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Comments: CDTC's comments are attached.

We appreciate the opportunity to provide comments on the recently released Pacific Northwest National Scenic Trail (PNT) Comprehensive Plan. The effort to create a comprehensive plan for the PNT is an exciting and urgently needed undertaking, and we sincerely appreciate the due diligence from the agency, partners, and community members who have contributed to the future management of the PNT as well. CDTC hopes to remain engaged as an interested party as this project moves forward to receive future notices, and we appreciate the consideration of the impacts to the Continental Divide National Scenic Trail as this process moves forward.

Representing approximately 2,500 members and over 14,000 supporters nationwide, the Continental Divide Trail Coalition (CDTC) is the 501(c)(3) national nonprofit organization formed in 2012 to work with the federal land management agencies to complete, promote, and protect the Continental Divide National Scenic Trail. The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 as a unit of the National Trails System. The 3,100-mile CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West along the Continental Divide between Mexico and Canada. It travels through 20 National Forests, 21 Wilderness areas, 3 National Parks, 2 National Monuments, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. The vision for the CDNST is a primitive and challenging backcountry trail for the hiker and horseman on or near the Continental Divide to provide people with the opportunity to experience the unique and incredibly scenic qualities of the area.

The CDNST passes through Montana, Idaho, Wyoming, Colorado, and New Mexico, and is administered by the U.S. Forest Service in cooperation with the NPS, BLM, and Tribal, state, and local governments, as well as numerous partner groups including the CDTC. In 2020, CDTC signed an Inter-agency Memorandum of Understanding with the U.S Forest Service, the Bureau of Land Management, and the National Park Service, which identifies the Continental Divide Trail Coalition as a lead national partner in the management and administration of the Continental Divide National Scenic Trail. To date, CDTC has been successful in coordinating more than 250,000 hours of volunteer stewardship to maintain and improve the CDNST, building positive relationships with federal land managers and local trail-focused groups, organizing special events to help educate the public about the CDNST, implementing Trail Adopter and Gateway Community programs, and encouraging Congress to continue to appropriate funding for the CDNST in the USFS budget.

#### Background

The Continental Divide National Scenic Trail (CDNST) is far more than a path on the ground; rather, it is the sum of the myriad scenic, natural, cultural, and historical qualities of the areas surrounding the trail that make a journey along the CDNST unique and spectacular. The CDNST is protected and maintained not only for the physical trail itself, but more importantly, for the experience it provides.

The United States Congress designated the Continental Divide National Scenic Trail by an Act of Congress in 1978. The Continental Divide National Scenic Trail Comprehensive Management Plan was approved by the U.S. Forest Service and set forth as policy in 2009. This overarching policy direction serves to implement Congress's direction in the National Trails System Act, and is an essential tool for guiding decisions regarding Forest Plan direction for the CDNST. The Comprehensive Plan also incorporates FSM 2353.42 and 2353.44b.

#### Supplemental Materials

Included with these comments are supplemental materials, referred to below, that CDTC hopes will help inform management decisions around the PNT Comprehensive Plan. Those materials include:

- CDTC Experience Policy

Comments on the Proposed Project Overview

CDTC appreciates the U.S. Forest Service's dedicated stewardship of the National Trail System, and in particular, the recent effort to create a comprehensive plan for the PNT. As a trail that shares approximately 26 miles of trail tread with the PNT, CDTC is excited to engage in this shared work not only due to the valuable historic, cultural, and natural resources shared between the PNT and CDT landscapes, but also because the future management of the PNT will impact CDT trail states such as Idaho and Montana and their communities, and will continue to have an impact on the future of the National Trail System at large. As a system of trails connecting some of the most biodiverse, intact, and scenic ecological areas in the country, the management of recreational resources like PNT is layered and has impacts far beyond the tread of the trail. This is true for decisions made and actions taken on the PNT, not only because it shares a geographical endpoint and tread with the CDT on the Continental Divide in Glacier National Park, but because management decisions on one unit of the National Trail System has a ripple effect across the nation far outside the geographic boundaries of any individual trail.

Nature and Purposes Statement

CDTC applauds the changes to the nature and purposes statement from the 2022 PNT Comprehensive Plan Scoping Documents. The improvements to the nature and purposes statement reflects input from the public and other collaborators, and furthermore, we appreciate the inclusion of the National Trails System Act and Executive Order 13195: Trails in the 21st Century. This additional language provides the contextual framework for the setting, recreational opportunities, and purposes that national scenic trails serve, and will help ensure further consistency and alignment between foundational direction and future management.

The inclusion of House Report No. 90-1631, while productive for similar purposes as stated above, does introduce a conflict with other language found in the [quote]nature[quote] statement. The House Report states that:

[quote]selection of routes for National Scenic Trails - Such right-of-ways shall be[ellipsis] located to avoid, insofar as practicable[ellipsis]existing commercial and industrial developments[ellipsis].private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition.[quote]

However, the [quote]nature[quote] statement includes in the trail experience histories and connections to the land including [quote]the legacy of working forests, farms, ranches, and maritime areas.[quote] As these particular items are commercial developments and private operations, CDTC encourages the nature and purposes statement to avoid inclusion of these entities, and instead, center on the primitive experience for which the trail was established. This will help to ensure that management of the trail does not center on a legacy of human industry or exploitation of the land, but instead on the connection with the natural landscape.

CDTC understands the inclusion of working lands, as we work closely with many communities and partners along the trail, including 20 Gateway Communities, which includes a number of private operations, businesses, and others such as farmers, ranchers, and fisheries. However, while the ability to visit communities and learn of their ways of life, including their private ventures, these private, commercial operations are not a foundational component for which the CDT was established to protect, preserve, or access. Instead, CDTC encourages the inclusion of the following language or something similar:

[quote]The PNT experience includes the opportunity to visit communities along the trail, who are able to share with PNT travelers their histories and connections to the land, evident in the legacy of working forests, farms, ranches, and maritime areas[ellipsis][quote]

These changes will allow future management of the stewardship of the PNT to be less prescriptive, and instead, empower PNT travelers to connect with communities, while also not prescribing to land managers or the communities that they work with, what legacies should be elevated over others, especially those that are not

necessarily foundational to the PNT experience.

Additionally, CDTC recommends changes to the second bulleted statement to include additional guidance on the separation of the PNT experience and motorized use. A suggestion for that language or something similar could be:

[ldquo]Provide for maximum outdoor recreation potential, particularly day, overnight, and national significant extended recreational opportunities removed from the sights, sounds, and visuals of motorized use for foot travel and, where allowed by local management, pack and stock use and bicycling.[rdquo]

This additional language is similar to language in the National Trail System Act, which states, [ldquo]The use of motorized vehicles by the general public along any National Scenic Trail shall be prohibited[hellip][rdquo]. As a foundational component of the NTSA and the PNT experience, this additional language will, as stated above in reference to further inclusion of NTSA language, will help to further align future management and stewardship of the PNT with foundational documents that outline the experience for the National Trail System. While CDTC recognizes that there is a section later in the PNT Comp. Plan about the prohibition of motorized use, additional language in the nature and purposes section will help ensure that future management decisions inherently align with this key tenet of the NTSA.

[ldquo]Key[rdquo] Uses

CDTC is glad to see that hiking is explicitly stated as the primary use of the PNT. However, the term [ldquo]key uses[rdquo], while clear in its intent, is not one that seems familiar in trail management or the management of the CDT. Instead, CDTC recommends that [ldquo]key[rdquo] uses be changed to [ldquo]compatible[rdquo] or [ldquo]potentially compatible[rdquo] uses. Unless there is the need to create additional hierarchy beyond the primary hiking use due to prioritization of concerns, impacts, and actions in the future, it seems unclear why [ldquo]key[rdquo] was used instead of [ldquo]compatible[rdquo] as is the standard we have seen in trail stewardship. For example, with hiking as the guiding priority (as far as [ldquo]use[rdquo] is concerned[rdquo]) in future management decisions, a local Unit should weigh heavily the impacts to hiking, more than other uses, particularly if there are negative impacts to the hiking-users experience. Furthermore in that example, if [ldquo]horseback riding[rdquo] was higher in priority due to its primitive nature than bicycling due to its mechanized nature, the use of [ldquo]key[rdquo] uses could be useful. However, it[rsquo]s unclear if that is the intent. The use of [ldquo]compatible[rdquo] as opposed to [ldquo]key[rdquo] also lends itself to further clarifying that incompatible uses do exist and could allow for further clarification on incompatible uses in the future that do not align with future PNT management.

As we have seen on the CDT, it is essential to clarify as much as possible the priority uses, compatible uses, potentially compatible uses, and incompatible uses. The CDT was originally established as a primarily hiking and horsebacking trail, but with the proliferation of mechanized and motorized travel, CDTC[rsquo]s concerns for user conflict and the need for additional capacity for monitoring and management continues to grow. This has created a strain on land managers within the agencies who are already witnessing a growth in the popularity of outdoor recreation and particularly new users, who sometimes do not have the knowledge to understand the compatible uses for trails. And now there are attempts with pieces of legislation like the Biking on Long Distance Trails (BOLT) Act that now aim to align sections of the CDT with

long-distance biking trails, which was not an intended, primary use of the CDT, and has the potential to significantly alter the CDT Experience. For these reasons, CDTC urges the suggested clarifying language so that the sideboards are in place to ensure that the nature and purposes of the PNT are retained, while able to adapt with new technologies and new user groups.

In regards to Pack and Saddle Stock, CDTC encourages altering the language in this section to include non-equestrian stock use. Travelers on the CDT have used pack-llamas and even

pack-goats in the past, and we have seen these uses positively align with the CDT Experience and believe the same could be true on the PNT.

#### Optimal Location Review (OLR)

CDTC applauds the content of this section and we hope to emphasize how important it is to retain this direction within the PNT Comp. Plan. An OLR process with clear principles and procedures will help to ensure the agency's success in completing the trail and proactively stewarding the trail so that as the more miles are added, the trail retains the PNT nature and purposes. However, similar to our comments above, we believe that additional principles could be added to the "Guiding Principles for the OLR" to help retain the nature and purposes of the PNT. As was stated above, the House Report No. 90-1631 states that national scenic trails will be:

"located to avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation..."

CDTC believes that this is foundational to the nature and purposes of the CDT, and as such, should be explicitly stated in the review of future optimal locations. This will be particularly important as the PNT will undoubtedly be in close proximity to developed areas, which will only continue to expand as we see population growth in the Pacific Northwest, particularly in areas like Western Washington and Western Montana. As such, the OLR process should determine a path for the trail that minimizes the impact of these developed areas for the least negative impact on the trail experience. Suggested language for this section could include the following:

- The location of the PNT will optimize retention of natural conditions, or the possibility of recovery of natural conditions, and the primitive character of the trail. The location or relocation of the PNT will avoid, insofar as is practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition.

We encourage the inclusion of this language in anticipation that there will also be some areas where complete avoidance of developed areas is not possible, but this language helps to clarify intent and the analysis of impact to the PNT.

#### Scenic Management

We are pleased to see the extent of the Scenery Management section as well as the inclusion of multiple points of feedback from public comments. CDTC, overall, supports the direction given in this section, with minor suggestions based on the experiences we have undergone on the CDT.

Under the "Management Practices" section, it is critical to future management of the PNT that scenery management addresses the zones of foreground, middleground, and background. While there is a great deal said about the foreground, there lacks adequate direction for the middle ground and background zones. CDTC supports that the foreground should have a Scenic Inventory Objective (SIO) of high or very high, but the foreground is not the only zone that affects the trail user's experience or perception of a primitive and primarily natural qualities of the trail experience which are emphasized as essential elements of the Nature and Purposes of the PNT. Additional language could include the following:

- \* SIO for the foreground (0.0 - 0.5 miles on either side of the trail) should be high or very high.

- \* SIO for the middleground (.5 - 4 miles on either side of the trail) should be moderate.

And while the foreground and middleground are perhaps the most prioritized viewsapes for the majority of the trail, the PNT will traverse ridgelines and mountaintops with many wide vistas. As such, the scenic management of the PNT should seek to include sideboards for these more high-visibility areas that are also often some of the

most popular to visit for day and section hikers.

Additionally, renewable energy developments such as wind, solar, geothermal, and other energy generation and related transmission facilities to the list of development concerns.

#### Capacity

CDTC applauds the agency's efforts to address a trailwide capacity for PNT thru-hikers. However, there seems to be a disconnect or a lack of clear explanation between the capacity and the PNT's desired conditions. We believe that there are other ways to identify and manage for a certain capacity that aligns with the nature and purposes of the PNT without assigning a prescriptive numerical value for the trail's entirety. Across the 3,100 of the CDT, we see major differences in the capacity depending on optimizing for resource protection, visitor experience, or other activities addressed in management plans.

For example, capacity in the Gunnison National Forest in intermountain Colorado may be much more in demand due to its proximity to population centers, developed activities, and number of access points. In a given year, there could be hundreds of users attempting a long-distance hike on the Colorado Trail (which aligns with the CDT) or section hiking, in addition to thousands of day users. This capacity differs greatly from what we see on the CDT in the Bob Marshall Wilderness where there are far fewer section or long distance users due to its remoteness.

The capacity number of 552 - 1,748 thru-hikers per year may translate to differing levels of activity depending on the section of trail. The remote sections in the Yaak Valley of Montana will likely get less hikers than highly trafficked sections closer to population centers like those in Western Washington. As we have seen on the CDT, while thru-hiker numbers have steadily increased, the number of long-distance hikers who are doing section hikes of 100+ miles is anecdotally growing more rapidly. So in consideration of providing for the cumulative PNT experience, CDTC encourages a departure from the static numbers that only look at that trail in its entirety and at those hiking the trails entirety. Instead, we would encourage adaptive management that is tied directly to supporting the desired conditions derived from the nature and purposes statement, instead of a numerical range that only identifies a small number of applicable experiences on the trail.

#### Miscellaneous

##### Non-substantial Relocations

Under the section on relocating sections of trail, the PNT Comp. Plan states that non-substantial relocations of segments of a national scenic trail may only occur if all the following conditions are met, which includes the following condition:

[Idquo]the administering agency has determined that the relocation is necessary to either (1) preserve the purposes for which the trail was established or (2) promote a sound land management program in accordance with multiple use principles[rdquo]

While the first conditional to preserve the purposes of the trail makes sense, the second conditional does raise a concern about what could be considered [Idquo]non-substantial[rdquo]. The way the second conditional reads seems to indicate the management of a National Scenic Trail could be considered secondary to other management objectives. CDTC appreciate that the Forest Service is responsible with managing and stewarding lands and resources for multiple uses, however, we believe this statement could be used in the future to justify relocating the PNT when the trail does not wholly align with other management objectives, without creating a threshold or sideboards to establish what could trigger such a relocation. Forest planning, project-level decisions, and other actions must all be adaptable, as does management of the PNT. It should not be the case though that management of the PNT or actions impacting the PNT experience should be normalized to be considered any less urgent or prioritized than management of other resources. And the principles that guide management of the PNT, should not be summarily subsumed into the management of other resources in those instances where proactive management of the PNT might be less than convenient if prioritized. By reading through this plan, it is

clear that is not the intent, but it seems like the language in the second conditional could open the door in the future to make management of the PNT less prioritized, without giving a threshold or sideboards to make those determinations where management has become less harmonious.

#### Motorized Uses

CDTC applauds the inclusion of the guidance on page 63 of the PNT Comp. Plan to provide further clarity on incompatible uses, particularly motorized uses. There is some additional language, particularly on point #4, that we believe would help to strengthen protections of the PNT's nature and purposes as well as giving more direction for land managers making decisions in the future. Point #4 states, "[Motorized crossings of the trail, if necessary, should be limited.]". We would encourage further sideboards in this language, just to ensure that the proper processes are being followed and so that the purposes of a National Scenic Trail are not being made a secondary or tertiary priority to other uses. A suggestion for how that language could be included can be found below:

"[Motorized crossings of the trail, if necessary, should be limited and designated through the appropriate travel management planning process, and encourage the use of monitoring and mitigation techniques to proactively avoid user conflict.]"

As a primarily hiking trail, the possibility of more interactions with motorized use is urgently impactful for the PNT experience. As such, we support tactics to ensure that for those sections where there are new motorized crossings of a National Scenic Trail, that the agency is ensuring monitoring is being done to track user conflicts to further support the users' safety. In addition, mitigation techniques like signage and user education with guidance at trailheads can provide additional support when these rare motorized crossings do occur.

#### Conclusion

Thank you for the opportunity to provide scoping comments on the recently released Pacific Northwest National Scenic Trail (PNT) Comprehensive Plan. As the lead partner organization tasked to complete, protect, and promote the CDNST, CDTC is happy to assist in this process and further analysis, and consult on any potential impacts to the CDNST and National Trail System. If you have any questions, please contact L. Fisher, Trail Policy Program Manager, by phone at (406) 272-6179 or by email at [Lfisher@continentaldividetrail.org](mailto:Lfisher@continentaldividetrail.org).