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First name: Hawk

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Organization: Appalachian Trail Conservancy

Title: VP of Trail Management

Comments: Comments are attached

March 26, 2025

Derek Ibarguen Forest Supervisor c/o Theresa Corless White Mountain National Forest 71 White Mountain Drive,
Campton, NH, 03223 603-536-6135 theresa.corless@usda.gov

Dear Supervisor Ibarguen,

On behalf of the Appalachian Trail Conservancy (ATC), thank you for the opportunity to comment in support of the proposed Webster Cliff Trail Relocation and Project-Specific Forest Plan Amendment #67593.

Founded in 1925, ATC's mission is to protect, manage, and advocate for the Appalachian National Scenic Trail. ATC works cooperatively with the US Forest Service, National Park Service, state land managing agencies, and 30 individual trail clubs to manage and protect the Appalachian Trail through the Cooperative Management System. The Appalachian Trail (A.T.) spans 2,198 miles through 14 states from Georgia to Maine. About 150 miles of the A.T. in New Hampshire are on lands managed by the White Mountain National Forest (WMNF).

ATC supports the proposed Webster Cliff Trail relocation and the Project-Specific Forest Plan Amendment that will facilitate it. The project will create a more sustainable alignment for this part of the Appalachian Trail on the White Mountain National Forest in both Wilderness and non-Wilderness areas. Most of the current alignment of the A.T. on the WMNF has been laid over poorly aligned fall line trails, and the science and profession of recreational trail layout, design, and construction has advanced significantly since the early creation of recreational trails on the WMNF. We now know that fall line alignments are subject to erosion and associated resource degradation, visitor use impacts, and regular reconstruction costs, which continue to rise. Improving the alignment and design of trails reduces all of these predictable consequences of poorly aligned trails, while providing an improved experience for trail visitors.

Relocating this section of the Webster Cliff Trail/A.T. into Wilderness at carefully assessed and limited locations is likely to provide a much more stable and sustainable alignment less susceptible to ongoing resource damage while mitigating challenging and costly repairs.

We understand the need to execute a project-specific amendment in the absence of a forest-wide plan amendment. Though the latter would more efficiently allow for similar resource protection on all parts of the Forest, the proposed amendment will at least allow for this important project to proceed.

In closing, ATC commends the WMNF in identifying this practical need for relocating unsustainable trails onto improved alignments and recognizing that in some locations this may require a non-Wilderness trail, such as segments of the A.T., to be relocated into Wilderness.

Thank you again for the opportunity to comment on this important proposed relocation and please let us know if we can provide any additional information.

Sincerely, Hawk Metheny Vice President of Trail Management Appalachian Trail Conservancy