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Please accept the following comments from the Oroville Chapter of the Pacific Northwest Trail Association (PNTA) regarding the Draft Colville National Forest Proposed Land and Resource Management Plan. As a local chapter of the PNTA, our interest in the forest plan revision centers around the Pacific Northwest National Scenic Trail (PNT). The mission of the PNTA is to promote, protect, and maintain the PNT in a manner that makes a lasting contribution to the recreation, education, and enjoyment of present and future generations. We care about the trail and are willing to put in time to make it better.

Our comments are specifically about the proposed management of the PNT. The page and line numbers refer to the draft land management plan.

Page 90-91, MA-DC-NT-01, National Recreation Trails and MA-DC-NT-02, National Scenic Trails.

Line number 2513 seems to label the desired conditions in lines 2514 through 2536 as applicable only to National Recreation Trails and lines number 2538 through 2564 only applicable to National Scenic Trails. There are places in the text where the phrase "nationally designated trails" is used, which implies the whole desired condition section is directed towards all nationally designated trails. This is confusing. We suggest rewriting this section so that it is applicable to all nationally designated trails and changing the label to read - MA-DC-NT-01, Nationally Designated Trails. This would rid the section of repeated and similar direction that only adds to the length of the document and ambiguity about where to apply direction.

Where a separate desired condition statement unique to a national recreation or to a national scenic trail is needed, it could be labelled as such. Lines number 2534-2536 provide a good example of a unique desired condition applicable only to national recreation trails and could be labelled MA-DC-NT-0X. National Recreation Trails.

Page 70, FW-STD-LG-01, Stock Driveways.

We support prohibiting the designation of stock driveways on the PNT. The proposed plan should also include a standard prohibiting creation of new water developments for stock or placing of salt blocks within a 1/4 mile of the trail. This standard would protect the physical integrity of the trail by not attracting and concentrating stock near or along the trail.

Page 92, MA-OBJ-NT-01, Pacific Northwest National Scenic Trail.

The stated objective of relocating 10 to 15 percent of the trail miles from roads to a non-motorized setting is low. Only 5-7 1/4 miles of trails would be relocated after 15 years. The objective should be changed to read - "Within 15 years of plan implementation, relocate 30 to 40 percent of the trail miles currently located on roads into a non-motorized trail setting."

We estimate about 50 miles of the PNT is currently located on roads. The Colville N F contains about 140 miles of the PNT. An objective of 30-40 percent would mean the Forest relocates 15 to 20 miles of trail within 15 years. That is an average of 1-2 miles of trail relocated per year. Relocation should include relocating road miles to existing trails as well as developing new trails where needed. That is a reasonable objective and shows the Forest's commitment to managing a nationally recognized trail.

Page 92, MA-GDL-NT-04. Wildland Fire Suppression.

We support this language that promotes protection of the PNT during wild land fire suppression. The guideline should be strengthened by adding direction to employ minimum impact tools and tactics when managing wildland fire or prescribed fire.

The last sentence, "use of red chemical fire retardants where there would be a lasting visual effect should be avoided", should be restated as a standard that reads as follows. Use of chemical fire retardants, regardless of pigment color, shall be avoided where there would be a lasting visual effect. Fire retardant drops, regardless of pigment, can have a big visual impact because they usually cover large areas and the unnatural color persists for years.

Page 93, MA-SU-NT-01. Suitable Uses.

Facilities, developed recreation. This table shows that "facilities, developed recreation" may be authorized. This seems to contradict the desired condition in lines number 2556 to 2559, which puts a n emphasis on "unaltered landscapes." The text should be changed to allow existing developed recreation facilities, but not allow new developed recreation facilities.

Mechanized recreational use. We support allowing mountain bikes on the PNT where permitted. The Kettle Crest section of the PNT is already regionally and nationally recognized for high quality mountain biking. Mountain bikers use local lodging, gas, food, and shops. This brings more recreation tourism dollars to the local economy. According to the 2015 Economic Analysis of Outdoor Recreation in Washington State (Briceno, T., Schundler, G. 2015. Economic Analysis of Outdoor Recreation in Washington State. Earth Economics, Tacoma, WA), bicycle riding is one of the top five recreational activities and the third highest recreational activity by expenditure in Washington state.

Page 109, MA-GDL-SIA-01. Permitted Grazing.

We support this guideline. The PNT will attract more and more recreational users because of its national significance and outstanding recreation opportunities. It is important to the quality of recreation experience to have a clearly defined trail to follow.

Wilderness recommendations.

This comment is directed to wilderness recommendations generally and is not specific to any alternative.

A wilderness designation that surrounds the PNT is a benefit because it would support and protect the scenic and ecological integrity of the trail corridor. The PNT corridor desired condition for "unaltered landscapes where generally only ecological changes occur" would be easily delivered through a wilderness designation. On the other hand, wilderness designation can be a challenge when it comes to maintaining a trail. Trails are

expensive to maintain when only hand tools are allowed. The more miles of the PNT within wilderness the costlier will be to maintain the PNT to standards.

Earlier in this comment letter we supported mountain biking along the Kettle Crest portion of the PNT. Mountain bikes are not allowed in wilderness. The Forest should consider the major loss of a regional and national mountain biking asset along the length of the Kettle Crest if this area is designated as wilderness.

There are tradeoffs that go along with a wilderness designation. We neither support or oppose wilderness designations along the PNT. Instead, with this comment, we support the Forest Service taking a hard look at the trade-offs.

Thank you for your consideration of these comments. Sincerely,

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