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Comments: I am writing as a

- current Utah Republican precinct chair (SLC074),
- biologist (1977 BS Biology, magna cum laude, Phi Beta Kappa, Utah Secondary Teaching Certificate 1977-1992),
- lawyer (1979 JD),
- member of the Union of Concerned Scientists, and
- member of Patriotic Millionaires.

The Forest Service should drop its proposed Forest Plan amendment for the White Mountain National Forest as it considers how to address Wilderness trail management.

Amending the Forest Plan to allow trail relocation throughout Wilderness could weaken protections for currently trailless areas, which

- help protect plants and wildlife,
- keep Wilderness from being overrun by humans, and
- offer a truly primitive experience or those who venture into these areas.

The Forest Service should instead conduct site-specific NEPA analysis for all trail relocations it proposes outside of established trail corridors in Wilderness, including for the Webster Cliff Trail.

Trail relocation in Wilderness outside of designated trail corridors is an exception to the WMNF's Wilderness plan.

Looking at trail relocation on an individual basis allows for better analysis of impacts to Wilderness.

The Forest Service should make every effort to relocate trails in Wilderness within established trail corridors.

The Forest Service should not use a Categorical Exclusion to amend its Forest Plan.

A Forest Plan amendment will have lasting and wide-ranging impacts.

Any amendment should only be undertaken with rigorous analysis and public feedback.

All trail relocation work in Wilderness should be completed using traditional skills and tools, rather than motorized and mechanized equipment.