

Data Submitted (UTC 11): 6/26/2026 3:28:40 PM

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Comments: I agree with the following conclusions and recommendations:

Recommendations and Conclusions

"In general, as we have noted repeatedly to the Forest Service in prior comments, we recommend a site-specific approach to trail construction, decommissioning, or relocation, as was performed for WebsterCliff. Approval of this draft programmatic amendment does not absolve the Forest Service of its responsibility to perform an additional site-specific Forest Plan amendment in the future.

We recommend that, prior to consideration of any programmatic or site-specific amendments, the Forest Service conduct a trail monitoring report that would collect and provide detailed information on trail use and conditions. Such a report would help guide the agency's future actions, provide site-specific analysis, and allow for an informative and transparent commenting process. Information found at <https://wilderness.net/practitioners/toolboxes/trail-condition-monitoring/> may be useful in preparing such a report.

To reiterate our major concerns:

1. The Final EA violates NEPA by failing to take a hard look at impacts.

SUGGESTED REMEDY: Among other impacts, the Forest Service should estimate or project the number of miles of wilderness trails that are expected to be relocated, or the number of miles of new trails (or user-created trails) that would be added to the system. These estimates would be important to further estimate the impact of trail construction (new and related trails) and changes (increases) in visitor use would have on Wilderness. Trail relocation could easily lead to two scars rather than one on the landscape. Without such estimates, there is no way for this analysis to reasonably determine the impact that this programmatic amendment will have across the National Forest.

2. The Final EA violates NEPA by failing to consider a reasonable range of alternatives, including prohibiting the consideration of adopting user-created trails.

SUGGESTED REMEDY: The Forest Service should review an alternative that would prohibit the adoption of user-created trails.

3. The Final EA violates NFMA by proposing to eliminate the Forest Service's obligation to conduct Forest Plan amendments when revising the Wilderness Management Plan, a part of the 2005 WMNF Forest Plan (Appendix E).

SUGGESTED REMEDY: The Forest Service cannot amend zoning within the Wilderness Management Plan (Appendix E of the Forest Plan) without also amending the Forest Plan. The Forest Service should scrap this programmatic amendment and instead pursue future rezoning in the manner that it approved the Webster Cliff Trail relocation, with a site-specific forest plan amendment."