



June 30, 2020

Dear Gorge Commission and Forest Service Planners:

Trailkeepers of Oregon, Pacific Crest Trail Association, Washington Trails Association and Friends of the Columbia Gorge would like to thank the Gorge Commission and Forest Service staff for their work in drafting the Columbia River Gorge National Scenic Area Management Plan revisions, specifically Chapter 1, Scenic Resources and Chapter 4, Recreation Resources. We appreciate the opportunity to comment and applaud the inclusion of some key elements that are positive steps towards a world class recreation system. Specifically, we support these objectives:

- Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to recreation opportunities in the Scenic Area
- Establish a loop trail around the Scenic Area
- Provide safe pedestrian and bicycle passage across the three Columbia River bridges in the Scenic Area to connect scenic travel corridors for these user groups
- Provide equitable and accessible (regardless of income level, ethnicity, gender, ability, or age) resource-based recreation opportunities

The Gorge Commission stated at the beginning of the plan review process that recreation would be a primary focus. While many of the policy revisions modernize the Management Plan, these changes aren't adequate to address the recreation issues people are most concerned about.

The policies in the recreation section do not constitute a comprehensive plan for recreation and without it these problems will continue to grow. We believe the agencies and partners should work together towards a comprehensive review of the current and future recreation concerns that exist throughout the Gorge. In addition, we advocate for the Climate Resiliency Plan to include recreation-based transportation needs when considering future climate resiliency solutions.

In addition, we offer the following revisions:

1. **GMA Objective #2 and #3, Trails and Pathways, Page 167.** We recommend combining the two into one objective. Combining the two objectives that share the goal of connectivity makes sense as communities work to connect to one another through trail systems.

**Proposed revision** (New language in bold blue, current Management Plan language is in red):

*2. Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to recreation opportunities in the Scenic Area.*

*3. Establish a loop trail around the Scenic Area.*

**2. Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to expand recreation opportunities and establish a loop trail around the Scenic Area.**

2. **GMA Objective #6D, Trails and Pathways, Page 168.** We recommend revising this objective. Coordinating trail construction and maintenance across agency boundaries is inherently more complex, thus the default is a tendency to look inward rather than across borders. The Scenic Area is inextricably linked to public and conserved lands adjacent to its boundary. Retaining this objective highlights the importance of viewing the landscape as a whole and seeking trail system solutions that are comprehensive. In addition, as natural disasters can impact current trail connections that run both in and outside the boundary of the Scenic Area, we have concerns that elimination of this objective could lead to a more fragmented trail system. We would like more clarity on the necessity of eliminating this objective.

**Proposed revision** (New language in bold blue, Management Plan draft revisions are in red):

~~*D. Provide trail linkages between Scenic Area trail opportunities and trails in the National Forests and other public lands north and south of the Scenic Area.*~~

**D. Provide trail linkages between the Scenic Area and adjacent public lands to the North and South where such opportunities exist to improve access to regional trails, form loop trails to reduce out-and-back congestion or increase the utility of existing trail assets.**

### **GMA Policies**

3. **GMA Policy #8, Trails and Pathways, Page 169.** We recommend keeping objective with a minor revision for clarity. Although new trails may be the best solution in some instances, in general, evolving the existing infrastructure to meet modern sustainability design criteria and best practices for congestion management will yield the best return on investment.

**Proposed revision** (New language in bold blue, Management Plan draft revisions are in red):

~~*8. Priority shall be given to the completion and improvement of existing trails, incomplete trail loops, and trail segments, considering relationships with trails in Urban Areas, the SMA, and outside the Scenic Area.*~~

**8. Priority shall be given to enhancing the current trail infrastructure while considering relationships with trails in Urban Areas, the SMA, and outside the Scenic Area. Examples of such enhancements include rerouting sections that fail current design standards or forming loop trails with connectors to enhance flow and reduce out-and-back congestion.**

### **GMA Guidelines**

**4. GMA Guidelines #1D(3), Approval Criteria for Recreation Uses, Page 179.** We recommend rewording the objective. The new language can be interpreted broadly and we believe that specific measures, such as installing boot brushes, will provide tangible benefits.

**Proposed revision** (New language in bold blue, current Management Plan language is in red):

~~*D (3) Applications for new trails or trailheads shall address and minimize the potential spread of noxious weeds.*~~

**D (3) Applications for new trails or trailheads shall take measures to reduce the potential spread of noxious weeds through measures such as incorporating boot brushes and educational signage.**

**5. GMA Guidelines #1D(4), Approval Criteria for Recreation Uses, Page 180.** We recommend that land managers consider the potential for wildfire hazard, but are concerned that a formal “evaluation” will become a burden that doesn’t produce new, useful information. Rather we suggest that recreation managers consider existing community wildfire protection plans and their own agencies wildfire management directives.

**Proposed revision** (New language in bold blue, current Management Plan language is in red):

~~*D (4) Applications for new trails or trailheads shall evaluate the potential for fire risk during critical fire hazard periods, and consider that evaluation in developing the physical and managerial setting of the site.*~~

**D (4) Applications for new trails or trailheads shall consider the potential of fire risk in developing the physical and managerial setting of the site.**

### **Coordination**

**6. GMA Policies, #4 Page 171.** We recommend that recreation providers consider law enforcement and safety concerns, but don't believe there is a need to require consultation. Our understanding is that state and federal land managers have open lines of communication with law enforcement, public safety and emergency service providers already. Our concern is that a required formal "consultation" will become a burden that doesn't produce new, useful information.

**Proposed revision** (New language in bold blue, current Management Plan language is in red):

*4. Recreation providers shall consult with applicable local and state law enforcement, public safety, and emergency service providers when developing proposals for new recreation sites. Law enforcement and safety concerns associated with existing recreation sites shall be considered when developing strategies in response to new recreation development proposals.*

**Law enforcement and safety concerns associated with existing recreation sites shall be considered when developing strategies in response to new recreation development proposals.**

### **7. New Plan Components for the Pacific Crest National Scenic Trail**

While the Pacific Crest Trail currently is afforded a high level of scenic protection in the Special Management Area, and some in the General Management Area, there are additional plan components the revised plan can and should include to protect PCT values. The missing components include a Desired Condition statement for the PCT and provisions regarding other incompatible uses.

The PCT within the General Management Area encompasses six miles on private land and/or within Urban Areas. As PCTA has discussed with the planners, it isn't feasible to further protect, within the scope of this planning process, the scenic/visual qualities of the PCT in the GMA.

The PCT traverses 13.5 miles of federal land within the Special Management Area and the PCT's status as a Key Viewing Area does provide important scenic protections. The best protection is that new development and land uses must be "Not Visually Evident" from the PCT within the SMA (Draft plan pages 69-70). This would presumably protect the trail's viewshed, on federal lands, from new roads, utilities, other developments, and resource extraction operations that can't meet the scenic standard. However, this doesn't address other key protections needed for the PCT corridor, which are *not* purely scenic in nature.

**Proposed revision** (New language in bold blue)

### **Desired Conditions/Goals**

**The nature and purposes of the Pacific Crest National Scenic Trail (PCT) are to provide for outstanding journeys on foot or on horseback along the spectacular landscapes of the high Pacific mountain ranges. Tranquility and closeness with nature can be found consistently along the trail, evoking a feeling of extended retreat from civilization, even if only venturing out for a day.**

### **Guidelines**

**New recreation events, such as foot races, horseback endurance events, fundraising events, and other large group events should be limited to designated PCT crossings only to minimize conflicts with the nature and purposes of the PCT. Existing recreation events on the PCT may be allowed to continue at current levels.**

**New trails that are proposed to cross the PCT or to be built within the foreground of the PCT, should be designed to minimize conflicting uses and to minimize the scenic, natural, and recreation impacts to the PCT.**

**Place priority on the purchase of lands or interest in lands necessary to protect the Pacific Crest Trail experience as delineated in the Pacific Crest Trail land acquisition inventory, and the 2006 PCT Optimal Location Review.**

### **Rationale:**

The 2012 Forest Service Planning Rule calls for National Scenic Trails to have their own plan components within a corridor surrounding the trail on Forest Service lands. Forest Service units having completed recent plan revisions have established a PCT Corridor (or Management Area) in compliance with this rule. Those plans include provisions meant to protect both the scenic and experiential aspects of the PCT.

The provisions regarding large group events and minimization of conflicting uses come from the National Trails System Act. It states that activities that are incompatible or will substantially interfere with the trail's nature and purposes should be avoided. It's clear in the PCT's description and design criteria that it was meant to avoid congested areas of concentrated recreational use, instead favoring remote areas with as much wilderness character as possible, in order to maximize its intended types of recreation: hiking and horseback riding. These primary intended users are displaced by large group events and by intersecting trail systems not built to harmonize with the PCT.

The provision regarding priority on acquisition of lands to protect the PCT also comes from the National Trails System Act.

We suggest three possible ways for the Gorge Commission and Forest Service planners to accomplish these objectives:

1. Within the Recreation chapter, the PCT Desired Condition statement and other PCT-specific provisions could be included under both the GMA Trails and Pathways section, and also in the SMA section.
2. Within the Scenic chapter, plan components could be included within the sections on Key Viewing Areas in both the GMA portion (beginning on p. 38) and the SMA portion (beginning on p. 69).
3. The plan could require a Corridor Strategy for the PCT, like it does for other scenic routes designated as KVAs. A Corridor Strategy for the PCT could be vastly simpler than the strategies for the highways, because the PCT already has other documents establishing design and project planning standards. It could simply state a PCT Desired Condition and the other provisions listed above.

Once again, we would like to thank the Commission and staff for their work on this important effort. We believe that the changes in the plan and the recommendations we've put forth above strike the right balance between directing our collective efforts and leaving room for flexibility and innovation as we work through current challenges and prepare for the future. We look forward to working in collaboration with all the public land management agencies to provide trails and facilities that we can all be proud of for generations to come.



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