



# Pacific Crest Trail Association

February 2, 2024

USDA Forest Service Pacific Northwest Regional Office  
U.S. Forest Service  
1220 SW 3rd Avenue Portland, OR 97204

This letter submitted online at: [US Forest Service NEPA Projects Home \(usda.gov\)](https://www.usda.gov/forestservice/NEPAProjectsHome)

RE: U.S. Forest Service Notice of Intent to Amend the Northwest Forest Plan and Prepare an Environmental Impact Statement

Dear Regional Foresters Buchanan and Eberlein,

I am writing on behalf of the 14,396 member Pacific Crest Trail Association (PCTA). The 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. 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." As such, the PCTA's role is 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 commend the Forest Service and thank the Northwest Forest Plan (NWFP) Advisory Committee for their work to amend the NWFP to better protect natural and social resources in the face of climate change and other changing conditions. Unfortunately though, the Notice of Intent (NOI) does not address outdoor recreation as a key focal area to be considered within the NWFP Amendment. Outdoor recreation on our public lands, including Forest Service administered lands, has increased substantially since the original NWFP went into effect in 1994. As the Bioregional Assessment states,

"In contrast to the NWFP's guidance for natural resource management, there is no overall consistency to recreation management. The lack of uniform management direction related to recreation inhibits our ability to effectively and efficiently address management concerns for resources that cross multiple administrative boundaries... *The increasing demands and economic significance of recreation activity* as well as the impacts of excessive deferred maintenance and a changing climate was not anticipated in 1994 [emphasis added]."<sup>1</sup>

Outdoor recreation supports social, economic, and overall community health for both communities located in the NWFP area, as well as people who travel to these Forests to recreate. The NWFP area, a vast region of over 24 million acres, offers some of the country's highest quality outdoor recreation opportunities, encompassing numerous wild & scenic rivers, wilderness areas, and rugged backcountry for non-motorized and motorized recreationalists.

---

<sup>1</sup> NWFP Bioregional Assessment



Approximately 1,242 miles of the PCT, a Congressionally designated national scenic trail, cross the NWFP area. Outdoor recreation and PCT management specifically have a clear nexus with stated NWFP Amendment focal areas. While the PCT may only seem to be a recreation resource or facility, the PCT, and sufficient management of the surrounding landscapes, contribute significantly to fire resistance and resilience, serves as an important connector and corridor for species adapting to climate change, and contributes to both local and broader communities and their economies. As such, updated and enhanced management of the PCT through the establishment of “**Management Areas**”, as recently designated through the Inyo, Sierra, and Sequoia National Forests plan updates, will contribute to the broader goals of the NWFP Amendment, as well as provide the PCT with management that meets the Congressional intention for designating the PCT as a national scenic trail.

The National Trails System Act establishes national scenic trails as:

“National scenic trails, established as provided in section 5 of this Act, which will be extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.

As captured in the plain language of the Act, national scenic trails are more than just the trail treads; they are the landscapes that surround the trails, and conservation of the qualities and resources found along national scenic trails is essential to providing for the “nature and purposes” for which such trails were designated. The PCT’s nature and purposes are captured in the Forest Service **PCT Foundation Document**<sup>2</sup>. The PCT’s nature and purposes clearly align with the goals to create healthy, fire resilient forests and landscapes, especially in the midst of rapid climate change.

Building upon this statutory and policy language is the 2012 Planning Rule, which classifies the PCT (as well as the 10 other national scenic trails) as a “designated area.” The Planning Directives then provide specific direction for revised plans to contain plan components that promote the nature and purposes of each national scenic trail.

Our following comments are grouped in relation to the NWFP topic areas.

### Fire resistance and resiliency

The NOI states, “New direction would also effectively steward existing plantations to contribute to a robust and resilient ecosystem that support the region’s communities.” This goal is consistent with management of the PCT, as the trail experience largely depends on the landscapes along the trail being natural (and natural appearing), healthy, and resilient in the face of wildfires and climate change. Active management to reduce fuels, protect against future, catastrophic wildfire, and create more resilient forests is completely compatible with the nature and purposes of the PCT. As per Guideline 07 from the 2023 Sequoia National Forest Final Plan<sup>3</sup>:

“Vegetation management, including timber harvest, within the management area should be designed to minimize impacts to the scenic qualities of the areas through which the trail passes.”

---

<sup>2</sup> [Pacific Crest National Scenic Trail Foundation Document \(usda.gov\)](#)

<sup>3</sup> [Forest Service \(usda.gov\)](#)

And, Potential Management Approach #3 from the Final Plan states:

“Use vegetation management (including prescribed burning, wildfire, herbicides, biological controls, grazing, timber harvest, etc.) within the management area to provide for public safety or conservation or enjoyment of the scenic, historic, natural, and cultural qualities of the areas through which the trail passes, including the long-term scenic character.”

Per the Guideline and Potential Management Approach, active management, including vegetation management, can occur along the PCT, as long as those activities are carried out in a manner that minimizes and mitigates short-term impacts to the PCT experience. This direction encourages and balances the needs between active management and recreation opportunities while moving forests and landscapes toward being more fire resistant and resilient.

### Climate

The NOI states:

“Climate-related vulnerabilities include increased drought-related stress, increasing insect, exotic species and pathogen damage, and loss of appropriate historical forest type cover in some areas. Drought conditions and longer fire seasons are climate impacts with wide-ranging effects, and improved fire resilience is an important adaptation strategy.”

We are seeing and working through these impacts each and every year on the PCT. Wildfires are compromising the integrity of the trail tread itself as soils are becoming unstable after ridges are severely burned. These compromised areas then can't withstand intense storm events and entire hillsides are failing, sloughing, and sliding, at times taking the PCT with it. As per the Forest Plan language above<sup>4</sup>, management direction that contributes to the PCT's nature and purposes is compatible and has overlapping strategies for moving the surrounding landscapes in a direction of being more resilient.

Additionally, the PCT isn't only a recreational trail. The corridor itself, especially with appropriate management, can serve as a high-elevation corridor that connects other protected, climate resilient landscapes and ecosystems. The PCT's corridor can also serve as a migration route for animals as they adapt to climate change, and provide a refuge of intact habitat for both plant and animal species.

### Communities and economies

The NOI acknowledges that timber production goals have not resulted in significant economic prosperity for local communities:

“The NWFP has largely not achieved its timber production goals, which were the NWFP's primary criteria for supporting economies and community wellbeing.”

As such, it states that a primary goal of the NWFP amendment is to focus on other economic opportunities.

“The intent of the NWFP amendment is to be forward-looking and promote adaptability of communities, the forest workforce, and the Forest Service to future changes with a focus on timber and non-timber products and other economic opportunities.”

---

<sup>4</sup> id.

Interestingly, the NOI articulates “non-timber” and “other” economic opportunities but stops short of explicitly addressing outdoor recreation as a potential source of economic improvement for communities located within the NWFP area. This is a missed opportunity, as “The Bureau of Economic Analysis calculates the economic output of outdoor recreation to be \$1.1 trillion, surpassing industries such as mining, utilities, farming and ranching, and chemical products manufacturing.”<sup>5</sup>

The NOI connects the NWFP amendment goals with Executive Orders (EO)14008 and 14072. We appreciate this planning effort being aligned and as consistent as possible with the Administration’s goals around conservation and climate change. However, both EOs address the importance of providing access to and enhancing outdoor recreation. EO 14072 states:

“We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature. Many local economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector.”<sup>6</sup>

EO 14008 states:

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, revitalizing recreation economies, and curbing methane emissions.”<sup>7</sup>

Both EOs acknowledge the overlapping goals of improving recreation and public access and how this is compatible and even strengthens the multitude of goals to address climate change and enhance communities and their economic opportunities.

A key opportunity and resource to tie these overlapping goals together is the Pacific Crest National Scenic Trail. Use of the PCT, and especially longer-distance trips have become increasingly more popular every year.<sup>8</sup> The PCTA, at the request of the USDA Forest Service, issues the PCT Long-distance permit for people attempting to hike or ride horseback 500 miles or more. Over the past few years, the PCTA has issued close to the limit of authorized Long-distance permits of 8,000 per year. This doesn’t account for the far greater number of people taking shorter-distance trips on the PCT – day-hikers, weekend backpackers, week-long backpackers, etc. This use of the PCT contributes positively to local communities and economies that are near the PCT. PCT users also contribute more broadly to the population centers that are located within a few-hour distance from the PCT when they buy supplies and gas and make other purchases to support their PCT trip. Further, beyond financial contributions, the PCT provides a means of access for people to into our National Forests. These visitors are then more likely to become advocates for our public lands and support the management they need to meet the broader NWFP goals of managing for climate and wildfire resilience and recovery in areas that have burned in previous years.

The PCT also provides opportunities for volunteers to engage with the maintenance and administration of the trail. In 2023, the PCTA, in cooperation with State and Federal land management agencies, facilitated over 57,000 volunteer hours that contributed to the maintenance and administration of the PCT. These dedicated volunteers contribute their time, efforts, and resources to improving the PCT and our public lands; and, these opportunities

---

<sup>5</sup> [National Recreation Economic Data - Outdoor Recreation Roundtable](#)

<sup>6</sup> [Federal Register :: Strengthening the Nation’s Forests, Communities, and Local Economies](#)

<sup>7</sup> [Federal Register :: Tackling the Climate Crisis at Home and Abroad](#)

<sup>8</sup> [PCT visitor use statistics - Pacific Crest Trail Association \(pcta.org\)](#)

provide a meaningful way for members of communities along the PCT to engage with the trail and our public lands. Improving the management of the PCT will encourage more people to engage with the trail and Forest Service through volunteerism.

It is for these reasons that sufficient and consistent management of the Pacific Crest National Scenic Trail, and the surrounding “**area**” that is essential to providing the trail experience, should be considered as part of the NWFP amendment process. The approach to take to accomplishing this goal, consistent with Forest Service regulations (2012 Planning Rule and Directives) and recent Forest Plan Revisions, is to **establish a PCT Management Area through the NW Forest Plan area**. In the nearly 12 years since the 2012 Planning Rule went into effect, only three national forests along the PCT have revised their Plans. At this rate, it will take the agency over 100 years to revise the remaining 22 individual forest plans along the PCT. The NWFP amendment process provides the opportunity for the Forest Service to revise plans across more than 1,200 miles of the PCT as directed by statute and regulation, while furthering the stated goals of the NWFP amendment process.

Thank you for considering our comments in response to the NW Forest Plan NOI. As your primary private partner in the cooperative management of the PCT, we are fully committed to working with the agency throughout the NWFP amendment process to meet the amendment goals while enhancing management of the Pacific Crest National Scenic Trail. The NWFP and PCT management goals will reinforce each other. By addressing them together, the Forest Service will build constituency for our public lands through improved recreation management while supporting efforts to manage for more resilient forests.

Thank you,

A handwritten signature in black ink, appearing to read "Justin Kooyman".

Justin Kooyman  
Director of Trail Operations

Cc: Lindsey Steinwachs, U.S. Forest Service, Pacific Crest Trail Program Administrator  
Megan Wargo, PCTA Chief Executive Officer