

**CRATER LAKE NATIONAL PARK  
TRAIL MANAGEMENT PLAN/ENVIRONMENTAL  
ASSESSMENT**

**PUBLIC COMMENT SUMMARY**

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# CRATER LAKE NATIONAL PARK TRAIL MANAGEMENT PLAN/ENVIRONMENTAL ASSESSMENT PUBLIC COMMENT SUMMARY

## SUMMARY OF PUBLIC INVOLVEMENT

On September 21, 2021, the National Park Service (NPS) released the Crater Lake National Park Trail Management Plan/Environmental Assessment (plan/EA) for public review. A news release dated September 21, 2021, directed individuals interested in the planning effort to visit the NPS Planning, Environment, and Public Comment (PEPC) website. On the project PEPC site, individuals could download a copy of the plan/EA; view an interactive story map that presented the alternatives analyzed in the plan/EA; and submit feedback on the alternatives, analysis of environmental impacts, and any other concerns or ideas related to trail development and management at the park. A 30-day public comment period for the plan/EA ran from September 21 through October 21, 2021. During this time, the NPS planning team held one virtual public meeting on Wednesday, September 13, 2021, via WebEx, to introduce the alternatives and answer questions.

A total of 27 correspondences were received during the comment period. Of these, 26 were submitted directly to the [PEPC website](#), and one correspondence was mailed to the park. This document includes high-level summaries of public comments and the National Park Service's responses. Substantive comments and supporting rationale or revisions resulting from public comments are included in the trail management plan finding of no significant impact (FONSI) and errata.

## COMMENTS RECEIVED AND NPS RESPONSE

### General Support for Alternative(s) and/or Individual Actions

*Comment Summary:* Many comments received via PEPC expressed support for one of the alternatives and/or personal reactions to individual actions included in the range of alternatives. Overall, commenters favored alternative 1, the NPS preferred alternative, over the no-action alternative and alternative 2, although the National Park Service received at least one comment supporting each of three of the alternatives analyzed in the plan/EA, including the no-action alternative (i.e., continuation of current management).

Commenters also highlighted individual actions included in one or more of the alternatives. A handful of commenters supported equestrian use at Crater Lake National Park and were glad to see horse use added to the Pumice Flat Trail and other new opportunities for equestrians in alternative 1. A few commenters specifically voiced support for a completed Rim Trail, which was analyzed in alternative 2 and not included in the NPS preferred alternative (alternative 1). One commenter wished the action alternatives included more dog-friendly trails.

*NPS Response:* NPS staff and public comments identified several potential issues with expanding the Rim Trail to the east side of the caldera, including proximity to Rim Drive, lack of views of the lake along much of the alignment, likelihood for creating social trails, safety concerns along unstable slopes, impacts to sensitive and rare plant species, impacts to whitebark pine, and impacts to the historic Rim Road. Impacts to natural resources, cultural resources, and visitor experience

associated with actions in alternative 2 are fully analyzed in chapter 3 of the trail plan/EA, “Affected Environment and Environmental Consequences” (pages 31–71).

Dog use varies from trail to trail. Currently, dogs are allowed on the Annie Spring Trail, Dutton Creek Camp Trail, Godfrey Glen Trail, Lady of the Woods Historic Trail, North Junction Trail, Pacific Crest Trail, and Red Cone Spring Camp Trail when they are on a leash 6 feet or shorter. Under alternative 1, on-leash dog use would be expanded to the Mazama Campground Loop Trail and Munson Valley Roadside Trail. Dogs would also be allowed on the Chevron Trail, Lady of the Woods Winter Trail, and North Entrance Road Winter Trail, which are common to both action alternatives. Dogs are prohibited on other trails to protect wildlife resources, visitor experiences, and visitor safety.

### **Development of Trails/Routes Not Included in Action Alternatives**

*Comment Summary:* Several commenters provided ideas for trails and/or routes that were not analyzed in the environmental assessment or provided other suggestions that the National Park Service had considered but did not appear in alternatives 1 or 2.

*NPS Response:* Many of the new trails/routes suggested in public comments did not contain enough details to be considered as new, reasonable alternatives or actions that could be analyzed as part of the current plan/EA. Other suggestions received during the public comment period—for instance, closing portions of East Rim Drive to vehicles, expanding mountain bike use, developing a second access trail to the lakeshore, and developing trails near Llao Rock and Cascade Springs—were considered early in the planning process but were dismissed because of the level of potential resource impacts or infeasibility. Rationale for dismissing these actions is included in the trail plan/EA under “Actions Considered but Dismissed” (pages 27–28).

Additional suggestions were not substantially different from the actions analyzed in alternative 1 and alternative 2 or were determined infeasible. Some suggested routes—including different possible alignments to complete the East Side Rim Trail and access the lakeshore and a new trail through the Pumice Desert—would result in more impacts to soils, vegetation, and wildlife than the actions included in the NPS preferred alternative (alternative 1) and were dismissed from additional analysis. The suggestion to extend Ponderosa Pine Trail by constructing a suspension bridge over Annie Creek was dismissed due to the high cost of constructing and maintaining a bridge at that location and because the trail alignment proposed by the commenter included lands not administered by the National Park Service. One commenter suggested incorporating a bike lane on Munson Valley Road instead of building a separate trail offset from the roadway, but park staff had dismissed this idea earlier because of safety concerns and potential impacts to the historic bridges along the road.

### **Other Suggested Actions Outside Scope of Trail Management Plan/EA**

*Comment Summary:* Some commenters included suggestions for management actions that related to park operations or slight changes to current maintenance practices. A few commenters also requested that the park conduct more research on a variety of topics, including visitor use and desired experiences, impacts of equestrian use, and the overall need for additional equestrian facilities.

*NPS Response:* Under the National Environmental Policy Act (NEPA), the National Park Service may pursue management actions that have no potential for significant environmental impacts under ordinary circumstances as a categorical exclusion. Decisions about interpretive trail signs and

general operations (including snowplowing, staff patrols, placement of bear lockers, and winter trail route adjustments) can be made outside of the planning process. Because of their operational nature, these actions have little or no potential to cause meaningful environmental impacts that would inform the decision-making process. In addition, these actions can proceed independently from the proposed action and have independent utility; they are not considered connected to the proposed action. Therefore, consistent with Council on Environmental Quality's NEPA Regulations and the 2015 *NPS NEPA Handbook*, the National Park Service has not analyzed impacts associated with these actions. Research and surveys can be undertaken by the National Park Service and/or its partners at any time, and these activities are typically outside the scope of the National Environmental Policy Act. Park staff will consider these suggestions in future management.

**Comment Summary:** Some commenters suggested actions or topics that are outside the scope of the current plan. These suggestions included relocating backcountry campsites, managing climbers at Mazama Rock, managing vehicle numbers or adding a shuttle service for Rim Drive, and transferring of a small parcel administered by US Forest Service to the National Park Service for administration as part of Crater Lake National Park.

**NPS Response:** These comments do not respond to the purpose and need for this project. The trail management plan focuses on providing new experiences for nonmotorized recreational trails; the plan was not intended to provide direction for vehicle management, climbing management, backcountry campsite management, or potential land acquisitions.

### **Concerns Related to Trail Management**

**Comment Summary:** Some commenters expressed general, high-level concerns about costs and/or feasibility related to long-term monitoring of indicators and thresholds for resource protection and visitor experience, construction and maintenance of new trails, and enforcement of identified visitor capacities.

**NPS Response:** The trail management plan is a long-range plan; full implementation of the preferred alternative (alternative 1) is expected to take many years. New trail development would take place as funding and staffing and other park priorities allow. If and when actions in the NPS preferred alternative are implemented, actual costs would vary. Specific costs would be determined in subsequent, more detailed planning and design efforts. Once the plan is complete, funding will be sought in future years on a project-by-project basis. The National Park Service will also leverage partnerships for funding and other support related to construction and maintenance of proposed trails. Ease of monitoring was one of the primary criteria used to select the limited list of indicators and thresholds included in the plan. These indicators are designed to monitor the achievement of desired conditions and the range of issues the plan aims to address.

**Comment Summary:** A few commenters wondered if the actions included in the trail plan/EA would ultimately address park crowding.

**NPS Response:** Visitor use management is an iterative process in which management decisions are continuously informed and improved through monitoring to determine the most effective way to manage visitor use. Assessing the outcome of management actions is necessary to ensure that management actions are having their intended effects and desired conditions are maintained (i.e., crowding is limited). As monitoring of conditions continues, managers may need to modify management actions, implement adaptive management strategies, or consider new management strategies to ensure that desired conditions are achieved.

## Potential Impacts

**Comment Summary:** Commenters mentioned potential resource impacts from trails and other activities included in the action alternatives. Most comments of this type expressed broadly worded concerns related to construction of new trails, but some identified specific types of use or visitor actions that commenters worried would impact the park's resources. Several commenters worried about the impacts of expanding equestrian use on soils, vegetation, backcountry infrastructure, and other trail users.

**NPS Response:** "Chapter 3: Affected Environment and Environmental Consequences" of the trail plan/EA describes key issues and resources that could be affected by implementation of any of the considered alternatives: soils (pages 31–33), vegetation (pages 34–39), wetland and riparian areas (pages 39–41), northern spotted owl (pages 42–46), whitebark pine (pages 47–49), wilderness character (49–55), historic structures and cultural landscapes (55–58), and visitor use and experience (pages 58–71). Environmental analysis of equestrian use proposed in the action alternatives is included in chapter 3.

**Comment Summary:** One commenter expressed concern about impacts to wildlife from dogs in backcountry and/or wilderness areas.

**NPS Response:** Dogs that are controlled by a leash of 6 feet or shorter are currently allowed on selected trails. The NPS preferred alternative (alternative 1) modestly expands on-leash dog access in proposed frontcountry trails, but dogs would continue to be prohibited on other trails to protect wildlife resources, visitor experiences, and visitor safety. Off-leash dogs are not permitted on trails and would not be permitted under either action alternative.

**Comment Summary:** One commenter specifically called out the potential for construction activities to impact the park's northern spotted owl population.

**NPS Response:** The National Park Service acknowledges these concerns, as actions that result in elevated sound levels can result in harassment-level disturbance of owls from up to 0.25 miles away from the footprint of the project. The National Park Service proposes measures to reduce and mitigate potential impacts to the northern spotted owl in chapter 2 of the plan/EA. These measures would be implemented as part of the selected alternative to lessen potential impacts to northern spotted owls and other species that may be affected by actions included in the plan/EA. The National Park Service consulted with the US Fish and Wildlife Service on potential impacts to threatened and endangered species from the selected alternative. The US Fish and Wildlife Service concurred with the NPS conclusion that the proposed action is not likely to adversely affect the northern spotted owl. A concurrence of "not likely to adversely affect" requires that all effects are beneficial, insignificant, or discountable. Insignificant effects include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those extremely unlikely to occur.

**Comment Summary:** One commenter expressed concerns about potential environmental impacts to whitebark pine from the construction of the Vidae Ridge Trail under alternative 2.

**NPS Response:** The National Park Service acknowledges these concerns. Construction of the proposed Vidae Ridge Trail would result in the permanent removal of approximately 0.4 acres of vegetation from within whitebark pine stands. The impact analysis has been revised to reflect this in appendix A, "Errata Indicating Text Changes to Plan/EA" in the finding of no significant impact document. Ultimately, this action was not included in the NPS preferred alternative (alternative 1).

**Comment Summary:** Some commenters expressed concern about impacts to wilderness character, wildlife, and visitor experience associated with the proposed Vidae Ridge, Falls to Flowers Trail, and East Side Rim Trail.

**NPS Response:** The National Park Service acknowledges these concerns. Potential impacts from trail construction, maintenance, and use are analyzed in chapter 3 of the plan/EA and briefly discussed in appendix C. Ultimately, the Vidae Ridge Trail and East Side Rim Trail were not included in the NPS preferred alternative (alternative 1).

## **Accessibility**

**Comment Summary:** One commenter expressed concern about the lack of accessible trails proposed within the plan.

**NPS Response:** Achieving accessibility in outdoor environments presents challenges and constraints posed by terrain, the degree of development, construction practices and materials, and other factors. Appendix D to the plan/EA notes the [Architectural Barriers Act \(ABA\) Accessibility Standards](#) that are most applicable to trail construction. One example is improved information about the condition and difficulty of trails that would allow visitors of all abilities to make informed decisions about which trails to use. Exceptions to these standards are provided in situations where terrain and other factors make compliance impracticable. While the plan does not include the designation of trails as accessible, the NPS preferred alternative (alternative 1) would improve accessibility with several new trails having firm and stable surfaces on gentle grades. Furthermore, all new trails and modifications to existing trails will include consideration of improvements that increase the accessibility of trails and adjoining facilities for people with disabilities. These improvements will be considered on a case-by-case basis during the design and construction phases and implemented to the extent practicable.

## **Consultation with Associated Tribes**

**Comment Summary:** One public comment included the request for additional consultation with the Klamath Tribes.

**NPS Response:** The National Park Service shared the draft plan/EA with federally recognized tribes connected to Crater Lake as part of its consultation obligations under section 106 of the National Historic Preservation Act. Consultation activities are briefly described in “Chapter 4: Consultation and Coordination” (pages 80–81). The park will continue to consult with associated tribes as it moves forward with implementation of the plan/EA and future park planning efforts.