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Comments:

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 new trails and trail relocation throughout Wilderness will 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 for those who venture into these areas.

The agency should first analyze and create a trail monitoring report and then consider trail management options. Doing so would include site-specific analysis, transparency, and a more informed commenting process. Not doing so would be an arbitrary and capricious action by the Forest Service.

The Forest Service should instead conduct site-specific NEPA analysis for all new trails and trail relocations it proposes outside of established trail corridors in Wilderness, as it did for the Webster Cliff Trail. Trail relocation in Wilderness outside of designated trail corridors is an exception to the WMNF's Wilderness Plan, and considering trail relocation on an individual basis allows for better analysis of impacts to Wilderness.

I urge the Forest Service should make every effort to relocate trails in Wilderness within established trail corridors. Doing so would avoid the damage that trails can do to intact wilderness while still providing increased recreational opportunities.

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