



Pacific Crest Trail Association

November 8, 2024

Regional Forester
USDA Forest Service, Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

This letter submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=62873>

RE: Community Protection - Central and West Slope Project Draft Decision Notice and Finding of No Significant Impact

Dear Forester Eberlein,

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 Plumas National Forest's Community Protection – Central and West Slope Project Draft Decision Notice (DN)/Finding of No Significant Impact (FONSI). The PCTA is pleased to see that the Forest is addressing the landscape-level impacts related to the recent wildfires. We support the purpose and need of the project to reduce risk of wildfire impacts on communities and critical infrastructure, reduce the potential for extreme fire behavior in the wildland-urban interface, maintain road systems for emergency access and evacuations, and to foster an all-lands approach to fire and fuels management. Similar to other projects in the Region and on the Plumas National Forest, we support the purpose and need of the project but *do not* support the widespread removal of trees along the PCT; doing so would significantly degrade the natural-appearing landscape, which is an essential part of the trail's nature and purpose. The PCTA feels that the Plumas NF has modified management practices as needed and has avoided activities that are incompatible with the PCT as a congressionally designated National Scenic Trail. With that said, *it is important that the PCT be added to all project maps to accompany the modified management practices (design features) and to protect the trail during implementation.*

The PCTA supports the selected Alternative, and the design features included in the EA. Specifically, we support the design features identified on pages A-21 and A-22 of Appendix A. *The PCTA would object to the project if any of the following design features were to be removed or altered in the Final Decision.*

- REC-2 – Overnight guests and day users will be notified of anticipated fuels treatments that may affect recreation activities. Notification of planned treatments will be posted on PNF and/or concessionaire websites, as appropriate. Signage will also be posted at the entrances to affected recreation facilities and resources (e.g., trailheads, parking lots, campgrounds) regarding anticipated treatment activities and any temporary closures.
- REC-3 – 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.



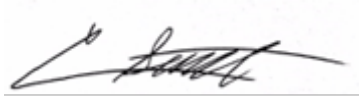
- REC-4 – Skid trails will be treated to prevent post-harvest use by off-highway vehicles (OHV). Skid trails that intersect forest roads or trails will be revegetated, camouflaged, or barricaded with natural materials once they are no longer in use.
- REC-5 – Within recreation sites, new landings will be sited in coordination with a Recreation Specialist and will be fully decommissioned and closed following use.
- REC-6 – Within recreation areas, avoid scheduling implementation work between the Memorial Day and Labor Day holidays. When not possible, avoid disruption to recreation activities and high use recreation sites on weekends and holidays.
- PCT-1 – No logging until after mid-August in units where the Pacific Crest Trail travels through or is adjacent. To accommodate hikers establish reroutes or provide traffic controls.
- PCT-2 – No heavy equipment within a 70-foot buffer along the Pacific Crest Trail. Within the buffer only hand falling is permitted. Trees should be felled away from the trail. No skidding would occur on the PCT. All skid trails would be 100 feet from the PCT. Landings would be placed so they are not visible from the trail.
- TRAIL-1 – Advanced notice of trail closures would be posted at trailheads and on the Forest website. During active logging trails would be closed for safety. Trails should be closed after Labor Day to reduce impacts to Forest visitors.
- TRAIL-2 – All Trails - No skidding on trails. Crossings are to be made perpendicular to trails, unless review by recreation staff determines that site disturbance can be minimized by crossing at a different angle. Recontour/smooth and scatter material to conceal and discourage use of skid trails where they cross the trail. Protect all existing structures such as turnpikes, bridges and signs during thinning and burning.
- VQO-1 – Within Preservation Zone (Bucks Lake Wilderness): Allow for ecological changes only. Target consumption of piled material when burning to 90% or greater.
- VQO-2 – Within Retention Zones: Provide a natural-appearing landscape where management activities are not visually evident. Locate landings and primary skid trails away from the immediate foreground along trails and primary roads.
- VQO-3 – Within Retention Zones, minimize stump height in both mechanical and hand thinning treatment units within the immediate foreground of trails and primary roads. Target consumption of burn piles to 90% or greater where they are visible from trails and primary roads.
- VQO-4 – Within the Project area, implement the following measures within 300 feet of the Pacific Crest Trail:
 - Trees identified for removal will be marked, and trees identified for retention will not be marked.
 - Stumps will be cut as low as possible and cut angled away from the trail.

To further protect trail users during implementation activities, the PCTA encourages the forest to also include the following component to the project:

- Unit will communicate project timing and implementation with PCTA staff.
 - PCTA will post project information on our website and app so PCT users are aware, can expect project impacts, and can receive information and education regarding the purpose of the project.

Thank you for considering the PCTA's feedback and for including design features that protect the trail experience and provide for the nature and purposes of the PCT. We are supportive of the project and look forward to seeing it implemented in the near future.

Thank you,

A handwritten signature in black ink, appearing to read "Connor Swift", is enclosed in a thin black rectangular border.

Connor Swift
PCTA, Regional Representative

Cc:

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

Ryan Bauer, U.S. Forest Service, Forest Fuels Manager, Plumas National Forest

Chuck James, U.S. Forest Service, Forest Recreation Program Manager, Plumas National Forest

Justin Kooyman, PCTA, Director of Trail Operations