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Attn: Becky Blanchard and the PNNST Comprehensive plan ID Team

Mr. Casamassa, Ms. Blanchard, and colleagues:

I am writing in response to the call for comments regarding formulation of the Pacific Northwest National Scenic Trail Comprehensive Plan. For others reading this response who are not familiar with my background, I write as an individual with 42 years of professional experience in management, protection, and planning for National Scenic Trails as a primary partner with the US Forest Service. The majority of my experience is with the Appalachian Trail, The Pacific Crest Trail and the Pacific Northwest Trail and regions 1, 4, 5, 6, and 8, as well as the USFS Washington Office. I served on the first PNNST Federal Advisory Council and worked as the PNTA Director for Trail Management and Protection for 3 years (2001-2004).

Because I have been involved with both formulating an NST Comprehensive Plan and with managing NSTs under a Comp Plan, I would urge diligent work on the part of the USFS and its partners to make the plan as clear in its direction as possible. To this end, you will see below comments about content concerning the PNT Comp Plan and regarding wording that is unclear, or concepts and direction poorly expressed. I will also comment where critical direction and information is well expressed when I think that the agency should know that I would object to removal or substantial alteration of what is presented in the document.

I am somewhat concerned, after conversations with Becky Blanchard and Jeff Kish, that the cover letter that accompanied the documents does not fully express what the agency hoped to get out of this process, nor is it clear that, apparently, there will be a further scoping process at the time that the NEPA compliance documents are formulated. I would suggest that you consider a follow-up letter to the initial recipients to clarify the agency's desires in this regard.

What is the PNNST?

Page 1 paragraph 1 - sentences 3 and 4 Sentence 3 refers to areas important to native peoples. Sentence 4 begins with the words "these areas include" which refers, grammatically to the areas of tribal importance, which is clearly not the intent of sentence 4. I would suggest that you replace those words with the phrase, "the initial route of the PNNST currently in use includes[hellip]"

Page 1 paragraph 2 sentence 1 The word "contiguous" is incorrect in this context. The correct word is "continuous".

Proper trail and experience design indicates that many sites which are integral to the trail experience are not directly on the trail tread, but rather on a short trail that provides access for trail users. These include major viewpoints, scenic features such as geological formations or a stunning piece of vegetation, critical water sources, and important overnight use sites. It would be my recommendation that these sites and the trails that connect them to the main trail be considered a part of the Pacific Northwest National Scenic Trail. Again, they are integral to the trail experience. Congress recognized this need in Section 7( c ) of the National Trails System Act: "National scenic or national historic trails may contain campsites, shelters, and related public use facilities". I believe that this is a critical piece of direction for the Comprehensive Plan. I believe that this is a far superior solution to this need than using official side trail designation to accomplish the needed protection.

#### Why Do We Need a Comprehensive Plan?

This section is clearly delivered and the 'Needs' conclusions are correct and appropriate.

#### How Does the Comprehensive Plan Apply on Federal Lands?

The description of planning levels is clear and accurate. The relationship of these three planning levels would be more clear if they were described as a 'Tiered Planning Process'. A clear direct statement that agency unit plans like a Forest Plan must comply with direction in the NST Comp Plan, and that in turn project plans must comply with the agency unit plan (and therefore the Comp Plan) is needed. I think that it would be good to include a statement that references the Multiple Use and Sustained Yield Act and makes clear that not all uses are appropriate on every acre and harmony is sought across the Forest Service System. I think that it would also be good to point out that the PNT crosses areas of lands that have other area or corridor specific Congressional direction, and that the most restrictive direction will apply.

Last paragraph - There is a need throughout the document to provide a list of references at the end with sufficient direction to lead the reader to those documents. Important and relatively obscure documents like Executive Order 13195 should be attached in some way to the document so that interested readers including agency decision makers do not have to struggle to find needed tools and direction.

In footnote 1- In the first line I think it is important to start the list of what action depends on should start with "[hellip] application of the National Trails System Act[hellip]" and then go on to "agency specific laws[hellip]"

#### How Does the Comprehensive Plan Inform Management of the Trail Outside of Federal Lands?

A well worded and accurate explanation of that situation. I would suggest presenting the second sentence in bold type in the final document.

#### The Proposed Action

Intro paragraph - Concur and recommend retention in the final document.

#### Elements of the Proposed Action

I believe that the introductory section of this part (page 3 to the beginning of page 4) is an accurate recounting of the requirements of the NTSA regarding the Comprehensive Plan and should be retained in the final document and carried through in as much as is possible with procedures adopted for mandates that cannot be fulfilled completely (perhaps resources and acquisition inventories). Substantial alteration would be ill advised.

Nature and purposes - The introductory section including the pertinent section from the Act are well presented,

should be retained and must be adhered to in the final formulation of the Nature and Purposes section of the Comprehensive Plan.

## Nature

I do not believe that the current Nature statement complies with the requirements above it in the document. The first and last paragraphs are fine. The statement that starts with "Trail experiences include.." does not conform with Congressional intent in designation of the PNNST. While it was necessary for the trail to be located through "working forests" (lands managed primarily for extraction of wood products), ranches and farms, and on roads and through towns when it was pieced together, largely through private efforts or by agency efforts preceding the NST designation for the PNT, and it is true that this is the currently used route available to the public at this time, that does not mean that this is the experience for which the trail was designated. There is nothing in the NTSA or the foundation documents related to the PNT or NSTs in general that would lead you to think that this was an appropriate conclusion. It may be necessary to retain these less than optimal locations in some areas for the foreseeable future, and in rare cases forever, to provide a continuous route between the areas that provide the desired experience on the trail, but they are not a desired situation. This is the reason that Congress passed the NTSA in 1968, passed the substantial amendments in 1978 that gave administering agencies the responsibility to purchase appropriate routes for these trails, and that led Congress to appropriate hundreds of millions of dollars over more than 50 years for land acquisition on National Scenic Trails.

This plan, in particular, regulates management of Federal lands along the Trail and the Forest Service and BLM have a long history of working to locate NSTs in Wilderness and remote and largely natural appearing settings wherever possible. Congress has even seen it as a positive when they can designate federal lands surrounding NSTs in various protective categories of land management within various parts of the federal estate, because they see these designations as being compatible, desirable, and interrelated. The original Congressional Record description of the PNT proposed "It will be as much as possible a wilderness trail" with "relatively great attention given in planning to its walker's potential wilderness experience." There is no mention of Wilderness in the nature and purpose statement of the PNNST Comp Plan scoping document. There needs to be. Instead, there is a focus on the built environment, e.g., working forests, farms and ranches of which there is no mention in the Congressional Record.

As someone who was at the table when this version of the Nature statement was formulated, I can assure you that this Nature statement does not meet the direction in the law or conform with the vision of those involved in the establishment of the PNT on the ground, or as a National Scenic Trail.

## Purposes

This section is largely well written and the content is appropriate. I would object to the exclusion of any of these elements in the final plan.

In the purpose part of the statement, the Congressional purpose of the PNNST is not fully expressed as in the National Trails Systems Act: NST's "will be extended trails so located as to provide for maximum outdoor recreation potential...". These words should be included in the statement.

The last bullet is poorly worded though its intent is important to include. I don't believe that it is appropriate for the federal government to "create inclusiveness". Requiring that people take part in a particular recreation activity is as bad as forced exclusion from an activity. We can't make it happen. I believe we can "encourage inclusion of all people, cultures, [hellip]". We can assure that opportunities to use the Trail do not exclude people from any segment of the public. We can reduce economic and perceptual barriers to use. We can even promote the positive benefits of PNT use to a widely inclusive public, but we cannot "create" inclusivity. A sensitive rewriting of the phrase is needed. I would be happy to participate in a discussion of the wording.

## Primary Use(s) of the Trail

I believe that the intent of this section as far as the identification and prioritization of uses is exactly correct. The writing is sufficiently clear so as not to confuse the reader. I believe that it would be helpful to note that some sections of the trail were providing stock and bicycle opportunities before the PNT was designated and that some sections are maintained by these segments of the recreation stewardship community. Special consideration should be given to accommodating these uses where the PNT provides a critical and irreplaceable link in larger opportunities for these two uses.

I would concur with comments being submitted by the Pacific Northwest Trail Association regarding the inclusion of conservation of the scenic, natural, cultural, and historic resources that are an integral part of the PNT experience as being a second primary use as appropriate and necessary given Congressional direction.

## Objectives and Practices

I agree with the rationale for including this material in the plan. It is clearly required by law.

## Significant Natural, Historical and Cultural Resources.

Although I commend the optimism that has led the authors to think that this inventory would be possible by the finalized plan, I believe that this should be approached and recognized as a preliminary inventory based on readily available existing sources and that, more importantly, the Comp Plan would lay out a plan for providing a comprehensive set of inventories over time. Even with exceptional funding, I believe that just the Natural History inventory for the AT took 12 years and is still being periodically updated through new discoveries.

I see the list of categories as incomplete. To provide exceptional management of the PNT, a complete Natural History inventory is needed, not just the iconic species and ecological communities. Rather than traces of the past, I believe an archeological resource inventory is needed for the same reason.

## Carrying Capacity and Visitor Use Management

This introductory section of this topic is generally well written and an appropriately thorough explanation.

In the first bullet the one tool that is critical for a trail like the PNT that is not mentioned is the capacity to complete trail work. Poorly maintained trails can easily result in unacceptable physical impact when drainage goes unmaintained and overgrowth and trail blockages like blowdowns cause users to depart from the intended trail tread. Without the capacity to redesign and relocate sections of trail that are poorly designed now, or to complete major rehabilitation work, tread deterioration and consequent environmental impacts can escalate geometrically. The results are physical impacts well beyond what was possible at dramatically reduced use levels. In the worst cases even minimal use can keep the situation unstable enough to create unacceptable levels of impacts. Please add trail work capacity for maintenance, reconstruction and construction prominently to the list of tools.

In the last bullet, I am missing the point. If capacity is calculated using resource protection and desired experience as the limiting factors, why would anyone balk at that capacity representing a desired use level, given the "maximum recreation potential" mandate in the NTSA?

## Identifying Carrying Capacity

Again, it seems necessary to provide information regarding where and how to obtain copies of key supporting

documents. I see that they are set up with links in the electronic version, but that may not be how a reader is accessing the document. Have the two documents in the first paragraph been adopted as agency policy, with the requisite public review. I ask because the title of one makes it clear that the reason for the paper is to influence policy on the matter.

In the paragraph that starts with "limiting factor[hellip]" I believe what would be more clear would be this insertion: "[hellip] the agency identified potential limiting factors and conditions[hellip]". For instance, the overlap with the PCT in the Pasayten Wilderness is probably moot due to different seasons of thru hiker use. I don't understand how sections of trail on roads or adjacent to private lands effects overall capacity.

#### Trail-wide Capacity

#### Thru-hiker capacity

I am curious why the Cabinet-Yaak and Selkirk Mountains Grizzly Bear Recovery Zones are critical, but the Grizzly Bear Recovery Zones in the Cascades are not. It seems that population density and overall use must be much higher in the Cascades as compared to the sparsely populated and relatively hard to access areas to the east. Is the capacity of other uses in these recovery areas being considered in determining thru-hiker capacity?

I was frankly surprised by the high end of the calculated capacity having traversed all of the identified critical areas.

I have only one comment on the next three segments under Trail Capacity. In the last portion there is a phrase "addressing carrying capacity by trail stage", a term not in common use to my knowledge. I would suggest a rewrite to clearly state what is meant.

Somewhere in this entire section or perhaps another, it is stated that capacity does not equate with use limits. From bitter experience on the PCT, I would propose that the Comp Plan should state that use limits will be instituted to keep thru hiker use within the capacity of the trail for such use. I would further propose that use limits be set at a conservative initial level and a process established for updating that level in the future. Setting limits well before an unforeseeable geometric explosion of use is definitely preferable, and necessary for resource and experience protection, in advance. If the boom never arrives, no harm done. Believe me, you can't put the genie back in the bottle no matter how much you wish that you could.

#### Land Acquisition and Protection Strategy

Introductory section - This sounds like a plan and is definitely required. No comments at this stage.

#### Recommended National Trail Right of Way

For the purposes of the Comprehensive Plan, I would suggest that the agency adopt a less confusing term (Trail Corridor?, Experience protection corridor?) at the outset, explain that the term is used to avoid confusion and that it is equated with the term Right of Way as used in the NTSA. Then use that term for the rest of the document.

Regarding the minimum trail right of way, I agree whole heartedly that this should be the default width and certainly always required where the PNT is in its preferred remote, natural location. Even though in unavoidable, more developed than desirable, segments such a corridor may never be achieved, establishment of such a corridor would open the door to purchase of lands within the area if situations change. It also establishes a basis for the interest of agencies and organizations to influence decisions affecting the trail experience through public or private processes.

## Practices for Relocating the National Trail Right of Way

The way this section is structured, moving 30 miles of trail is not a relocation if the resulting tread is within a half mile of the existing trail. Is this what is really proposed? Dramatic movements of the trail could be undertaken without it being termed a relocation. Does this mean that NEPA compliance would be unnecessary? I would strongly recommend the inclusion of other classes of relocation within the initial corridor or the relocated corridor in the future. This should range down to "trivial relocations", that are undertaken during maintenance with specifications for a maximum allowable length and lateral dislocation. There should be something said about NEPA compliance in this section - you can't just do an Optimal Location Review (OLR) and move the trail.

### Substantial Relocations

I believe that a substantial relocation should require an OLR to produce the information upon which such a relocation should be based. In practice, the OLR guidelines should require that OLRs, most commonly, should cover long sections of trail to assure that overall optimal locations are not selected with blinders on that cause decision makers and planners to miss opportunities for the location that best serves the public.

I believe that the description for the extent of the relocation needed to trigger this classification is what is found in the NTSA requiring Congressional action and yet the requirement for that action is not mentioned.

### Non-substantial Relocations

No comment on the three requirements.

The OLR principles are well thought out and have been based on other NSTs where their use has been vetted through application. Principles 1-7, 9 and 10 should be carried into the plan in a much more extensive set of instructions for completing OLRs. I would oppose the substantial alteration or omission of any of these principles in the final plan.

Principle 8 reflects language in the NTSA, but I believe that is misapplied here. The language in the act refers to plans in place when a trail is designated. Often when the trail location is changed, involving a non-trivial shift in location, and the corridor shifts with it, then management direction, standards and guides are applied to lands previously managed under a different set of management directions. Conversely lands that are currently managed primarily as an NST corridor shift out of that status and are managed under direction assigned during the NEPA process. Unless the current agency management plan recognizes this process in the direction for NST management, claims could be made that moving the PNT from, for example, a paved road walk to USFS lands that are primarily managed for wood product extraction or motorized recreation would not "harmonize" with the existing plan. The solution is to provide direction to agency units to include direction for a shift in corridor in their management plans. Once in their plans such a shift would harmonize by definition.

### The Planning Schedule

I am concerned that, without a federal advisory council impaneled for going onto 6 years and no apparent action on impaneling one to assist with this process, that there will be insufficient time for the council to provide meaningful input as envisioned in the NTSA. Speedy action would help resolve this concern.

I believe that a 30 day comment period for the draft plan and EA is insufficient for a plan with such extensive impact and assuming that the plan will contain sufficient direction for the PNT and will have provided sufficient analysis in the EA. I would urge retaining a schedule that puts the comment period in January and February. A longer comment period would allow for the loss of time for NST meetings with agency partners traditionally held in February and related NST work.

## Appendix A

I am surprised by the amount of detail included here in the scoping notice, my comments are as follows:

I support the inclusion of the following numbered points in the Appendix. They are well written and provide critical direction. I would object to any of these being omitted from the final Comp Plan:

Trail-wide Objectives - 1 through 8,

General Management Approach and Practices - 9,11 and 12,

Trail Uses Desired Conditions - 14 through 17,

Trail Uses Management Practices - 19, 21 through 24,

Trail Setting Desired Conditions - 25 through 27,

Trail Setting management Practices - 28 - 31,

Land Acquisition and Protection Desired Conditions - 32 through 34,

Land Acquisition and Protection Management Practices - 35 through 38a - I,

Trail Alignment and Design Desired Conditions - 39, 40, 42 and 43,

Trail Alignment and Design Management Practices - 44 through 50,

Trail Facilities and Signs Desired Conditions - 51 through 53,

Trail Facilities and Signs Management Practices - 58, 60 through 67,

Visitor Information and Interpretation Desired Conditions - 68 through 74,

Visitor Information and Interpretation Management Practices - 75 through 78,

Visitor Use Management and Carrying Capacity Desired Conditions - 79 through 81,

Visitor Use Management and Carrying Capacity Management Practices - 83 through 87,

Trail Closures and Temporary Detours Desired Conditions - 88, 89

Trail Closures and Temporary Detours Management Practices - 92, 93, 95,

Scenery Desired Conditions - 96 and 99,

Scenery Management Practices - 100, 101, 104 through 106,

Cultural Resources Desired Conditions - 107 through 112,

Cultural Resources Management Practices - 113 through 118 and 120 through 128,

Water Resources Desired Conditions - 130 through 133,

Water Resources Management Practices - 134 through 141,

Biotic Resources Desired Conditions - 143 through 146,

Biotic Resources Management Practices - 147 through 150, 152 and 154,

Wildland Fire Desired Conditions - 155 through 158,

Wildland Fire Management Practices - 159 through 164, 165 a through, 166 a through c, 167 a through c and e, "If the PNT used as fire line" a and b, "For control and containment[hellip]" a and b, "If motor Vehicles were used[hellip]"a through c,

Special Use Authorization Desired Conditions - 170 through 173,

Special Use Authorization Management Practices - 174 through 182

Connecting and Side Trails Desired Conditions - 184 through 188

Connecting and Side Trails Management Practices - 190 through 197

With the important Appendix direction that I support taken care of, let's turn to direction that ranges from unclear and in need of rewriting to just flat incorrect or counterproductive.

Item #10 - the correct quotation of the NTSA is "Other uses along the [hellip]" This is important and refers to uses other than the primary uses of a trail.

Item #13 - The first section of this is right on the money and should be retained as is. The second sentence is not and should not be retained. Due to the tremendous backlog in management planning for agency units, many plans exist with direction that was written before the PNT was designated 13 years ago. The point of the direction in this item should be that decisions and actions should comply with the law, even if the relevant plan does not. Please delete the second sentence.

Item #17 - I would recommend that there should be added here, or as an additional Management Practice in this section, direction that prohibits use of the PNT as a stock driveway.

Item #18 - To correctly mirror direction in the NTSA in the first sentence it should say "on or along the" PNNST

Item #20 - This direction seems to be internally contradictory. First it says One Trail for all uses, and in the next paragraph that where possible bypass routes for pack stock and bicycles should be provided. I believe that provision of bypass trails is a complicated question that should be considered on a case by case basis in a way that provides for the best experience for the primary use, and that this should be the direction delivered here.

Item #41 - This direction is headed toward being good but, there is another alternative which is to decide to discontinue these motorized uses and do a road to trail conversion. This should be incorporated in the first sentence. This alternative has been the decision for some sections of the PNT in years past. I would recommend that the second sentence be rewritten as follows to make clear that elimination of sections of PNT on road is the goal: "Any segments of the Pacific Northwest Trail unavoidably located on roads are only as long as necessary to provide for continuous travel".



Item #54 - I believe that this direction should be rewritten to add, "and to assure public safety".

Item #55 - A second sentence needs to be added as follows, "Signs should be rarely utilized in any backcountry PNT setting and should be of minimum size necessary".

Item #56 - should add a second sentence saying, "Wilderness appropriate service marks should be utilized in all wilderness and remote backcountry locations".

Much of the direction regarding signs in this section could be eliminated by adopting existing USFS standards for signing on National Scenic Trails, and including that document as an appendix.

Item #57 - This is generally good direction. I would clarify the direction by adding "[hellip]public corral facilities through ancillary trails connecting them to the main PNT when determined[hellip]"

Item #59 - Again, I believe that it would be more appropriate to adopt the existing USFS direction for signing National Scenic Trails and not reinvent this.

I believe that there is a critical piece of direction that is missing for Visitor Information and Interpretation. Almost all information and interpretation should be delivered off site with some level of exception for trailheads and where the trail is unavoidably in developed settings.

Item # 82 - this is generally good direction, but as mentioned in previous comments, I am currently uncomfortable with the carrying capacity numbers used.

Item #86 d - I feel that this is so important that I wanted to call it out. It is critically important that the agencies collaborate to figure out a trailwide permit system that is in place now, when the number of thru users is low and does not approach any carrying capacity or desired permit level. Now is the time to have those discussions and work out the system while that process can take the time to resolve the issues. Then if the unexpected geometric rise in use occurs, everything will be in place to keep use levels where they need to be.

Item #90 (and related direction) internal (2) - after over 40 years of experience with NSTs on USFS, NPS and BLM lands, I cannot envision a "planned activity" within a properly managed NST corridor that would require the closure of a National Scenic Trail. Pauses in access for brief periods of time (15 to 30 minutes), yes. Traffic control and flaggers, yes. Extended closure of the trail, no. Even while a utility constructed a series of 765KV towers (30 stories tall) and strung massive high tension wires over the PCT, hikers were held up for no more than 30 minutes at a time, under a canopy with cold drinks and snacks and an apology from the utility staff on site at either end. An extended closure should not be allowed.

Item #91- I would recommend that you add the following, "[hellip]in a manner that encourages and facilitates compliance by users".

Item #94 - Paragraph 3 should be removed as per my comments to Item #90.

Item #97 - This is perhaps one of the most concerning parts of the materials presented for comment. The USFS has used the premier system for scenery management that is available anywhere. It has been in place for about 40 years, is widely understood and accepted. The Visual Management System/Scenery Management System is the tool that has been used by the agency to provide critical protection for National Scenic Trails for 40 years. The standard that has been used in many, many Forest LRM Plans is an SIO of Very High on wilderness lands (preservation VQO) and High (retention VQO) or Moderate (partial retention VQO) in other locations. This standard is applied to the federal lands within the viewshed. It is my recommendation that the following standard

be adopted in the Comp Plan:

SIO of Very High for all viewshed lands within designated Wilderness and remote backcountry lands with a natural appearing landscape (lands with existing wilderness character for users on the PNT).

SIO of High for PNT foreground on other federal lands and Moderate for PNT middleground and background.

SIO of Moderate for federal lands where a rural or urban setting dominates the viewshed.

This well understood and accepted type of direction should replace the wording in the current item #97 and other places in this section. What is there now is not clear and does not use well accepted terms from the agency's own system. It is not clear what "baseline conditions" are referred to but agency policy is clear when it says: "These objectives are keyed to the values set forth in variety classes and sensitivity levels. Except for preservation (now Very High SIO), each describes a different degree of acceptable alteration of the natural landscape based on the importance of aesthetics. The degree of alteration is measured in terms of visual contrast with the surrounding natural landscape." (USDA Agriculture Handbook Number 462). This clearly spells out that the baseline conditions, by agency policy, are a natural landscape.

Item #98 - A useful addition to the second paragraph would be the addition of a second sentence as follows: "Development or modification of the natural environment are subordinate to the natural landscape". This ties to the comments under Item #97. Wording in the 3rd and 4th paragraphs of this section should be clarified as follows (changes in italics): In those segments of the trail where a more primitive experience is not possible, cultural features such as historic structures add elements that support scenic character and contribute to scenic quality. In these more developed settings land uses such as forestry, farming, ranching, working waterfronts and commercial areas are present, and may contribute to visual variety and sense of place.

Item #102 - In line with the comments for item #97, the recommended rewrite is: In developed areas and locations where preservation (SIO of Very High) or retention (SIO of High) are not possible, minimize visual impacts on foreground views.

Item #103 - add footnote to define the terms cultural landscapes and traditional cultural properties.

Item #119 - It is very possible that it will not be reasonably possible to have a continuous and appropriate trail and avoid all the things listed. My understanding is that "areas of reserved treaty rights" would include almost all federal lands and much private land that the PNT crosses (something we should all recognize and stand behind). I recommend ending the sentence with "[hellip]whenever possible.", and adding a sentence about minimizing impacts in coordination with the tribes involved.

Item #129 - Since "no adverse effects" is probably an unattainable standard, the phrase "minimal adverse effects" should be substituted.

Item #132 - I think this statement gives an incorrect impression to those who are not backpackers. I would guess that less than 5% of the PNT has any reasonable access to toilet facilities of any kind and backcountry toilet facilities generally inappropriately concentrate waste or are unmaintainable. This should be rewritten to emphasize education and requirements for proper waste disposal without facilities.

Item #142 - Improve this direction by adding the words "or enhanced" , which should always be our goal.

Item #151 - In the list of things that a user should have please add "food storage expertise to protect wildlife and the recreation experience"

Item #153 - at the end of this sentence, add "and require weed free feed when needed for resource protection"

Post-fire Rehabilitation - Add an item requiring managers to seek post fire rehabilitation funding through all available sources.

Item #169 d - The entire foreground seems extreme for this type of treatment. Is this actually getting anything for the PNT? A more useful method would be to require that stumps be angle cut with the face pointed away from the PNT.

Item #169 f - I think that there is a missing word or phrase here because I can't understand what is meant. The problem is here: "[hellip]that intercept or are tied to the ??? within 100 feet[hellip]"

Special Use Authorization - I would urge the addition of the following direction: No commercial use permits will be issued if such uses will interfere with traditional non-commercial uses of the trail by the general public, especially in areas with any overall use limits.

Connecting and Side Trails - Early in this response I included the paragraph below. I include it here because if this advice is not taken, then all the side trails leading to sites integral to the use of the PCT should be identified and designated as official side trails, although this is not my first choice to incorporate them into trail management and protection: From my response to What Is the Pacific Northwest National Scenic Trail -

Proper trail and experience design indicates that many sites which are integral to the trail experience are not directly on the trail tread, but rather on a short trail that provides access for trail users. These include major viewpoints, scenic features such as geological formations or a stunning piece of vegetation, water sources, and important overnight use sites. It would be my recommendation that these sites and the trails that connect them to the main trail be considered a part of the Pacific Northwest National Scenic Trail. Again, they are integral to the trail experience. Congress recognized this need in Section 7( c ) of the National Trails System Act: "National scenic or national historic trails may contain campsites, Shelters, and related public use facilities". I believe that this is a critical piece of direction for the Comprehensive Plan. I believe that this is a far superior solution to this need than using official side trail designation to accomplish the needed protection.

Item #193 first line - The word "responsible here should be replaced with "responsibility".

Thank you for the opportunity to respond to this scoping document. I look forward to continued involvement in this process through Comprehensive Plan completion. I would be happy to meet or correspond with agency staff working on this plan to clarify these comments or to discuss how to productively resolve the issues that I raise here. I can be reached through the contact information listed below.

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