



United States
Department of
Agriculture

Forest
Service

White Mountain National Forest
Pemigewasset Ranger District

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File 2320
Code:
Date: September 11, 2009

Dear Interested Citizen,

I would like to thank you for your interest in the Pemigewasset Bridge Removal Project. My decision is to move forward with the project. The enclosed Decision Memo provides detail as to the reasons for my decision. These documents are also posted on our White Mountain National Forest web site: www.fs.fed.us/r9/forests/white_mountain/projects/projects/.

I have reviewed the public comment letters and the analysis documents. I am satisfied that this project is beneficial, and can safely proceed with no significant adverse environmental effect to the National Forest, the Pemigewasset Wilderness or the surrounding area.

My planning staff and I have 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 Pemigewasset Ranger District.

Sincerely,

/S/ MOLLY FULLER

MOLLY FULLER
District Ranger



White Mountain National Forest



United States
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Agriculture

Forest Service

Eastern
Region

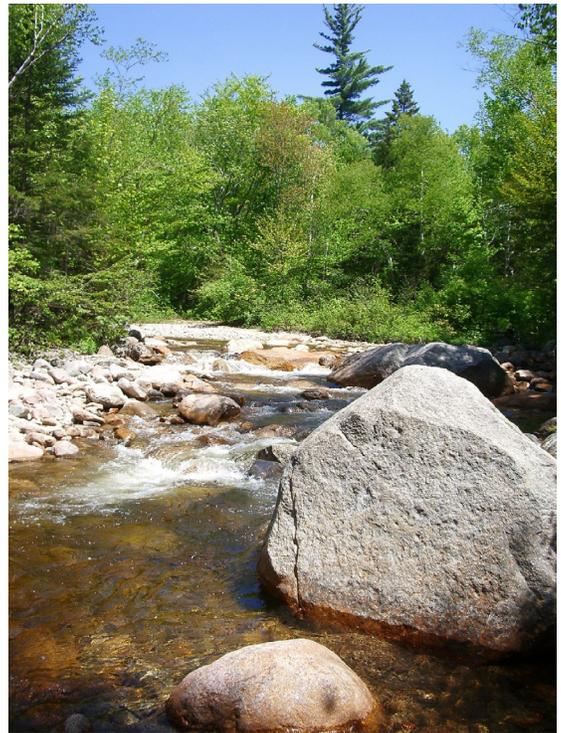


Pemigewasset Wilderness Bridge Removal

Decision Memo

Town of Lincoln
Grafton County, NH

Pemigewasset Ranger District
September 2009



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1 Decision

After careful consideration of public input, the recommendations of appropriate resource specialists, and the requirements of applicable laws and regulations, I have decided to remove the 180-foot suspension bridge which spans the East Branch of the Pemigewasset River, remove the steel I-beam bridge which spans Black Brook and close the intervening 0.7 miles of the Wilderness Trail. In this document you will find a detailed rationale for my decision and a description of the management actions we plan to take to implement the decision.

2 Rationale for the Decision

This project has generated a significant amount of public interest. We heard from many supporters of the proposal that to remove the bridge would be the right thing to do to enhance the wilderness attributes of the area. We also heard from many people who thought we should repair the bridge and continue to maintain the trail system as it currently exists. Your letters and emails expressed a range of comments that were logical, detailed, reasoned, passionate, and sometimes very personal. I sincerely appreciate your input and I want to assure you that I heard you. My challenge, as I am writing this, is to adequately explain how I arrived at this decision. I am also challenged with conveying to you an appreciation, even if you don't agree with me, of my desire to achieve something that will truly benefit both you and future generations. Please continue to read this section, even if you read nothing else, for it will help explain the matters I considered while making this difficult decision.

The impetus for proposing this project came in the summer of 2008 when Forest Service engineers conducted a field inspection of the suspension bridge and concluded that the wooden components of the bridge, with the exception of the suspension towers, had deteriorated and that the bridge would have to undergo significant repairs or be closed. A Minimum Requirements Analysis – a process to identify, analyze, and select management actions that are the minimum necessary for Wilderness administration – guided us through the process of acquiring the information necessary to evaluate possible courses of action that would comply with both law and Forest Service policy. Our first step was to determine if any administrative action was necessary, and in this case the structure was determined to have significant safety issues which would require closing it for public use by the end of the 2009 season if no repairs were made. We concluded that, yes, some type of action was necessary. At the very minimum, we would have to close the bridge to public use, which is an administrative action in itself.

In step two of the analysis, we determined what activity would least impact the wilderness resource and character. This step asked us to develop and consider alternatives that were fully compliant with prohibitions set forth in Section 4(c) of The Wilderness Act, with one or more alternatives that included the use of some of the prohibited activities.

1964 Wilderness Act (section 4c): *“except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act ... there shall be no temporary road, no use of motor vehicles, motorized*

equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and *no structure or installation within any such area.*" (Italics added)

In this case, the bridge is a structure and we have to consider whether or not it is a necessary one to meet the minimum requirements for the administration of the area for the purposes of this Act. This is a critical point, and sets the stage for a much closer look at what direction exists for administering a Wilderness. Section 4(b) of The Wilderness Act provides direction to manage in such a way as to preserve the area's wilderness character.

1964 Wilderness Act (section 4b): "... each agency administering any area designated as wilderness shall be responsible for *preserving the wilderness character* of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character." (Italics added)

The attributes of wilderness character are provided in the definition of wilderness in section 1(c) of the Act.

1964 Wilderness Act (section 1c): "...an area of undeveloped Federal land retaining its primeval character and influence, *without permanent improvements* or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, *with the imprint of man's work substantially unnoticeable*; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation..." (Italics added.)

I believe the presence of a man-made bridge, particularly a 180-foot suspension bridge with towers and cables, is a non-conforming structure and is not consistent with the ideal state intended by the authors of the Wilderness Act. Further direction is provided in the White Mountain National Forest (WMNF) Land and Resource Management Plan (the Forest Plan), which zones areas within each Wilderness into four possible wilderness management zones.

White Mountain National Forest Land and Resource Management Plan (2005) p. 3-14, G-6: "The number and type of improvements, such as trails, footbridges and signs should be kept to a minimum and be consistent with zone designations."

The Wilderness Trail and the suspension bridge are in Zone D, which the Forest Plan describes as the most heavily used and most highly developed trails and areas within the WMNF Wilderness. It goes on to state that bridges may exist for public safety or resource protection. Consequently, the presence a bridge is not expressly forbidden; however, a determination must be made as to whether or not the bridge is *necessary to meet the minimum requirements necessary for the administration of the area.*

The administration of the area includes allowing appropriate uses such as hiking and cross-country skiing. The challenge to me, as a wilderness manager, is to allow these uses to occur in a manner that does not impair wilderness character. Reviewing the trail routes that use the suspension bridge reveals that the bridge connects the trails in the eastern half of the Wilderness with the western half of

the Wilderness. The bridge is necessary to provide connections between trails such as Thoreau Falls, Shoal Pond, Nancy Pond, Carrigain Notch, Desolation and Cedar Brook Trails to Bondcliff, Franconia Brook, Lincoln Brook, and Twin Brook Trails via the Wilderness Trail. The suspension bridge also connects a popular loop trail route, which connects the Lincoln Woods Trail and Wilderness Trail to the Cedar Brook Trail and the Eastside Trail. Without the bridge, access to or from the eastern half and western halves would be possible through either the Lincoln Woods-Wilderness Trails or the Eastside-Cedar Brook Trails respectively, but not both. Access to either the western or eastern half of the Wilderness over a trail will require selecting either the Lincoln Woods-Wilderness Trail or the Cedar Brook-Eastside Trail in advance. Accurate route planning would become essential as the option to make a dry crossing of the East Branch within the Wilderness would no longer be available.

So the question remains: is this bridge the minimum requirement necessary to administer the area? Or more to the point, is the bridge a minimally necessary feature of the trail system to provide access to the Pemigewasset Wilderness? The impacts of removing the bridge on the trail network would certainly make it less convenient; it reduces the opportunities to connect two halves of the Wilderness. It also makes it more challenging, in terms of distance, to connect between these areas. Following removal, one would have to travel to Lincoln Woods to use the suspension bridge there, near Route 112, to avoid fording the river. Is it acceptable to lose this trail connection between these two areas of the Pemigewasset Wilderness? Clearly, there is a trade-off here.

In making my decision, I considered some other management actions that have taken place in the Pemigewasset Wilderness, well before my tenure as the District Ranger. Following its designation as Wilderness in 1984, the Desolation Shelter, previously located along Desolation Trail near its junction with Carrigain Notch Trail, was removed using non mechanical and non motorized techniques. Also, the tent platforms (except the caretaker's) at Thirteen Falls Tentsite were removed and replaced with earthen tent pads. These actions, while they might seem somewhat unremarkable, were purposeful and deliberate in their objective to improve the wilderness character of the Pemigewasset Wilderness.

There have also been some fairly recent decisions made on other districts of the Forest to repair or replace bridges in Wilderness. Each of these decisions presented unique circumstances that resulted in decisions much different than this decision. The decision to replace the Dry River Bridge on the Saco District considered public safety in light of the bridge's role in providing access along a single trail into the Dry River Wilderness and the historic use that has occurred along that trail. On the Androscoggin District, the decision to repair the Madison Gulf Bridge, which is part of the Appalachian Trail, considered public safety on a high use trail that provides access through the Great Gulf Wilderness. In both of these cases, the bridges were determined to be essential trail features in order to continue to afford reasonable and safe access to or through the wilderness. In neither of these cases was there a parallel trail that followed the river on the opposite side of the river. It is important to recognize that wilderness management decisions are not meant to set precedents for future decisions; rather each case will be analyzed separately to consider its specific circumstances.

It is also worth considering the Pemigewasset Wilderness in its context with other wilderness areas in the Northeast. At 45,000 acres, it is the largest of the six wilderness areas in the White Mountain National Forest. The next largest is the Sandwich range Wilderness at 35,800 acres. Due to its size, the Pemigewasset Wilderness typically includes an overnight stay to traverse because the total distances between most of the trailheads exceed 15 miles. Outside of the White Mountain National Forest, you would have to travel West Virginia to the Cranberry Wilderness (47,800 acres) or to Virginia to the Shenandoah Wilderness (80,000 acres) to find a larger Wilderness. The opportunities for solitude and a more consistently uninterrupted wilderness experience increase with a larger wilderness. As development pressures continue to increase in the Northeast, the value of a wilderness of this size, if it is managed more closely to the intent of The Wilderness Act, will increase. I would be remiss not to consider this in any management decisions regarding the Pemigewasset Wilderness.

Beyond the laws and regulations that govern wilderness management, I considered what will change after the bridge is removed. I can recall my first visit to the bridge, after hiking almost six miles, three of those miles in wilderness, and arriving at the site. It does take one back for a moment to have such a large and substantial structure before you. This experience is out of context with a wilderness experience, both from the visual impacts of the presence of the bridge to the experience of making a long, dry crossing on a man-made structure over the East Branch of the Pemigewasset River. The East Branch's headwaters are upstream from this crossing another 5 to 9 miles and mostly all within the Pemigewasset Wilderness. With the exception of one bridge on the Thoreau Falls Trail, virtually the entire wilderness appears to have been affected primarily by the forces of nature, and the imprint of man's work is substantially unnoticeable. Some have argued that is not a "true" wilderness due to the extensive logging history that occurred throughout the area in the late 1800s and early 1900s. To that point I can only say that the designation as Wilderness has already been decided by law, and the goal of wilderness management is to close the gaps between where there is evidence of human influence and what is attainable. The regenerative ability of the landscape has made the Wilderness, for the most part, natural in its appearance, and with each year that passes nature is further reclaiming this area. This decision reflects a desire for an enhanced wilderness experience for generations to come.

I am also governed by Forest Service Manual direction regarding these trade-offs.

Forest Service Manual 2320.6 – The Wilderness Management Model and the Wilderness Act. "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. *Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.*" (Italics added)

The enduring value of providing an area that is more wild, more unrestrained, and more lacking the imprint of man's works may not be recognized or appreciated for several generations. It is hard to fully appreciate the devastation that occurred in the forest in these very same areas resulting from unsustainable logging practices of the early 1900s without looking at pictures of logging camps, railroads and vast clear cuts that spanned the landscape. It is my hope that the

evidence of this bridge will also disappear from sight, and eventually from memory, to a point at which future generations of hikers on the Cedar Brook Trail will walk past the former bridge site without notice or recollection of what was once there, much as what happens for many visitors when they pass by the sites that were former logging camps along many of the trails.

I believe there should be something different about wilderness that distinguishes it from the non-wilderness areas that surround it. For many users the differences are fairly subtle, and include reduced signing, a lack of trail blazing, and a slightly lower standard of trail maintenance. The presence of the suspension bridge contributes to the perception that the differences really are subtle. Removing the bridge will add to the area's wilderness character by removing this influence and imprint of man. There would no longer be a substantial structure to remind visitors that man's work extends deep into the middle of the Pemigewasset Wilderness. Visitors will need to be more self-reliant, accept more challenges, and engage in more careful trip planning once the bridge is removed. These attributes are consistent with wilderness values and what one should expect when visiting a wilderness.

I thoroughly considered the potential impacts this action could have on the safety of visitors to the Pemigewasset Wilderness and the safety of members of the search and rescue community involved in operations in the area. Closing the 0.7 mile stretch of the Wilderness Trail leading up to the bridge site would eliminate a dead end section of the trail leading to the river which would potentially encourage hikers to attempt a ford. Eliminating this section of trail will reinforce the need to plan routes safely, starting on the side of the river which leads to your intended destination. As a result, any visitor who opts to try to ford the river is doing so at their own risk. Removal of the suspension bridge does not force someone to ford the river. During the scoping process, New Hampshire Fish and Game Search and Rescue personnel were consulted and related that it would be speculative, at this point, to conclude that removing the bridge would cause more search and rescues.

During the scoping period, I read and heard passionate arguments for keeping the bridge and to preserve the eleven mile loop that connects the Lincoln Woods, Wilderness, Cedar Brook, and Eastside trails. The fact that it follows railroad grades that lined the banks of the East Branch has made this a very popular and relatively easy day hike and cross-country ski route in winter. Its gentle grade affords access to a wider range of abilities and its convenient trailhead access at Lincoln Woods along the Kancamagus Highway adds to its popularity. One of the implications of this decision was a compromise of visitor convenience and comfort by removing the loop possibilities. However, as outlined in The Wilderness Act, Forest Plan, and Forest Service Manual, in a conflict such as this, between wilderness values and visitor convenience and comfort, preserving the wilderness resource is the overriding value. The role of wilderness is not so that it can be manipulated by man to serve a particular recreational activity. While this loop trail option will be lost as a result of this decision, visitors will still be able to travel up and back on either side of the river. Also, it is not the only loop trail of its kind for skiers or hikers available on the Forest (see Appendix A — Response to Comments,

FS Response 5.1; and Appendix B — Alternative Hiking and XC Ski Loops to Lincoln Woods On or Near the Pemigewasset District.

By now I hope that you have an appreciation for some of the things I considered in making this decision. As Secretary James Wilson wrote to our first head forester, Gifford Pinchot, in 1905, “Where conflicting interests must be reconciled, the question will always be decided from the standpoint of the greatest good for the greatest number in the long run.” I kept these words in my mind as I reviewed the responses to our scoping letter and the analyses of the resources involved. I truly appreciate all of the interest you have shown in this project, and it is not a decision I took lightly.

For a period of time, there will be a deliberate education effort to alert people to the trail system changes. I see this as a critically important challenge for which I ask your assistance if you are in a position to provide it. The countless number of maps, guide books, online resources, and people who may not be aware of this action will take some time to update and inform. We will provide as much appropriate signing and information as possible; however, much of the published information about hiking in the White Mountains is not from the National Forest. Your willingness to share this information could save many people from having to make some last minute trip planning changes.

3 Background

3.1 Project Area

The Pemigewasset Wilderness Bridge Removal project is located in the heart of the Pemigewasset Wilderness of the White Mountain National Forest, in the Town of Lincoln, Grafton County, New Hampshire. The Pemigewasset Wilderness falls within, and is managed by, the Pemigewasset Ranger District. The project area is accessible from many trailheads off Route 302 and Route I-93, among others, but the most direct route is a hike of 5.5 miles on the Wilderness Trail from the Lincoln Woods trailhead off the Kancamagus Highway (NH Route 112). The bridge lies in an area designated in the WMNF Land and Resource Management Plan (Forest Plan) as Management Area 5.1 Wilderness; this MA designation is commensurate with the congressionally designated boundary for the Pemigewasset Wilderness. Two bridges are included in this decision: the “Suspension Bridge” and the “Black Brook Bridge”.

3.2 Purpose and Need

The Forest Plan describes the purposes of MA 5.1 to include:

1. Manage as part of the National Wilderness Preservation system in accordance with the Wilderness Act of 1964, the Eastern Wilderness Act and individual Wilderness enabling legislations.
2. Provide a range of Wilderness values including social, scientific, ecological, and recreational.
3. Recognize the particular importance of maintaining Wilderness character within the northeast, including the character of an untrammelled landscape, where population pressures are intense and the overall landscape has been heavily modified

Facilities across the Forest are inspected on a regular basis to assess structural conditions as they relate to maintenance needs and public safety.

A field inspection of the Suspension Bridge in 2008 conducted by Forest Service engineers concluded that the wood components of the bridge, with the exception of the suspension towers, had deteriorated and the bridge would be unsafe to cross by the end of the 2009 summer field season. As a result of this determination, the Pemigewasset Wilderness Bridge Removal Project was proposed with a primary purpose aimed at addressing the public safety concerns associated with the bridge and to ensure compliance with the Forest Plan with regard to nonconforming structures (the bridges) in Wilderness. The Wilderness Act of 1964, the Forest Service Manual, and the WMNF Forest Plan require preserving the wilderness character and sustaining and protecting natural conditions of any area designated as Wilderness. Removing the bridges will fulfill these requirements and provide a more primitive recreational experience for visitors to the area.

3.3 Minimum Requirements Analysis

The Minimum Requirements Analysis identifies, analyzes, and selects management actions that are the minimum necessary for wilderness administration. It applies direction from the Wilderness Act and incorporates a two-step process. Step 1 determines whether administrative action is necessary. If action is found to be necessary, then Step 2 provides guidance for determining the *minimum* activity.

No Action: The no action alternative would allow for the bridges to remain in place and the .7 mile section of the Wilderness Trail to remain open. This alternative was not analyzed further because the 180-foot suspension bridge is currently unsafe for travel and its continued presence would encourage some visitors to take the risk of using it to cross the river. Additionally, as the structure deteriorated and fell into the river over time, it would be not only a hazard, but would also leave a lasting imprint of man in the East Branch of the Pemigewasset River. Alternative 1, no action, would have some impact on the area's existing wilderness character because it requires fencing and signing. Though these additional structures are justified for safety reasons, this alternative results in more structures and is contrary to law and policy on wilderness stewardship. Moreover, leaving an unsafe structure in place puts the public at an unnecessary risk.

Repair or Rebuild the Suspension Bridge: The alternative to repair or rebuild the suspension bridge and leave the bridge over Black Brook and the .7 mile section of the Wilderness Trail open was suggested by members of the public during the scoping process and was considered as an option from the start of the Minimum Requirements Analysis. This alternative was carefully considered and evaluated. The engineering staff analyzed the components that would need to be replaced, calculated weights, and developed cost estimates for both material and labor needed to repair the bridge. Repairs would have extended the life of the bridge approximately another 20 years before it was estimated the wooden support towers would have to be replaced. The interdisciplinary team reviewed repairing the bridge in light of wilderness management direction concerning non-conforming man-made structures. The team also considered

the concerns voiced during the public scoping process to continue to maintain the bridge. All of these factors had to be considered together in an evaluation of the potential trade-offs associated with repairing the bridge versus removing the bridge and de-linking the Eastside Trail from the Wilderness Trail. It became clear that management direction, both in law and policy, was strongly moving us toward removing the bridge; however, the public's expressed desires to repair the bridge and maintain this trail connection are also considered in the decision making process. In the end it became a management decision which had to consider public safety as well as the purpose and need of the project in the area concerned. The rationale for not proceeding with an alternative to repair or replace the bridge is also discussed in section 2.

Remove the Bridges with Motorized Equipment: The Minimum Requirements Analysis also considered an alternative to remove the bridge with motorized equipment as an exception to our rules and regulations. This alternative considered the effects of the project on wilderness character, heritage and cultural resources, maintenance of traditional skills, safety of personnel and visitors, economics and time constraints, and additional site and action-specific criteria. The decision to use primitive tools to dismantle the bridges and stock animals to remove them was made after thorough analysis of the various effects that both motorized and non-motorized tools would have on the resources. Though there are trade-offs between extended pack stock trips on the trail and a helicopter to sling load materials to and from the site, pack stock are compatible with wilderness values and character, while helicopters are not. We gave careful consideration to the impacts on the trail from the pack stock and felt that these impacts can be mitigated by a winter removal with pack stock and dog sleds. We will use these means to extract the heaviest components of the bridge during the winter and, if necessary, manually carry the remainder of the components out of the wilderness during the snow free times of the year.

4 Decision to Be Implemented

There are three main actions that comprise the Pemigewasset Wilderness Bridge Removal Project.

- Remove the 180-foot suspension bridge which spans the East Branch of the Pemigewasset River and re-route a 100 foot section of the Eastside Trail.
- Remove the steel I-beam bridge which spans Black Brook.
- Close and rehabilitate the 0.7 mile section of the Wilderness Trail between the Bondcliff trail and the Suspension bridge.

Remove the Suspension Bridge: During the fall of 2009 work will begin to dismantle the 180-foot suspension bridge which spans the East Branch of the Pemigewasset River. The bridge will be closed to all foot traffic and Forest Service crews will take the structure apart with hand tools. Materials that cannot be carried out the wilderness prior to winter will be temporarily stockpiled in the vicinity of the site until there is snow cover and the ground is frozen. During the winter, stock animals will be used to haul the bridge materials to the wilderness boundary at which point trucks will be used to haul the materials away for salvage or disposal as appropriate. A 100-foot section of the Eastside Trail will be re-routed along an existing skid trail near the suspension bridge

site in order to bypass the section of trail which currently turns toward the bridge site. This rerouted section of trail will avoid the bridge site and make for a more direct passage along the Eastside Trail. The old section of trail to the bridge site will be rehabilitated with native brush. It is anticipated the removal of the stockpiled bridge material will occur during the winter of 2009-2010; however, it is possible that it may extend into the winter of 2010-2011 depending on resource availability.

Remove the steel I-beam bridge over Black Brook: Time and weather permitting, after the suspension bridge is removed the steel I-beam bridge over Black Brook will be dismantled with hand tools and removed from the wilderness with stock animals in winter. This bridge will be removed via the Wilderness Trail to Lincoln Woods Trailhead. Disassembly of this bridge may overlap into the fall of 2010 depending on 2009 progress and resource availability.

Close the 0.7 mile section of the Wilderness Trail: After the bridges are removed from the Wilderness, the .7 mile section of the Wilderness Trail between the Bondcliff Trail and the suspension bridge site will be closed. The treadway will be rehabilitated with native brush.

In addition to the actions mentioned above, there will be an information campaign to disseminate information about these projects to the public and to companies involved in publishing guide books and maps. All trailheads accessing the Pemigewasset Wilderness will be posted with notices to advise the public of the trail and access changes.

5 Rationale for Categorically Excluding the Decision

Based on information in the project record and similar activities on the WMNF, I have concluded that this decision can be categorically excluded from documentation in an environmental impact statement or environmental assessment.

Decisions may be categorically excluded from documentation in an environmental impact statement or an environmental assessment when they are within one of the categories found at 36 CFR 220.6(d) and (e), and there are no extraordinary circumstances related to the decision.

5.1 Category of Exclusion

I have determined that the selected action is a routine activity within the following category of exclusion found at 36 CFR 220.6(e)(1):

Construction and reconstruction of trails.

This category is appropriate for the decision because the environmental effects associated with the bridge removal project best fits this category and because other projects of similar nature have been accomplished within the parameters of this category with no adverse environmental effects.

5.2 Finding that No Extraordinary Circumstances Exist

Based on information presented in this document and the entirety of the project record, I have evaluated the resource conditions listed in 36 CFR 220.6(b)(1) and determined there are no extraordinary circumstances related to this project. As

indicated in 36 CFR 220.6(b)(2), the mere presence of one or more of the listed resource conditions does not preclude use of a categorical exclusion. It is the degree of the potential effects of a proposed action on these resource conditions that determines whether extraordinary circumstances exist. As long as the potential effects on these resources are minor or non-existent, there are no extraordinary circumstances (Forest Service Handbook 1909.15, Chapter 30.4). A summary of the project's potential effects on each resource condition follows.

Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.

The Endangered Species Act requires that federal activities not jeopardize the continued existence of any species federally listed or proposed as threatened or endangered, or result in adverse modification to such species' designated critical habitat. As required by this Act, potential effects of this decision on listed species have been analyzed and documented in a Biological Evaluation. As detailed in the Biological Evaluation, this decision will have "no effect" on listed species or designated critical habitats because no listed species or critical habitats have the potential to occur in the area that would be affected by this project.

Potential effects of this decision on Regional Forester sensitive species have been analyzed and documented in a Biological Evaluation.

Floodplains, Wetlands, or Municipal Watersheds

Executive Orders 11988 and 11990 direct federal agencies to avoid adverse impacts to floodplains or wetlands, which are defined in the executive orders. The project is located in the floodplain for the East Branch of the Pemigewasset River. Forest Plan management direction and project design features will ensure that impacts to the floodplains are prevented. Therefore no extraordinary effects to floodplains and wetlands from this project will exist.

This decision will not affect municipal watersheds because there are no municipal watersheds in the area.

Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas

This decision includes activity within the Pemigewasset Wilderness. The activity within the wilderness includes removal of two non-conforming, man-made bridges and closing .7 miles of the trail between the two bridges. The degrees of potential effects on wilderness character are being improved by removing the bridges therefore no extraordinary impacts exist.

Inventoried roadless area or potential wilderness area

There are no inventoried roadless areas from the Roadless Area Conservation Rule or WMNF Forest Plan inventories in the area that would be affected by this decision. Therefore this decision will not affect inventoried roadless areas.

Research Natural Areas

There are no Research Natural Areas in the project area. Therefore, this decision will not affect Research Natural Areas.

American Indian and Alaska Native religious or cultural sites; and archaeological sites, and historic properties or areas

This decision complies with the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. The bridges to be removed as part of this decision are not cultural resources or historic structures. Therefore this decision will not affect cultural sites, archeological sites and historic properties or areas.

6 Public Involvement

This project was listed on the quarterly White Mountain National Forest Schedule of Proposed Actions (SOPA) and will remain on the SOPA until after a decision is made. Direct mailings of a scoping package were sent on April 22, 2009, to approximately 134 interested parties, partners, state and local governments, and other organizations (Project Record, mailing list), and posted on the White Mountain National Forest website. The *New Hampshire Union Leader* newspaper printed an article about the proposed project on April 29, 2009, with information on how to comment. The proposal was also discussed with visitors at the Forest Service's Lincoln Woods Visitor Center and the White Mountain Attractions Visitor's Center in Lincoln, NH, as well as at various other trail-heads and information outlets. A meeting was held on April 13, 2009, with the Town Lincoln Selectmen to discuss the project proposal. Interested members of the public were encouraged to comment on the project. Due to the amount of public interest this project generated, the Forest Service re-opened the scoping comment period for an additional 30 days starting on June 8th. We also hosted a public information meeting on June 12, 2009, to allow for a variety of opportunities and outlets for the public to comment on this project.

The Forest Service received over 115 letters from interested individuals and organizations. Many comments urged the Forest Service to repair or rebuild the suspension bridge. Many people who commented pointed out the value of the suspension bridge as the key connector to make a loop of the Eastside Trail and the Wilderness trail from the Lincoln Woods parking lot, and urged us to keep the bridges intact for recreation purposes. There was some positive reaction to the proposal and the majority of these people cited wilderness values in their support of the project. Comments received from these scoping efforts were used to refine the project, to explore the possibility of extraordinary circumstances, and to evaluate potential effects of proposed activities on resources. For a detailed response to comments see Appendix A.

7 Findings Required By and/or Related to Other Laws and Regulations

My decision is consistent with the WMNF Land and Resource Management Plan and complies with all applicable laws and regulations.

8 Administrative Review or Appeal

This type of activity is not covered by the 2005 Earth Island Institute v. Ruthenbeck court ruling. Therefore this decision is not subject to appeal in accordance with 36 CFR 215.

9 Implementation Date and Contact

Implementation of this decision may begin immediately.

For additional information concerning this decision, contact: John Marunowski at email <jmarunowski@fs.fed.us>, or by phone at 603-536-1315 x4016 or by FAX 603-536-5147.

Additional information about this decision also can be found on the White Mountain National Forest web page at <www.fs.fed.us/r9/forest/white_mountain>.

/S/ Molly Fuller 09/11/2009

MOLLY FULLER
Pemigewasset District Ranger
Responsible Official

Date

Appendix A – Response to Comments

1 Health and Safety

1.1 The lack of advance notice to the public about the bridge removals is a safety hazard. People will be planning trips into the Pemigewasset Wilderness based on maps which are out of date.

As part of the project, we will work to disseminate the information about the changes to the trail system. This includes informing map and guidebook producers, placing signs at trailheads that access the wilderness, releasing statements to local news sources, and posting it on the Forest's website. In addition, hiking community websites and forums can be used to assist in ensuring that the information is available. Field personnel, Forest recreation staff and visitor information centers will be critical to getting the message out.

1.2 The bridges are important for emergency evacuations from the wilderness.

Historically, the bridge has not been relied upon for emergency evacuations. Since there are trails on either side of the river, visitors and search and rescue resources can safely access all trails in the wilderness without having to ford the East Branch of the Pemigewasset. A ford of Cedar Brook would be required on the Eastside Trail which can be quite substantial during the high runoff times of the year. Just like visitors properly planning for a trip, search and rescue managers will have to properly plan for their incidents, and decide which route is best.

1.3 There is no reliably safe way to cross the river without a bridge. By removing the bridges you are exposing inexperienced hikers and skiers to the dangers of fording the river.

Crossing the river is always a personal choice. It is incumbent upon the hiker to decide whether or not they are comfortable with crossing. Fording a stream can be a fulfilling, and powerful experience, and can strongly contribute to a true wilderness experience. However, it should only be done with extreme caution, when conditions allow and sound judgement is used. With the closure of the .7 mile section of the Wilderness Trail, the loop will no longer exist. Visitors on the Cedar Brook Trail will have no reason to cross, as there would be no trail on the other side. The trail closure provides for safety by eliminating the temptation to cross at that site. The effect of the bridge removal is that visitors need to spend to the time to plan ahead and prepare for the hazards they may face.

1.4 When you remove the Black Brook Bridge some people may try to use the old railroad trestle to cross the brook and get hurt.

The crossing of Black Brook is part of the .7 mile section of trail being closed. As such, crossing the brook will no longer be necessary. Visitors desiring a better look at the Trestle Bridge will have to assess if the stream conditions, and decide to cross the brook. At present, there are already large gaps between the Trestle Bridge, and the terrain surrounding it, as well as signs warning of instability.

1.5 There should be further evaluation of user safety and the consistency of this project proposal with the standards and guidelines in the White Mountain National Forest Land and Resource Management Plan.

Given the fact there is a trail on either side of the river (the Wilderness Trail and the Eastside Trail) there is no absolute need to cross the river as you can get safely out to Lincoln Woods no matter where you are. Any visitor that opts to try to ford the river is doing so at their own risk. Our removal of the suspension bridge is not forcing them to ford the river.

The Forest Plan states (WMNF Plan 2-3) under closures G-1 “Forest Supervisor Orders or other means may be used to restrict or close activities, uses, or areas in order to prevent, mitigate, or correct existing or potential resource impacts, trail development, health and safety issues, user conflicts or other management concerns.” The safety issue at hand is a deteriorating bridge. The WMNF forest plan directs us to move forward to mitigate the safety hazard. The District Ranger has chosen to do so in a manner that also addresses impacts to the wilderness resource. See section 2 of the Decision Memo for more information on how this project complies with the WMNF Forest Plan and other applicable laws.

1.6 Because of deteriorating material, for safety sake, it should be removed.

A team of engineers from the White Mountain NF, and US Forest Service Region 9 inspected the bridge in 2008. Their inspection was the impetus for this project. We strive to provide for the safety of Forest visitors, and this project will help us attain that goal, while enhancing Wilderness values.

1.7 If safety is a factor, consider placing a bridge near the East Side Campground, outside of Wilderness.

This is not part of the proposed action but it will be considered during planning for future projects in the area

2 NEPA Process

2.1 The length of the scoping period to provide input for this project was inadequate.

We agree the public comment period starting April 22, 2009 was too short for the amount of interest and concern this project generated. Input from interested parties is an integral part of our decision making process. We use comments received in scoping along with the best available science, input from our resource specialist, direction from our forest plan and applicable laws to formulate the best possible decision. In order to make sure all interested parties were able to comment on this project we re-opened the proposal to public comment on June 8th for an additional 30 days and hosted a public meeting on June 12th, 2009.

2.2 Decisions on other bridges such those in the Great Gulf and Dry River Wilderness Areas and the Franconia Brook bridge which is close to the Pemigewasset Wilderness Area reveal management inconsistencies with this decision.

Each of these decisions regarding a bridge in or near a wilderness area have a different set of resource concerns, safety implications and surrounding trail layout for alternate routes. It is the job of the deciding officer to weigh all the factors concerning an individual bridge with the direction in the WMNF Forest Plan and wilderness law. It would not be possible for one to make a blanket decision for all bridges in wilderness areas. The only consistencies are that we

apply wilderness policy and mandates and thoroughly examine the implications of each individual decision .

2.3 The consequences of the proposed actions were not fully and completely considered and no alternative actions were examined as they should have been for this project.

An interdisciplinary team of resources specialists fully examined the project area and analyzed the impacts of the decision. A Minimum Requirements Decision Guide (MRDG) was used to determine if administrative action is necessary, and to analyze four alternatives: 1. no action, 2. repairing the bridge with non-motorized equipment, 3. removing the bridges with non-motorized equipment and decommissioning the trail and 4. removing the bridges with motorized equipment and decommissioning the trail. All the aforementioned reports and the MRDG are filed in the project record and available for public review.

2.4 The materials currently available do not contain enough analysis or information for an informed decision.

The scoping report sent to the public is a summary of the proposed project and a request for public comment on the proposal. The District Ranger who made the decision on this project had all the public comments received on this project, reports from resource specialists, the MRDG (described in answer 2.3), the WMNF Forest Plan and applicable laws and regulations to refer to when making her decision. If you would like to see the project record please contact John Marunowski at <jmarunowski@fs.fed.us>.

3 Wilderness

3.1 To remove the bridge parts by primitive non-motorized means is carrying purist ideals too far. The trails would quickly recover to their primitive state if mechanized equipment is used.

According to the Wilderness Act of 1964, "... there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area". The minimum requirements analysis conducted for the project, analyzed four different alternatives. One of the alternatives was removing the bridge with motorized equipment. This alternative analyzed using a helicopter to sling load bridge materials out of the Wilderness. Our final determination showed that we can lessen our impact on the trail and Wilderness character by disassembling and removing the bridges in the following fashion. Disassemble the suspension bridge in the fall and stack the bridge components. If weather allows, disassemble the Black Brook steel I beam bridge and stack those components. Then, remove the heavy bridge components in the winter using stock and dog sleds. Remove the lighter components with backpacks throughout the snow free times of the year. Disassembly of the Black Brook steel I beam bridge may overlap into the fall of 2010 depending on 2009 progress. Once beyond the Wilderness boundary, motorized equipment can be used to haul the components out of the forest. By using non motorized equipment in Wilderness we are holding ourselves to the standards set forth in the Wilderness Act.

3.2 The proposed additional signage to inform hikers of the bridge removal is not compatible with wilderness.

All of the trailheads that access the Pemigewasset Wilderness will be signed to inform hikers of the bridge closure. Because all of the trailheads lie outside the Wilderness area, limited signage will be necessary within the Pemigewasset Wilderness. Some temporary signs may exist at the bridge site to inform the public of the immediate safety hazard of the bridge removal. Signs of this nature are compatible with wilderness to mitigate a safety concern.

3.3 If you look at the Pemigewasset Wilderness as whole, this bridge is just a tiny part of man's footprint on the wilderness.

We agree, the Pemigewasset Wilderness has seen a heavy human hand for more than 100 years and these bridges are just a small part of the impacts visible today. Since the suspension bridge was in need of repairs for safety reasons, it made sense to analyze whether we should be repairing or removing the structures before we move forward with repairs. After consideration of the public comments received on this project, reports from resource specialists, the MRDG (described in response 2.3), the WMNF Forest Plan and applicable laws and regulations the District Ranger decided that bridge removal would lessen man's footprint on the wilderness thereby returning this portion of the wilderness to its intended state, wild.

3.4 A bridge does not detract from the wilderness character and experience.

Wilderness designation does not try to profess that the area is pristine or untouched by the effects of mankind. Especially areas in the East, like the Pemigewasset Wilderness, where entire swaths of the forest were clearcut by loggers. However, the wilderness designation does direct land managers to let the area be shaped by the forces of nature rather than the hand of humans, and to limit the amount of development to only that which is necessary to administer the area as Wilderness. The bridges are not necessary for successful administration or recreation use of the Pemigewasset Wilderness and removing them will enhance the area's wilderness character.

3.5 The bridge does not distract from the appearance of the river itself and is scarcely visible from the trail once beyond the immediate approaches. As a result, it does not influence the untrammelled feel of the area or prevent a primitive type of recreation.

We asked ourselves several questions when it came to wilderness character. Does our proposal provide for an untrammelled character? Is wilderness unhindered and free from modern human control or manipulation? Does our proposal provide for an undeveloped character? Is the wilderness without permanent improvement or human occupation? Does our proposal provide for a natural character, where Wilderness is free from the effects of modern civilization? Does our proposal provide for a primitive and unconfined type of recreation where people can encounter solitude, freedom, risk and the physical and emotional challenges of self discovery and self reliance.? After asking ourselves these questions, we found that indeed our proposal does influence and enhances the untrammelled feel of the area, provides for a primitive type of recreation and enhances the undeveloped quality of the Pemigewasset Wilderness.

3.6 As stated in the 1984 NH Wilderness Act (section 4) “except as necessary to meet minimum requirements for the administration of this area”. This bridge is a minimum requirement for a trail system that is used by so many hikers.

A full Minimum Requirement Decision Guide analysis (MRDG as discussed in 2.3 and 2.4) has been completed to determine the minimum action necessary for this project. It was determined that since there are two trails on both sides of the Pemigewasset River and that removal of the bridge would in no way limit access to any area of the Pemigewasset Wilderness, that removal of the bridge fulfills the minimum requirement.

3.7 I believe more damage is done to wilderness areas when those venturing into it spread out and make their own trails and water crossings. Leaving the bridges would actually save the immediate wilderness area from human impacts.

An associated action to removing the suspension bridge is to close the .7 miles section of the Wilderness Trail which leads to the bridge location. By removing the access to the bridge location, there will be no need for the public to ford the river. This will eliminate the threat of user made trails to fording spots and associated impacts. Visitors, as in any part of the wilderness, may still choose bushwhack along the banks or cross the river. It is not part of our wilderness management policy to restrict off trail travel. The Wilderness Act states “A Wilderness ... has outstanding opportunities for ... a primitive and unconfined type of recreation”.

3.8 This plan will greatly increase the effects and impacts of human use in other areas of the Pemigewasset Wilderness.

The hike required to reach some points within the wilderness from certain trailheads will be longer with the removal of the bridges, but access will not be restricted to any area located within the Pemigewasset Wilderness. Areas beyond the bridges will still be accessible via the East Side Trail, and areas located in the northern Pemigewasset Wilderness can be accessed by the Wilderness Trail. Since the access is not limited, it is expected that all areas of the Pemigewasset Wilderness will see the same use patterns prior to the bridges removal. See 3.10 for patterns in existing recreation use.

3.9 Removal of both of these bridges will be a positive step in bringing the Pemi Wilderness into closer conformance with the Wilderness Act and will put some “wild” back into the Wilderness.

We agree. Thank you for your comment.

3.10 The Scoping Letter implies that traffic is expected to shift to the East Side Trail after the closure. This contradicts the Management Plan (MA 5.1, Wilderness, pg. 3-9): “[U]se will not be dispersed from high- to low-use areas by management actions.”

The scoping report refers to the Eastside Trail in the following excerpt, “Built in 1960, the (suspension) bridge provides a crossing over the East Branch of the Pemigewasset River on the Wilderness Trail and provides access from the north and west side of the East Branch of the Pemigewasset River to the Cedar Brook Trail, the Thoreau Falls Trail and all points east in the Pemigewasset Wilderness. These trails can also be accessed from the Eastside Trail which leaves

from the Kancamagus Highway in the same location as the Wilderness Trail". We do not feel that traffic will shift to the Eastside Trail after the closure, we are simply stating that access to the Pemigewasset Wilderness will not change. We believe the traditional use patterns of the Pemigewasset Wilderness will stay the same. The popularity of overnight facilities such as Guyot and 13 Falls draw in considerable number of backpackers as do four thousand footers such as Bondcliff, Mt. Bond, West Bond and Owls Head. These higher use areas are still accessible via the Wilderness Trail whereas the less popular areas such as the Cedar Brook Trail and the Stillwater Junction area are accessible via the Eastside Trail. We will continue to rely on our wilderness monitoring data to show trends in use patterns.

3.11 If the steel bridge is out of place in wilderness it could be replaced by one constructed of natural materials.

Part of the connected action of this project is to close a .7 mile section of the Wilderness Trail which leads to the suspension bridge and lies just beyond the Bondcliff Trail junction. We felt that closing the trail would provide for safety and not create a dead end. Within that trail closure is the Black Brook steel I beam bridge. Once the trail is closed, the steel I beam bridge will no longer serve a purpose to hikers within that closure. Secondly, the removal of the steel I beam bridge will enhance the wilderness character of the area by removing a man-made, non-essential, nonconforming structure. Therefore, to rebuild the bridge is not necessary given the trail closure and the enhancement to wilderness character.

3.12 The suspension bridge predates the wilderness designation by several decades, and should be left there.

When the Pemigewasset Wilderness was designated as wilderness in the 1984 New Hampshire Wilderness Act, the White Mountain National Forest accepted the responsibility of managing this area under a special set of guidelines as conveyed in the 1964 Wilderness Act. The Pemigewasset Wilderness was designated due to its wild and primitive character. While the bridge does pre date wilderness designation, once the wilderness was designated as such, all management actions from that point forth direct land managers to let the area be shaped by the forces of nature rather than the hand of humans, and to limit the amount of development to only that which is necessary to administer the area as wilderness. We feel removing the bridges and closing a section of trail is the minimum necessary to administer this area as wilderness.

3.13 There should be some wiggle room in the interpretation of the wilderness rules.

Wilderness management is not a black and white world. There are many documents which guide our decision making process such as the Wilderness Act, the Forest Service Manual, and the White Mountain Land and Resource Management Plan. The District Ranger does have some flexibility when following the direction presented in these documents to account for safety and the intricacies of each individual situation. The decision was heavily influenced in the spirit and intent of the act and the need to look forward into the future as development pressures and a changing world make the designated Wilderness Areas more rare and important.

3.14 Planners used an ends justify the means approach to rationalize their proposed actions in the MRDG.

As discussed in response 2.5, we came up with a list of alternatives for this proposal and weighed those proposals against wilderness character and other attributes. These values included safety of forest visitors and employees, economic and time constraints, maintaining traditional skills and identification of heritage or cultural resources. In essence, each alternative was weighed against both sets of attributes as to provide for a well rounded balance between wilderness character and other important characteristics. While one may think that wilderness designation pre judges a course of action, in fact each course of action is given careful consideration.

3.15 This project will greatly improve the Wilderness characteristics in this area and better reflect the ideas set forth in the 1964 Wilderness Act.

The 1964 Wilderness Act, along with the 1984 New Hampshire Wilderness Act, Forest Service Manual, and White Mountain National Forest Plan were documents that were used to reach this decision. The 1964 Wilderness Act guides us to manage the land to be “untrammeled,” without permanent improvements. The removal of these bridges will help us bring the Pemigewasset Wilderness Area closer to the vision of the Wilderness Act creators.

4 Cost

4.1 A financial analysis of the cost of removal vs. cost of repair for the Wilderness Bridge must be presented.

The costs of removal vs. the cost of repair of the bridges along with 4 alternatives were analyzed in the MRDG (described in answer 1.3). The MRDG is filed in the project record and was used by the District Ranger in her decision making process for this project.

4.2 If costs are a deciding factor against repairing the bridges then look for funding in other areas such as parking fees, special funds or cutting expenses in other areas.

Cost was not a deciding factor in the decision making process for this project. The District Ranger was most concerned with coming up with a sound management decision while balancing public comments received in scoping along with input from our resource specialist and direction from our forest plan and applicable laws.

4.3 If it is cheaper to repair the bridge, then we ought to do so.

After doing a cost analysis in the MRDG of 4 alternatives (described in answer 1.3) we determined that it was not cheaper to make the repairs that are immediately necessary given the future repair and maintenance costs that would be needed over the life of the bridge.

5 Recreation Use Opportunities

5.1 Hikers and skiers will be losing a very enjoyable and easily accessible loop if the bridges are removed.

Yes. This is true. However, many other loop hikes abound on the Forest, at varying degrees of difficulty. Some less difficult loop hikes on the Pemigewasset

Ranger District include East Pond, and Little East Pond, and the Kineo, and Three Ponds Trails. For those looking for skiing opportunities, they can be found at the Beaver Brook Ski Area off of US Route 3 in Bethlehem, the Lafayette Ski System in Franconia, Zealand Valley on US Route 302, Smarts Brook on NH Route 49, Flat Mountain Pond Trail, and Sandwich Notch Road. Additional skiing opportunities include Sawyer Pond, Nanamocomuck Ski Trail, and Oliverian Brook Ski Trail. These provide a wide range of opportunities for skiing and hiking on the Forest.

5.2 If you remove the bridges you will be taking away the only relatively accessible hiking or skiing loop of its kind on the White Mountain National Forest. Many of the uphill trails are not an option for those of us who are restricted in some way (handicapped, elderly, very young). We hope there will always be a bridge at the East Branch of the Pemigewasset River in this location to make the Wilderness Trail/ East Side Trail loop possible for the rest of us.

We recognize the fact that we eliminating a popular loop hike and ski. However, our policies, guidelines, and legislation ask us to manage the wilderness for values consistent with the 1964 Wilderness Act, as well as the 1984 New Hampshire Wilderness Act, US Forest Service Handbook, and White Mountain NF Plan. Wilderness cannot always be easily accessed, and that is recognized in legislation. Though the loop will no longer be there, those who are restricted will still be able to access the wilderness. “Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. *Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.*” Forest Service Manual 2320.6 – The Wilderness Management Model and the Wilderness Act. Building a bridge over the East Branch of the Pemigewasset River outside of wilderness was suggested during the scoping process and will be reviewed for potential projects in the future.

5.3 The effect of the bridge removals will be to limit and, for some people, outright deny access to OUR (i.e., all American citizens) wilderness area.

Since there are trails extending up either side of the East Branch, we are not limiting or denying access to our wilderness. The bridge will eliminate a loop, but the opportunity will still be there for people to enjoy the wilderness. With this project we will not be creating any barriers for people to enter the area, we will only be changing the way in which it is accessed.

5.4 We have an abundance of non-wilderness areas with easy access for human traffic close at hand in New Hampshire and in the White Mountains.

We agree. Wilderness legislation was enacted to preserve land to exist in a wild, untrammled state. The 1964 Wilderness Act provides for recreational use, but deems that it should be a more primitive experience. The removal of the bridges will provide this opportunity.

5.5 The accumulating effect of continually designating large areas of the WMNF as wilderness, and then using that as an excuse for failing to do appropriate maintenance, is to consciously deny use by rendering it too difficult or dangerous to access for all but a select few.

Wilderness is not designated to limit access to an area. As mentioned in response 5.3, we are creating no barriers to access; we are simply changing the way in which visitors access the area. We are beholden by the United States Congress, and therefore, the People of the United States, to manage this piece of land in accordance with the 1964 Wilderness Act, as well as the 1984 New Hampshire Wilderness Act. The appropriate course in this case is to use these laws, as well as guiding documents in the form of the US Forest Service Handbook, and the White Mountain National Forest Plan, to provide opportunities for primitive recreation, solitude, as well as other values.

5.6 The removal of any structures based strictly on wilderness guidelines should be coupled with construction of similar structures outside wilderness so as to maintain the Forest-wide level of amenities.

As part of the decision making process, outlined in the MRDG, we asked ourselves if options exist outside of the Pemigewasset Wilderness. In this case, it may be possible to construct a bridge near the wilderness boundary. This idea is being considered, and will be assessed as part of a larger management strategy for that area.

5.7 The existing trail structures strikes a proper balance between access and seclusion in the eleven mile loop from Lincoln Woods.

The Ranger fully recognizes it is a difficult balance between providing access for people to enjoy loops in the wilderness, while at the same time reducing the impact of human-made features and she did not make this decision lightly. After careful consideration of legislation and management direction, the intricacies of the location and surrounding trails system and safety, the District Ranger decided that this area could have a better balance between access and wilderness characteristics if the bridge is removed. See responses 5.1 through 5.4 for more information on access and loop opportunities. See responses 3.4 and 3.5 for more information on wilderness characteristics

5.8 Bootleg trails will become the norm as visitors attempt to find their own ways to cross the river, which could lead to destruction of fragile ecosystems as well as erosion of soils within the wilderness.

As stated in responses 1.3 and 1.4, the closure of .7 miles of the Wilderness Trail will eliminate the need to cross the East Branch near the bridge site to form a loop. If visitors properly plan their trips, then there should be little need to ford the river. If visitors should choose to cross the river, they can do so at any point along the Eastside Trail or Wilderness Trail. They won't always be crossing at the suspension bridge site as they will have many other opportunities that don't include a .7 mile bushwack to reach the old bridge site. Both trails follow the river with a good view of possible fording opportunities. If hikers do choose to cross the river they may find it a rewarding experience, consistent with the values set forth in the Wilderness Act. This area will become just like any other part of the forest where visitors can make the decision to stay on the trail or bushwack or ford rivers where they please. As a result, over time this area will be equally as susceptible to erosion of soils as any other, but no more so.

5.9 By closing the seven tenths of a mile between the Bondcliff Trail and the bridge, you are inviting people to create a bootleg trail between the Bondcliff Trail and the Thoreau Falls Trail to complete a popular hiking loop.

Many of the users of the popular loop are looking for a relatively easy experience on flatter trails. We deem it unlikely that this type of visitor would make the considerable effort of bush whacking for more than 1.5 miles. However, your concern is warranted, and this is a condition that we would monitor, as part of our regular wilderness monitoring program.

5.10 Any management action should consider the significance and public attachment a structure can earn over 49 years.

We agree, we carefully considered the significance and public attachment to both bridges while making this management decision. However, this decision was a balance of management direction, safety, public attachment to the structures as demonstrated in the scoping responses and other factors. We believe the decision is the best possible blend of all these important considerations.

5.11 The bridge fulfills the requirements of the Forest Service motto as stated on the bottom of the scoping letter “Caring for the land and serving the people.” The bridge serves people and as a result should not be removed.

We agree, a bridge over the East Branch serves people. However, in wilderness, we will also be serving people by removing the bridge and providing them a more natural and undeveloped recreational opportunity. If this bridge were outside the wilderness area the decision could have very well been to repair the structure. However, when considering a management action all resources must be analyzed for impacts including, in this case, wilderness itself. When the Pemigewasset Wilderness was designated, land managers were handed the responsibility of managing the land in accordance with the Wilderness Act while also caring for the land and serving the people. We have done this to the best of our ability with the Pemigewasset Wilderness Bridge removal project.

5.12 The Forest Service has not replaced one single hiking bridge lost due to naturally occurring conditions, yet they continue to build bridges for snow-mobilers. Such discrimination will only worsen if they close the Pemi bridges.

There are examples of hiking bridges on all three districts of the WMNF that have been re-built or repaired as a result of damage due to naturally occurring conditions. A few such bridges include the Dry River bridge and the Madison Gulf bridge which are both incurring construction work this field season (2009). There are many other projects that are completed, current or planned involving bridges on the WMNF both in and outside Wilderness Areas.

5.13 This important trail section provides a way into cedar brook and the eastern portions of the Pemi wilderness. Do not close it. Yes, I could get there from Lincoln Woods but the trip is much longer and less safe than hiking in from the Wilderness Trail.

Changes in the distance and level of difficulty required to access all parts of the Pemigewasset Wilderness were considered during the analysis of this project. However, this decision also incorporates a careful balance with management direction. For example the Forest Service Manual 2320.6 *The Wilderness Management Model and the Wilderness Act* states: “Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value ...” As a result partly of this and

other management direction, the decision was made to move forward with the bridge removal project.

5.14 The proposal recognizes that there are still ways to access the same area of the Wilderness and it will require prior trip planning.

Prior trip planning is paramount in all cases, but will become more so with the completion of this project. Education will be a large component of the work done before, during and after the bridges are removed. Visitors are responsible for their own safety, but it will be our responsibility to provide them with the correct information, so that they may accurately and safely plan their trips.

6 Heritage

6.1 The suspension bridge is being removed before it reaches 50 years old so that it will be exempt from any historic protection. Take the time to do an appropriate study before taking management action.

This structure is being removed because it is unsafe for use and it does not conform to management direction in the Wilderness Act. The age of the bridge was considered though it was not a determining factor in the timeliness of the proposal. The Forest Archeologist was consulted and a cultural reconnaissance report was completed and submitted to the NH State Historic Preservation Officers (SHPO). SHPO plays a critical role carrying out many responsibilities in historic preservation. Surveying, evaluating and nominating significant historic buildings, sites, structures, districts and objects to the National Register is one such key activity. A report describing our proposal was sent to SHPO and concurrence was given with the project proposal.

6.2 The entire route is a really important historic feature of the Pemigewasset Wilderness.

We agree that the route of the Wilderness Trail is an important historic feature of the wilderness area. After balancing all other resource concerns and management direction we do not feel that the fact that it is an historic route warrants keeping a bridge in the wilderness. Those who still desire to travel the historic route can do so by using wilderness travel skills.

6.3 The Black Brook Bridge is necessary to properly examine and inspect the J.E. Henry Trestle and the next .7 miles of the Wilderness Trail which provides historical interest as a classic example of early 20th century railroad activity.

The steel I beam bridge over Black Brook is not necessary to view the old trestle bridge. Visitors can view the historic structure from the banks or rocks in the stream. Once the bridge over Black Brook is removed, the .7 miles of Wilderness Trail will be accessible by bushwhack and during times of low flow by fording the Black Brook. Removing the bridge does not prevent the public from properly examining the cultural resources in the area. However, visitors will have to do additional planning and use wilderness travel skills to access this area.

6.4 The steel beam bridge is necessary to keep people from using the adjacent historic trestle, although I would love to see a more rustic replacement.

Part of this management decision is to decommission the .7 mile section of trail which includes the historic trestle. This will remove the necessity of crossing Black Brook and prevent people from having to use the trestle to cross the brook.

7 Other

7.1 Pack animals will bring invasive species to the wilderness.

This is certainly possible. In order to prevent this potential negative impact of using pack animals we have developed the following 2 mitigation measures.

1. The pack animals will be required to eat certified weed free hay for 2 weeks prior to commencing work in the wilderness area and during the whole time they are present on the WMNF.
2. The work sites and travel ways will be monitored after the completion of the project in order to catch any invasive species that may take root.

8 Future Plans

Building a bridge over the East Branch of the Pemigewasset River outside of wilderness was suggested during the scoping process. This is not part of the proposed action but it will be considered during planning for future projects in the area.

Appendix B – Alternative Hiking and XC Ski Loops to Lincoln Woods On or Near the Pemigewasset District

XC Ski Loops (Non-Snowmobile Trails)

1. Spruce Goose XC Trail, Zealand Trail, & Zealand Rd. (7-12 miles) Moderate
2. Beaver Brook XC Ski Trails – Multiple Loops (3-10 miles) Easy > Difficult
3. Lafayette XC Ski Trails – Multiple Loops (4-7 miles) Easy > Moderate
4. Greeley Ponds & Livermore Trails (5-9 miles) Easy > Difficult
5. Smarts Brook Trails – Multiple Loops (3-10 miles) Easy > Difficult
6. East Pond & Little East Pond Trails - Kanc side (12 Miles) Moderate
7. Sawyer Pond & Nanamocomuck XC Ski Trails - Multiple Loops (9-12 miles) Moderate
8. Lower Nanamocomuck Trails (3-11 miles) Moderate
9. Olivarian Brook XC Ski Trails (3-12 miles) Easy

XC Ski Loops (Multi-Use With Snowmobiles)

1. Gale River Rd. (8-10 mile loop) Easy
2. Zealand Rd. & Snowmobile Trails (12+ miles) Moderate
3. Mt. Kineo, Donkey Hill & Three Ponds Trails (6 miles) Easy

Hiking Trail Loops

1. Zealand Trail loop, Lend a Hand, Hale Brook Tr. (8 miles) Moderate
2. Greeley Ponds & Livermore Trails (5-10 miles) Moderate
3. Greeley Ponds, Livermore Tr., Flume Path (9 miles) Moderate
4. Smarts Brook Trails – Multiple Loops (3-10 miles) Easy > Difficult
5. Mt. Kineo, Donkey Hill & Three Ponds Trails (6 miles) Moderate
6. Hubbard Brook Tr., Three Ponds Tr., Kineo Tr. (14 miles) Moderate
7. East Pond & Little East Pond Trails – Kanc side (12 miles) Moderate
8. Olivarian Trails (10 miles) Moderate
9. East Side Tr., Cedar Brook Tr., Hancock Notch Tr. (13 miles) Moderate

This is only a sampling of possible loop hikes and XC Ski Trails. There is over 1,400 miles of trails in the White Mountain National Forest and surrounding areas. Additional loops are available in every region.

