

April 2, 2025

Scott Hall, NEPA Specialist
White Mountain National Forest
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Campton, NH 03223

Sent via the Internet: <https://www.fs.usda.gov/project/?project=67593>

Dear Specialist Hall:

These are comments from Wilderness Watch and Standing Trees on the scoping letter for the Webster Cliff Trail relocation and an amendment to the White Mountain National Forest Plan. Wilderness Watch is a national wilderness advocacy organization, headquartered in Missoula, Montana with offices in Idaho, Minnesota, and Vermont. Wilderness Watch is dedicated to the protection and proper administration of the National Wilderness Preservation System. Standing Trees is a grassroots membership organization that works to protect and restore New England's forests, with a focus on state and federal public lands in Vermont and New Hampshire. Standing Trees' members regularly visit the White Mountain National Forest, including the area impacted by the Webster Cliff Trail Relocation and Project-Specific Forest Plan Amendment.

We commend the Forest Service for taking our suggestions into account in our comments in April of 2023 by proposing to do a site-specific Environmental Assessment (EA) for the Webster Cliff Trail relocation and required amendments to the Forest Plan. If changes are needed, then this is the process to analyze options and then make a decision. Further, the stated anticipation that any trail relocation would be done by traditional methods, because motorized or mechanized equipment is not needed, is also positive.

That said, the EA needs to continue on the positive path by doing a proper analysis and looking at alternatives. Here are some questions and suggestions the EA should consider:

- The EA needs to explain the location of the wilderness boundary and the trail. The official 1984 wilderness boundary of the Presidential Range-Dry River Wilderness¹ shows the trail is entirely outside of the Wilderness. The legal description is in agreement with that finding. However, the small map in the Wilderness Management Plan (Appendix E page 37 of the Forest Plan) shows the trail goes ever so slightly into the Wilderness. To reconcile these incongruities, one could assume the official boundary is 300 feet from the location of the trail at the time of wilderness designation and that the trail has changed location since that time and a section is now within the Wilderness. Further, it appears the official boundary map (especially the more detailed 1984 map) and the map in the Forest Plan are a bit different, though the small-scale of the Forest Plan map makes a comparison difficult. These questions need to be clearly analyzed and explained in the EA.²
- Similarly, the map in Appendix E of the Forest Plan (page E-37) does not show a corridor designation for the trail in this area. This omission also needs to be explained and analyzed in

¹ The additions to the Wilderness in 1984 were not in this area. Thus, the 1975 and 1984 maps and legal descriptions are the same for this area.

² If the trail has not changed location since 1975 (or 1984), then it is possible the location of the trail on the official boundary map is wrong.

the EA.

- If there is a current corridor designation for the trail in the Wilderness, then it would be 1000-feet wide (500 feet on either side, see Appendix E discussion on wilderness zones beginning on page 5A). The EA should look at options to relocate the trail within this quite wide corridor.
- The EA needs to analyze whether the proposed relocation will solve the problem. The proposed route appears to also be in steep terrain that appears to be similar to where much of the trail is currently located. If the project results in two scars on the landscape and two sections of deteriorated trail, then the relocation would be a failure and more of an impact on the Wilderness than the status quo.
- The scoping letter admits significant increases in use have taken place on the trail and that trail structures (presumably water bars) have not been replaced in decades. If use and lack of adequate maintenance are the main causes for the trail condition, relocation won't solve them. Thus, the EA needs to also consider use limits and commit the agency to proper maintenance whether the trail is relocated or rebuilt within the current alignment.

Lastly, we request a joint field trip with the Forest Service to look at this project before a decision is made. Sharing of ideas in the field often results in better decisions.

Please keep us updated on this proposal. Please send us the EA when it is ready. Thanks again for considering our concerns. We look forward to hearing from you.

Sincerely,



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