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August 3, 2022

Objection Reviewing Officer  
Deputy Regional Forester Elizabeth Berger  
USDA Forest Service Pacific Southwest Region  
1323 Club Drive  
Vallejo CA 94592

Dear Objection Reviewing Officer:

What follows are objections by the Pacific Crest Trail Reassessment Initiative (PCTRI) to material contained within the Land Management Plan for the Sequoia National Forest Pre-objection Version, R5-MB-325-A, June 2022. Page references are to pages within that document.

1. Regarding:

*(a) Standard 03*

Pacific Crest National Scenic Trail outside Designated Wilderness (p. 116);

Standards (MA-PCT-STD) (p. 117);

Standard 03: **please delete “and bicycle travel”** (p. 117).

The objectionable words rely on three authorities that are found in footnote 24: 36 CFR § 212.21, USFS Regional Order 88-4, and 16 USC § 1246(c).

As we explained on July 28, 2022, in a letter to the Pacific Crest National Scenic Trail Administrator, none of these authorities is apposite.

36 CFR § 212.21 does not prohibit mountain biking, and it would be defective if it did by reason of not taking into account 1983 amendments to the National Trails System Act, 16 USC § 1241 et seq.

Closure Order 88-4 is invalid because its permanent retention violates the Administrative Procedure Act of 1946, 5 USC § 551 et seq.

Finally, the reference to 16 USC § 1246(c), a provision of the National Trails System Act, must take into account the aforementioned 1983 amendments to that Act, specifically 16 USC § 1246(j).

Please see our letter of July 28, 2022, for details. It is attached to this submission.

*(b) Standard 06*

Standard 06: for the reasons mentioned above, **please delete “bicycle travel does not occur on the trail”** (p. 118).

2. Regarding:

Pacific Crest National Scenic Trail outside Designated Wilderness (p. 116);

Suitability (MA-PCT-SUIT) (p. 119);

Standard 05: **please delete “and bicycle travel”** (p. 119).

The sentence in Standard 05 reads as follows in pertinent part: “bicycle travel on the Pacific Crest National Scenic Trail tread is not suitable year-round.”

PCTRI finds this sentence ambiguous. If it is stating that bicycle travel is banned at all times, the authorities relied on do not support that conclusion (see above). If it is stating that bicycle travel is infeasible when the trail is snow-covered, that is factually inaccurate, since fatbikes ride on snow all over North America.

These requests need not generate controversy and should be easy to implement. The PCNST is managed by the PCNST Administrator in any event, pursuant to applicable law and policies. Removing the objectionable words will not, of itself, open the 13 non-Wilderness miles of the PCNST in the Sequoia National Forest to mountain biking. That will be decided by the PCNST Administrator in consultation with other officials within the USFS and partner agencies.

Sincerely yours,



Ted Stroll

On behalf of the Pacific Crest Trail Reassessment Initiative