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Comments: Page 2

How does the comprehensive plan apply on federal lands?

Each federal land management agency is responsible for developing and managing the segments of the Pacific Northwest Trail on the lands it manages in a way that harmonizes with other authorized land uses, while ensuring the Pacific Northwest Trail and its nature and purposes are provided for and the values for which the trail was established remain intact (Executive Order 13195).

Comment:

Management of the PNT may not always harmonize with other uses of public land within the trail's right-of-way. When management cannot be harmonized, managing for the desired conditions of the PNT must be prioritized over other conflicting uses.

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Nature and Purposes

The trail invites travelers into the backcountry, to seek the grandeur of glaciated peaks, tranquil lakes, boundless horizons of majestic mountains, deep canyons, storm-carved coastlines and the splendor of wild places. 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. Communities along the trail share with travelers their history and deep connections to the land.

Comment:

The Nature and Purposes statement should be aspirational, not an inventory of baseline conditions. The founding vision for the nature of the Pacific Northwest Trail was published in 1974 and working forests and other descriptors used in this statement of trail experiences were not described in the founding vision.

The PNT should be as much as possible a wilderness trail with relatively difficult access, relatively few signs and shelters, and relatively great attention given in planning to its walker's potential wilderness experience.

At a minimum, "Working forests" should be removed from the description of trail experiences in the Nature and Purposes statement. The vision for the trail that congress understood when it designated the PNT as a national scenic trail was that it would be as much as possible a wilderness trail, and that it would emphasize the wilderness experience

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Primary Use(s) of the Trail

The comprehensive plan will identify the primary use(s) of the trail. The proposed action identifies hiking, with an emphasis on long-distance backpacking, as the primary use of the Pacific Northwest Trail. This primary use will guide trail-wide administration and management of the Pacific Northwest Trail, including efforts to complete the development of the Pacific Northwest Trail as a continuous 1,200-mile non-motorized trail. The plan also identifies packing and riding stock and bicycling as key uses in certain areas that should be valued and considered in administering and managing the Pacific Northwest Trail.

Comment:

The National Trails System Act specifically states that national scenic trails are located and designated for "the conservation and enjoyment of the scenic, historic, natural, and cultural resources in the areas through which these trails pass (16 U.S.C. 1242(a)(2))

I support hiking, with an emphasis on long-distance backpacking, as the primary use of the Pacific Northwest

Trail, and hope that land managers recognize the PNT as a tool for conservation within its right-of-way as a key-use of the trail. Recommend including language about conservation in this comprehensive plan.

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#### Carrying Capacity and Visitor Use Management

\* Visitor capacity is about the maximum amount of use that can be sustained, not how much use is desired.

#### Comment:

This is an important distinction to make and should stay in the comprehensive plan. The PNT should be managed for desired levels of use, not to the extreme maximum of what is acceptable.

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#### Identifying Carrying Capacity

Limiting factors are those that most constrain the trail's ability to accommodate visitor use. Through the interview process, the agency identified limiting factors and conditions related to visitor use that will be important to monitor and will help prioritize locations where site-specific visitor use management planning may be needed in the future:

3. Preserving wilderness character, particularly opportunities for solitude, where the Pacific Northwest Trail is in wilderness areas

#### Comment:

3. The trail was designated to be "as much as possible a wilderness trail" and the congressional record suggests a benefit of designation should be "the incentive the Pacific Northwest Trail would provide for federal administrators to emphasize wilderness values in their management of land on either side of the trail."

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#### Trail-wide Capacity: Thru-hiker Capacity

The proposed action includes an estimated carrying capacity for thru-hiking for the Pacific Northwest Trail of 552 to 1,748 thru-hikers per high use season (June 15th to September 15th). This is based on the most limiting passages of the trail, which are in the Cabinet-Yaak and Selkirk Mountains Grizzly Bear Recovery Zones and Olympic National Park's Wilderness Coast. A numeric range is provided because of variables such as thru-hikers' ability to make advanced campsite reservations or get walk-up campsites opportunities in the national parks and the size of hiking or camping groups (party size).

#### Comment:

A carrying capacity for thru-hikers closer to the lowest end of the range provided would be better to protect the founding vision and values for the trail while best ensuring that the trail corridor will be accessible to all user groups during the peak season.

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#### Non-substantial Relocations

\* 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;

#### Comment:

This language from the National Trails System Act should be presented with additional context. Multiple-use principles do not dictate that all uses should be accommodated on every acre of land. It is possible to manage a unit in accordance with multiple-use principles by segregating incompatible uses within a management area. The location of a national scenic trail should be determined through optimal location review. Other uses should be accommodated within the national trail corridor when they do not substantially interfere with the trail's nature and purposes. Conflicting uses may be better accommodated elsewhere.

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#### General Management Approach and Practices

12. Involve tribes that have ancestral lands and other connections along the Pacific Northwest Trail. The Forest Service and the federal land managing agencies will involve affected tribes through consultation, coordination, and collaboration, as appropriate.

Comment:

I support engagement with tribal governments whenever possible, and as early in the process as possible.

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#### Trail Uses: Desired Conditions

17. Conflicts between different types of trail uses and activities are minimal and do not interfere with the Pacific Northwest Trail's nature and purposes and other trail values.

Comment:

Please add a management practice that states that designation of the PNT as a stock driveway in a Range Permit is not allowed.

18. Public use of motorized vehicles does not occur on the Pacific Northwest Trail.12

Comment:

I recommend that this line is modified to say "18. Public use of motorized vehicles, including ebikes, does not occur on the Pacific Northwest Trail.12

19. In general, when balancing potentially competing needs of different trail uses on the Pacific Northwest Trail, favor the primary use.

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#### Visitor Information and Interpretation

Comment:

Recommend that you emphasize that most interpretation should be presented off-site. Any on-site interpretation should be limited to trailheads and other developed areas and should not encroach on otherwise natural-appearing sections of trail.

#### Scenery: Desired Condition

97. Scenic integrity of the Pacific Northwest Trail overall is retained or enhanced relative to baseline conditions (see Stringham et al. 2016) through land management and/or, as appropriate, realignment of the trail travel way (see the Trail Alignment and Design section) or relocation of the trail and the associated national trail right-of-way.

Comment:

Recommend that land within the trails right-of-way should be managed for a scenic integrity objective of "high" to "very high."

#### Scenery: Management Practices

98. As appropriate to the setting, views along the Pacific Northwest Trail highlight ecological processes, cultural practices, and/or their interplay in shaping the landscape.

Across most of the Pacific Northwest Trail in federally administered areas, ecological processes appear to be the dominant forces shaping the foreground viewing zone.

Cultural features such as historic structures add elements that support scenic character and contribute to scenic quality.

Where land uses such as forestry, farming, ranching, working waterfronts, and commercial areas are present,

they contribute to visual variety and sense of place.

Comment:

In most instances, "forestry, farming, ranching, working waterfronts, and commercial areas" should only be accommodated as necessary to maintain Pacific Northwest Trail connectivity. Ebey's Landing National Historic Preserve (NPS) is a good example of an application of this management practice.

Recommend editing this management practice to ensure that it is not suggest that "forestry, farming, ranching, working waterfronts, and commercial areas" are necessary or desired elements of the PNT experience. Additionally, the management practice should restrict the locations where these use types may occur.