



August 28, 2023

Elizabeth Berger  
Regional Forester, Pacific Northwest Region  
Jacqueline Emanuel  
Associate Deputy Chief, NFS, USDA Forest Service

Rick Pringle  
Pacific Northwest NST Administrator  
USDA Forest Service  
1220 SW 3rd Avenue,  
Portland, OR 97204

**Re: Notice of Opportunity to Object, Pacific Northwest NST Comprehensive Plan/EA**

Dear Regional Forester Berger, Associate Deputy Chief Emanuel and PNNST Administrator Pringle:

I would like to express my gratitude and congratulations to everyone who has contributed to the development of this plan. Creating a comprehensive management plan (CMP) for a resource as large and complex as a national scenic trail (NST) is no small undertaking, with little specific direction for carrying out the task in the law that requires it, and scarce modern precedent to look to for inspiration and guidance. It is clear from my review of this plan that its architects understood the magnitude of such a project and made every effort to rise to the occasion.

I have participated in the development of this plan since the effort began in earnest in 2015, starting with my appointment to the inaugural Pacific Northwest National Scenic Trail Advisory Council (PNNSTAC) that year, and continuing through to the current term. For the last seven years, I have also supported the development of this plan under formal agreement with the Forest Service throughout my tenure as Executive Director of the Pacific Northwest Trail Association (PNTA). Additionally, as a representative of the PNTA, I have provided extensive and substantive comments on most plan elements during all stages of this NEPA process. My standing to participate in this objection period is well-established.

As I alluded to above, PNTA is largely in support of the plan as it is currently written; so much so, in fact, that unless otherwise noted in this letter, we would object to any changes to the current language that may result from this objection period and reserve the right to participate in the resolution process if such changes will be considered.

I will now address three plan components which we believe require additional revision to adequately support the future management of the Pacific Northwest Trail (PNT).

Our objections to current plan direction are as follows:

### **National Trail Planning Corridor**

As we have previously stated in our written comments, we believe that the recommended National Trail Planning Corridor (NTPC) width is inadequate to allow for the efficient identification of, and realignment to, the optimal location for the trail, and that the current recommendation fails to fully consider and incorporate the feedback that we and other national trails system experts have provided throughout the NEPA and PNNSTAC processes. While we note that the language has incrementally improved from the previous draft language, —to provide for the possibility of a wider corridor than the one initially proposed— we believe the recommendation falls substantially short of ensuring that an appropriate width will be considered during the formal selection process for the NTPC.

Additionally, we remain concerned over a lack of plan direction for how this selection will be made, by who, and within what timeframe. Direction should also be provided in the plan that establishes a timeline for the NTPC width to be selected and published.

We continue to advocate for a NTPC width of 20 miles (10 miles in either direction of centerline from the congressionally designated route). Additionally, we request that the plan specify that the NTPC width be selected and published as soon as possible, but no later than 12/31/2024.

### **Optimal Location Review (OLR)**

We suggest adding an eleventh guiding principle from House Report No. 90-1631:

“...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...”

Reflecting in the OLR/land protection sections that developed areas are to be avoided when at all possible would further support the nature of a National Scenic Trail.

### **Carrying Capacity**

Before continuing with our objection, I would like to acknowledge the enormous undertaking that the study and identification of a trailwide carrying capacity has been. While there is little recent precedent for the creation of an NST CMP, there is no precedent at all, recent or otherwise, for how an NST carrying capacity should be identified. This has been a groundbreaking exercise.

While we express our admiration for the seriousness with which the agency approached this task, we object to its approach and advocate for alternative processes to address the carrying capacity requirement in the National Trails System Act (NTSA) for the following reasons:

- 1) Identifying a carrying capacity for one specific user group—which in most cases will be among the smallest and least impactful— while ignoring the impacts of all other user groups fails to adequately address the cumulative impacts of trail use on the intended trail experience and conservation goals for the PNT management corridor.

We believe the carrying capacity for the trail should represent the maximum number of users that can be accommodated on the trail during any given period of time, regardless of their type of use, while providing for the intended user experience and conservation objectives within the PNT management corridor.

- 2) Identifying a single trailwide carrying capacity is not a requirement of the NTSA, and other approaches would likely be more pragmatic in meeting the intent of this direction.

We believe that rather than identifying a single trailwide carrying capacity based on the most restrictive sections, carrying capacity for each section should be independent of the others, and decisions regarding carrying capacity for each section should be made at local level, to support desired conditions for the trail outlined in this plan, while also being informed by local monitoring and management objectives.

Additionally, we share the following blanket objection:

My participation in the development of nearly all other plan elements on behalf of the PNTA has been thorough, substantive and appropriately documented. We believe that most of the language in this plan is inclusive of the comments we have previously provided throughout this process, and reiterate that we would object to any changes that are not otherwise described above.

Thank you for your continued attention to feedback throughout this process. We have observed and appreciate the care with which you have considered all substantive stakeholder comments and concerns, and look forward to participating in the resolution process as this effort draws to a close.

Sincerely,

**Jeff Kish**

*Executive Director*

**Pacific Northwest Trail Association**

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