United States Department of Agriculture | **Forest Service** | **White Mountain National Forest**
Saco Ranger District

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File Code: 1950
Date: May 8, 2006

Dear Interested Citizen,

I would like to thank you for commenting on the Dry River Suspension Bridge Replacement Project. Numerous comments were received and considered during the comment period. I have reviewed the comments and the analysis documents and an effort has been made to address all questions and concerns. I am satisfied that this project is beneficial, and can safely proceed with no significant adverse environmental effects to the National Forest or Presidential Range-Dry River Wilderness.

My decision is to replace the Dry River suspension bridge. The enclosed Decision Memo provides detail about my decision. This document is also posted on our White Mountain National Forest web site: www.fs.fed.us/r9/forests/white_mountain/projects/projects/.

Our planning staff has appreciated the public involvement on this project. The goal of public involvement efforts in our programs and projects is to improve decisions. We look forward to your continued involvement in projects on the Saco Ranger District. Again, thank you for your interest in the management of the White Mountain National Forest.

Sincerely,

/S/TERRY MILLER

TERRY MILLER
District Ranger

Enclosures (1)

Dry River Bridge Replacement Project

Decision Memo

Saco Ranger District

United States
Department of
Agriculture

Forest
Service

White Mountain
National Forest

Saco Ranger District

May 2006

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DECISION MEMO

Dry River Bridge Replacement Project

USDA Forest Service, Eastern Region, White Mountain National Forest
Saco Ranger District
Cutt's Grant, Coos County, New Hampshire

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1.0 Decision

1.1 Background

The Dry River Trail begins along NH Route 302 in Crawford Notch State Park. The 9.5 mile trail ascends the Dry River valley to the ridge between Mounts Monroe and Washington and ends at the Lakes of the Clouds. The first half of the trail originally followed an old standard gauge railroad corridor that remained from the logging days of the 1800s, however much of the trail was relocated in the early 1970s, to avoid 6 of the 9 hazardous crossings of the Dry River. According to historical records and field surveys, removal of the remaining 3 crossings was not possible due to terrain. Once the existing trail leaves the old railroad bed, it becomes a steep, narrow path maintained according to appropriate trail standards for wilderness.

In 1975, Congress designated the Presidential Range-Dry River as Wilderness (PL 93-662), which included the project area. The Forest Service constructed the existing 100-foot Dry River suspension bridge in 1977. The bridge is 1.7 miles from the Dry River Trailhead on NH Route 302 and 1 mile inside the Wilderness boundary (see Figure 1 on page 17).

Two hiker fatalities occurred during attempted crossings of the Dry River in the early 1970s. One of these occurred at the current bridge location, which is the first of the 3 remaining crossings of the Dry

River. These tragedies along with the flashy reaction of the river, to rain events were likely integral factors in the decision to construct the existing bridge.

1.2 Purpose and Need

The purpose of this proposed project is to address the imminent structural failure of the Dry River suspension bridge. In the spring of 2005, following an unusually severe rain and ice event, numerous trail bridges on the WMNF were damaged or entirely lost. The Dry River suspension bridge was damaged. A bridge engineer's inspection identified significant decay of the primary timber structural components. The bridge has been posted closed since it was inspected due to the significant safety hazard it poses to the public.

The Dry River is a volatile, entrenched channel surrounded by steep, bedrock slopes. The stream responds quickly to storm events throughout the year, not solely during spring runoff. Despite the fact that boulders of all sizes are found throughout the channel, these options for a rock crossing disappear with significant rainfall. The Appalachian Mountain Club's White Mountain Guide (1998) describes the river crossings: "When water levels are high, the few Dry River crossings that remain on this trail – and on the trails that diverge from it – are at best difficult and can be very dangerous."

This Dry River Trail is used by diverse visitors with a range of skill levels. The trailhead is located along a highway in Crawford Notch State Park which facilitates access. Removing the existing structure would not provide the improvements that many of the traditional user groups accept and rely upon. Many users travel a long distance and their trip planning may not account for storm events that make the Dry River impassable even by skilled wilderness visitors.

1.3 Description of Decision

It is my decision to replace the Dry River suspension bridge. It is not a clear cut or simple decision to weigh the effects upon wilderness characteristics, public purposes of wilderness, and safety. In nearly each case, there are immeasurable benefits and costs to any administrative action in wilderness and such decisions should not be taken lightly and certainly have not been in this situation. This decision, including the specifications below, is based upon the Minimum Requirements Decision Guide (MRDG), also referred to as the Minimum Tool concept. The MRDG is a process designed to identify, analyze, and select management actions that are the minimum necessary for wilderness administration. This process has been ongoing since last summer and the completed analysis is available in the project file.

The existing concrete abutments and cable will be reused as these components have been found to be in good repair by a bridge engineering firm. The other major structural components, including the towers and I-beams will be replaced with weathering steel, which will have a useable life of approximately 100 years and will acquire a brown tone over time to better blend with the natural surroundings. The bridge decking and railing will be wood, similar to that on the existing structure. These materials will provide a balance between useful life and natural appearance. The use of weathering steel will also allow the bridge to be pre-fabricated off site eliminating the need for power tools during assembly.

This decision also includes the transport of new bridge components to the site and removal of existing components with the use of helicopter. This component of the decision is dependent on approval from the Regional Forester who has the authority to permit the non-emergency use of mechanical transport in

wilderness. The use of a helicopter in wilderness is also a very difficult decision. By employing a helicopter, the duration of the construction process will be halved (from 4-6 to 2-3 weeks). The estimated weight of the existing, creosote-treated bridge materials is 25,000 pounds which would expose personnel to injury for many weeks in order to haul this material out over challenging terrain. The existing bridge material is also treated with creosote, which is a known health hazard with the potential to cause serious medical conditions after prolonged exposure.

1.4 Alternatives Considered but Eliminated

Over the course of the last year and through the MRDG analysis process, numerous alternatives were considered, some in more detail than others. Table 1 below lists those alternatives and the rationale for removing each of them from consideration. Alternatives in bold font were considered in greater detail than in the MRDG analysis process.

Table 1: Alternatives Considered and Rationale for Removing from Consideration

Alternative Considered	Rationale for Removing from Consideration
No action.	No action would allow the current, condemned structure to remain, continuing to be a hazard to visitors who opt to use it to cross the Dry River. The structure would not serve either the public purposes or values of wilderness in its' current state.
Construction of a rock crossing at the bridge site.	Large boulders currently exist at the site, which are not viable for use as a reliable crossing. Attempting to construct a rock crossing would not serve to facilitate access.
Relocation of the trail to remove the current crossing.	The Forest Service relocated this section of the trail in the 1970s removing 6 of the 9 river crossings that existed at that time. All the crossings could not be eliminated due to the steep, unfavorable terrain. Field investigations in 2005 concluded the same.
Relocation of the bridge and/or crossing location.	As was done in the 1970s, alternative crossing locations were searched for in 2005. A better location was not found that would allow for a rock or other crossing. If the bridge is replaced, the existing abutments, anchors, and cable have been determined to be in good condition and reusable. Opting for another bridge location would not be cost effective or positive for wilderness character even if there were another viable crossing site.
Closure of the Dry River Trail.	Concerns over the previous fatalities in this drainage brought up the idea of closing the trail if a reasonably safe method of crossing could not be found. Due to the historical use and importance of this trail to safely access the Presidential Range – Dry River Wilderness, this alternative was not considered further.
Removal of the existing structure and no replacement.	The removal of the bridge would have a negative impact on many of the traditional Dry River Trail users because access beyond this crossing of the river would be limited except possibly during low flow. As a result, use could be redistributed to other access points to the Presi-Dry Wilderness. This alternative clearly meets wilderness objectives in their

	purest sense by removing a structure and allowing the site to return to a more natural appearance. However, it fails to recognize the very real and documented public safety issues with this crossing and river including fatalities.
Replacement with a different style of bridge, especially one without towers.	Other options for bridge design were considered and a bridge engineering firm was consulted. Opting for another design, such as a suspension bridge without towers, is not an approved design that would meet current Forest Service standards. It would also require moving the abutments causing further disturbance to wilderness character.
Replacement without the use of mechanical equipment.	As described in Section 1.3 above, this alternative would increase the duration of the project two-fold and would also require extensive hauling of creosote-treated timbers on a narrow trail with challenging footing. Safety concerns for employees and contractors completing this work were a strong consideration.

2.0 Reasons for Categorically Excluding the Decision

Decisions may be categorically excluded from documentation in an environmental impact statement or environmental assessment when they are within one of the categories identified by the US Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in Forest Service Handbook (FSH) 1909.15 sections 31.12 or 31.2, and there are no extraordinary circumstances present.

2.1 Category of Exclusion

The proposed action falls within the categories of actions described in the FSH 1909.15, Amendment 1909.15-2004-3, 31.2. Category 1 of Section 31.2 states: "Construction and reconstruction of trails." This category requires a project file and a Decision Memo.

2.2 Relationship to Extraordinary Circumstances

The environmental analysis determines if any extraordinary circumstances exist that could result in significant effects to the environment. In accordance with FSH 1909.15 Chapter 30, the following specific resource conditions were examined:

2.2a Threatened and endangered species or their critical habitat.
No Federally Listed Threatened or Endangered Species or Designated Critical Habitat, Species Proposed for Federal Listing or Proposed Critical Habitat, or Forest Service Sensitive Species have been observed or are known to be present. A rare plant survey was conducted in the project area and no suitable habitat for sensitive plants species was identified.

2.2b Floodplains, wetlands, or municipal watersheds.
This project is located nearby the banks of the Dry River and within the 100 year floodplain of the Dry River. A wetlands permit application has been sent to the New Hampshire Wetlands Bureau for this project. The implementation of this project is dependent on the issuance of a wetlands permit and adherence to its terms and conditions. This project will help protect riparian vegetation by providing a defined means of crossing the Dry River and minimizing the trampling of vegetation along the banks by visitors attempting to find a viable crossing location.

There are no mapped wetlands in the project area or public water supply sources in the project area. The project is not expected to have any affect on downstream wetlands or municipal watersheds.

2.2c Congressionally designated areas, such as wilderness, wilderness study areas, or National Recreation Areas.
This project is located within the Presidential Range-Dry River Wilderness. The MRDG process was used to determine the minimum activity necessary to address the Dry River bridge. The effects of this project on wilderness character are not expected to be significant or last beyond the immediate construction phase. The replacement of the bridge would maintain the recreation access and level of development historically present at this location since 1977.

This project will not affect any other Congressionally designated areas.

2.2d Inventoried roadless areas.
This project is in Congressionally designated wilderness as described above. The standards for management of wilderness are more stringent that those for inventoried roadless areas. Though the Presidential Range – Dry River Wilderness is roadless and would meet all roadless criteria (Forest Service Handbook 1909.12), this analysis and decision focused on the location of the project in wilderness.

2.2e Research Natural Areas.
There are no research natural areas within the project area (Forest Plan 2005).

2.2f Native American religious or cultural site, archaeological sites, or historic properties or areas.
No known cultural sites are located within the project area. A cultural resources survey has been conducted. Prior to project implementation, the State Historic Preservation Office will be consulted. If any artifacts or sites are discovered during the survey or implementation, they will be evaluated and protected.

2.2h Summary
No other extraordinary circumstances related to this project were identified. Based on past experience with similar activities of this type on the Saco Ranger District, I have determined that the environmental effects associated with the proposed action are not likely to exceed those associated with Category 1 of Section 31.2 actions.

3.0 Public Involvement

The Dry River Bridge Replacement Project was listed in the Schedule of Proposed Actions in January 2006 and 77 scoping reports were mailed to interested and affected parties in March 2006. The scoping report was also posted on the White Mountain National Forest's web site. The majority of the respondents support the project some noting the bridge's importance to hikers given the dangers of crossing the Dry River. Some supportive responses also included concerns about effects on US Route 302 and the aesthetics of the proposed bridge design. Those

opposed to the project had numerous concerns about the project's effects on wilderness. See Appendix B for additional detail regarding public comments and Forest Service responses.

4.0 Consistency with the Land and Resource Management Plan (Forest Plan) and other Applicable Laws

My decision to replace the Dry River suspension bridge is consistent with the Forest Plan. Standards and guidelines in the Forest Plan are designed so that on the ground activities comply with applicable regulations, laws, and executive orders.

4.1 Forest Plan

The project area is in Management Area (MA) 5.1 (Forest Plan 2005). This project would conform to the White Mountain National Forest's Land and Resource Management Plan (2005), including the Wilderness Management Plan (Appendix E). The location of the Dry River suspension bridge falls into Zone D, defined by the Wilderness Management Plan as including "the most heavily used and most highly developed trails and areas within WMNF Wilderness."

The Wilderness Management Plan directly speaks to the presence of bridges in Zone D: "Bridges may exist for public safety or resource protection." Additionally Wilderness management in this zone "emphasizes sustaining and protecting natural conditions, while providing access for and accommodating a moderate to high level of human recreation use." The direction provided by the Forest Plan does not require replacement of the bridge, but supports this decision to do so.

5.0 Administrative Review or Appeal

This decision is not subject to a higher level of administrative review or appeal pursuant to 36 CFR 215.12.

6.0 Implementation Date

This decision may be implemented immediately following the issuance of a wetlands permit by the New Hampshire Wetlands Bureau, completion of a cultural resource survey and concurrence by the State Historic Preservation Office, and Regional Forester approval of the use of a helicopter in Presidential Range-Dry River Wilderness.

7.0 Contact Person

Further information about this decision can be obtained from Holly Jewkes at the Saco Ranger District:
33 Kancamagus Highway
Conway, NH 03818
Voice: 603 447-5448 Ext. 127
TTY/TDD: 603 447-3121
Email: hjewkes@fs.fed.us

8.0 Signature and Date

I have concluded that this decision may be categorically excluded from documentation in an environmental impact statement or environmental assessment as it is within one of the categories identified by the US Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in FSH 1909.15 sections 31.12 or 31.2, and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative environmental effect. My conclusion is based on information presented in this document and in the Project File.

/s/ Terry Miller 05/05/2006
TERRY MILLER Date
District Ranger

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Appendix A - Design Features

In addition to the standards and guidelines in the Land and Resource Management Plan (USDA 2005), the following site specific design features will be used in implementing this project. Design features identify how particular standards and guidelines are applied to the project proposal. They also may be features that are not directly associated with standards and guidelines, but will be implemented on the ground to address site-specific safety or resource needs. Design features for the Dry River Bridge Replacement Project include:

1. If heritage resources are found, project activities will be halted until the Forest archeologist or district paraprofessionals can evaluate the findings and make recommendations on how to proceed.
2. Project activities will comply with the Wetlands Permit issued by the New Hampshire Wetlands Bureau.
3. If rare plants are identified in the project area, the district biologist will evaluate the area and make recommendation on how to proceed.

Appendix B - Public Comments and Forest Service Responses

All 7 comments received are noted and available in the project file.

Summary of comments in support of the project
4 respondents generally support the project as proposed and provided the following comments:

- With the replacement project to take an expected 2 to 3 weeks, the long-term positive effects outweigh any negative consequences, and will without questions be of assistance to thousands of tourists and seasoned hikers for years to come.
- We feel 7 hours of helicopter use in the wilderness area would have much less impact to the wilderness as opposed to dragging 25,000 pounds of materials over a number of weeks on existing trails.
- I live nearby and am in favor of the project.
- I am in favor of the project.

Summary of comments in opposition of the project and Forest Service responses.
Three respondents opposed the project as proposed. These comments also include questions raised by those in favor of the project, but requested more information.

Commenter #1	
Comment #1a	My only comment is to be as efficient as possible with the helicopter work. Hopefully some can organize the deliveries and removal tasks with a minimum of visits. Will this effect traffic?
Forest Service response to #1a	The intention of using a helicopter for transport of materials is to minimize the length of the project. The existing bridge will be dismantled prior to flying new materials to the site so that the helicopter will carry a load in and out on each trip. This will minimize the flight time required to complete the shuttling of materials. There are no expected affects to US Route 302.
Commenter #2	
Comment #2a	I find that replacing this bridge is not appropriate for a Congressionally designated Wilderness. After all, wilderness is intended to be a place free from the hand of man, a place where people can go to experience Nature on its own terms. No doubt use of this trail would be safer if the bridge were replaced, but that is not the issue. Built structures, in particular structures newly built in the 21st century, have no place in our Wilderness.
Forest Service response to #2a	Neither the 1964 Wilderness Act nor Forest Service policy prohibit the presence of structures in Wilderness. Structures of some kind exist in all WMNF Wildernesses, and in most Wildernesses across the country. The question of whether to build a bridge hinges instead on the idea of "untrammeled" wilderness as stated in the Wilderness Act. If a bridge is

	not built on the site, hikers will almost surely walk up and down the river looking for acceptable stream crossings. This will result in numerous user-created trails along the bank. Though the bridge creates an aesthetic impact, it reduces the physical impacts from these hikers. Thus, with the bridge in place, natural processes will be allowed to continue untrammeled in more places in the Presidential Range-Dry River Wilderness. Though neither approach is a perfect option, we feel replacing the bridge allows us to maintain wilderness character better than leaving the area without a crossing. Further, the Forest objective for Wilderness is to manage the areas to standard in accordance with the Wilderness Management Plan and national direction (White Mountain National Forest Land and Resource Management Plan 2005). The project area lies in Zone D, defined in the Wilderness Management Plan as including "the most heavily used and most highly developed trails and areas within WMNF Wilderness." Zone D includes the least amount of land area in the Presidential Range-Dry River Wilderness (less than 1%). The overwhelming majority of the land lies in Zone A, which does not contain any trails or other facilities. The Wilderness Management Plan further describes Zone D as: "The landscape within this zone is modified by the developed trail system and associated structures, and may include bridges, primitive shelters and/or toilets, designated campsites, and impacts resulting from recurring recreation use." The Plan also addresses the type of wilderness recreation experience that is provided: "There is a moderate degree of challenge and risk, and a lower degree of self-reliance than in other zones." Based upon the Wilderness Management Plan, the replacement of the Dry River suspension bridge would be inappropriate in over 90% of the Presidential Range – Dry River Wilderness. However, this portion of the Dry River Trail is the only portion of the Wilderness that is designated as Zone D that is not associated with a shelter. Though it was a difficult decision, the replacement of the bridge meets the public purposes of wilderness and does not change the long-term effect on wilderness values from the existing condition.
Commenter #3	
Comment #3a	For the record, I object to the use of a helicopter within a Wilderness Area, for anything other than search and rescue (and then only in certain circumstances.
Forest Service response to #3a	The use of mechanized transport in wilderness was a difficult decision to arrive at and was based on the use of the Minimum Requirements Decision Guide process. The use of helicopter for a non-emergency situation is also dependent on approval by the Regional Forester. However, the reduction of the duration of the project by at least ½ and

	the minimizing of risk of injury to Forest Service personnel and contractors were weighed in the decision-making process. Resource damage is also possible given the hundreds of trips it would require to transport materials to and from the site.
Comment #3b	I find it bizarre that the scoping letter claims "The Project Area [sic] does not include any inventoried roadless areas." The project Area is a Wilderness.
Forest Service response to #3b	The project area does lie in wilderness, which affords more stringent standards than an inventoried roadless area. The Presidential Range – Dry River Wilderness is also roadless, however the distinction between the two for the purposes of this analysis serves to highlight the location of the project area in Congressionally designated wilderness.
Comment #3c	The scoping letter completely ignores the present opportunity to construct a Dry River Trail bridge which is more in accordance with the Wilderness status of the area. I object to the FS decision to maintain the present concrete bridge abutments. The Wilderness Area should host abutments which are stone face, or, in keeping with the former logging railroad in the area, log cribbing. A permanent bridge in a Wilderness Area deserves more than usual attention to the bridge's aesthetics and appropriateness for the site.
Forest Service response to #3c	Through the MRDG process, the aesthetics of the bridge were considered in detail and balanced with structural integrity, useful life, and Forest Service requirements for bridge specifications. The decision was to use weathering steel, which over time browns rather than retaining a stainless shine, in combination with wood decking and railings similar to the existing structure. The steel beams for the towers will be a lattice design rather than a solid rectangular piece of steel more reminiscent of the logging railroad era. Log cribbing would not support such a long span bridge and would deteriorate in a matter of decades requiring costly replacement in terms of dollars and impacts to wilderness character.
Comment #3d	The Dry River bridge is receiving less than average care. Apparently, no thought has been given to burning on site, in winter, the existing bridge materials. I suggest you do so.
Forest Service response to #3d	Through the MRDG process, a significant amount of thought was given to alternative methods for dealing with the existing bridge's materials. The existing timber components of the bridge are treated with creosote. Creosote cannot be burned as it may produce toxic chemicals during combustion, which is inappropriate for a Class I airshed, wilderness character and the safety hazards it would pose to personnel and the public. Therefore, the material needs to be removed from the site and disposed of at a proper facility.
Comment #3e	The scoping letter does not state how many helicopter trips will be required.
Forest Service response to #3e	The number of helicopter trips is dependent on the allowable external load for a specific ship on a specific day. The type of helicopter used, temperature, and elevation determines the allowable external load.

	Therefore, a solid number is difficult to provide without knowing these specifics. Qualified helicopter personnel have reviewed the site and locations suitable for materials to be transported to and from in order to provide for safety and the shortest turn around times to limit the amount of flight time needed to complete the transport of materials.
Comment #3f	I do not consider the Dry River Trail's southern 1.7 miles to include " . . . extreme safety risks."
Forest Service response to #3f	The Forest Service agrees that the southern 1.7 miles of the Dry River Trail does not pose extreme safety risks. The trail is maintained to Forest Service standards where it lies on National Forest land. It is maintained to the appropriate standards and with the appropriate methods for wilderness, when it crosses into the Presidential Range – Dry River Wilderness. The quote believed to be referenced by the commenter from the scoping report in full is: "Although this short-term use of a helicopter would temporarily compromise wilderness character, it is deemed preferable to the extreme safety risks of transporting thousands of pounds of material on foot." When considering that personnel would be carrying heavy and awkward loads on this trail for weeks, safety concerns are a significant consideration. The trail has steep portions with loose and wet rocks that are appropriately challenging to navigate in a wilderness setting. However, exposing personnel to these known and identified hazards for weeks does pose a high safety risk of trips, falls and other injuries.
Commenter #4	
Comment #4a	I fully realize that the construction of any bridge in federal Wilderness involves a delicate balance of factors. While safety is a valid concern in Wilderness, hiker convenience is a much lower priority. But these issues become intertwined and easily confused. There are very few cases where anyone must cross the river, its mostly that they want to cross the river in order to meet a specific timetable or objective.
Forest Service response to #4a	The Wilderness Act defines Wilderness in part as having "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Decades of experience have shown that hikers desire the type of recreation available in the Presidential Range – Dry River Wilderness. There is no indication that this demand will abate; thus, we do not see this as an issue of hiker convenience, but as an issue of safety. Thus, we are compelled to replace the bridge in kind. Based upon the Wilderness Management Plan, the replacement of the Dry River suspension bridge would be inappropriate in over 90% of the Presidential Range – Dry River Wilderness. However, this portion of the Dry River Trail is located in Zone D. Though it was a difficult decision, the replacement of the bridge meets the public purposes of wilderness and does not change the long-term effect on wilderness character from the existing condition. The Plan also addresses the type of wilderness

	recreation experience that is generally provided in Zone D: "There is a moderate degree of challenge and risk, and a lower degree of self-reliance than in other zones."
Comment #4b	More detail is needed regarding the history and decision process for construction of the current bridge. Why was it built just a few years after the Wilderness was designated? What were the circumstances of the deaths? Were there other factors that supported the construction of the bridge?
Forest Service response to #4b	Unfortunately, reconstructing the decision process from 30 years ago is difficult and certainly does not do justice to the thoughts and efforts of those who made or influenced those decisions. Efforts were made to reduce the number of crossings by relocating the trail, however terrain did not allow the elimination of all of them. An appreciation and regard for the newly designated Wilderness is also obvious in the documents in the files. From the information available and communication with employees that worked on the Saco Ranger District at that time, the unique characteristics of the Dry River that created serious safety issues during common rain events and the fatalities that occurred were strong considerations in the decision to construct this bridge.
Comment #4c	This is not the only stream crossing in the Dry River Wilderness that is potentially dangerous. The other crossing can be just as dangerous. If we bridge one, why not the others?
Forest Service response to #4c	This comment is outside the scope of the document. It only deals with the decision to replace one bridge. However, if proposals were put forward to bridge other streams, the MRDG process would be used to aid in determining what, if any, action is appropriate to manage situations in wilderness. In addition, the Forest Plan and Wilderness Management Plan will be used to guide any future decisions in wilderness.
Comment #4d	Meeting the "expectations of user groups" should not be a determining factor in managing a Wilderness area. Hiker information and education are required so that anyone who enters the area is properly prepared. Presumably, the biggest risk is to hikers descending from the surrounding peaks or huts, who are least likely to be prepared for the complications of a dangerous stream crossing near the end of their hike. These folks can be among the least experienced, and the most likely to make a rash decision about crossing the river. But like all "user" problems in Wilderness, all educational and informational solutions should be exhausted before resorting to extreme solutions such as a suspension bridge.
Forest Service response to #4d	Though user group expectations were considered in the MRDG process, they were not a determining factor for decision. WMNF Wilderness management is based on the premise of balancing ecological integrity with adequate provision of primitive recreation. To accomplish this goal, the Wilderness Management Plan emphasizes information and education as a means to get safety and many other

	messages across to Wilderness visitors. However, a decision was made when the initial bridge was built that information and education efforts were secondary to assuring visitor safety in an unusual and extremely dangerous area. With the decision to rebuild this bridge, we are reaffirming that difficult decision, both to maintain recreation opportunities and to preserve wilderness character.
Comment #4e	A bridge is antithetical to Wilderness in many ways. But aside from the philosophical issues, the bridge has a very real and direct impact. By enabling and encouraging more people to enter the Wilderness, it reduces the opportunities for solitude. This is in direct conflict with the stated goals of the Wilderness Act. The bridge also contributes to the overuse of the immediate area, as demonstrated by the ongoing problems with unauthorized campsites along the trail, just upstream of the bridge. Without the bridge, this area probably would not be classified as "high use".
Forest Service response to #4e	We believe visitors go to the Presidential Range – Dry River Wilderness to experience solitude and unconfined recreation. The existence of a bridge in the wilderness is not likely to encourage them to visit any more than the presence of a trail does. The bridge simply allows those visitors who come to experience a primitive form of recreation to do so more safely than they otherwise could. Replacement of the bridge will enable access deeper into the wilderness, which we feel is in line with Wilderness direction, in that it increases opportunities for solitude. If the bridge were not replaced, then some visitors with a destination commonly accessed via the Dry River Trail would likely be displaced to other trails in the Wilderness. The use level would then likely increase on other trails. This action would potentially conflict with the Forest's recreation management approaches, particularly the standard which states: "Forest management actions will not disperse use from high to low use areas." Ongoing efforts, monitoring, and wilderness patrolling are addressing dispersed campsites in the Presidential Range – Dry River Wilderness. Last summer, a Student Conservation Association crew worked for several weeks on relocating designated sites and rehabilitating unauthorized campsites. The absence of a bridge at the project area would likely increase the occurrence of unauthorized campsites along other trails accessing the Wilderness.
Comment #4f	The scoping letter does not discuss other alternatives for crossing the river, such as different locations or possible trail relocations.
Forest Service response to #4f	Numerous alternatives were discussed and analyzed during the MRDG process that are discussed in Section 1.4 of this document.
Comment #4g	Assuming that abridge is to be (re)constructed, alternative designs could be considered. The current wide-deck, single-span bridge is not the only approach. There are many design options that could be more consistent

	with a Wilderness setting, such as two shorter spans to boulders, or a more Spartan cable design that retains some sense of challenge. The choice of building materials is not adequately discussed. What will be used for decking? In understand there is consideration of steel towers, but this is not mentioned in the scoping. Should the current concrete work be replaced with stone? These issues are not mentioned.
Forest Service response to #4g	Through the MRDG process, alternative bridge materials were considered in detail and balanced with structural integrity, useful life, and Forest Service requirements for bridge specifications. The Forest Service also contracted a bridge engineering and design firm that specializes in remote trail bridge construction for additional professional input. The decision was to use weathering steel, which over time browns rather than retaining a stainless shine, in combination with wood decking and railings similar to the existing structure. The steel beams for the towers will be a lattice design rather than a solid rectangular piece of steel more reminiscent of the logging railroad era. Choosing another design would also require moving abutments and possibly the location of the bridge, which would increase area and length of disturbance.
Comment #4h	Transportation of materials should be more fully explored. What about horses? Over snow transport?
Forest Service response to #4h	When the bridge was originally constructed in 1977, the path of the logging railroad was much more defined than it is today. Vegetation has grown significantly and the abandoned portions of the old dry river trail have also re-vegetated. The current trail corridor is challenging and the tread is very narrow in places. In order to transport the materials in and out of this location, additional tree removal and trail improvement would be needed which would increase the length of the project as well as the impacts to the character of the existing trail and wilderness character.
Comment #4i	Given the far-ranging effects of this bridge, including the direct construction factors and the ongoing influence on visitor behavior, I believe a more complete environmental assessment is appropriate.
Forest Service response to #4i	This decision solely applies to the replacement of the existing bridge on the Dry River Trail. As discussed in the response to Comment #4e, we do not view the bridge itself as affecting visitor behavior, rather than the opportunities within the Wilderness. In terms of level of analysis necessary, implementation of this project is dependent on Regional Forester approval of the use of mechanized transport in wilderness. The effects on wilderness character and the public purposes of wilderness will be short-term and limited to the construction phase. A bridge has existed at this location for nearly 30 years. This decision complies with Forest Plan and Wilderness Management Plan standards and guidelines.

Comment #4j	This is a difficult and important decision. It will affect not only Dry river, but also set a precedent for bridges in other Wilderness areas (such as the Pemi), as well as bridges in the pending Wild River Wilderness.
Forest Service response to #4j	This decision is solely for the project area and is not precedent setting. Any other proposals for bridges or river crossings in the Presidential Range – Dry River or other wilderness will be analyzed according to their own circumstances. In fact, other bridges damaged by last year's ice and rain event were removed and not reconstructed because reasonable rock crossings were available nearby that could be used during the majority of the peak use season. Any future analyses of this type would require their own project specific environmental analysis including compliance with the Forest Plan, Wilderness Management Plan, and completion of the MRDG process.
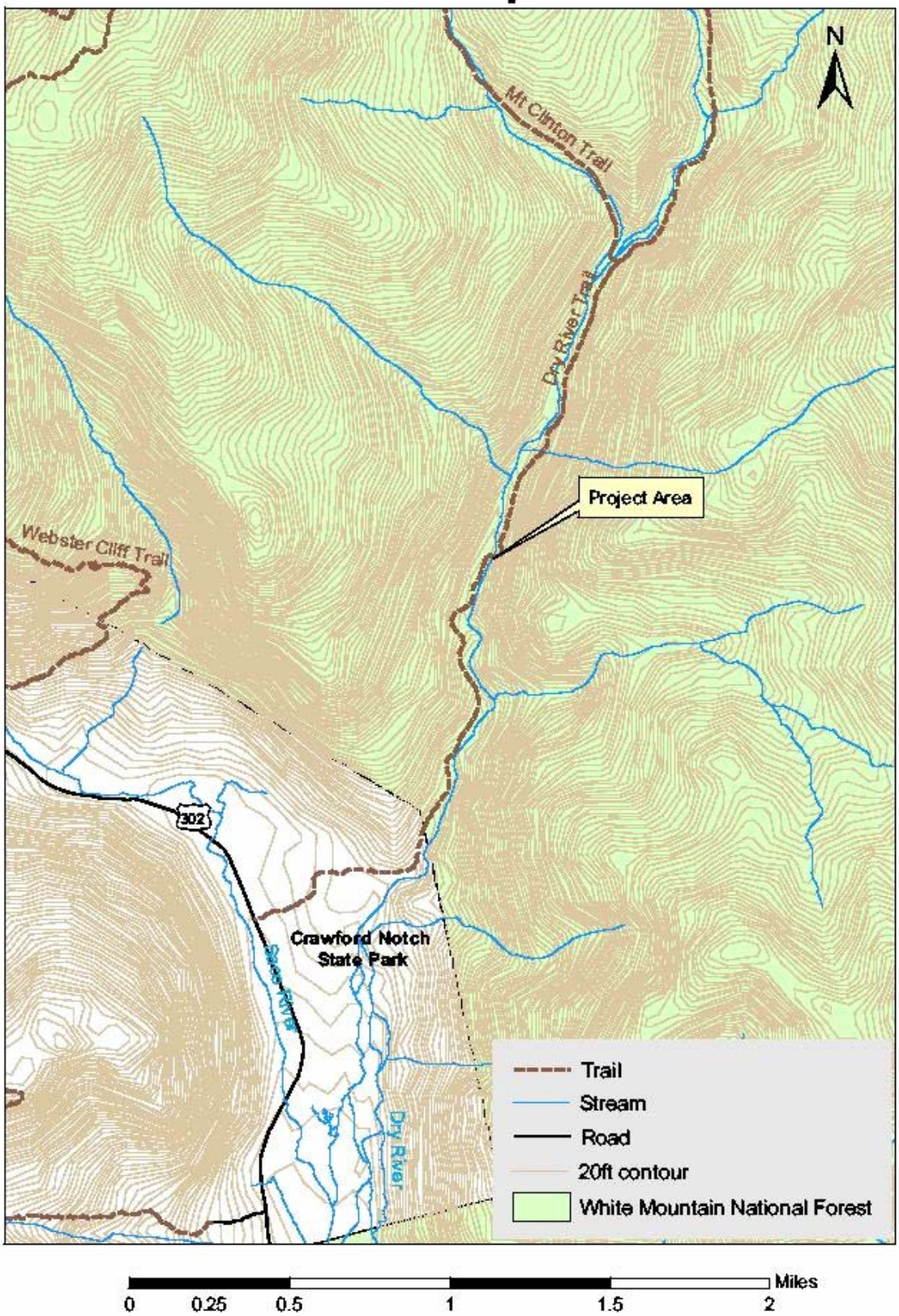
Figure 1: Dry River Suspension Bridge Site Map