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Comments: Our letter is attached as a PDF.

Washington Trails Association appreciates the opportunity to provide comments on the Pacific Northwest National Scenic Trail Draft Comprehensive Plan and the associated Environmental Assessment. The creation of a comprehensive plan for the PNT will contribute to the continued development of the Trail and guide its future management. Thank you for your work developing the draft plan. This letter highlights many areas where the plan provides good direction and notes areas where it can continue to improve.

Washington Trails Association (WTA) has more than 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. We are the nation's largest state-based trail maintenance and hiking advocacy nonprofit organization, with more than 26,000 members. In 2022, WTA crews contributed over 152,000 hours of work towards the stewardship of trails in Washington. This extensive amount of volunteer trail maintenance speaks to the public's deep passion for trails and recreation. Almost three-quarters of the PNT is located in Washington. At WTA, we frequently hear from the hiking community about their support for the PNT and the national trail system more broadly. WTA crews regularly maintain portions of the PNT. We strongly support the continued development of the PNT both on and off of federal lands.

The PNT provides outstanding and nationally significant hiking experiences. We hope this letter will support the refinement of this plan so that federal agencies can properly manage this unique congressionally-designated resource. In this letter our comments are grouped thematically around key topics.

#### Nature and Purposes Statement

The Draft Comprehensive Management Plan has made considerable improvements to the statements that express the nature and purposes of the PNT. During scoping, WTA commented on a portion of the nature statement that stated, "[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.]" (Scoping Document 4). We expressed concerns that this sentence collapsed geologic processes, indigenous history, and industry into a single unified trail experience category. Thank you for revisiting this section of the plan. The new statement reads:

"The lands along the trail are the homelands of many distinct indigenous nations. Since time immemorial, natural processes and tribal traditional uses have shaped these places and have been shaped by them. Communities along the trail share with travelers their histories and connections to the land, evident in the legacy of working forests, farms, ranches, and maritime areas as well as in beloved local parks and pathways (29)."

WTA appreciates the changes that have been made to this key portion of the plan. This new language addresses our concerns and clarifies that PNT users will encounter "the legacy of working forests, farms, ranches, and maritime areas" through their interactions with communities. Thank you for reframing the relationship of these modified landscapes to the PNT. We also appreciate the inclusion of the phrase "beloved local parks and pathways" in the nature statement. It is valuable to acknowledge these places especially since a large percentage of the PNT is located on land that is not currently in federal ownership. WTA hopes that the PNT can continue to be a driver for creating accessible new public green spaces in areas where the trail is confined in its possible location and must pass through developed areas.

The adjusted nature statement lists some of the unique features of the PNT. It could be further improved with minor edits. The current statement is more matter-of-fact than the nature statements of other national scenic trails such as the Pacific Crest Trail or the Appalachian Trail. We would like to see aspects of the statement be more aspirational. The first sentence could become more inspiring with minor additions. It could say (added language in *italics*):

[Idquo]The Pacific Northwest National Scenic Trail is an east-west-oriented long-distance trail that features spectacular undulating landscapes and outstanding vistas as it traverses the extreme northern reaches of Montana, Idaho, and Washington from the Rocky Mountains, through the Cascade and Olympic mountain ranges, to the Pacific Coast (28).[rdquo]

The PNT was designated based on its unique character and the outstanding opportunity to meet the [Idquo]outdoor recreation needs[rdquo] of our country (16 U.S.C. 1241). WTA celebrates the decades long journey to meet the congressional intent for the Trail, and we hope the final statement expresses the full potential of the PNT[rsquo]s designation.

The Forest Service did an excellent job articulating the continued work needed to fully realize the nature and purposes in the Trail-wide Objectives section of the plan. WTA appreciates the eight points enumerated in this section [Idquo]that build on the PNT[rsquo]s nature and purposes, further clarifying the vision for the trail[rdquo] (59). The clarity of these points will provide excellent guidance to managers. We are especially grateful for the plan[rsquo]s direction that managers [Idquo][u]se an equity lens to identify and address barriers that limit people[rsquo]s enjoyment of the trail and its benefits[rdquo] (60). This necessary direction will assure the management of the trail considers the needs of marginalized populations. WTA would object to the exclusion or substantial alteration of this guidance in the final plan.

The purpose statement in the draft plan improves on the version from scoping. WTA appreciates the addition of language that closely mirrors the National Trail System Act (NTSA). The new statement begins by saying, [Idquo]National scenic trails are extended trails through iconic landscapes that 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 they go through.[rdquo] We ask that this direction be retained in the final purpose statement. It provides a useful reminder that Congress intends national scenic trails to be available to the public. Trail managers must assure that the PNT provides for [Idquo]maximum[rdquo] outdoor recreation potential[rdquo] while also protecting trail values.

#### Visitor Use Management and Carrying Capacity

The comprehensive plan is required by law to include [Idquo]an identified carrying capacity of the trail[rdquo] (16 U.S.C. 1244). The draft plan attempts to meet this requirement and [Idquo]maintain opportunities for high-quality visitor experiences while protecting natural and cultural resources[rdquo] (75). The Forest Service made a credible attempt to review 1,200 miles of trail and consider use limitations. However, the carrying capacity range does little to speak of how specific levels of visitation will impact the desired conditions of the Trail. This shortcoming is one of several problems with the capacity portion of the plan. As written, this section may lead future managers to anchor their thinking to a flawed estimated range instead of focusing on providing outstanding user experiences and protecting trail values.

The capacity discussion is narrowly focused and provides insufficient guidance for future management decisions. The carrying capacity range provided of [Idquo]552 to 1,748 thru-hikers per high use season[rdquo] is solely based on individuals who hike the full length of the Trail. Thru-hikers are a tiny fraction of PNT users in many areas. The attention on thru-hikers in the plan may lead managers to focus on management actions that only impact one user group. Actions geared towards thru-hiking numbers may restrict long distance hiking which is

[Idquo]the primary experience the PNT is managed for because that opportunity is identified as the core experience, and central to the nature and purpose of the PNT[rdquo] (76). WTA understands that the carrying capacity range is an estimate that currently has no impact on PNT long distance travel, but the framing of the capacity estimate concerns us. It may inhibit recreation managers from considering how to improve the visitor experience and manage visitor impacts simultaneously. The agency has the ability to consider visitor use management proactively. We would encourage the comprehensive plan to take a more nuanced approach to carrying capacity, user management and possible impacts from the environmental assessment [ndash] focusing on visitor experience and the key goals of the trail system. Future managers should be directed to examine the current state of knowledge about visitor use impacts and emerging best practices when they consult this section of the plan. For instance, the environmental assessment states:

[Idquo]Limiting visitor use numbers is only one tool for managers to address resource and social impacts related to visitors use. Site-specific trail conditions must be considered by local managers. The ability of the trail and adjacent resources to accommodate use will differ across different sections of the trail (i.e. soil types, trail maintenance level, and trail design features), and the use-impact relationship is not linear. Generally, impacts increase as use increases, but only up to a point at which additional use causes very little impact (Marion 2016). Similarly, social impacts associated with the amounts of use (crowding) and types of use (conflict) are often based on visitor expectations or goals that will vary by trail section and the recreation setting (65).[rdquo]

Recreation ecology research suggests that visitation impacts will vary immensely across the trail, based on physical and social dynamics. Impacts do not rise linearly with increasing use. The marginal impact of each user at higher levels of visitation is low in comparison to marginal impact of users at low levels. WTA believes that due to the complexity of managing visitor impacts, it is likely not possible to identify a carrying capacity for the Trail as a single number or a numeric range. It would be more useful for the plan to express capacity as an interplay between resource conditions and the full spectrum of Trail users. This section can do more to guide managers in mitigating impacts while protecting the opportunity for users to experience long distance travel on the PNT.

The current capacity estimate is derived from a few limiting attributes. The Carrying Capacity Report gives an estimate for how users may interact with areas of the Trail with use restrictions. The capacity estimate gives considerable weight to areas with limited camping permits in national parks, and sets capacity based on grizzly bear recovery zones where the trail is currently managed for [Idquo]low-use[rdquo]. It is our understanding that these limiting attributes were considered using a Level of Service Model from the Federal Highways Administration that can be expressed by the equation [Idquo]((Groups per hour)(Hiking Entry Hours)(Average Party Size)(Capacity criteria adjustment factor))[rdquo]. These calculations led plan writers to conclude that [Idquo]limiting passages[rdquo] on the Trail might cap use at 552-1,748 thru-hikers per year (Carrying Capacity Report 16-17). We are concerned that the mathematical model used to create this estimate suggests a level of clarity about user distribution and the effects of limitations that is misleading. The resulting estimation is lower than is justified by the desired conditions of the Trail, and it reductive as it ignores the complex interactions between and expectations of the various types of PNT users.

In WTA[rsquo]s experience, flows of long distance hikers on national scenic trails do not spread in an even and predictable fashion. Hikers are impacted by factors that cannot currently be modeled. At the beginning of the hiking season, itineraries are shuffled based on individual preferences in response to variable snowpacks. At the end of the season, users may rush to finish in response to severe autumn weather. Thru-hikers may congregate in towns if a major storm drenches the Trail or an extreme heat wave spikes temperatures. Hikers can be evenly dispersed across a landscape and suddenly group together when a wildland fire closure empties hundreds of miles of a National Forest. In these situations long distance users tend to skip forward in their journeys. This may cause users to congregate in unexpected pulses. The Forest Service is aware of these dynamic impacts on other national scenic trails, yet this section suggests a less complicated distribution on the PNT. Conclusions derived from a simplified model are likely to produce inaccurate results. Once example can be found at the

Trail's western edge.

WTA staff do not think the camping restrictions on the Olympic National Park coastline would produce the predicted limitation on long distance travel along the PNT. The Carrying Capacity Report shows that the ten miles of the PNT south of the terminus at Cape Alava have overnight camping quotas. However, thru-hikers traveling west could fairly easily camp outside of the limited camping area, time their last day of hiking with the tides, reach the terminus, and then exit via the Ozette Ranger Station without camping in the quota limited zone. The concept of limiting attributes does not account sufficiently for the public's ability to avoid specific use restrictions.

Campsites and camping restrictions in popular areas like national parks are not static limiting attributes. The plan could do more to encourage managers to proactively consider locations where management actions can protect trail values while [providing] for the ever-increasing outdoor recreation needs of an expanding population (16 USC 1241). In 2020, North Cascades National Park created drop-in camping along the Pacific Crest National Scenic Trail. These sites are being improved with adjusted layouts that limit the potential for resource damage during peak visitation. Drop-in camping for long-distance hikers also helps mitigate experiential impacts for users with permits to camp elsewhere, by concentrating thru-hikers in one location. Some campsite strategies are listed in Appendix F as adaptive management approaches, but their lack of prominence in the plan may lead managers to wait to consider their implementation until use significantly increases. Given the unpredictable flows associated with long distance hiking, strategies that prevent impacts during peak visitation are valuable management actions even in areas classified as more developed on the recreation opportunity spectrum. Implementing these techniques and approaches in places with camping pressures would reduce the aerial disturbance of camping impacts while protecting the public's ability to enjoy unconfined long distance hiking experiences. We believe these approaches ought to have a more prominent location in the visitor management section, and managers ought to be encouraged to plan for periods of higher PNT use. These actions can protect trail values without restricting the public's ability to enjoy the national trail system.

It is not clear to WTA that trailwide capacity should be based on maintaining the PNT as a [low-use] trail in Grizzly Bear Recovery Zones. The PNT does not need to be [low-use] to achieve its nature and purposes. The environmental assessment does not show population impacts on grizzly bears along the PNT from non-motorized recreation. The EA states:

[Management of the PNT based on the recommended nature and purposes primary uses, and desired conditions and management practices identified in the Plan is not expected to result in disturbance of biological functions, injury, or mortality of individuals of any special status species, and therefore would not jeopardize any federally-listed species (69).]

It further states that, [the proposed comprehensive plan is not expected to result in direction (alteration, degradation, or elimination of habitats) or indirect effects to habitats] (70). We know that the best available science suggests that visitor impacts are nonlinear. WTA believes that the Forest Service should reduce the challenge of complying with a vague average weekly group limit and assure protection of core habitat by taking administrative actions outside of this planning process. The Forest Service should classify the PNT as a high use trail in concert with other actions, such as decommissioning roads, to assure no net loss of grizzly bear core habitat. This action would meet the needs of the Trail, and it would likely save the federal government time and money.

#### Relationship to Federal Land Management Plans

WTA understands that the previous comment regarding grizzly bears related to future planning processes. This comprehensive plan must lead to a reevaluation of existing plans for the Trail to be properly managed. The draft

plan states:

[Idquo]This comprehensive plan is a long-term programmatic plan designed to provide guidance and recommendations for future actions that will be pursued through Federal agency land management plans; project-specific decisions and associated National Environmental Policy Act analyses; and agreements between Federal agencies and with non-federal land managers and private landowners (8).

While we understand that the comprehensive plan does not replace existing land management plans, this document ought to compel a reexamination of existing management. Far too many management plans that overlap the PNT were written before the Trail[rsquo]s designation. The designation by Congress of the PNT implies a change in management priorities. This plan contains good direction on motorized recreation, scenery, and the management area for the Trail, among other topics. To assure that this direction guides the management of the PNT, we ask that the Forest Service, Park Service and Bureau of Land Management devote sufficient time and resources to identify needed changes to management plans and adjust those plans to make them compatible with this planning effort.

#### Recommended National Trail Planning Corridor

The draft plan addresses the requirement to manage the lands around the PNT to protect the Trail[rsquo]s values in accordance with Executive Order 13195 by stating that the [Idquo]national trail planning corridor for the PNT is one mile in width (0.5 miles on either side of the trail)[rdquo] (49). This is good direction. WTA would object to any substantial alteration of this guidance in the final plan.

#### Trail Uses

The primary use of the PNT is hiking. The plan expresses that thru-hiking is an important form of backpacking that the Trail is managed to provide. The plan also says that [Idquo]pack and saddle stock use and bicycling are important and valued modes of travel and key uses[rdquo] (30). It is not clear what [Idquo]key uses[rdquo] mean for the development of the PNT. We recommend using the phrase [Idquo]compatible uses[rdquo] instead of [Idquo]key uses[rdquo]. This change would make the relationship between hiking and other uses better defined.

The plan cites the NTSA to direct that [Idquo]Public use of motorized vehicles on or along any national scenic trail is prohibited[rdquo] (61). The plan could be more explicit in describing this prohibition by noting that the trail corridor exists year round. We recommend adding language to guide local units in travel management planning processes including specifying requirements for authorizing designating crossing points of the Trail for motorized vehicles. We expect that this type of planning will be an increasingly important priority as population growth occurs near the PNT and motorized e-bikes become more common. It may also be helpful in planning for oversnow vehicle use near the PNT.

#### Scenery

The direction for the preservation of the scenic quality of the PNT is a strength of the draft plan. We agree with the plan when it states, [Idquo]Preservation of scenery is one of the most important management challenges on a national scenic trail[rdquo] (84). Thank you for including language that [Idquo]PNT management protects and enhances opportunities to experience dark skies free from artificial light pollution and experience natural sounds free from anthropogenic noise[rdquo] (87). These are important desired conditions that are further supported by the project planning direction for planning teams to thoroughly analyze possible impacts and consider the [Idquo]cumulative effects of projects across the PNT on scenery[rdquo]. We ask that this direction be retained in the final plan.

#### Trail Location, Geographic Regions

The draft plan contains an overview description of the Trail's route. In other sections the plan expresses that the PNT is on interim routes in places where it is located along roads and motorized trails. This section provides an opportunity to reaffirm the need to relocate the Trail away from these unsuitable areas.

In the Pacific Crest Trail's Comprehensive Management Plan certain road walks that have proven difficult to eliminate from the trail experience are called out explicitly as interim in nature. On the PCT this includes the crossing of the Columbia River on the motorized Bridge of Gods. In the decades since the PCT's comprehensive plan was written, these references to specific locations being interim and unsuitable have been useful to those working to improve the location of the PCT. It would be advantageous to explicitly name some of the places where the PNT is located on dangerous roads. For instance, west of North Cascades National Park the route description states, "[Here a relatively long road-walk begins and the trail winds its way up the Mt. Baker Highway]" (40). Since the description acknowledges the road, WTA would further note that the route contains narrow curves to Lake Ann trailhead that are unsafe and contain blind hairpin corners. We think the route description should note that the Trail in this area is in an interim location that fails to meet the nature and purpose of the PNT. In the Pasayten Wilderness the route is described as "[sharp] ten miles of trail tread with the Pacific Crest Trail" (40). We believe the Trail is actually collocated with the PCT for 13 miles. We suggest changing the description in the final version.

#### Trail Relocations

Large amounts of the PNT will need to be relocated to move the trail off roads and into alignments that best meet the vision for which the Trail was designated. The optimum location review guidance included in the draft plan is essential to the development of the PNT. The direction for realignments could be improved by clarifying that a relocation will occur when moving the Trail creates a superior PNT experience. Currently, the plan instructs that a relocation can occur when "[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]" (52). The second part of the direction should be removed. The Forest Service consistently works to "[promote a sound land management program in accordance with multiple use principles]." Including this phrase suggests that the PNT can be moved even in situations where moving the trail would create a detrimental impact to the trail. This is inconsistent with the NTSA.

#### Climate Change

During scoping WTA asked about the effects of climate change on the Trail. Thank you for including a section on "[Climate Variability and Projected Change]" in the environmental assessment. WTA remains concerned that impacts from climate change threaten to degrade the PNT experience. We appreciate continued attention to this ongoing trail threat.

#### Application to Non-Federally Managed Lands

The plan notes that about 30 percent of the PNT is located on land that does not belong to the federal government. The plan states, "[State government agencies that manage portions of the PNT are the Idaho Department of Lands, Washington State Department of Natural Resources, Washington State Parks, and Washington Department of Ecology]" (13). It also states that "[8 percent is on state lands managed by the Idaho Department of Lands, Washington State Department of Natural Resources, Washington State Parks, and Washington Department of Ecology]" (23). We suspect that there may be an error in these statements. The PNT crosses Washington Department of Fish and Wildlife (WDFW) lands. For example the trail is located on WDFW land north of Palmer Lake in Okanogan County and west of Anacortes in Skagit County. WDFW is not listed as a state government agency that manages the PNT. We recommend adding WDFW to the included

list. WTA is not aware of Washington Department of Ecology administered lands that contain the trail. We ask that the Forest Service check with the Department of Ecology to determine if their agency manages the trail. We suspect the plan may have intended to say WDFW and included Ecology by mistake.

#### Partner Organizations

The draft plan contains an excellent section about partnership and collaboration with nonprofit organizations. Thank you for noting the ways that the NTSA provides for the involvement of non-government actors in the management of the PNT. We appreciate the language in the plan that states [ldquo][p]artner organizations may be involved in almost all aspects of the PNT.[rdquo] Thank you for naming WTA as an organization that has [ldquo]made significant contributions to the development and maintenance of the PNT[rdquo] (17). It is our privilege to work in partnership with the Forest Service, the Pacific Northwest Trail Association and others to assure that the PNT continues to develop towards its full potential. The Pacific Northwest National Scenic trail is a spectacular resource that provides an unparalleled backcountry east-west hiking experience in our state. We are thrilled that it will soon have a comprehensive management plan. We hope that the conclusion of tis planning process accelerates the Trail[rsquo]s continued development. W e look forward to continuing to support the Trail into the future.