
**PACIFIC NORTHWEST TRAIL
ASSOCIATION**



*Preserving and protecting the
Pacific Northwest Trail since 1977*

November 12, 2022

Pacific Northwest Regional Forester's Office

1220 SW 3rd Ave.

Suite 1700

Portland OR 97204

Attn: Becky Blanchard and the PNNST Comprehensive plan ID Team

RE: PNTA Comments on PNNST Comprehensive Plan Public Scoping Document

Ms. Blanchard,

The Pacific Northwest Trail Association (PNTA) is a 501(c)(3) national nonprofit organization with a mission to protect and promote the Pacific Northwest National Scenic Trail (PNNST), and to enhance recreation and educational opportunities for the enjoyment of present and future generations. The PNTA has more than 14,000 supporters nationwide. Each year, the PNTA contributes over 30,000 hours of labor in service to the PNNST by employing youth and young adults from PNNST gateway communities on trail crews and by coordinating volunteer trail stewardship efforts. In addition to trail stewardship, the PNTA serves as the primary source of public information regarding the PNNST, by providing education digitally, in print, and through community events that promote safe and responsible enjoyment of the Trail and surrounding public lands. PNTA is the primary national nonprofit organization working in partnership with the U.S. Forest Service on behalf of the Pacific Northwest National Scenic Trail.

The Pacific Northwest Trail Association submits the following comments on the Pacific Northwest National Scenic Trail Comprehensive Plan Public Scoping Documents of September 2022. Comments are arranged by the sections of the plan and identified by the heading "PNTA Comment." The wording being commented on is included with hilites followed by the PNTA comment.

Writing a comprehensive plan for an approximately 1,200 mile national scenic trail is a large and complex undertaking. We congratulate the agencies involved in accomplishing this step of the planning process.

Page 1

What is the Pacific Northwest National Scenic Trail?

The Pacific Northwest Trail was first proposed by trails advocate Ron Strickland in the early 1970s. Strickland worked with other volunteers, as well as landowners and land management agencies, to identify a **contiguous** route from the Continental Divide to the Pacific Ocean, mostly using existing trails, paths, and roads.

PNTA comment:

We recommend replacing “contiguous” with “continuous”.

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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).

PNTA comment:

Management of the PNT may not always harmonize with other uses of public land within the trail’s right-of-way. When management can not be harmonized, managing for the desired conditions of the PNT —as a congressionally designated special area— must be prioritized over other conflicting uses. Executive Order 13195 does not contain language that directs federal land management agencies to manage national scenic trails “in a way that harmonizes with other authorized land uses.” It does say “Federal agencies will, to the extent permitted by law and where practicable—and in cooperation with Tribes, States, local governments, and interested citizen groups—protect, connect, promote, and assist trails of all types throughout the United States. This will be accomplished by: . . . (b) Protecting the trail corridors associated with national scenic trails and the high priority potential sites and segments of national historic trails to the degrees necessary to ensure that the values for which each trail was established remain intact”, which may be best accomplished by limiting or prohibiting other conflicting use types within the trail corridor.

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

The comprehensive plan provides a vision for the Pacific Northwest Trail to inform the federal land management agencies, tribal governments, state government agencies, county and municipal governments, private landowners, partner organizations, and volunteers that

collectively steward the trail through a cooperative management approach. The comprehensive plan is not binding on non-federal governments or private landowners. However, the management practices and recommendations in the comprehensive plan can serve as best management practices that may be applied on a voluntary basis by tribal, state, county, and municipal governments as well as private landowners, through their local planning processes or through cooperative agreements.

PNTA Comment:

The language regarding the direction in this plan being non-binding outside of federal lands is important and should be emphasized to help reduce concern among non-federal landowners along the designated route.

PNTA does recommend that the finished plan should establish a clear process under which owners and managers of non-federal land along the route can formally enter into agreement to adopt the practices described in this plan. Cooperative management agreements with the states of Washington, Idaho, Montana and other non-federal entities could be one tool to accomplish this, but PNTA encourages federal acquisition of easements across state and private lands to further ensure consistent management of the PNT across all jurisdictions in perpetuity.

Page 4

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.

PNTA 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 was originally entered into the Congressional Record by Congressman Joel Pritchard the following year. Working forests and other descriptors used in this statement of trail experiences were not described in the founding vision. Instead, this was:

From well above treeline to luxuriant forests, from one inland wilderness area to another, to the most mysterious of all wildernesses —the sea— will someday stretch a dream trail, a passionate walker's trail.

It will 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.

It will be a trail of superb backpacking —not pale, bland, crowded trail slumming— but adventurous frontier walking. Today there is great obligation upon those who would create a new national scenic trail to avoid the mistakes of the past. Overcrowding, poor design and location, deterioration of wilderness values, and rampant vandalism can all be minimized if enough thought, dedication and money are devoted to the Pacific Northwest Trail. I strongly believe that creating a new trail to serve the geometrically growing numbers of backpackers need not be a disservice to the country through which that trail passes.

In fact, in addition to its other values, the creation of this trail would help to protect many fine roadless areas that are now in danger of development. The National Trails Act of 1968 provides some direct protection for every footpath designated as a national scenic trail. Even more helpful would 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 as well. (Joel Pritchard (WA). "Proceedings and Debates of the 94th Congress, First Session" Congressional Record Vol. 121, No. 40)

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. Activities associated with the terms "working forests . . . farms and ranches" within the management corridor —such as commercial timber harvest and cattle grazing— are antithetical to this vision. Emphasizing wilderness values in the management of the land on either side of the trail would be nearly impossible in these areas, which substantially interfere with the conservation of the trail's significant resources and the enjoyment of its primary users.

We believe the nature and purposes statement should contain language that specifically acknowledges that the PNT shall be "as much as possible a wilderness trail."

We recommend replacing the line "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" with "Trail experiences include opportunities to reflect on how people since time immemorial have shaped these places and have been shaped by them."

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Primary Use(s) of the Trail

The comprehensive plan will identify the primary use(s) of the trail.² 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.³

PNTA 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))

PNTA supports hiking, with an emphasis on long-distance backpacking, as the primary use of the Pacific Northwest Trail, but we encourage land managers to more fully recognize the PNT —as a tool for conservation within its right-of-way— as a key-use of the trail. Language providing this direction should be included in this comprehensive plan.

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Significant Natural, Historical, and Cultural Resources

The comprehensive plan will identify significant natural, historical, and cultural resources that support the nature and purposes of the Pacific Northwest Trail, based on its legislative history and unique niche in the National Trails System. The proposed action identifies eight resource themes significant to the Pacific Northwest Trail that will be elaborated in the plan:

1. the trail itself,

PNTA Comment:

We support the inclusion of 'the trail itself' in the list of significant themes, in recognition of its national significance and in acknowledgment that the value of the whole is greater than the sum of its parts.

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.

PNTA 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 very edge of what is acceptable. We recommend that desired levels of use by thru-hikers are determined and listed in the plan, or that the upper end of the stated carrying capacity of the trail is reduced to better support desired conditions for wilderness character and opportunities for solitude.

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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:

1. Backcountry campsite permits in national parks
2. Management in Grizzly Bear Recovery Zones
3. Preserving wilderness character, particularly opportunities for solitude, where the Pacific Northwest Trail is in wilderness areas
4. Overlap of Pacific Northwest Trail with other national scenic trails
5. Segments of the Pacific Northwest Trail on open motorized roads
6. Segments of the Pacific Northwest Trail on or adjacent to private lands
7. Potential future conditions that could present limiting factors such as the availability of campsites in areas where terrain is limiting, conflict between different types of uses, human waste impacts, future wilderness designation, and wildfire impacts on trail use.

PNTA Comment:

2. PNTA recommends expanding line 2 to be inclusive of other ESA listed species and associated management areas.
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."

We request that this line be expanded to specifically include other areas outside of designated wilderness where managing for wilderness character and opportunities for solitude may be possible. This should include, at a minimum, recommended wilderness and inventoried roadless areas.

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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).

PNTA Comment:

PNTA appreciates the inclusion of the Carrying Capacity Report in this round of scoping, but remains unconvinced that the upper end of the carrying capacity range listed for thru-hikers would necessarily protect against a feeling of overcrowding or a deterioration of wilderness values where the existing management constraints may be insufficient to do so.

We also suspect that the upper end of the stated range may invite unnecessary conflict between user groups. In some trail stages, the upper end of the range appears to assume that no other users aside from thru-hikers will be present within the stage when thru-hiker use is measured. In areas such as the Cabinet-Yaak and Selkirk Grizzly Bear Recovery Zones, if thru-hiker use were to reach the upper end of the stated carrying capacity range, current management constraints would leave "no room" for other user groups during those times.

Finally, we believe that while the upper end of the stated carrying capacity range may be possible in theory, the total number of thru-hikers that could be accommodated in practice would be significantly lower. In order to reach the upper end of the listed range while adhering to all other current management direction for these areas, thru-hiker use would have to be spread across the majority of the peak-use season. The limited window of opportunity to complete a thru-hike of the Pacific Northwest Trail necessitates a concentration of use during more narrow windows of time, making the stated upper carrying capacity number misleading.

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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Implementing and Monitoring the Carrying Capacity for the Pacific Northwest Trail

The comprehensive plan will include a plan for implementing the carrying capacity of the trail by prioritizing limiting factors and addressing carrying capacity by trail stage. The monitoring plan will outline potential indicators and thresholds to guide monitoring efforts. An adaptive management toolbox will also be included. The identified carrying capacity numbers and desired experience zones will inform local managing agency implementation of site-, segment-, or area-specific monitoring and management actions to manage visitor use along the trail.

PNTA Comment:

Replace the word “inform” with “direct”, to read: “The identified carrying capacity numbers and desired experience zones will direct local managing agency implementation of site-, segment-, or area-specific monitoring and management actions to manage visitor use along the trail.

Land Acquisition and Protection Strategy

PNTA Comment:

PNTA requests direction to, when practicable (i.e. single large land owner, etc..), pursue acquisition of parcels large enough to conserve all resources that are significant to the PNT, as opposed to the minimum acquisition necessary to protect connectivity. This would greatly benefit the user experience and conservation goals.

Recommended National Trail Right-of-Way

The proposed action will include a preliminary administrative recommendation for the location and width of the national trail right-of-way for the Pacific Northwest Trail. In the proposed action, the location of the recommended national trail right-of-way follows the congressionally designated route of the Pacific Northwest Trail. The width of the recommended national trail right-of-way is a minimum of one mile (0.5 miles on either side of the trail).

PNTA Comment:

We support a minimum mile-wide right-of-way and recommend consistent application across all jurisdictions.

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Practices for Relocating the National Trail Right-of-Way

Relocation occurs when a segment of a national scenic trail needs to be moved outside of the existing national trail right-of-way. By relocating, the segment of the national scenic trail and its corresponding national trail right-of-way are moved to a new permanent location. The National Trails System Act establishes the conditions under which relocation may occur (16 U.S.C. 1246(b)). The goal of any relocation would be to select a location that is equal to or superior to the former location in terms of its ability to provide for the nature and purposes of the trail.

PNTA Comment:

PNTA supports this goal, and emphasizes the importance of the founding vision for the trail, as originally understood and enacted by Congress, which are discussed in connection

with the Nature and Purposes section above, in the forefront whenever relocations are considered.

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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;⁸

PNTA 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.

Optimal Location Review

PNTA Comment:

Language should be added to this section clarifying that the route identified through OLR shall be selected in accompanying NEPA documents unless the NEPA process reveals new evidence of another route that is superior to the route that is identified in the OLR.

Desired Conditions and Management Practices: General Management Approach and Practices

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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.

PNTA Comment:

PNTA recommends that engagement with tribal governments be sought 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.

PNTA 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.

PNTA Comment:

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

We recommend the inclusion of ebikes to this line to specifically exclude their use on or along the PNT. We believe this is important to address within the PNT comp plan so as not to rely on agency travel management policy that may be subject to future change.

We believe this desired condition must include the word "along" in order to be consistent with direction provided in the National Trails System Act. The use of motorized vehicles *along* national scenic trails is the only activity that is specifically prohibited by the Act.

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

PNTA Comment:

This is good direction, PNTA would object to the modification or removal of this practice in the finished plan.

20. Enhance opportunities for the key uses, where appropriate, as a complement to the primary use.

In general, the primary use and key uses should co-occur on one shared trail rather than as separate, parallel trails.

Where practicable, the administering agency, managing agency, and partner organizations may coordinate to identify bypass routes for pack and saddle stock use and/or bicycle use

around sections of the Pacific Northwest Trail where such use is restricted or impassable to other trails open to those uses.

PNTA Comment:

This direction is confusing.

The first section states that primary and key uses should co-occur on one shared trail rather than separate parallel trails. This appears to be followed by a conflicting recommendation to identify bypass routes as needed to support key uses of the trail. Identifying bypass routes would effectively create separate parallel trails for different use types.

We recommend retaining the first direction. Primary and key uses should co-occur on one shared trail when appropriate. Trail location should favor primary use. In some instances it may be that the optimal location for the trail's primary use precludes key uses. This is OK.

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Trail Facilities and Signs

56. The Pacific Northwest Trail route is uniformly marked with the official service mark.

PNTA comment:

In recognition of the fact that the use of the official service mark for the trail may be inappropriate or impractical to use in all settings, we recommend this line be replaced with "The Pacific Northwest Trail is marked, as frequently as necessary for navigation purposes, according to the guidance provided for national scenic trails in chapter 5 of Sign and Poster Guidelines for the Forest Service EM7100-15."

57. National Trails System Act Requirement: Reasonable efforts shall be made to provide sufficient access opportunities to the Pacific Northwest Trail (16 U.S.C. 1246(c)). **Develop the minimum facilities necessary to provide an enjoyable visitor experience.** Facilities should not interfere with the nature and purposes of the trail and other trail values. Connect the Pacific Northwest Trail to parking areas, campgrounds, and public corral facilities when determined to be appropriate through analysis of resource capability and user demand.

PNTA Comment:

We support this direction and would like to see it retained in the finished plan. It is in line with the description of the trail provided in the congressional record, which says: "It will 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."

58. Before facilities are installed, ensure that long-term maintenance will be able to occur. Select materials that minimize operation and maintenance costs. Facilities that are no longer useful or desired should be removed and the sites should be naturalized.

PNTA Comment:

Please keep this management practice in the comprehensive plan. Federal budgets rise and fall over time. It is important that any infrastructure built can be sustained.

62.

Locate, design, and maintain facilities so they are compatible with the setting and protect natural and cultural resources.

Facilities should be appropriate to the setting. In more primitive settings, facilities should blend into the surrounding landscape. In more urban settings, they should fit into the valued landscape character of the place and the built environment. Follow the management practices in the Scenery section in this chapter and relevant management direction for scenery from the land management plan for the area.

Implement relevant managing agency standards and best management practices to locate, design, and construct facilities and structures (such as campsites and dispersed camping areas, toilets, water crossings, food storage poles or lockers, and garbage disposal) to protect natural and cultural resources, including water resources.

Develop and/or maintain facilities to be compatible with wildlife management and minimize incidental harm (i.e., bear-proof trash and dumpster receptacles, bird/bat proof vents on vault toilets).

Consider climate change and related impacts (such as vegetation change, drought, wildfires, storms, floods, and sea-level rise) in the location and design of facilities.

PNTA Comment:

PNTA is very supportive of the direction provided in management practice 62, but encourages the agency to include more specific direction in the finished plan, specifically in relation to food storage infrastructure and direction that could help to create resiliency to current and future impacts of climate change within the management corridor.

For food storage poles or lockers, we recommend that the comprehensive plan should prescribe the establishment of campsites, located in areas specifically identified to minimize the potential for wildlife conflict, with lockers, poles or wires as appropriate for the setting, every five to ten miles along the PNT within grizzly bear recovery zones.

PNTA believes that current food storage orders, on Forest Service lands in particular, are inadequate for the protection of wildlife within the PNT corridor because they are often impossible to comply with where trees of the appropriate size and structure to meet hanging requirements are not present.

On climate change, PNTA notes this is the only mention of climate change within the scoping document. We believe that the finished plan should address climate change more extensively and thoroughly, to include direction that is not limited to the location and design of facilities, but also includes a strategy to better protect the management corridor from the impacts of climate change, and provides managers and partners with the tools needed to more efficiently and effectively restore the trail corridor from the impacts of increased wildfire activity.

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66. In general, avoid memorials and/or recognition (e.g., adopt-a-trail signs) that involve new signs along the trail. Consider other ways to memorialize or recognize people.

PNTA Comment: Please keep this management practice in the comprehensive plan, and recognize that requests are not just for signs, but can include benches, plaques, statues, etc. Such memorials and signs detract from the natural setting desired for the PNT.

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Visitor Information and Interpretation

PNTA Comment:

PNTA believes that the practices described in this section are good, but that it should be emphasized that most interpretation should be presented *off-site*. When interpretation is provided on-site, it should be limited to trailheads and other developed areas, and should not encroach on otherwise natural-appearing sections of trail.

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Trail Closures and Temporary Detours

90. Trail closures and temporary detours occur only when (1) necessary in emergency situations or (2) for planned activities, when sufficiently coordinated in advance with the Pacific Northwest Trail administrator, affected tribes, and partner organizations.

PNTA Comment:

Line 2 of this direction is too ambiguous. What kinds of “planned activities” are acceptable as grounds for closing a national scenic trail? Both permissible and prohibited activities should be clearly defined in the plan.

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 travelway (see the Trail Alignment and Design section) or relocation of the trail and the associated national trail right-of-way.

PNTA Comment:

Retaining scenic integrity baseline is an inadequate goal for the management of the Pacific Northwest Trail corridor. 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.

PNTA 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. The PNT passes through this Preserve, where hikers will see "historical, agricultural and cultural traditions of both Native and Euro-American."

PNTA requests editing this management practice to ensure that it is not misconstrued to 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.

Recommended text: "Outside of lands managed by the Department of Agriculture, where land uses such as forestry, farming, ranching, working waterfronts, and commercial areas cannot be avoided, they contribute to visual variety and sense of place."

99. The Pacific Northwest Trail provides opportunities to experience dark skies free from artificial light pollution and experience natural sounds free from anthropogenic noise.

PNTA Comment: Evaluation of areas for possible wilderness have used dark skies analysis as an indicator of remoteness and lack of development and it is good to recognize this can be an useful tool. As written it leaves one wondering how this may be applied in the real world management of the PNT. For instance, the Pasayten Wilderness (Okanogan-Wenatchee NF) has been evaluated for and provides a dark sky experience. Does that lead to an interpretation that the PNT now has an adequate dark sky experience so other opportunities need not be provided?

Having a trail free of anthropogenic noise is an excellent practice to pursue. Again, one wonders how this might be applied in real-world management of the PNT in the absence of any discussion of a goal or target. Both the dark sky and free from anthropogenic noise management practices are worth pursuing. They might be useful when designating an official route or in prohibiting noisy activities such as requests from the military to use areas above the trail route for overflights.

PNTA requests that this line be replaced with: "The Pacific Northwest Trail should be managed to retain or enhance, in relation to baseline conditions, opportunities to experience dark skies free from artificial light pollution and experience natural sounds free from anthropogenic noise."

Scenery: Management Practices

100. Identify important viewpoints along the Pacific Northwest Trail. Develop and implement strategies to protect scenery resources in the viewshed (foreground, middleground, and background zones).

PNTA Comment:

Scenery Resources should be protected to meet scenic integrity objectives from all points along the trail.

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Water Resources: Desired Conditions

133. Water sources are suitable for human use when properly filtered and treated, are sufficient to meet the needs of all trail users and are not a limiting factor in the use and enjoyment of the Pacific Northwest Trail.

139. If necessary, develop and maintain water sources in key locations to support the primary use and, where applicable, key use(s).

Where practicable, agencies may partner with grazing permittees or lessees to provide water facilities for the benefit of both the trail and grazing operations.

PNTA Comment:

This section is generally vague about which water sources are subject to the desired condition #133 and management practice #139. Is it all water sources within 1/2 mile of the trail? All water sources designated as such for the PNT? More specifics on what water sources are included would be helpful and reduce arguments among users. Suggest editing #139 to read; “Where necessary to protect the trail experience, agencies may partner.....”

Management practice #139 also mentions water facilities that benefit both trail and grazing operations. Language in other portions of this scoping document say the trail has a “primary purpose,” which appears to contradict the notion that it may be managed for the benefit of a grazing operation too.

A look at the “Trail Uses: Desired Conditions” section of the proposed plan states that “...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 (#18.) Management practices section #19 states “...when balancing potentially competing needs of different trail uses on the Pacific Northwest Trail, favor the primary use.” There is other text that reinforces that the trail has a primary purpose, and management of the trail, including the corridor, is to strive to meet that primary purpose alone, not strive to provide benefits for other uses.

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Wildland Fire: Management Practices

165. In general:

b. Avoid using the Pacific Northwest Trail as a control feature.

c. As appropriate, use minimum impact suppression tactics (MIST) or other tactics to minimize the long-term effects of suppression on the Pacific Northwest Trail and associated resources.

PNTA Comment:

We agree that the PNT should not be used as a control feature and application of MIST is appropriate. Both of these management practices should be kept in the comprehensive plan. However, MIST has written direction for protection of biologic systems, but is weak on protection of scenic values, particularly use of retardant in fire fighting. Retardant is persistent for years on rocks. Please explore language limiting or prohibiting the use of retardant on a trail with a primary purpose to provide very high scenic values.

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Wildland Fire: Post-fire Rehabilitation

PNTA Comment:

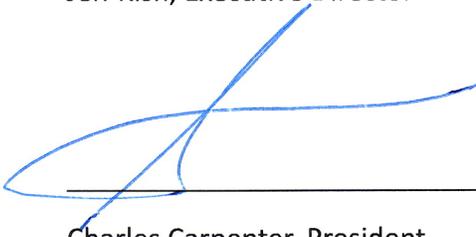
Please see our comments about use of retardant on a trail with a primary purpose to provide very high scenic values. This section is silent about removing or lessening the scenic impacts of retardant drops within the corridor. Suggest including such direction here.

PNTA has reviewed all of the documents provided through this scoping process. PNTA's proceeding comments are not our only thoughts about the content of the documents provided in this scoping process. There is much in this PNNST draft comprehensive plan that PNTA thinks is good for the PNNST. We reserve the right to object to removal of any of the current parts of these documents we view as beneficial while looking forward to continuing to review future iterations of this comprehensive plan.

Thank you for considering these comments.



Jeff Kish, Executive Director



Charles Carpenter, President