

Comment No.	Page(s)	Section or Line #	Table Name and/or Attribute Name ----- Quote	Type of Comment	Comment	Proposed Change	Resolution	Resolution Explanation	Type of Follow-up	Commenter
1	--	--		--	INTRO I admire the highly educated and excellent, particularly the technically excellent among us all. I test out as a practical, unimaginative, fact-centered human being. Technical excellence rings my bell. And this standard demonstrates a PhD level of data development to cover all the bases for everyone. However much I may worship the technically excellent, I must prostrate myself and genuflect in the most heartfelt way and kiss the rings of Practicality, Person-hours and Budget, the domineering muses where I work.		Beyond Scope	This data standard has been developed by trail managers from multiple agencies and is currently being implemented. The core standards will be implemented and data provided based on agency priorities and budgets (Line 279).	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
2	[8] [29]	[247-253] [361]	ITDS Attributes AGENCY DATA SOURCE	--		SOME SUBSTANCE I encourage the development of a metadata-documented required skeletal data set with the attributes of lines 247 through 253 below plus Agency Data Source using the table on line 360. Add a Trail Name field using USGS place name standards. Add to this a Unique Trail Segment Identifier as the FGDC minimum standard.	Rejected  Rejected  Rejected  Rejected	1. The FTDS ( <a href="http://www.nps.gov/gis/trails">http://www.nps.gov/gis/trails</a> ) have been determined by a multi-agency team as the minimum set of attributes needed to provide basic trails management information. The core standards will be implemented and data provided based on agency priorities and budgets (Line 279). Local implementation requirements may only include a subset of the FTDS. However, if these data are rolled up into agency or department level data sets, they must be compliant with the FTDS.  2. The Trail Codes (line 247 - 253) are general groupings used to better understand the application of the FTDS. They are not official categories or data attributes.  3. Trail names are established by a variety of sources including Congress, federal and local agencies, and trail advocates. The managing agency is the most knowledgeable authority for determining the official or legal trail name. The implication of changing trail names can be many and costly, including changing maps, signage, decision documents, etc.  4. The FTDS Team does not agree it is necessary or productive to identify unique or static segments within a trail, as explained in Appendix C Frequently Asked Question 19a and 19b. This can be addressed through dynamic segmentation.	No follow-up needed	
3	--	--		--	COMMENT The FGDC can then create a relateable/joinable Supplemental Table, Tables or Geodatabase available with the encyclopaedic listing of attributes for the time in the future when Congress creates a new Civilian Conservation Corp or Civilian Data Corp or some other state-funded subsistence-wage corps that can do the bidding of the PhD-conferred data Gurus, Gods and Goddesses. Or each agency can pay employees or add volunteers to create and update the encyclopaedia of detailed data required for each trail segment.		Beyond Scope	This comment describes the implementation of a potential system. The FTDS do not define a particular database or data structure, but are intended to <u>define a core set of data attributes</u> that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems. Refer to Appendix C Frequently Asked Questions 1, 2, 4 and 5. The core standards will be implemented and data provided based on agency priorities and budgets (Line 279).	No follow-up needed	
4	--	--		--		SUBSTANCE The segment data standard can be generated using FIPS State and County, etc. codes and the unique identifiers FIPS or each agency uses to identify itself and its management units. Of course the last characters of the unique ID would be the segment number. Congressional Districts blow all over in the winds of politics, and can be generated by data analysis.	Rejected	As explained in Appendix C Frequently Asked Questions 19a and 19b, it is not necessary or productive to identify unique or static segments within a trail. This can be addressed through dynamic segmentation. The FTDS provides sufficient specificity to identify individual trails.	No follow-up needed	

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5	[24 ?]	-- [346 ?]	ITDS Data Parameters ? LAND USE PLAN ?	--	COMMENT AND REQUEST Some trails may be governed by more than one management plan.		Accepted as Submitted	The FTDS accommodate the identification of trails governed by more than one management plan. As indicated in Line 345, the Land Use Plan attribute allows for multiple entries.	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
6	[8]	247 248	Trail Code / Trail Category Reg. Trail Regular Trail: [etc]	--		I encourage an attribute of RGT for Regular Trail. I discourage the use of a period in any data attribute or name unless mandated by software or Federal Law.	Rejected	The Trail Codes (Line 247 - 253), including "Reg. Trail" are general groupings used to better understand the application of the FTDS. They are not official categories or data attributes.	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
7	[8]	249 250 251 252 253	NHT NST National Scenic Trail [etc] NHT1(Desig) Route(s) [etc] NHT2 (HR) [etc] NHT3 (Rec) [etc]	--		I propose adding an item NC or "Name Code" like PCT (Pacific Crest Trail), AT (Appalachian Trail), etc. or a number that can find a lookup or similar table. Have another master table of trail names that are generated from the USGS place names databases.	Rejected	1. Trail names are already covered under the FTDS attribute "Trail Name" (Line 388). National trail designations are addressed under the FTDS attribute "National Trail Designation" (Line 371) which includes a standardized list of values for congressionally designated trails.	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
							Rejected	2. Response from GNIS Committee Member Bob Bewley (BLM) indicate the following: Trail names are established by a variety of sources including Congress, federal and local agencies, and trail advocates. The managing agency is the most knowledgeable authority for determining the official or legal trail name. The implication of changing trail names can be many and costly, including changing maps, signage, decision documents, etc.		
							Rejected	3. This comment describes the implementation of a potential system. The FTDS do not define a particular database or data structure, but are intended to define a core set of data attributes that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems refer to Appendix C Frequently Asked Questions 1,2 4 and 5.		
8	[29]	360	LIST OF VALUES (LOV)	--		Add "Tribe" to the Agency Data Source list please.	Accepted in Principle	Agency Data Source already includes the data attribute "Tribal." This attribute is currently incorporated in multiple agency data sets.	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
9	--	--		--		<b>SUMMARY</b> Standardize a minimum data set of four items (designator, agency, trail name, unique segment) with metadata. This can be called the LT or "Lumper's Table" or IT - "Index Table". Item three is a trail name code, item four is a key item, the segment number relateable or joinable to a vast table called the ST or "Splitters Table," the majority of this data standard.	(Duplicate Comment)	(Duplicate comment. Refer to reply for Comment #2)	No follow-up needed	Thomas Chris English BIA Western Regional Office Division of Forestry 2 AZ Center Fl 12 400 N 5th St. Phoenix, AZ 85004 6/17/2008
10	--	--		--		Make the standard item "Reg. Trail" "RGT".	(Duplicate Comment)	(Duplicate comment. Refer to reply for Comment #6)	No follow-up needed	

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11	--	--		--		Add Tribe to the Agency Data Source list.	(Duplicate Comment)	(Duplicate comment. Refer to reply for Comment #8)	No follow-up needed	
12	--	--		--		Have copyable FGDC standard encyclopaedic tables, or tables with FIPS State, County, Agency, etc. standard Codes and names and standard trail placenames again, joinable/relatable/or geo??able to the base table. Each of these tables would also be documented to FGDC standards.	Beyond Scope	This comment describes the implementation of a potential system. The FTDS are not intended to define a data structure or database, but rather are intended to define a core set of data attributes that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems (refer to Appendix C Frequently Asked Questions 1, 2, 4 and 5). Lists of values unique to the FTDS are included in this standard. Commonly defined LOVs (e.g. FIPS) are not re-defined in the FTDS documentation.	No follow-up needed	
13	--	--		--	Please, please, please, please don't hang an Augean Stable of data requirements on us poor entities having no DOI business justification, therefore un-fundable requirement for encyclopaedic trails data.		Beyond Scope	The FTDS ( <a href="http://www.nps.gov/gis/trails">http://www.nps.gov/gis/trails</a> ) have been determined by a multi-agency team as the minimum set of attributes needed to provide basic trails management data. The core standards will be implemented and data provided based on agency priorities and budgets (Line 279). Local implementation requirements may only include a subset of the FTDS.	No follow-up needed	
14	[16-17]	3.1	ITDS Attribute Overview	General	COST attributes will turn into a management nightmare. If a cost is entered for a particular trail segment, and then that trail segment becomes further segmented based on other attributes, all of the new segments will have the original cost value. The data manager will need to remember to split the cost between the new segments or the cost amount will be inflated. Also, if all trails participate in FMSS (or related system), this is duplicate work and a waste of resources.	Eliminate costs as attributes.	Rejected	Agencies are required to track and report costs. Summarized costs by trail have been identified as a data need by the Federal Interagency Council on Trails. Including cost attributes in the FTDS facilitates the compilation of costs that can be used for a variety of purposes (refer to Appendix C Frequently Asked Question 16). The FTDS cost attributes identify summarized agency cost by trail, not by sub-segment. The FTDS is not intended to define the design or implementation of a geospatial model (refer to Appendix C Frequently Asked Question 4 and 5). An agency-specific geospatial model implementation, for example, could have a related cost table associated to it. Additionally, trail management agencies do not all use one database, but rather a variety of databases (refer to Appendix C Frequently Asked Question 15).	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
	[23]	3.2.2	ITDS Data Parameters							
	[31-32]	3.3	ITDS Attributes							
15	[17] [18]	3.1	ITDS Attribute Overview NHT NST VISITOR CENTER NAME VISITOR FACILITY TYPE	General	The Data Parameters table following line 329 suggests that the Standard Feature Type for data is line. NHT NST VISITOR CENTER NAME & VISITOR FACILITY TYPE would best be represented as points not lines.	Eliminate NHT NST VISITOR CENTER NAME & VISITOR FACILITY TYPE from attributes. Or, note on the Data Parameters table and in the "notes" field of table 3.3 that these two attributes should have a point feature type.		<b>Accepted in Principle.</b> Table 3.2.2 has been modified to include a column identifying Feature Type with values of Line, Point, or Polygon.	Edits made to LOV tab of FTDS spreadsheet and corresponding PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
	[25] [27]	3.2.2	ITDS Data Parameters NHT NST VISITOR CENTER NAME VISITOR FACILITY TYPE							
	[36] [58]	3.3	ITDS Attributes NHT NST VISITOR CENTER NAME VISITOR FACILITY TYPE							
	[20]	329 [after line 330]	Generally-Applicable Data Parameters <b>Feature Type</b>							
16	[13]	3.1	ITDS Attribute Overview TRAIL NUMBER	General	Where do we go to find the TRAIL NUMBER? This attribute cannot be null, but we are unaware of any number assigned to the Ice Age National Scenic Trail (IANST).	Allow TRAIL NUMBER to be null or eliminate the attribute.	Rejected	The Trail Number attribute is used as a primary identifier (along with the Admin Org and Managing Org) to identify a specific trail. Trail numbers are or will be determined by managing agencies or entities.	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
	[27]	3.2.2	ITDS Data Parameters TRAIL NUMBER							
	[55]	3.3	ITDS Attributes TRAIL NUMBER							

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17	[14] [14] [16] [14]	3.1	ITDS Attribute Overview CONGRESSIONAL DISTRICT COUNTY RIGHTS-OF-WAY STATE	General	CONGRESSIONAL DISTRICT, COUNTY, RIGHTS-OF-WAY, and STATE attributes are best kept in their own polygon layers and then intersected with the trail line if/when mileage data are needed. Keeping these attributes in a line feature (the Standard Feature Type as indicated in table following line 329) will result in unnecessary segmentation and duplication of update efforts when districts, leases, or easements change.	Remove CONGRESSIONAL DISTRICT, COUNTY, RIGHTS-OF-WAY, and STATE from attributes.	Rejected	This comment describes the implementation of a potential system. The FTDS are not intended to define a data model or database, but rather are intended to define a core set of data attributes that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems (refer to Appendix C Frequently Asked Questions 1, 2, 4 and 5). The core standards will be implemented and data provided based on agency priorities and budgets (Line 279). These data attributes have been identified as necessary to answer Core Questions (Section 2.3.5) identified by the Federal Interagency Council on Trails. As indicated in Appendix C Frequently Asked Question #19a and 19b, these attributes do not necessarily need to be identified or populated as static segments. Depending on agency data capabilities, several attributes can be derived via the overlay of spatial polygons.	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
	[23] [24] [26] [26]	3.2.2	ITDS Data Parameters CONGRESSIONAL DISTRICT COUNTY RIGHTS-OF-WAY STATE							
	[30] [32] [51] [54]	3.3	ITDS Attributes CONGRESSIONAL DISTRICT COUNTY RIGHTS-OF-WAY STATE							
	[20]	329 [after line 330]	Generally Applicable Data Parameters <b>Feature Type</b>							
18	[27] [see also 58-60 ?]	3.2.2	ITDS Data Parameters VISITOR FACILITY TYPE	General	VISITOR FACILITY TYPE - may run out of space if multiple LOVs are listed	Increase LOV Width to at least 100.	Rejected	The LOV width identifies the space provided for each identified value from the list of values (not the total space provided). None of the standardized values identified for this attribute exceed 50 characters.	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
19	[28]	3.2.2	ITDS Data Parameters Footnotes	General	"LOV Unique or Not Unique" definition is missing from table 3.2.2.	Define field name of "LOV Unique or Not Unique" as done following Table 3.3.	Accepted in Principle	Table 3.2.2 has been modified to include a definition for "LOV Unique or not Unique" in the footnote section for this table. Similarly, the footnote section of Table 3.3 has been modified to only reflect column headings displayed in that table.	Edits made to both tables in FTDS Publ to include footnotes from spreadsheet and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
20	[26]	3.2.2	ITDS Data Parameters TRAIL SYSTEM	General	TRAIL SYSTEM - IANST is a Federal and State Trail and also shares the route of local trails, yet no overlap of attributes is allowed. How should we populate this field when there may be 3 values for one trail segment?	Allow multiple entries.	Rejected	The FTDS attributes are identified for each applicable trail segment by the managing agency or entity. On long distance trails, the Trail System attribute changes along the route and should be recorded accordingly. For example, the Trail System may be State Government Trail for one segment, then National Forest System Trail for another segment, etc. There can only be one Trail System identified per segment. If the Ice Age NST overlaps a portion of another local trail, each trail would be recorded as individual routes and the Shared System attribute would be populated to indicate the overlap in mileage. Refer to Appendix C Frequently Asked Question 20. Although the FTDS do not define a particular data model, in a GIS model, multiple overlapping routes (as described in this example) could be displayed as a single line.	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
21	[34] [32-33]	3.3	ITDS Attributes MANAGED USE DESIGNED USE	General	MANAGED USE and DESIGNED USE - IANST has some certified segments where the trail is on a public road. In these instances, the managed use or designed use would be an automobile, which is not listed in the LOVs.	Add "automobile" to LOVs for Managed Use and Designed use.	Rejected	National Scenic Trails are not managed for automobile use. In this example, the segment of IANST is likely managed and/or designed for the trail uses of Hiker/Pedestrian, Pack and Saddle, or Bicycle. As a road, this route is also likely designed and managed for road uses of Highway Vehicle or other subsets of road use. The trail uses are recorded under the FTDS attributes of Managed Use and Designed Use (while the road uses are likely recorded in agency road data sets). On the trail segments which also overlap a road, the FTDS attribute Shared System should also be identified with the value "Road" selected to indicate that this trail overlaps or occurs concurrently with the road.		Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008

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22	[starting on 31]	3.3	ITDS Attributes	General	Some attributes are listed as "populate only if applicable." It would be better to populate with "NA" if not applicable rather than leave it blank so data does not look incomplete.	Add value of "NA" to all attributes that need to only be populated of applicable. Remove text stating "populate only if applicable."	Rejected	Agency data specialists have determined the overhead for default-setting or manually populating numerous attributes with NA and subsequently storing that data is less efficient than only requiring data entry/validation where applicable. Additionally, a concern was raised that "NA" would potentially be over-used and/or result in invalid data entry.	No follow-up needed	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
23	[26]	3.2.2	ITDS Data Parameters PROHIBITED USE	General	PROHIBITED USE - If all motorized vehicles are prohibited, would just the LOV of "1" be entered or do all the subsets (1.1, 1.1.1, 1.1.2, etc.) need to be entered? Clarify in Notes. May run out of space if multiple LOVs are listed.	Add to notes field: If all subclasses of a use are prohibited, only the main LOV needs to be entered. For example, just enter "1" if all motorized vehicles are prohibited.	Accepted as Submitted	Clarifier has been added to Table 3.3 Notes section for this attribute.	Added clarifier to FTDS spreadsheet Notes and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
	[46-51]	3.3	ITDS Attributes							
24		3.3	ITDS Attributes	General	PROHIBITED USE - what exactly is the definition of "official legal order?" Does it need to be federal or do state or local regulations also qualify?	Clarify definition of "official legal order" in the notes field to include federal and non-federal regulations.	Accepted in Principle	Clarifier regarding non-federal regulations has been added to Table 3.3 LOV Definition section for this attribute.	Added clarifier to applicable LOV definitions in FTDS spreadsheet and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
25	[62-63]	430-439 [431-440]		General	This may be a moot point as the note suggests this section will be updated. However, by having multiple records where trail types overlap, an inflated number of miles for the trail can occur when pulling statistics from the data.	Remove text relating to "trail type" from Appendix A since "trail type" is not currently an attribute.	Rejected	The attribute Trail Type was inadvertently excluded from the FTDS attribute list, although it was explained in Appendix A. This has been corrected and Trail Type has been added to the FTDS attributes and list of values.	Edited tables 3.1, 3.2.2 and 3.3 to include Trail Type and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
26	[95]	973 [974]		Editorial	missing the word "be" in sentence	... described in a manner that will clearly be understood and...	Accepted as Submitted	Correction has been incorporated.	Edit made master copy of Appendix C and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
27	[114]	1177 [1178]		Editorial	missing comma after "Arizona"	...meet in Phoenix, Arizona, to draft a charter...	Accepted as Submitted	Correction has been incorporated.	Edit made master copy of Appendix E and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
28	[115]	1202 [1203]		Editorial	missing comma after "Arizona"	...Team meets in Phoenix, Arizona, in July 2003...	Accepted as Submitted	Correction has been incorporated.	Edit made master copy of Appendix E and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
29	[115]	1214 [1215]		Editorial	missing comma after "Colorado"	...Team meets in Denver, Colorado, in July 2004...	Accepted as Submitted	Correction has been incorporated.	Edit made master copy of Appendix E and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008
30	[116]	1225 [1226]		Editorial	missing comma after "Alaska"	...team meet in Anchorage, Alaska, in September...	Accepted as Submitted	<b>Accepted as Submitted.</b> Correction has been incorporated.	Edit made master copy of Appendix E and associated PDF.	Tiffany Stram Ice Age Park & Trail Foundation 8/4/2008

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31	65 [64]	527 [528]		General	Comment obtained during development of a local database. Cyclists prefer to know what type of bike a trail is designed for: on-road or off-road. In our database this distinction is made.	Create 2 classifications for cycling in Designed Use list	Rejected	<b>Rejected.</b> At this level, the values for Managed Use and Designed Use are somewhat general in nature. For example, the value "Pack and Saddle" does not differentiate between saddle stock or pack strings and "Motorcycle" does not differentiate between street-legal motorcycles and off-highway motorcycles. The level of specifics suggested by the commentor are addressed under agency-specific technical specifications or design parameters which identify specific tolerances for trail grade, width, surface obstacles, etc.	No follow-up needed	Susan Pulsipher North Carolina Dept of Commerce
32	100 [99]	Number 19 [starting at line 1068]		General	Does not say if these segmentation rules match with rules used by USGS for GNIS. Be helpful if names of trail segments and segments all matched up.	State whether two sets of rules are compatible.	Rejected	Response from GNIS Committee Member Bob Bewley (BLM) indicate the following: Trail names are established by a variety of sources including Congress, federal and local agencies, and trail advocates. The managing agency is the most knowledgeable authority for determining the official or legal trail name. The implication of changing trail names can be many and costly, including changing maps, signage, decision documents, etc.	No follow-up needed	Susan Pulsipher North Carolina Dept of Commerce
33	6	217 [218]		Technical	The definition focuses upon our modern uses of these linear items not the historic uses which generated them. This appears to be a deficiency.	If we are to stick with such a definition then it would make sense to include a reference to the division of trails into those which are authentic (existing traces due to past activities) and those which are commemorative (expedient routes lacking true features from past activity) in nature. The Oregon Trail generally is authentic while the Lewis and Clark Trail is commemorative for most of its length.	Rejected	<b>Rejected.</b> The Interagency definition of a trail (Lines 221 - 233) specifically references linear routes managed for "historic or heritage values." The expanded definition refers to "prehistoric and historic sites" that are both existing and more virtual in nature. The expanded definition also references the categories of NHT <sup>1</sup> , NHT <sup>2</sup> and NHT <sup>3</sup> as well as the extensive discussion on NHT Condition Categories.	No follow-up needed	Terry Del Bene BLM
34	6 [7]	221 [222]		Editorial		"stock" to "livestock"	Rejected	<b>Rejected.</b> Stock as used in the interagency definition of a Trail generally refers to pack and saddle animals (e.g. horses, mules, llamas, etc). Livestock is a broader category which also includes cattle, sheep, and other animals typically raised on a farm.	No follow-up needed	Terry Del Bene BLM
35	8	247 [248]		General		Instead of lumping all but a few trails into the "Regular" category it might be of utility to recognize all forms of Federal trail designations (National Register listings, National Historic Landmarks, etc. "Other Trail" would seem more accurate than "Regular Trail."	Rejected	<b>Rejected.</b> The Trail Codes (Line 247 - 253), including "Reg. Trail" are general groupings used to better understand the application of the FTDS. They are not official categories or data attributes. The FTDS is a formalization of the Interagency Trail Data Standard which was adopted by the NPS, BLM, FWS and USFS in 2003 and which includes the term "Regular Trail." The congressional designations of NST and NHT are major trail designations. The FTDS also include attributes for National Register of Historic Places Property Category (i.e. Historic Landscape, Site) and Special Management Area (i.e. National Historic Landmark, National Monument). See Table 3.3.	No follow-up needed	Terry Del Bene BLM
36	9	271 [272]		General	The adoption of "standard attributes" between agencies will not work unless the agencies commit to standard definitions and training as to how to classify trails and apply definitions.		Accepted in Principle	<b>Accepted in Principle.</b> This is the intent of the FTDS.	No follow-up needed	Terry Del Bene BLM

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37	9	276 [277]		General	Field verification is critical for an inter-agency data base. The current state of field verification between agencies and offices is extremely variable. Many data bases have incomplete and inaccurate information. It is good that this need is recognized but it should be the <i>Sine' qua non</i> of the system.		Accepted in Principle	<b>Accepted in Principle.</b>	No follow-up needed	Terry Del Bene BLM
38	11	305 [306]	ITDS Core Trail Questions	Technical	Trail condition varies significantly as do management, surface, national designations, etc. It is not clear how the broad variations in each of these independent variables affects the need for separate classification of segments. That is, if a segment changes in one or more of these variables does it become a new segment? If it does each managing office may be responsible for keeping separate data records for hundreds or even thousands of segments.		Rejected	<b>Rejected.</b> As explained in Appendix C Frequently Asked Questions 19a and 19b, it is not necessary or productive to identify unique or multiple static segments within a trail. Using the FTDS, identification of these changing variables can be addressed through dynamic segmentation.	No follow-up needed	Terry Del Bene BLM
39	11	306 [307]	ITDS Core Trail Questions	Technical	Sites associated with the NHT route cannot be so easily dismissed from the corridor. In essence this section appears to indicate that trail graves outside the ruts will not be subject to tracking of the core questions, even those which clearly apply.	It might be worth reconsidering this.	Rejected	<b>Rejected.</b> The footnote referenced in Line 306 refers to the Core Question "What is the total trail length? (in miles)" As explained in the footnote, the trail length is applicable to the associated NHT heritage resource route or NHT recreation/interpretive route. While historic sites are commonly associated with NHTs, these sites are not generally recorded in terms of trail length.	No follow-up needed	Terry Del Bene BLM
40	13	313 [314]	ITDS Attribute Overview TRAIL STATUS	Editorial		Strike "of being"	Rejected	<b>Rejected.</b> The FTDS is a formalization of the Interagency Trail Data Standard which was adopted by the NPS, BLM, FWS and USFS in 2003, including the attribute and definition for Trail Status. There is not sufficient clarity gained by the proposed edit to warrant the change in agency data sets.	No follow-up needed	Terry Del Bene BLM
41	17	318 [319]	ITDS Attribute Overview NHT NST VISITOR CENTER NAME	General	Visitor centers come and go. It makes little sense to track this variable. We have far more interpretive sites than visitor centers.		Rejected	<b>Rejected.</b> Per the definition for this attribute, it is aimed only at identifying those visitor centers developed specifically to provide NHT or NST-related information and interpretation. The Federal Interagency Council on Trails specified a need for this information.	No follow-up needed	Terry Del Bene BLM
42	18	319 [320]	ITDS Attribute Overview	General	There are a variety of variables listed here such as "Type of Route", Type of Site, NHT Condition Category, etc. which require clear definition as to what "types", "categories", "uses", etc. are proper responses. This is the crux of being able to share comparable information. Additionally there are visitor facilities associated with Regular Trails and Historic Resources which should be considered if we're going to keep that information		Rejected Rejected	<b>Rejected.</b> <b>1.</b> Table 3.3 provides definitions and applicable lists of values for each attribute. Appendix B provides detailed descriptions of NHT Condition Categories. <b>2.</b> The FTDS attributes are the core set of data determined necessary to address the Interagency Core Questions (Section 2.3.5). Individual agencies and entities can and should expand upon these core attributes to meet additional agency-specific information needs.	No follow-up needed	Terry Del Bene BLM
43	20	329 [330]	Generally Applicable Data Parameters <b>Spatial Data Source</b>	Technical	The acceptance of 1:24000 and 1:63,360 scales as our targets is tied to paper map systems. With G.I.S. we easily can function with more accurate scales, such as 1:5,000 or even better.		Accepted in Principle	<b>Accepted in Principle.</b> 1:24,000 and 1:63,360 are identified as the <u>minimally</u> acceptable mapping standard. Individual agencies may exceed the minimal scale as determined appropriate or feasible.	No follow-up needed	Terry Del Bene BLM
44	21	334	Attribute-Specific Data Parameters <b>Width</b>	Technical	Width of trail varies, often significantly within a few meters traveled along a trail. We'll need guidance as to how to sample for this variable. In the back of the document it suggests that width was abandoned as too specific. That is inconsistent with its inclusion here.		Rejected	<b>Rejected.</b> The Data Parameter Width (Line 333) refers to a database field width (i.e. the number of characters allowed in the data field), not the actual width of a trail.	No follow-up needed	Terry Del Bene BLM

Comment No.	Page(s)	Section or Line #	Table Name and/or Attribute Name ----- Quote	Type of Comment	Comment	Proposed Change	Resolution	Resolution Explanation	Type of Follow-up	Commenter
45	27	354	ITDS Data Parameters TRAIL CLASS TRAIL CONDITION	General	Since trail class and condition can vary in very short distances of trail traveled perhaps multiple entries should be allowed for these.		Rejected	<b>Rejected.</b> Only one Trail Class or one Trail Condition can be identified at any one location. As these values change along a trail, the changing value is recorded by beginning and ending measure point. Refer to Appendix C Frequently Asked Questions 19a, 19b, and 20.	No follow-up needed	Terry Del Bene BLM
46	34 [33]	366	ITDS Attributes JURISDICTION ?	General	Instead of having separate variables for National Park Service and Other Federal Agency perhaps it would be more efficient to have one variable which names the Federal Agency.		Rejected	<b>Rejected.</b> The Jurisdiction attribute provides a list of values that identifies each major federal agency with trail management responsibilities in alphabetical order. The list also includes an additional value of "Other Federal Agency" for any remaining federal agencies not listed.	No follow-up needed	Terry Del Bene BLM
47	48 [48-49]	381	ITDS Attributes PROHIBITED USE	Technical	It is unclear why the list of values differentiates between use by horse/mule, llama, and other pack stock. Further, we have wild horses using trail segments. Do they count as "domestic" stock?		Rejected	<b>Rejected.</b> The list of values identifies those uses or subsets of uses that are commonly prohibited on agency-managed trails. Wild horses are more comparable to wildlife in this context and are not a trail use that would be prohibited.	No follow-up needed	Terry Del Bene BLM
48	49	382	ITDS Attributes PROHIBITED USE	General	Why not lump cattle, sheep/goat, and other animals?		Rejected	<b>Rejected.</b> The list of values identifies those uses or subsets of uses that are commonly prohibited on agency-managed trails. As applicable, these prohibited uses can be identified as a "lumped" value such as Livestock or an individual value such as Cattle.	No follow-up needed	Terry Del Bene BLM
49	57	390	ITDS Attributes TYPE OF SITE	Technical	Would the presence of an "Archaeological Area" be protected information?		Accepted in Principle	<b>Accepted in Principle.</b> Yes, data regarding heritage or cultural resources is considered sensitive data and is protected by law. A clarification to this effect has been added to Section 1.3.	Added to FTDS Publication section 1.3: "Sensitive or protected data is subject to agency regulations, policy, and protocols."	Terry Del Bene BLM
50	58	391	ITDS Attributes VISITOR FACILITY TYPE	Technical	Would the presence of an "Archaeological Area" and "Historic Area" be protected information?		Accepted in Principle	<b>Accepted in Principle.</b> Yes, data regarding heritage or cultural resources is considered sensitive data and is protected by law. A clarification to this effect has been added to Section 1.3.	Added to FTDS Publication section 1.3: "Sensitive or protected data is subject to agency regulations, policy, and protocols."	Terry Del Bene BLM
51	63	466ff		General		The use of tables to lay out the trail types and classes would be of utility. Few long segments have only one trail class and/or type making a table a facile manner in which to present the comparative occurrence of these variables.	Rejected	<b>Rejected.</b> 1. References to Trail Type has been dropped from Appendix A. (Trail Type refers to an attribute used by the Forest Service, but not all 4 federal agencies). Note: Per phone conversation with Commentor, determined this comment was referring to data tables.	No follow-up needed	Terry Del Bene BLM
							Rejected	<b>Rejected.</b> 2. This comment describes the implementation of a potential system. The FTDS do not define a particular database or data structure, but are intended to define a core set of data attributes that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems. Refer to Appendix C Frequently Asked Questions 1, 2, 4 and 5.		

Comment No.	Page(s)	Section or Line #	Table Name and/or Attribute Name ----- Quote	Type of Comment	Comment	Proposed Change	Resolution	Resolution Explanation	Type of Follow-up	Commenter
52	73	549		Technical	The distinctions between NHTs and "Regular" trails based upon multiple linear routes is a spurious one. The only distinction in the designation as a NHT. The Cherokee Trail (regular) has three widely separated linear routes through Wyoming, while the Pony Express and Nez Perce NHTs have but a single route.		Rejected	<b>Rejected.</b> The FTDS does not base the distinction between NHTs and "regular trails" on the existence of multiple routes. NHTs are designated by Congress, which is a primary differentiation between NHTs and "regular trails." The expanded discussion in Appendix B regarding the NHT Corridor Concept is intended to provide additional clarification regarding multiple aspects of NHTs. Lines 550 - 552 of Appendix B explain that NHTs are not usually managed as one linear route and that it can be "helpful to consider each NHT as an unofficial, informal 'corridor', rather than a single line on a map."	No follow-up needed	Terry Del Bene BLM
53	74	569ff		Technical	If corridors are not intended to imply boundaries, what are they intended to imply?		Rejected	<b>Rejected.</b> As explained in Appendix B, "it is important to note that 'corridor' is used here as an unofficial descriptive concept, and not intended to imply the existence of actual area boundaries" (Lines 569 - 571). The corridor concept is an adjustable, unofficial delineation which can be expanded or contracted as needed to incorporate and communicate NHT thematically related trail resources.	No follow-up needed	Terry Del Bene BLM
54	76	609		Technical	The concept of a trail looking like it did during its period of "maximum historic importance" is going to be highly subjective and require substantial explanation. For example, the Oregon Trail (used for decades) went through a variety of changes from a faint track to being as wide as a modern four-lane highway in places. Does the fact that it no longer is littered with wagon train debris, carcasses of animals, oxen drool, feces, and graves indicate that its condition is not very good? In the thirty-five years of the main wagon and mule train use of the Oregon Trail how do we define that time of "maximum historic importance"?		Beyond Scope	<b>Beyond Scope.</b> 1. The NHT Condition Categories were developed by an interagency team of archaeologists, NHT administrators, and trail managers. The application of the NHT Condition Categories is dependent upon the responsible and consistent application of these categories by trained personnel. There is an inherent potential for subjectivity in the application of these categories, therefore necessitating peer review and "leveling" between specialists and agencies.	No follow-up needed	Terry Del Bene BLM
							Beyond Scope	2. The period of "maximum historic importance" for each NHT is specified in the Comprehensive Management Plan for each NHT.		
55	78	649ff [650ff]		Technical	What are the forms of "visible, on-the-ground evidence of the travel" that define a trace? Are these changes in surface conformation, vegetation, lines seen on aerial imagery? The current definition is unusable in a consistent fashion.		Rejected	"Visible, on-the-ground evidence" (Line 649 -650) refers to ground-truthed evidence that is visible on-site. While aerial imagery and remote sensing data may support the identification of this evidence, they are not a substitute for "visible, on-the-ground evidence."	No follow-up needed	Terry Del Bene BLM
56	78	655		Technical	Why are archaeological manifestations associated with the trail system, not part of the trail?		Rejected	The concept of "Visible Trail Remnant" refers to remaining physical evidence of the actual trail or use route. This concept is not intended to refer to associated archeological sites or features that are not directly part of the trail.	No follow-up needed	Terry Del Bene BLM
57	80 [79]	668 [669]		Technical	The word "essence" needs definition if multiple researchers and managers are to use this in a similar fashion.		Rejected	"Essence" is defined as the basic, real, and invariable nature of a thing or its significant individual feature or features. Utilization of this concept is dependent on logical application by trained specialists, and subject to peer review and "leveling" between specialists and agencies.	No follow-up needed	Terry Del Bene BLM
58	80 [81]	713 [714]		Technical	Flat-blading can be an impermanent effect. We have documented instances of mechanically disturbed trails which returned to the recognizable trail conformation in about a decade. We have other instances where damaged trails were put back into trail conformation as part of project mitigation.		(Duplicate Comment)	[NOTE: Per phone conversation with Commentor, determined this is a duplicate of comment 59]	No follow-up needed	Terry Del Bene BLM

Comment No.	Page(s)	Section or Line #	Table Name and/or Attribute Name ----- Quote	Type of Comment	Comment	Proposed Change	Resolution	Resolution Explanation	Type of Follow-up	Commenter
59	82 [81]	713 [714]		Technical	Flat-blading can be an impermanent effect. We have documented instances of mechanically disturbed trails which returned to the recognizable trail conformation in about a decade. We have other instances where damaged trails were put back into trail conformation as part of project mitigation.		Rejected	The NHT condition category reflects what exists on the ground at the time the surveyor is doing the assessment. Once a trail has been bladed and ditched, it has been permanently altered and is considered Category IV and will not revert to Category I. If Category IV trail is subsequently restored, the Condition Class may be potentially be changed to Category VI based on this manipulation.	No follow-up needed	Terry Del Bene BLM
60	95 [94]	944 [945]		General	In essence the application of a new classification system outside our current SHPO-driven data base does require us to create a new data base.		Rejected	The FTDS does not require the creation of a new database, but rather identifies and defines a standardized core set of data attributes that can be incorporated into existing, modified, expanded, or new agency databases. For example, BLM's trail database is FAMS which currently incorporates the majority of the FTDS.	No follow-up needed	Terry Del Bene BLM
61	96 [97]	960		Technical	If the definitions used to classify trails are not explicit and there is no training on how to consistently use the classification system, the public will get more confused as they will visit trails with widely varying conditions which are labeled identically.		Accepted in Principle	Consistent application of these definitions and concepts is dependent upon clear definitions, training, peer review and "leveling" between agencies and specialists. Publication of these standards by the Federal Interagency Council on Trails, the FGDC, and on the interagency FTDS website ( <a href="http://www.nps.gov/gis/trails">http://www.nps.gov/gis/trails</a> ) are important steps in this direction.	No follow-up needed	Terry Del Bene BLM
62	98	1023ff [1024ff]		Technical	Feet and miles are part of the "English" system of measurement. It might be appropriate to use that terminology here.		Rejected	The units of miles and feet are self-explanatory.	No follow-up needed	Terry Del Bene BLM
63	24	345 [346]	ITDS Data Parameters COUNTY	General	"County" One trail may weave across the county line several times over a short distance. It would be pointless to break a 5 mile trail into 4 sections (some of which may be a few hundred feet in distance) in order to assign only one county to each section. See comment NPS-Rudacille-7 for more details.	<b>County attribute should allow multiple entries;</b> not be limited to no overlap	Rejected	The FTDS is predicated on an acceptable level of data accuracy, including for example, the ability to be able to accurately indicate the miles of trail falling within a certain County. A specific segment of trail can only fall within a single County at any given point. Refer to Appendix C Frequently Asked Question 20.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP
64	24	346	ITDS Data Parameters MOTORIZED PROHIBITED	General	"Motorized Prohibited" Most of our wilderness trails have at least one end in the non-wilderness, therefore chainsaws and other motorized equipment are allowed on a portion of the trail, but not in the portion that is designated wilderness. Some trails enter and then later leave the wilderness. Not allowing an overlap in the attribute would require either doubling our number of trails by segmenting yet again, or more likely by either marking the attribute yes or no by whichever length (motorized allowed or prohibited) is greatest, or only listing 100% wilderness trails as motorized prohibited, which would indicate 14 wilderness trails in SNP, even though 78 of our trails go through designated wilderness. See comment 7 for details.	Motorized Prohibited attribute should at least allow 3 choices: "yes", "no", and "both" to indicate that motorized use is prohibited year-round on sections of the trails, but is allowed on other sections of the trail.  Ideally the change would be to input a <b>length for Motorized Prohibited instead of a yes/no</b> . The LOV would be a number, just like the Trail Length attribute, where we would enter the length of the trail on which motorized use is prohibited year-round. This information would be much more useful than a simple and inaccurate "yes/no". For many of our trails the Trail Length and Motorized Prohibited Length would be different (perhaps 6.2 miles in Trail Length with 3.8 miles on which motorized use is prohibited). It wouldn't take much additional space to type the length, but would be vastly more accurate.	Rejected	The FTDS accommodates changing values for any one data attribute as the values change along the length of a trail. The change in Motorized Prohibited along a trail as it occurs outside of and within wilderness is a good example. Refer to Appendix C Frequently Asked Questions 19a and 19b.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP

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Comment No.	Page(s)	Section or Line #	Table Name and/or Attribute Name ----- Quote	Type of Comment	Comment	Proposed Change	Resolution	Resolution Explanation	Type of Follow-up	Commenter
65	26	352	ITDS Data Parameters ROAD SYSTEM	General	"Road System" First let me say that this is an excellent attribute to include. However, this attribute should also allow overlap. SNP has a number of trails following old roadways that are on a National Park Service System Road, then a private road, then a country or state road as well. See comment NPS-Rudacille-7 for more details.	Road system attribute should allow multiple entries; not be limited to no overlap.	Rejected	A trail can occur along only one road at any given location, therefore only one value for Road System is allowed for any specific section of trail. The FTDS accommodate changing values for any one data attribute as the values change along the length of a trail. Refer to Appendix C Frequently Asked Questions 19a, 19b, and 20.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP
66	46	379	ITDS Attributes PROHIBITED USE	Editorial	I'm assuming this would be the place to indicate our illegal trails, built and/or maintained without permission. For LOV 0, "All Traffic" using "traffic" rather than "use" in the definition is confusing.	Change All TrafficLOV attribute code definition to "All types of motorized and non-motorized use"	Rejected	The ITDS definition of a trail is "a linear route <u>managed</u> for human-powered, stock, or off-highway vehicle (OHV) forms of transportation..." (Section 2.31). Inclusion of the word "managed" is intentional -- indicating management intent for the design, maintenance and/or provision of the trail. Illegally-developed routes do not meet this definition. The definition of the FTDS attribute Prohibited Use is the "mode of travel prohibited by official legal order" on a trail (Table 3.3, Line 379). FTDS attributes refer to routes meeting the FTDS definition of a trail, not illegal routes. Refer to individual agency data protocols regarding illegal or unauthorized routes.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP
67	54	387	ITDS Attributes TRAIL CLASS	General	Trail Class should include illegal or "excess" trails where the intended design and management is to restrict/close access and rehabilitate the trail. See below	<b>Add a trail class: "TC0 – Rehabilitate, close to use"</b>	Rejected	The ITDS definition of a trail is "a linear route managed for human-powered, stock, or off-highway vehicle (OHV) forms of transportation..." (Section 2.31). Inclusion of the word "managed" is intentional -- indicating management intent for the design, maintenance and/or provision of the trail. Illegally-developed routes do not meet this definition. The definition of the FTDS attribute Trail Class is the "the prescribed scale of trail development, representing the intended design and management standards of a trail" (Table 3.3, Line 387). FTDS attributes refer to routes meeting the FTDS definition of a trail, not illegal routes. Refer to individual agency data protocols regarding illegal or unauthorized routes.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP
68	54	387	ITDS Attributes TRAIL CONDITION	General	Trail Condition Attribute should include needing to restrict access and rehabilitate the trail. Sometimes this occurs with illegally established trails, other times with trails that can no longer be maintained, or are causing detrimental impacts. Existing trails can be there for many years despite an intent or attempt to remove, so this is not a temporary category	<b>Add a trail condition : "Condition F – Close, restrict, remove, and/or rehabilitate the trail"</b>	Rejected	The FTDS are intended to be applied to managed trails, including ones that are temporarily closed or that have been decommissioned. The FTDS are not intended to be applied to illegal or unauthorized routes (see Section 2.31, FTDS definition of a trail). Assuming the example provided by the commentor refers to a managed trail, the condition described falls within FTDS Trail Condition D. This Condition is defined as "Trail is not functional or serving the purpose for which it is intended; requires replacement or decommission to meet agency standard" (Table 3.3, Line 388).	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP
69	Entire	Entire		General	Overall this will be a great tool. My ongoing concern is with "over-segmenting" the trails. We have already divided our trails by managed use creating a number of additional trail assets, but to also divide by Congressional District, County, Wilderness (motorized prohibited), and Road System would result in virtually every trail we have being broken into 2 to 10 additional segments. At Shenandoah National Park we are struggling to manage costs, deferred maintenance and other data with "only" 300 trails and trail segments to track. Dividing those trails yet further is simply not an option.	Allow more multiple entries to avoid segmenting trails unnecessarily.	Rejected	Refer to Appendix C Frequently Asked Questions 19a, 19b and 20. The FTDS can be applied without the creation of multiple static segments for any given trail. Recording the values for any given FTDS attribute by beginning and ending measure point along the trail, combined with the GIS capability of dynamic segmentation allows for efficient and accurate data entry and output needed to meet a variety of information needs.	No follow-up needed	Melissa Rudacille NPS - Shenandoah NP

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70	--	--		--	<p>I looked at the trails standard a few weeks ago. It looks good for federal trail managers and their respective agency business needs. In that sense, I think you have solved the problem well.</p> <p>At the same the TDM is far too complicated for the average city, county, or recreational users to use and contribute to the overall data store. I recommend that a "Trails-light" standard be put together for both publishing a simplified version of the master databases to a public mapping audience and for use as a template in which local level government can compile and contribute basic trail geometry and attribute data.</p>		Rejected	The FTDS do not define a particular database or data structure, but are intended to define a core set of data attributes that can be used by multiple entities for a variety of purposes, implemented in a variety of tabular and spatial systems (refer to Appendix C Frequently Asked Questions 1, 2, 4 and 5). The FTDS identify and define a core set of data attributes needed to answer a set of commonly asked or Core Questions. It is likely that these attributes are applicable to many or most State and other agency trails. As indicated in Line 279, the FTDS will be implemented and data provided based on (individual) agency priorities and budgets. This may include a prioritized approach to data requirements and population.	No follow-up needed	Dennis Goreham Utah AGRC

**FGDC Review Terminology**

- accepted as submitted (AAS)
- accepted in principle (AIP)
- rejected as submitted (RAS)
- beyond scope
- no longer necessary (NLN)
- no longer applicable (NLA)