



*Protecting and restoring forests on New England's public lands
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July 4, 2025

James Innes, District Ranger
USDA Forest Service, Saco Ranger District
33 Kancamagus Highway
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Re: Webster Cliff Trail Relocation and Project-Specific Forest Plan Amendment #67593;
submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=67593>

Dear Ranger Innes,

Standing Trees submits the following comments regarding the U.S. Forest Service's Draft Environmental Assessment and Preliminary Finding of No Significant Impact (DEA) for the Webster Cliff Trail Relocation and Project-Specific Forest Plan Amendment #67593 ("Project") located in the White Mountain National Forest (WMNF) in the Saco Ranger District. This comment incorporates by reference the scoping comments that were previously submitted by Standing Trees and Wilderness Watch on this same project, as well as on the previous version of this project (Wilderness Standard Forest Plan Amendment-Trail Management #63551).

Introduction

Standing Trees is an incorporated nonprofit dedicated to advancing policy and legal solutions that protect and restore New England's native forests. Standing Trees seeks to hold state and federal agencies accountable for their actions that affect forests, and to ensure that land-managers and policymakers follow the latest climate and biodiversity science. Standing Trees members regularly recreate in the WMNF, including on the Appalachian Trail segment impacted by this Project.

We are grateful to the Forest Service for hosting a day in the field with Standing Trees, the Appalachian Mountain Club (AMC), and the Appalachian Trail Conservancy (ATC). This site visit was an excellent opportunity to strengthen relationships and build shared knowledge of issues on the ground. We agree that the Appalachian Trail through the Project Area is in poor condition and is not serving the public or the Presidential Range-Dry River Wilderness well.

We also want to applaud the Forest Service for choosing to:

- a) pursue a project-specific Forest Plan amendment instead of a forest-wide Forest Plan amendment;
- b) review the project with an Environmental Assessment rather than a Categorical Exclusion under the National Environmental Policy Act (NEPA).

As mentioned above, we agree that the Appalachian Trail is currently in poor condition through the Project Area. We are inclined to agree that the Proposed Action is a reasonable Alternative for detailed consideration, but we are not yet convinced that the Proposed Action is the most appropriate solution, much less the *only viable* solution, as is claimed by the Forest Service (DEA at 4). The bare-bones DEA suffers from similar deficiencies that we have observed in the EAs for other projects in recent years (Tarleton IRP, Peabody West IRP, Sandwich VMP, etc.). Among other areas that need improvement, the DEA's Purpose and Need appears to be arbitrarily limiting, the DEA fails to explore *any* Alternatives, and the DEA contains other errors that call into question the quality of this project review process.

Purpose and Need is confusing and contradicts the Proposed Action

The Purpose and Need states that “The current trail alignment is adjacent to a steep cliff, no other suitable location for the trail is viable. Taking action will surpass worsening sections of erosion in the current trail alignment, creating a more sustainable alignment” (DEA at 4). This statement seems to contradict the Proposed Action, which the Forest Service claims is a suitable and viable relocation of the trail segment. It also appears to be written too narrowly to allow for consideration of an appropriate range of Alternatives. The Purpose and Need presupposes that “a more sustainable alignment” of the existing trail is necessary. A more appropriate Purpose and Need would simply identify the issue (dangerous and unsustainable trail conditions) but not limit the solutions to merely realigning the existing trail.

Alternatives Analysis is limited to one Alternative, in violation of NEPA

The DEA contains no alternatives that were analyzed in detail *except* for the Proposed Action. The Forest Service lists four “Alternatives Considered but Not Analyzed in Detail” (DEA at 4). Can it really be that there isn't a single viable Alternative worthy of detailed exploration? Under NEPA, the Forest Service must evaluate “a reasonable range of alternatives to the proposed agency action . . . that are technically and economically feasible, and meet the purpose and need of the proposal.”¹ The deficient Alternatives analysis seems to be caused – at least in part – by the fact that the Purpose and Need doesn't allow for solutions beyond “creating a more sustainable alignment.”

During our hike to view the Project Area with the Forest Service, AMC, and ATC, we discussed the possibility of rerouting the Appalachian Trail, perhaps (but not necessarily) coupled with the closure of the Webster Cliff Trail. One such Appalachian Trail reroute could extend from Zealand Falls Hut to Crawford Notch/AMC Highland Center by way of the A-Z Trail and Avalon Trail. From Crawford Notch the Appalachian Trail could be rerouted along Crawford Path to Mizpah Springs Hut, where it would connect with the existing Appalachian Trail.

The above relocation would serve the Purpose and Need of addressing the dangerous and unsustainable trail conditions of the Webster Cliff Trail. It would eliminate any need for a Forest Plan amendment as described in the Proposed Action, reducing impacts to Congressionally-designated Wilderness. And it would also send Appalachian Trail hikers through a location with

¹ 42 U.S.C. § 4332(C)(iii)

significant services for hikers (the AMC Highland Center at Crawford Notch), as opposed to the current crossing of US 302 which lacks any services whatsoever, and has limited cell phone reception at best. For through-hikers, such a re-route could make logistics easier and improve safety.

Even if the Alternative reroute of the Appalachian Trail discussed above required trail work, it's possible that it would be less costly than the Proposed Action, and – as described above – it could contain any number of as-yet unexplored benefits.

We imagine there could be other Alternatives worth considering, as well. And the No Action alternative should be thoroughly investigated to establish a baseline from which to compare the Proposed Action and other Alternatives.

Project Biological Evaluation and DEA contain inaccurate and incomplete information

The Project Biological Evaluation (BE) says that the Northern Long-eared Bat is “threatened” (BE at 2) but it is in fact “endangered,” as noted in the DEA on p12. The DEA references “species abstracts” for eight species, but it is not clear what documents are referred to (DEA at 8). Where would one find these abstracts? They are not posted to the project documents folder. There is no link provided, and an internet search for “USDA Forest Service. 2023b. Species abstract – northern long-eared bat” didn’t reveal any documents by that name.

Conclusion

Standing Trees appreciates the Forest Service’s revised approach to this Appalachian Trail relocation project. Major improvements were made between the original Proposed Action in 2023 and the new Proposed Action announced earlier this year.

We believe that the current Proposed Action is a reasonable Alternative for consideration, but it is not the only viable Alternative, and it is far from clear based on the evidence presented that the Proposed Action is the most appropriate solution. We hope that the Final EA will thoroughly explore a No Action Alternative as well as the proposed Alternative discussed earlier in this document (reroute via Crawford Notch), at a minimum.

Thanks for your careful consideration of these comments, and – as always – we welcome additional opportunities to discuss the Project.

Sincerely,



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