

Data Submitted (UTC 11): 8/28/2023 7:00:00 AM

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Organization:

Title:

Comments: August 28, 2023

Elizabeth BergerRegional Forester, Pacific Northwest RegionJacqueline EmanuelAssoc. Deputy Chief, NFS,  
USDA Forest ServiceATTN: Debbie Anderson  
Rick Pringle

Pacific Northwest NST Administrator

R6 Regional Office

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, Assoc. Deputy Chief Emanuel and PNNST Administrator Pringle:

These are the comments and objections of Michael S. (Mike) Dawson of Vashon Island Washington regarding the comprehensive plan (Plan) and EA for the Pacific Northwest National Scenic Trail. I most recently provided extensive comments on a variety of aspects of the PNNST draft Comprehensive Plan/EA on or about April 17th, 2023, when the Draft Plan and EA were previously offered for comment, and also provided input at all stages of scoping.

I provide these comments based on my 43 years of experience working professionally on National Scenic Trails, including 21 years working with USFS Region 8 as a regional representative for the Appalachian Trail Conference, 4 years working with Regions 6 and 1 as the PNTA Director of Trail Management and Protection, 15 years working with USFS Regions 4, 5 and 6 as the PCTA Director of Trail Operations and continued contract work with PCTA and the Partnership for the National Trails System (PNTS). I currently serve on the PNT Federal Advisory Council and also did so in the Council's previous incarnation. Much of my work in all these positions has involved various levels of NST agency planning and policy, including the PCT foundation document, the AT Comprehensive Plan, many Forest Plans and the current Forest Planning Rule and Directives, and a multitude of agency project level plans.

I have spent a great deal of time reviewing the various iterations of documents Comprehensive Plan process, including extensive communications with agency staff seeking clarity. My 24 page epistle in response to the Draft Comp Plan should be on file. As well as my response to scoping for this planning effort. I have also worked closely with PNTA and PNTS to review the planning documents and formulate my response comments.

Involvement in the Objection Settlement Process

Having seen the Plan evolve over time, it is important for me to say that the quality of direction provided in the Plan has increased substantially over each iteration. In general, I see the plan as an excellent document to guide the future development and protection of this Congressionally designated resource. I say this as someone with a great deal of experience implementing the Comprehensive Plans for the Pacific Crest and Appalachian National Scenic Trails.

This leads me to my first concern regarding the Objection Process going forward. It is likely that many interested organizations and individuals may put forward objections to the current Plan. These may be motivated by a wide range of viewpoints, and many may not be well versed in the Congressional intent, and long agency policy and direction history for NSTs based on that intent, or the objector may simply wish that it didn't exist. It is of great concern to me that there may be efforts to change excellent and crucial direction that exists in the Plan, which I support. Based on the areas of concern raised in my comments on the Draft Plan, I would object to substantial changes in the direction provided in the current Plan, which I do not individually address specifically for improvement in this objection statement. The areas of my interest in the plan are well documented in my Draft Plan response of April, 17, 2023. As such, I would request to be involved and consulted in deliberations regarding potential substantial changes in the majority of the current Plan document as a result of efforts in objection resolution. I believe that my standing to make this request is well established.

To ease the connection of my previous input regarding the Plan, I have ordered the comments here in the same order as my previous submission regarding response to the Draft Plan.

N&P

This portion of the Plan is much improved since its first iteration. I would specifically object to substantive changes in the Nature and Purposes section of the Plan through the objection process.

OLR

This is my comments from the Draft Plan response (in italics):

I recommend that another principle be added based on the House Report (draft page 28) where it points out what should be avoided when designing an NST. The list may not be comprehensive, but it is, for 1968, remarkable for recognizing the threats to NSTs. Even specific new threats can be looked at in the context of similar incompatible projects and facilities. Here is suggested language to capture the direction in question:

#. Relocations will maximize retention of natural conditions, or the possibility of recovery of such conditions, and the primitive character of the trail area. Relocations 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 and its use for outdoor recreation.

Another additional principle that would be important would be to recognize that there are some locations where a primitive or primarily natural location is simply not possible and directs the process to minimize the impact of those situations on the overall PNT experience. Here is recommended language:

#. In locations where a primarily natural, primitive setting is not practicable, relocations minimize the length and duration of trail locations in more developed landscapes. Efforts will be made to provide as natural a trail corridor as practicable in these locations both for through travelers on the trail and to provide such experiences for short term, easily accessible PNT use. In areas where the trail experience is seriously compromised through major development, all efforts should be made to group the crossing of multiple linear and site impacts in a single location in a limited area, for instance crossing multiple roads and utility corridors within a limited section of trail.

While some of this direction is found in Chapter 3 Trail Values, that information is far away from this section which directs the principles for carrying out this process. The OLR section of the Plan on pages 76-78 is critical to providing direction for implementing Congressional intent, which is currently missing from the provided evaluation principles. Some, but not all required direction is found in principle #6, but it is currently insufficient.

What is included in "The PNT"

While this matter has now been addressed to some extent in the Scenery section of Chapter 6, this addresses only one aspect of the need to include features that are integral to the PNT experience as being included in the term Pacific Northwest Trail or PNT in a more general way to comply with NTSA direction.

National Trail Planning Corridor

Size of the National Trail Planning Corridor as compared to the National Trail Management Corridor

While revisions in the Plan have changed the direction for the size of the NTPA, it provides no direction or clarity regarding how the width will be determined in the form of important factors to be considered, or examples of what width should be in particular situations, needed to guide the determination of the NTPA extent.

Scenery

Protection of Middleground and Background views especially on federally managed lands.

This section of the Plan still lacks specific direction regarding the Desired Condition for Scenery in the middle ground and background, which must be at least Moderate to fulfill the direction in the NTSA and other indicators of Congressional intent in its passage. There is adequate direction in this section regarding other elements of management of the scenic resources that are at the heart of the PNT's designation, and we would object to any other substantive changes in this section of the Plan through objection resolution.

Movement of the NTPC and the National Trail Management Corridor with changes in trail location

I find no revised section of this Plan that addresses the issues raised in my comments to the Draft Plan. I object to the lack of such direction in the Plan. My previous comments are below in italics:

While it is useful as a benchmark in judging the extent of a change in trail location to use whether such a change is within the current NTPC, what seems to remain unsaid in the plan is that when a section of trail is moved, both the National Trail Planning corridor and any National Trail Management Corridor (NTMC) must move with the trail, either because the half mile on either side of the trail centerline is based on the trail's location, or because foreground from the trail is based on the location of the user. This is also related to "related facilities" as addressed earlier in these comments.

Section by Section Draft Comprehensive Plan Review

Chapter 1

Relationship to Federal Land Management Plans and Special Area Plans

This section of the Plan inexplicably continues to lack reference to the USFS Planning Rule and Directives which contains specific direction regarding National Scenic Trails under the section on Congressionally Designated areas. Its exclusion is a gap in providing pertinent direction for USFS Forest Planning and must be rectified.

## Chapter 2. Roles and Responsibilities

This Chapter is filled with critical direction to fulfil the NTSA in the development and protection of the PNNST as outlined elsewhere in the Plan. I would object to any substantive changes in the direction provided here except as presented in the earlier sections of this objection.

Collaborative Management Model - This continues to be an important part of the Plan in providing for the vision for management provided in the NTSA and I would object to any substantive changes in this section of the Plan through objection resolution.

### Trail Administration

#### Forest Service as Administering Agency

#### Other Government Agencies and Officials

## Chapter 3. Trail Values

This Chapter is filled with critical direction to fulfil the NTSA in the development and protection of the PNNST and to fulfil requirements of the Act. I would object to any substantive changes in the direction provided here except as presented in the earlier sections of this objection or presented below in this section of my objection statement.

### Primary Use - Pack and Saddle Stock Use

Because this use has been changed to a Primary Use since the Draft Plan. I think that it is important to address a situation that This action has created. While I, as a member of the PNT Advisory Council and an individual fully support the elevation of Pack and Saddle Use within the Plan, that plan also includes important direction regarding the infeasibility of providing for this use in all segments of the PNT. I am concerned that the idea of not providing for a Primary Use on all portions of the PNT seems counterintuitive and provides a precedent that may be inappropriate. It is late in the process to raise this issue, but it has only been created in the past month and now appears in the final Plan. I would encourage the agency to discuss this matter and include affected partners to resolve this matter before adopting the Plan. It is my hope that raising it in this objection process would provide that opportunity. To be clear, I believe that the detailed direction of this use in the Plan is appropriate.

## Chapter 5. Objectives and Practices for Trail Management

This Chapter is filled with critical direction to fulfil the NTSA in the development and protection of the PNNST as outlined elsewhere in the Plan. I would object to any substantive changes in the direction provided here except as presented in the earlier sections of this objection.

### Trail Uses

#### Motorized Uses

As presented in my comments on the Draft Plan the following change should be made in item #6:

#6 Another alternative to moving the PNT off of motorized roads and trails is to discontinue the motorized use of those travelways - "[hellip]or discontinue those uses" should be added to the end of the first sentence.

To direct that the only way to resolve these conflicts with NTSA direction is to move the PNT is simply incorrect

and would lead to less than optimal locations for the PNT and potentially less than optimal solutions to provide for motorized uses.

## Scenery

### Desired Conditions & Management Practices

Because it is of such importance, I will reiterate here the need for direction regarding scenery management in middleground and background. Again, I would propose the following direction regarding VQO/SIO requirements for viewshed beyond foreground based on the agency handbook referenced in the Plan:

Lands in the PNT viewshed beyond the foreground zone should be managed to meet an SIO of Moderate, High or Very High dependent on circumstance and overall land management objectives for those lands.

### Chapter 6. Implementation

This Chapter is filled with critical direction to fulfil the NTSA in the development and protection of the PNNST as outlined elsewhere in the Plan. I would object to any substantive changes in the direction provided here except as presented in the earlier sections of this objection.

Again, thank you for the opportunity to participate in this planning process. If there is any desire to seek clarification of these objections, to discuss the implications of changes in this draft or to explain the intent of specific language in the draft, please do not hesitate to contact me as indicated below.

Sincerely,

Mike Dawson