



# Pacific Crest Trail Association

November 14, 2024

Regional Forester  
1323 Club Drive  
Vallejo, CA 94592

This letter submitted to: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64028>

RE: North Fork Forest Recovery Project Draft Decision Notice & 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 North Fork Forest Recovery Project Draft Decision Notice (DN) and Final Environmental Assessment (EA). We continue to support the purpose and need of the project to accelerate post-Dixie Fire forest recovery, improve forest resiliency in the face of climate change, and reduce wildfire risk for nearby communities. The PCTA appreciates that our comments from the Proposed Action and Draft EA were taken into consideration and that the Final EA reflects our recommendations.

The PCT is designated a National Scenic Trail by the National Trails System Act. The Act states in section 7(c), "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail... *to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established.*" Part of the PCT's nature and purposes, as described by the newly released [PCT Foundation Document](#) approved by the Pacific Southwest Regional Forester, is that, "Collaborative management ensures the Trail is preserved for the conservation, public use, enjoyment, and appreciation of the nationally significant scenic, historic, natural, and cultural quality of the areas through which the Trail passes." Building upon this, the Pacific Crest Trail Comprehensive Management Plan (PCT Management Plan) also states, "It is anticipated that even though some resource activities may occur immediately adjacent to or across the trail, the agencies will protect the integrity of the trail proper by *modifying management practices as needed.*" With that said, PCTA supports the selected alternative in the Final EA and Draft Decision. The selected alternative includes Project Design Features (PDFs) that help reduce the visual impacts to PCT users and carries out the intent of the National Trails System Act and the PCT Management Plan.

We will continue to support the North Fork Forest Recovery Project, given that the following PDFs are maintained and implemented in the Final Decision. *PCTA would object to the project if any of the PDFs were to be removed or altered:*

- REC-2: 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-5: 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: Trees to be removed will be marked and trees remaining will be un-marked within the immediate foreground viewing distance zone (300') from the PCT.
- PCT-2: Cut stumps as low as possible within the immediate foreground viewing distance zone (300') from the PCT.
- PCT-3: Angle cuts away from the trail within the immediate foreground viewing distance zone (300') from the PCT.
- PCT-4: Piles will be placed and burned outside of the immediate foreground viewing distance zone (300') from the PCT as conditions allow.
- PCT-5: Trail closures will be communicated to Pacific Crest Trail Association (PCTA) staff.
- VQO-1: 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-2: 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.

Thank you for incorporating PCTA's recommendations into the North Fork Forest Recovery Project Draft DN and Final EA. We commend the U.S. Forest Service for quickly and actively addressing the widespread impacts and needs of the forest and look forward to working with Forest staff to ensure the PCT's nature and purposes are provided for throughout the project.

Thank you,



Connor Swift  
PCTA, Regional Representative

Cc:

Lindsey Steinwachs, U.S. Forest Service, Pacific Crest Trail Program Administrator  
Joseph Hoffman, U.S. Forest Service, Plumas NF, Mt. Hough RD, District Ranger  
Liz Ballou, U.S. Forest Service, Plumas NF, Mt. Hough RD, NEPA Planner  
Chuck James, U.S. Forest Service, Plumas NF, Forest Recreation Program Manager  
Erika Brenzovich, U.S. Forest Service, Plumas NF, Recreation and Lands Program Manager  
Justin Kooyman, PCTA, Director of Trail Operations