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Organization: Pacific Crest Trail Association

Title: Acting Director of Trail Operations

Comments: Dear Forest Supervisors Benson and Gould, I am writing on behalf of the 14,700-member Pacific Crest Trail Association (PCTA). The PCTA is the primary private partner, with the federal, state, and local land management agencies, 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." As such, it is the PCTA's role to work with the USDA Forest Service to ensure the best possible management of the PCT and the year-round experiences it affords trail users. We have reviewed the Sierra and Sequoia National Forests Prescribed Fire Proposed Action. The PCTA supports the purpose and need of the project to, "[...] facilitate increased application of prescribed burning across the Sequoia and Sierra National Forests' landscapes that contribute to sustainable, resilient vegetation structure and protection of human communities and other highly valued resources and assets." We particularly support collaboration and consultation with Native American Tribes as discussed on page 4 of the Proposed Action. We appreciate the project design features (PDFs) and clear language addressing treatment of the PCT within the project. Particularly, we strongly support PDFs Rec-1 and SPA-3 and urge their retention in the forthcoming Environmental Assessment (EA). These PDFs are essential to ensure that treatment of the PCT provides for the PCT's nature and purposes as articulated in the Forest Service PCT Foundation Document and complies with Forest Plan direction, while still accomplishing the project's purpose and needs. We also support the language regarding "[Special Area Considerations]" on page 22 of the Proposed Action. In addition to these PDFs, we encourage the Forest to incorporate the following additional PDFs into the proceeding EA: [bullet] The Sierra and Sequoia National Forest staff will communicate project implementation near the PCT to PCTA staff; PCTA staff will then communicate project activities to the public through our public website and social media channels. [bullet] Prescribed fire intensity should be managed sufficiently to limit scorch of canopy vegetation and tree boles. Flame height should be as low as possible. [bullet] Fire lines created for use of prescribed fire should meander to follow topography or vegetation masses that remain. Meander hand line shapes on edges to avoid a hard, unnatural appearing edge and to mimic natural fire. One constructive comment we have with the Proposed Action is where the document states, "[...] After the record of decision for this project is signed, landscape prioritization, stakeholder engagement, and implementation planning will occur in recurring 5-year cycles with opportunities for stakeholder collaboration and feedback at periodic checkpoints." We request that the Forests clarify this statement and be more explicit with how often the "[...] periodic checkpoints" are expected to occur. Supervisors Benson and Gould, thank you for considering the PCTA's comments in response to the Sequoia and Sierra National Forests Prescribed Fire Project Proposed Action. We are heartened to see direction from the Forest Plans being carried forward to ensure that this important project can occur while still providing for the PCT's nature and purposes. We are ready and willing to work with your staff as the project develops further. Thank you, Justin Kooyman PCTA Acting Director of Trail Operations Cc: Lindsey Steinwachs, USDA Forest Service, PCT Program Administrator