



December 10, 2025

Responsible Official:
Erick Walker
Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150

This letter submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65228>

RE: Caldor Fire Restoration Project Draft Environmental Assessment

Dear Supervisor Walker,

I am writing on behalf of the 14,000+ 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 dates back to 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." 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 PCTA has reviewed the Caldor Fire Restoration Project Draft Environmental Assessment (EA). We appreciate and support the proposal to restore desired ecological process and habitat conditions following the Caldor Fire and to improve the overall resiliency of the forest ecosystem to drought, to insect and disease outbreaks, and to impacts from future wildfire.

The PCTA is largely supportive of the proposed treatments identified in the project. The project has the potential to improve the resiliency of the landscape and in turn enhance the health of the forest and improve the long-term trail experience as a National Scenic Trail.

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) 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.*"

The PCTA is pleased to see that the Draft EA includes many resource protection measures (RPMs) that are intended to reduce undesirable impacts to the PCT and the surrounding landscape. With that said, *the PCTA is supportive of the project and Draft EA, given that the following RPMs (page 18, Appendix A)*



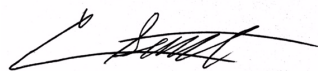
remain and are included in the Final Decision. The following RPMs from the Draft EA are essential in providing for the PCT's nature and purposes.

- REC-1: Design treatments to prevent substantially altering views that would expose structures or create undesirable views along scenic highways or scenic viewing locations, for example communication sites, water tanks, etc.
- REC-2: Minimize the extent and duration of temporary Forest Closure Orders. Provide signage during closures informing the public of the reasons for the closure and alternative options for recreation access during the closure.
- REC-3: Post signs and temporary closures advising when Project activities are going to take place, as well as posting interpretative signs to educate the public of fuels management and forest health objectives of the Project.
- REC-4: Where closures are not used, the following shall apply: For construction and maintenance projects that affect public access or use of a facility (i.e., construction activities along a trail or at a trailhead): provide advanced notice to the public to ensure that the public is aware of Project activities. Post signs in Project Area near public access points to highlight the proposed action. Some activities may require posting of trail guards, such as mastication adjacent to a trail. Advanced notice for activities that do not result in a substantial change to access is not required (i.e., trail or road maintenance where an alternate route is provided, construction at a trailhead that does not impede access, etc.). Consult with trails engineer or designee prior to implementation to coordinate notifications, sign placement and any additional needs, such as trail guards.
- REC-5: Project activities involving vehicles or machinery shall not proceed on federal holidays between May 1 and September 30, including the weekend and Friday before, unless agreed upon in advance by the Public Services Staff Officer and Forest Supervisor.
- REC-6: To the extent possible, limit ground-based machinery contact with trail tread.
- REC-7: Repair and rehabilitate any incidental damage caused to recreational improvement or facilities.
- REC-8: Where feasible, remove slash and do not pile within 10 feet of system roads and trails, and within 25 feet of developed recreation facilities.
- REC-9: Cut stumps within a maximum height of approximately six inches measured from the uphill side of the stump where practicable. Where feasible, within 25 feet of recreation improvements, facilities, and NFS system roads and trails flush-cut stumps level with the ground.
- REC-10: Do not masticate within 200 feet of recreation improvements and facilities.
- REC-11: The location of temporary roads shall fit the landscape with a minimum degree of landform alteration limiting the amount of earthwork. Avoid excessive cut and fill slopes for temporary road construction.
- REC-12: Where skid trails or cable corridors are readily visible, use natural features (e.g., trees, shrubs, logs, rocks, etc.) to help block access to these areas and prevent unauthorized vehicular or trail use following Project activity.
- REC-13: If any treatments or equipment cross the Pacific Crest Trail/Tahoe Rim Trail (PCT/TRT), Forest Service staff would notify PCTA/TRTA staff prior to implementation, work to establish an alternate route during the time of impact, and ensure temporary roads are restored after use so as to reduce the risk of non-authorized uses.
- REC-14: Paint or mark only trees to be taken within developed recreation sites, campgrounds, and recreation residence tracts (including understory trees).
- REC-15: Where the Project Area intersects with developed recreation sites and scenic resources, the IDT would coordinate prior to implementation during Project design to ensure recreation/scenic objectives are met.

- REC-16: A landscape architect or qualified recreation staff would be consulted before any marking of trees within developed recreation sites.
- REC-17: When marking recreation sites in advance of cutting, utilize butt markings or other system for marking that does not leave a large visual marking within recreation sites.
- REC-18: Maximize tree retention within recreation sites (thin to the largest residual basal area while still meeting thinning objectives).
- REC-19: Coordinate with trails engineer to identify approved crossing locations of temporary roads across system trails prior to implementation.
- REC-20: Large diameter woody material may be retained adjacent to trails to define trail corridor and limited off-trail travel or creation of alternate trail lines. Coordinate with trails engineer to identify location, placement and amount of material to be retained prior to implementation.
- REC-21: Minimize occurrence of masticated and/or slash material on trail surfaces, trails shall be maintained to have native soil as the primary travel surface. Mechanical work that crosses open trails shall be monitored daily to ensure material is not left on trail surfaces where it may present a hazard to public use.
- REC-22: Designated Forest Service trails would be returned to their previous width and character after Project activities.
- REC-23: Barriers would be strategically placed along open areas adjacent to roads or trails (e.g., boulders, split rail fence, and barriers/signs) to discourage post-treatment establishment of user-created routes.
- REC-24: Hauling, skidding, or use of heavy equipment for fireline construction on the PCT tread or use of the PCT for landings or temporary roads is prohibited unless there is no prudent and feasible alternative to provide for an overriding public need or for firefighter safety, and impacts upon the PCT are mitigated.
- REC-25: Implement measures to maintain public access to the PCT during management activities.

Supervisor Walker, thank you for considering PCTA's comments and for the time and effort put forth to protect the Pacific Crest National Scenic Trail. Please let us know if you have any questions regarding our comments.

Sincerely,



Connor Swift
Northern Sierra Regional Representative

CC:

Lindsey Steinwachs, U.S. Forest Service, Region 5, PCT Administrator
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