

April 21, 2023

Derek Ibarguen
c/o Theresa Corless
White Mountain National Forest Supervisor's Office
71 White Mountain Drive
Campton, NH 03223

Sent via the Internet: <https://www.fs.usda.gov/project/?project=63551>

Dear Supervisor Ibarguen:

These are comments from Wilderness Watch and Standing Trees on the proposed amendment to the White Mountain National Forest Plan—an amendment which is directed at relocating trails in Wilderness, especially the most protective Zone A. Wilderness Watch is a national wilderness advocacy organization, headquartered in Missoula, Montana with additional offices in Idaho, Minnesota, and Vermont. Wilderness Watch is dedicated to the protection and proper administration of the National Wilderness Preservation System. Standing Trees is a grassroots non-profit that advances policy and legal solutions to protect and restore New England's native forests, with a focus on public lands in Vermont and New Hampshire.

We appreciate the opportunity we had to meet via Zoom with staff members working on the White Mountain National Forest. We appreciate the concern they expressed for the six Wildernesses covering nearly 150,000 acres--the Pemigewasset, Great Gulf, Presidential Range-Dry River, Wild River, Sandwich Range, and Caribou-Speckled Mountain—found in the White Mountain National Forest. Nonetheless, we do have concerns with the proposed amendment.

During the call we learned a few key points. The intent of the amendment is to relocate trails in Wilderness Zone A (where maintained trails are currently prohibited by the Forest Plan) only where necessary to avoid resource damage and to make the trails more sustainable. The intent is not to increase trail mileage in Wilderness. The existing trail corridors in Wilderness Zones B, C, and D may not be wide enough to accommodate needed relocation. In theory, former trail tread would be abandoned and made part of Zone A if trail relocation were to go into Zone A. Site-specific NEPA would be done for trail relocations. Lastly, there is only one trail project relevant to this proposed Forest Plan amendment that is currently under consideration—the Webster Cliff Trail.

We feel any trail relocations into Wilderness Zone A should be done by a site-specific plan amendment with the trail NEPA process rather than amending the entire plan for the following reasons:

- Since the only foreseeable project is the Webster Cliff Trail, there is no need to amend the wilderness direction in the Forest Plan. A site-specific NEPA document that also functions as the amendment for the Plan for this project only seems more sensible. Furthermore, the Webster Cliff Trail is a peculiar and unique situation that is not a good fit with the proposed amendment. The Webster Cliff Trail is not in the Wilderness, rather it is 300 feet from and outside of the wilderness boundary according to the legal description.¹ As such, this problem may not be a wilderness issue at all. If the trail were to be relocated inside the Wilderness, it would add more trail miles to the Presidential Range-Dry River Wilderness, which we understand was not the

¹ Presumably, the boundary is 300 feet from the location of the trail at the time of designation.

intent of the proposed amendment (more on this later). Also, we would like to know if the 300-foot buffer is sufficient for trail relocation outside of the Wilderness. Regardless of the perceived need to reconstruct and relocate the Webster Cliff Trail, it seems somewhat questionable that impacts are occurring inside the Presidential Range-Dry River from the current condition of this trail 300 feet outside of the Wilderness. If true, this project doesn't seem to meet the intent of the proposed amendment which is to better protect Wilderness. Again, these kinds of questions could be best answered in a site-specific NEPA document that also considers a plan amendment, if deemed necessary.

- It appears Zone A's distinguishing characteristic would be removed by the proposed amendment, that being a trail-less area. At best, the proposed language is confusing and unclear because it is broad. In effect, the proposed amendment would make Wilderness Zone A a meaningless protective measure. This is a significant change from current Wilderness management under the WMNF Forest Plan, which maintains strict protections for Zone A. The statement allowing the approval of “an existing national forest system trail (NF ST) requiring a relocation into Zone A or designation of a travel corridor as an NFST trail within Zone A” does not indicate that any future trail in question to be relocated has to originate in Wilderness nor does it suggest any constraint on trail mileage or location in Wilderness.
- If this proposed amendment goes through, it could affect site-specific NEPA on relocation of trails within or into Wilderness. Future managers who have no connection or history to the proposed amendment may not do as rigorous a site-specific NEPA analysis because, they may believe trail relocation into Zone A is promoted because of the plan amendment. This proposed amendment could bias future NEPA analysis.
- The trail corridors in Wilderness are 1000-feet wide, 500 feet on either side of the extant trails. This is a fairly wide corridor and is likely sufficient in many cases to allow for relocation.

We are also concerned about the use of a categorical exclusion (See 36 CFR 220.6). This is no mere plan amendment for broad direction, but is a change in an allocation decision that could have real impacts on Wilderness. Wilderness is an extraordinary circumstance in the regulations on categorical exclusions. As such, we don't see how this proposal fits into a categorical exclusion.

Further, any NEPA analysis for a broad amendment like this should look at projected impacts. Projections like the number of miles of wilderness trails that are expected to be relocated, number of miles of trails outside of Wilderness that are expected to be relocated in Wilderness, current conditions of trails, and the impact trail construction and visitor use will have on Wilderness should be addressed. A categorical exclusion is insufficient for this task.

Please keep us updated on this proposal. Thanks again for meeting with us and considering our concerns.

Sincerely,



Kevin Proescholdt
Conservation Director
Wilderness Watch



Zack Porter
Executive Director
Standing Trees