clear and mandatory direction in the form of plan components should be in the Final Plan that directs restoration of impacts that adversely affects the nature and purposes of the PCT. As stated above, this is consistent with sections 24.43 1. b. and f. of the 2012 Planning Directives.

The PCTA provided comments on this issue on page 9 of our response to the 2019 Revised Draft Plan encouraging the Forest to incorporate plan components related to wildfire and prescribed fire restoration efforts. This is a key issue for the PCTA to ensure that impacts from prescribed and managed fire do not substantially interfere with the nature and purposes of the PCT.

### **PCT Management Area outside Designated Wilderness**

The PCTA supports all language and management direction found in MA-PCT and objects to the removal or substantive changes made to management direction in the Final Plan. The PCTA urges the Sequoia National Forest to retain all MA-PCT direction, with the exception of the following objections and proposed remedies.

### **MA-PCT Standards**

#### **2019 Revised Draft Plan MA-PCT-STD 01**

“Prohibit heavy equipment line construction on the Pacific Crest National Scenic Trail, unless necessary for emergency protection of property and safety.”

The PCTA’s objection and proposed remedy:

The PCTA has the exact same objection and proposed remedy to the deletion of this standard in MA-PCT as with MA-PCTW, as detailed in our objection above on page 3. The Inyo National Forest included this exact standard in their 2019 final plan for the PCT both in and outside of designated wilderness, and it would provide consistent management direction across the early-adopter Forests to include this standard. This is a key issue for the PCTA to ensure that wildfire management and suppression efforts do not substantially interfere with the nature and purposes of the trail.

#### **MA-PCT-STD 03, 04, and 05**

Overall, the PCTA strongly supports the management direction contained in these standards and urges them to be retained in the Final Plan. The direction is consistent with the National Trails System Act and existing Forest Service regulations. However, there is a problematic statement that is found in all three standards that reads:

“... or if approved on a case-by-case basis for management of the trail...”

This is a vague statement that could be interpreted broadly by current and future land managers leading to unintended consequences with management of the PCT. The PCTA supports the

language “administrative” purposes, as this should cover any exemptions needed for administration or management of the PCT.

The PCTA’s proposed remedy:

Remove the phrase, “...or if approved on a case-by-case basis for management of the trail...” from each of the three standards.

### **MA-PCT Potential Management Approaches**

As addressed above, Potential Management Approaches (PMAs) are not plan components, but contain management direction that is crucial to provide for the nature and purposes of the PCT. As directed by sections 24.43 1. b. and f. of the 2012 Planning Directives, it is necessary to “...include plan components that provide for the nature and purposes of national scenic and historic trails in the plan area...” As a result, the following essential PMAs should be converted to guidelines.

#### **Fourth PMA**

“As needed, restore areas within the management area damaged by wildland fire suppression efforts after fire suppression efforts have ceased.”

#### **Fifth PMA**

“As needed, restore areas within the management area after prescribed fire or wildland fire use projects.”

The PCTA’s proposed remedies:

These PMAs are identical to PMAs 3 and 4 from MA-PCTW. As such the PCTA’s objection and proposed remedies are identical – change these PMAs to guidelines; our full objection and proposed remedies can be found above on pages 4 and 5 of this objection.

The PCTA provided comments on this issue on page 9 of our response to the 2019 Revised Draft Plan encouraging the Forest to incorporate plan components related to wildfire and managed fire. This is a key issue for the PCTA to ensure that wildfire suppression efforts and managed fire impacts do not substantially interfere with the nature and purposes of the trail.

### **PCT Section of the Final Environmental Impact Statement**

Page 655, table 126 in the FEIS, shows 873 acres of the PCT management area as having a Scenic Integrity Objective (SIO) of "moderate." This conflicts with MA-PCT-GDL 01 which states:

“Management activities within the management area should be consistent with a scenic integrity objective of high (figure 24, appendix A) to minimize impacts to the scenic qualities of the areas through which the Pacific Crest National Scenic Trail passes.”

The PCTA would like to have this discrepancy clarified, and we support the management direction articulated in MA-PCT-GDL 01.

## The PCTA's objections regarding Forestwide plan components and other management direction affecting management of the PCT

### Chapter 2 Forestwide Desired Conditions and Management Direction

#### FIRE

##### FIRE-FW-STD 02

Retain this standard: This is crucial Forestwide fire management direction pertaining to the Pacific Crest National Scenic Trail and protection of the trail during fire suppression activities. We support this direction and object to its removal in the final plan.

##### FIRE-FW-GDL 05

The PCTA's objection and proposed remedy:

While we support the intent of this standard, we object to its current wording and recommend that the Forest adopt clear and explicit language that will prohibit full suppression fire techniques except when necessary for emergency protection of safety or property. The first sentence of this guideline uses the word "avoid", which is a departure from the more restrictive language used in the 2019 plan's MA-PCT-STD 01, to:

"Prohibit heavy equipment line construction along the Pacific Crest National Scenic Trail..."

Please see our comments pertaining to MA-PCTW-STD 01 and PCT-STD 01. We recommend changing "avoid" to "prohibit" in this guideline to ensure impacts to the PCT are minimized during wildfire management activities.

The second language edit refers to language in the third sentence which states, "...or along the Trail", we recommend changing this to read, "...or along the PCT" to dispel any lack of clarity to which trail is being referenced.

##### FIRE-WRZ-STD 01 and FIRE-WMZ-STD 02

The PCTA's objection and proposed remedy:

The PCTA objects to both standards which contain duplicate language, reading:

"Use natural barriers and features ... such as roads and trails when managing wildfires ..."

This direction conflicts with FIRE-FW-STD 02 which directs the agency to, "apply minimum impact strategies and tactics" in the Pacific Crest National Scenic Trail Management Area. The result is a lack of clarity for fire managers whether the PCT can or should be used as a fire line – something that has recently happened along numerous miles of the PCT on national forest lands in recent fires; if a fire manager only turns to this section of the Forest Plan, it could result in significant and long-term damage to the PCT.

To remedy this issue, the PCTA recommends that the following language is added to FIRE-WRZ-STD 01 and FIRE-WMZ-STD 02:

“Use natural barriers and features ... such as roads and trails, *excluding the Pacific Crest National Scenic Trail* (see MA-PCTW and MA-PCT-STD 01), when managing wildfires ...”

We provided comments to these standards on page 13 of our comment letter in response to the 2019 Revised Draft Plan.

## SCENERY

### SCEN-FW-GDL 01

The PCTA’s objection and proposed remedy:

The PCTA supports the direction provided in this guideline and would object if it were significantly altered or deleted. However, the term “*long-term timeframes*” is vague and undefined in the Pre-objection Plan. We recommend the following wording: “Management activities should maintain or move toward scenic integrity objectives *found on the SIO map in Appendix A within 5 years of any project or management activities.*”

The PCTA provided a nearly identical comment on page 14 of our response to the 2019 Revised Draft Plan.

## **Chapter 3. Area-specific Desired Conditions and Management Direction**

### SUSTAINABLE RECREATION

#### General Recreation Area

The General Recreation Area management plan components lack management direction for remote recreation experiences, as well as for ecological health and integrity. The PCTA recommends the additional of *MA-CBRA-DC 01 and 02 as the first two desired conditions for the GRA*, while still retaining them in the Challenging Backroad Area. These desired conditions provide strong and clear management direction that should be incorporated into all General Recreation Areas.

## **Appendix G: Existing Resource Plans that Continue to Guide Management**

Among the existing resources plans that continue to guide management is the “Pacific Crest National Scenic Plan (1982).” This should be corrected to provide the accurate title of “Pacific Crest National Scenic Trail Comprehensive Management Plan (1982).” Additionally, the recently released “Pacific Crest National Scenic Trail Foundation Document”, approved by the Pacific Southwest Regional Forester, should also be listed as a resource plan that should guide future management of the Pacific Crest National Scenic Trail.



We appreciate your time and consideration of the PCTA's objections and proposed remedies regarding the management of the Pacific Crest National Scenic Trail within the Sequoia National Forest Plan. As your primary private partner in the management and maintenance of the PCT, we are eager to work with the Forest Service to resolve our objections and ensure the PCT receives the management intended with its designation as a National Scenic Trail. Please do not hesitate to contact the PCTA with any questions or follow up you would like to have.

In partnership,



Justin Kooyman  
Associate Director of Trail Operations



Benjamin Barry  
Southern Sierra Regional Representative

CC:

James Bacon, U.S. Forest Service, Pacific Southwest Region, Director of Public Services  
Lindsey Steinwachs, U.S. Forest Service, Pacific Crest Trail Administrator  
Teresa Benson, U.S. Forest Service, Sequoia National Forest Supervisor  
Megan Wargo, PCTA, Acting Executive Director & CEO  
Jennifer Tripp, PCTA, Director of Trail Operations