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Comments: See Washington Trails Association's comment letter as an attachment. Thank you for consideration!

Washington Trails Association appreciates the opportunity to provide comment on the Pacific Northwest National Scenic Trail Comprehensive Plan.

Washington Trails Association has a more than 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington state by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. WTA is the nation's largest state-based trail maintenance and hiking advocacy nonprofit organization, with more than 27,000 member households and an online community of more than 100,000. Each year almost 4,500 WTA volunteers perform over 160,000 hours of trail maintenance across the state.

Proposed Action and Objectives

WTA is excited about the development of a coordinated, long-term administration and management plan for the Pacific Northwest Trail on federal lands. We support the designation of hiking as the primary use of the trail with key uses including pack and saddle stock use and bicycling where appropriate. Where allowed, we encourage maintaining trail to stock standards. Stock users are not only significant users of the trail but contribute greatly to the stewardship and maintenance of the trail system.

There are a number of key themes scattered throughout the comprehensive plan's objectives, desired conditions and management practices that we want to name support for.

Partnership, Collaboration & Tribal Involvement

* Recurring mentions of partnership, including non-governmental partner organizations who work with land managers to maintain trails (trail-wide objectives, pg 14; land acquisition and protection, pg 18; visitor information and interpretation, pg 22; visitor use management and carrying capacity, pg 23 and 24), which positions the trail to be adequately cared for by a network of stewards. We see collaboration and partnership as essential to aligning the Pacific Northwest Scenic Trail with the desired conditions outlined in this plan.

* Consistent consultation, coordination and collaboration with tribes as mentioned throughout various objectives (trail-wide objectives, pg 14; visitor information and interpretation, pg 22; cultural resources, pg 27). Tribes have been on the land for time immemorial. They are experts of the land and also rights-holders. Tribes should be brought in early to any planning or decision-making processes in order to produce outcomes that are co-created with tribal input.

Education & Stewardship

* The promotion of various responsible recreation and visitor education and stewardship objectives (trail-wide objectives, pg 14; visitor information and interpretation, pg 21 and 22). The Pacific Northwest National Scenic Trail will provide a wide array of outdoor experiences to many people, from those taking the trail across states to those hopping on and off for a day hike. A critical part of a recreator's journey on and off trail is learning how to become stewards of the places they enjoy. This plan's incorporation of objectives that tie the trail with stewardship foster a recreation environment that benefits the trail and its users.

Visitor Use Management & Equitable Access

* The plan's concept around visitor use management, and specifically naming the diversity of options

available to management agencies to achieve desired conditions beyond limiting use. This plan favors less direct management strategies before more active management strategies, and outlines considerations essential to the implementations of permits in cases where permitting is concluded as necessary. There is also explicit mention of applying an equity lens in the evaluation of visitor use management solutions or changes (visitor use management and carrying capacity, pg 24). WTA's perspective on equity and visitor management aligns with this plan's approach. Permitting and use limitations often require planning and information gathering that create barriers to use, favoring users with more resources and time flexibility. These impacts distribute unequally on the wide range of recreators hoping to get outside. For this reason, WTA supports this plan's approach to test alternative models of use management ahead of the impositions of permits.

Safer Trail Routing & Connections

* Efforts to relocate the trail to avoid motorized and unsafe sections of route (trail alignment and design, pg 19). Hiker safety should be a prioritized rationale for trail relocation and the long bouts of trail currently on roadways create unsafe conditions for users. Relocation of the PNT off of motorized roads and unsafe right-of-ways will also contribute to further aligning the trail with its many objectives that relate to preserving wilderness character and natural settings.

* Objectives dedicated to considering connecting and side trails of the PNW National Scenic Trail that lead to a better network of trails and visitor opportunities (connecting and side trails, pg 35). Feeder trails are critical components of providing a trail experience that accommodates the diverse type of use the Pacific Northwest National Scenic Trail expects, including day hiking and stock use.

In addition to our support for the elements listed above, we would like to share questions and feedback around specific areas within the comprehensive plan.

Nature and Purpose Statement

The nature and purpose statement was derived from the Pacific Northwest National Scenic Trail Advisory Council in 2016. This guiding statement sets foundational significance for the trail. We encourage further work on this portion of the comprehensive plan, namely drawing from the following sentence included in the nature definition:

[ldquo]Trail experiences include working forests, grasslands, broad river valleys, farms and ranches that reflect how people since time immemorial have shaped these places and have been shaped by them.[rdquo]

There is a lack of clarity in what this sentence is trying to accomplish in combining references to three distinct subjects: specific current uses of the land, valuable habitats and indigenous history. The sentence juxtaposes current uses of the trail corridor with acknowledgements of indigenous history ([ldquo]time immemorial[rdquo]); we believe the latter deserves its own distinct recognition. We are also unsure why three specific current uses of land around the trail corridor are mentioned [ndash] working forests, farms and ranches [ndash] and how these three current uses relate to a desired trail experience by people traveling the PNT.

We hope that the nature and purpose statements offer an aspiration for the trail and trail users, with acknowledgements of its history, rather than a demonstration of its current use or the landscape surrounding the trail. We would like to see the nature and purpose statements receive further refinement to set a vision for the trail that speaks directly to its primary and key uses.

Trail-wide & Thru-hiker Capacity

The standard for carrying capacity included in this plan is 552 to 1,748 thru-hikers per high use season, [ldquo]based on the most limiting passages of the trail[rdquo] (pg 8). The [ldquo]most limiting passages[rdquo] are described as the Cabinet-Yaak and Selkirk Mountains Grizzly Bear Recovery Zones and Olympic National Park's Wilderness Coast. In the comprehensive plan, no further details are provided to explain what [ldquo]most limiting passages[rdquo] is defined as other than the range of thru-hikers for carrying capacity in this section. We would like to see more information and details provided directly in the draft comprehensive plan to better understand how the 552 to 1,748 thru-hiker capacity was determined based on the [ldquo]most limiting

passages.”

WTA believes that approximating the carrying capacity of the trail dependent on the most limiting passages implies that if, in the future, other portions of the trail become more limiting, the thru-hike carrying capacity would correspond by contracting. This could establish a system in which the carrying capacity of the trail only shrinks over time. We would like to better understand how carrying capacity determinations would be taken into context with future limiting factors along the trail.

We would like more clarity on whether the PNT’s capacity is being defined using desired conditions for the trail or based on what the trail’s natural conditions can sustain. We encourage an evaluation of carrying capacity that is based on desired conditions for trail use that acknowledges multiple types of use.

Beyond this, we appreciate the evaluation of carrying capacity and desired conditions through a zoned approach, understanding that the countless miles and environments of the Pacific Northwest National Scenic Trail require distinct lenses to understand use and impacts.

Right-of-Way and Relocations

Rerouting the PNT away from active roads used by motor vehicles is one of the most complex issues facing the trail in the future. The parameters set in this plan around relocation practices inform how these reroutes will happen in the future. WTA is interested in learning where and how definitions for substantial and non-substantial use in the section Practices for Relocating the National Trail Right-of-Way (pg 10) were derived from. When defining what a substantial reroute would be, the plan says:

“Generally, substantial relocation proposals have substantial extent (such as more than 10 percent of the total designated length of the trail) or substantial deviation from legislative intent for the trail (such as adding miles on roads or moving away from a location that was named in the trail’s designating legislation).”

We are curious about establishing the principle that anything less than 10 percent of the total designated length of trail is a non-substantial reroute and would like to better understand what went into determining this percentage. Under this guideline, the entire portion of the trail in Idaho could be rerouted and considered a “non-substantial” relocation [ndash] which arguably deviates from the Congressionally designated intent of the trail. We recognize the need for this plan to create precedent in these definitions, and therefore would like to further understand what informed these standards.

In addition to our comments above, we have an additional question and comment:

* One key use of the trail is bicycling, but there is no mention of e-bikes. How do e-bikes fit into usage of the PNW National Scenic Trail?

* Climate change is one of the most pressing issues facing our public lands. This comprehensive plan tackles the multi-state stewardship of a trail and its corridors that span through wildlife-prone forests, fragile habitats, human-impacted ecosystems, and more. We would love to see places where considerations for climate change are included in future planning, including in the development of infrastructure, the acquisition of lands and in general value for protecting viewsheds and areas that contribute to a better trail experience and conservation throughout the trail corridor.

A comprehensive plan for the Pacific Northwest National Scenic Trail will do great service to coordinating and actualizing stewardship for this nationally beloved trail. We are excited to see this planning process continue and are looking forward to further involvement. Thank you for considering our comments.