Data Submitted (UTC 11): 4/2/2025 4:31:54 AM
First name: Kathryn
Last name: Lemoine
Organization:
Title:
Comments: The Forest Service has taken the right steps in doing a site-specific analysis through an EA for the Webster Cliff Trail and by proposing to complete trail work without motorized tools and equipment.
The Forest Service now needs to do a proper analysis, including looking at alternatives.
One alternative to consider is relocating this part of the Webster Cliff Trail within the 1,000-foot wide existing trail corridor in the Wilderness, assuming-as the scoping letter does-that the proposed reroute is outside of the trail corridor. The Forest Service should make every effort to relocate trails in Wilderness within established trail corridors.
The Forest Service should clearly demonstrate why it believes the Webster Cliff Trail must be relocated outside of the trail corridor in this specific area. The maps should also locate where the trail corridor is located as it is possible some or all of the proposed reroute might actually be in the corridor. The agency claims this trail section needs major relocation due to steep terrain, but provides no evidence-such as photos-in the scoping letter, and the proposed relocation seems to be in an equally steep location above Webster Brook. Also, trail structures such as water bars are decades old, suggesting the problem may be one of inadequate maintenance. The agency must demonstrate that the trail relocation won't result in the same problem a few decades from now.
Another alternative is reducing use on the trail. The Forest Service admits that increased use is a major reason for the proposed trail relocation. The relocation would increase the length of the trail in Wilderness, thereby increasing negative impacts on the Wilderness.
The Forest Service must adequately analyze the impacts to Wilderness. These include, but aren't limited to, increasing the physical scars in Wilderness from the old trail and the new proposed trail segment, the possibility this problem may repeat itself in the new proposed location, and impacts to wildlife from relocating a well-used trail to an area closer to Webster Brook.
All trail relocation work in Wilderness should be completed using traditional skills and tools, as the scoping letter states, rather than motorized and mechanized equipment.