



WILDERNESS WATCH

Keeping Wilderness Wild

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November 14, 2022

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Scoping Comment Submitted Electronically:
<https://cara.fs2c.usda.gov/Public/CommentInput?project=52259>

**RE: PACIFIC NORTHWEST NATIONAL SCENIC TRAIL COMPREHENSIVE PLAN
SCOPING COMMENTS**

Wilderness Watch submits these scoping comments for the Pacific Northwest National Scenic Trail Comprehensive Plan. Wilderness Watch is a national wilderness advocacy organization, headquartered in Missoula, Montana with offices in Idaho, Minnesota, and Vermont. Wilderness Watch is dedicated to the protection and proper administration of the National Wilderness Preservation System, including the designated Wilderness, recommended Wilderness, and Wilderness Study Areas affected by the Pacific Northwest National Scenic Trail (hereinafter “the trail”). Wilderness Watch members value knowing that Wilderness is protected as Congress intended—that it is administered as an untrammelled landscape retaining its primeval character and influence, without permanent ‘improvements,’ and with outstanding opportunities for solitude—whether or not they ever set foot inside the Wilderness boundary. Our members also visit and enjoy the Wildernesses impacted by the trail for various personal, professional, and spiritual reasons, including for the “primitive and unconfined” recreation opportunities the areas provide.

Because the Forest Service has provided limited information at this juncture regarding the proposed comprehensive plan, the below comments raise broad issues for consideration as the proposal progresses. We look forward to providing more detailed comments in the future as more details become available.

Wilderness

It appears the trail crosses at least six designated Wildernesses in Idaho and Washington (Salmo Priest, Pasayten, Stephen Mather, Mt. Baker, Buckhorn, and Olympic / Daniel J. Evans), at least one recommended Wilderness in Montana (Glacier), and at least one Wilderness Study Area in Montana (Ten Lakes). Because these areas are all managed as Wilderness, our comments will refer to these areas collectively as “Wilderness.”

The Wilderness Act establishes a National Wilderness Preservation System to safeguard our wildest landscapes in their “natural,” “untrammelled” condition. 16 U.S.C. § 1131(a). Wilderness is statutorily defined as “an area where the earth and its community of life are

untrammeled by man” and an area “retaining its primeval character and influence... which is protected and managed so as to preserve its natural conditions....” *Id.* § 1131(c). Thus, wilderness “shall be administered for the use and enjoyment of the American people *in such a manner as will leave them unimpaired for future use and enjoyment as wilderness*, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness....” *Id.* § 1131(a) (emphasis added). The Act’s opening section “sets forth the Act’s broad mandate to protect the forests, waters, and creatures of the wilderness in their natural, untrammeled state” and “show[s] a mandate of preservation for wilderness and the essential need to keep [nonconforming uses] out of it.” *Wilderness Soc’y v. U.S. Fish & Wildlife Serv.*, 353 F.3d 1051, 1061-62 (9th Cir. 2003) (en banc).

Overuse and development degrade wilderness character. Due to the increasing popularity of thru-hiking, and the potential for this trail to link with other popular thru-hiking trails, use related impacts to designated and recommended Wilderness, as well as impacts to Wilderness Study Areas, must be examined, disclosed, and addressed. Similarly, the added recognition and awareness of the trail due to its National Scenic designation is likely to increase use—whether day, overnight, or extended—of the trail, which poses impacts to Wilderness and the important secure habitat it provides for many sensitive and imperiled species. These impacts must be considered, and the Forest Service must analyze alternatives that would avoid or lessen these impacts, including potentially routing (or rerouting) portions of the trail to areas outside of Wilderness and particularly sensitive habitat.

Wilderness values and the Wilderness Act’s mandates must guide the agencies’ analysis for trail areas in Wilderness. As the Ninth Circuit has stated, agencies cannot “elevate[] recreational activity over the long-term preservation of the wilderness character,” and agencies must keep in mind that “[a]lthough the [Wilderness] Act stresses the importance of wilderness areas as places for the public to enjoy, it simultaneously restricts their use in any way that would impair their future use *as wilderness*.” *High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630 (9th Cir. 2004). The Forest Service manual provides similar direction noting, “Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.” Forest Serv. Manual 2320.6.

With these principles in mind, the Forest Service must disclose and take a hard look at the direct, indirect, and cumulative impacts of the trail on wilderness character—including visitor use, trail construction and maintenance, and associated development and administration—and analyze alternatives that would best ensure the preservation of wilderness character. The Forest Service should minimize increased visitor use in Wilderness to protect solitude (for humans and wildlife), minimize development by keeping trail maintenance minimal and avoiding camp site development, signage, and other lasting imprints of humans, and otherwise exclude uses of Wilderness that are prohibited by the Wilderness Act, including the use of bicycles. And the Forest Service should consider avoiding trail routing through Wilderness and sensitive, core wildlife habitat—either seasonally or, more preferably, permanently.

Wildlife

The values the Wilderness Act protects—including the exceedingly rare value of restraint—are the same values that underpin secure habitat for a range of wildlife species, including the highly imperiled grizzly bear. The trail cuts through four of the six grizzly bear recovery zones, travelling right through the middle of areas within the Northern Continental Divide Ecosystem known to have a high density of grizzly bears and thus a higher potential for conflict between humans and grizzlies, and through the Cabinet Yaak and Selkirk Ecosystems where the grizzly bear populations are critically imperiled and hanging by a thread. The trail would route human activity right into the heart of the few remaining places in the Lower 48 where grizzly bears have secure habitat away from the onslaught of human activity elsewhere. Given that we’ve squeezed grizzly bears into smaller and smaller pockets of fragmented habitat and into an impossibly small percentage of their former range, and given we’ve reduced them to a pitiful percentage of their former population numbers, can we not exercise some restraint?

The capacity report notes that non-motorized trail use does influence calculation of grizzly bear core habitat. And

other sensitive and imperiled species are not discussed. This ignores the growing body of research on the impacts of non-motorized recreation on wildlife, particularly in areas with previously limited human activity.

The agencies must disclose and take a hard look at the direct, indirect, and cumulative impacts of the trail and its associated management and administration on wildlife—from direct encounters, food storage issues, displacement and temporal avoidance, foraging and reproductive impacts—and analyze alternatives that would best ensure the protection of wildlife from displacement and human-associated conflict. The agencies should consider routing trail sections around core habitat areas entirely, or at the very least, consider seasonal closures in grizzly bear recovery areas and adjacent habitat (see, for example, the Mission Mountain Tribal Wilderness seasonal closures for grizzly bears) and seasonal closures for other wildlife (for example, during calving seasons). The agencies must also ensure and disclose that they are meeting the requirements of the Endangered Species Act, including fulfilling Section 7 consultation requirements regarding impacts to grizzly bears and any other listed species that may be impacted by creation, management, and administration of the trail.

Process and Public Involvement

It may be that the issues raised above, and those raised by other commenters require the preparation of an Environmental Impact Statement to fully investigate, disclose, and analyze issues. Whether an environmental impact statement or environmental analysis is prepared, please keep us informed of future opportunities to comment.

Thank you,

A handwritten signature in black ink, appearing to read 'Dana Johnson', with a stylized, flowing script.

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