



United States  
Department of  
Agriculture

Forest  
Service

September  
2005



# Decision Memo

## Randolph Mountain Club

### Special Use Permit

### Renewal

◆ Crag Camp      ◆ Gray Knob  
    ◆ The Perch    ◆ Log Cabin

**Low and Burbanks Grant**  
**Coos County, New Hampshire**

Prepared By  
The Androscoggin Ranger District  
White Mountain National Forest

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## 1.0 -- Decision

After conducting an environmental analysis and seeking public comment on the Randolph Mountain Club's request to renew their special use permit to operate four backcountry facilities in the White Mountain National Forest, I have decided to renew their special use permit for a tenure of 10 years. The special use permit authorizes the Randolph Mountain Club to occupy National Forest System lands to provide recreation opportunities to visitors in the White Mountain National Forest.

## 1.1 -- Rationale for the Decision

An analysis of the resource conditions (see Section 4.2) revealed no extraordinary circumstances that would require further environmental analysis.

The RMC has owned, maintained and operated Crag Camp, Grey Knob, Log Cabin, and the Perch successfully to the benefit of the White Mountain National Forest. With no compelling reasons such as financial insolvency or poor performance, and with support expressed by those who participated in the environmental analysis, I believe a decision to renew the permit is in the government's best interest.

## 2.0 -- Location, Features, and Background

The four facilities are located in Low and Burbanks Grant on the northwest side of Mount Adams in the northern White Mountains (See Maps 1 and 2). Fees (currently \$5.00-\$10.00/night) are charged for overnight stays. All facilities are first-come, first-serve.

### Gray Knob Cabin

Facility.....Cabin with a Bio-Sun composting toilet and a compost drying rack.  
Elevation..... 4,370 feet  
Capacity.....15 people  
Permit Area....2.2 acres



**Gray Knob Cabin**

### Crag Camp

Facility.....Cabin with a Bio-Sun composting toilet and a compost drying rack.  
Elevation..... 4,247 feet  
Capacity.....20 people  
Permit Area....4.5 acres



**Crag Camp**

## The Perch

Facility.....One three-sided lean-to and four tent platforms with a Bio-Sun composting toilet and a compost drying rack

Elevation..... 4,313 feet

Capacity.....24 people (eight in the lean-to, 16 on the tent platforms)

Permit Area....1.6 acres



**The Perch Shelter**



**Tent platforms  
at the Perch**

## Log Cabin

Facility.....Adirondack-style shelter with a bin/batch composting toilet and a compost drying rack.

Elevation..... 3,263 feet

Capacity 10 people

Permit Area 2.9 acres



**Log Cabin**

## 4.0 -- Category of Exclusion and Environmental Analysis

Renewal of RMC's special use permit is in the category of actions identified in Forest Service Handbook (FSH) 1909.15 Chapter 30, Section 31.2 (15):

“Issuance of a new special use authorization for a new term to replace an existing or expired special use authorization when the only changes are administrative, there are no changes to the authorized facilities or increases in the scope or intensity of authorized activities, and the applicant or holder is in full compliance with the terms and conditions of the special use authorizations.”

## 4.1 -- Rationale for Category

I find that the above category is appropriate for this analysis and decision because the Randolph Mountain Club is not proposing changes in the facilities, uses, or services currently authorized, and continues to comply with the terms and conditions the special use permit. I have determined that there will be no resulting significant effects on the environment, and therefore the proposed action requires no further analysis in an environmental assessment (EA) or an environmental impact statement (EIS).

#### **4.2 -- Resource Conditions and Extraordinary Circumstances**

The environmental analysis included on-site surveys for rare plants and heritage resources, and also determined 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:

##### **4.2a -- Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.**

A Biological Evaluation of the permit area was conducted to analyze and document the potential effects of this decision on listed species and their habitat. An analysis of additional species of concern in the White Mountain National Forest was also conducted. Field reconnaissance closely examined habitat and potential for plant populations. It was determined that the renewal of RMC's special use permit is consistent with the Conservation Measures outlined in the Canada Lynx Conservation Assessment and Strategy, and will have no effect on Canada lynx, which is a federally threatened species but considered extirpated from the White Mountain National Forest

Regional Forester sensitive species evaluated in this analysis are eastern small-footed myotis, northern bog lemming, and Bicknell's thrush. The permit renewal will have no impact on eastern small-footed myotis and would not likely cause a trend toward federal listing or loss of viability for northern bog lemming or Bicknell's thrush. The likelihood of eastern small-footed myotis and northern bog lemming occurring in the permit areas is low. While Bicknell's thrush may occur near the RMC facilities and individuals may be impacted by human presence, renewing the RMC permits will not change existing habitat conditions and serves to concentrate human use so potential impact outside the permit areas is lessened.

The Biological Evaluation and the species lists are available in the Project File.

##### **4.2b -- Floodplains, wetlands, or municipal watersheds**

There are no inventoried wetlands in the permit areas, however there is intermittent water on some of the trails and there are wet areas within the permit areas. Log Cabin is near the headwaters of Mystic Brook and the Perch is near the headwaters of Cascade Brook. The brooks serve as water sources for the facilities. The water source for Gray Knob and Crag Camp is a spring located between the two facilities. Wet areas in the permit areas are small and will not be impacted by the continuation of the existing uses in the area beyond what has occurred from decades of recreation use in the areas. Forest Plan standards and guidelines are designed to protect water and soil resources, and will be applied if any future actions in the permit areas are approved. Any potential impact occurring as a result of approved activities in the permit area will be addressed and mitigated through the permit's annual operations and maintenance plan.

The facilities are not located in floodplains.

A large area of the northern Presidential Mountains is located within a New Hampshire drinking water protection area; however, the RMC facilities are far removed from any residential drinking water source. Renewal of RMC's permit will have no effect on water quality or municipal watersheds.

Forest Plan standards and guidelines are designed to protect water quality and aquatic habitat. Therefore, renewal of the special use permit is not expected to result in any impacts to floodplains, wetlands, or municipal watersheds.

#### **4.2c -- Congressionally Designated Areas**

The four RMC facilities lie on the northern slope of Mount Adams, with the Great Gulf Wilderness stretching south from the summit of Mount Adams. None of the facilities are in the Wilderness, nor will renewal of the special use permit result in any impacts to the Wilderness.

#### **4.2d -- Inventoried Roadless Areas**

The RMC facilities are located within the Great Gulf Inventoried Roadless Area as identified in the proposed Forest Plan (USDA 2004a). Roadless Areas generally have characteristics that would be consistent with Wilderness designation, and are identified using specific criteria such as road density, overall size and measure of solitude, and the amount of recent clearcuts. The four RMC facilities and the recreation uses pre-date the Forest Service's Roadless Area inventories. The facilities and uses do not currently impact the Roadless Area character, nor will renewal of the special use permit with no changes in authorized uses have any future impact on the Great Gulf Inventoried Roadless Area.

The RMC facilities and authorized uses are consistent with the "semi-primitive non-motorized" recreation classification.

#### **4.2e -- Research Natural Areas (RNAs)**

The Forest currently has three designated Research Natural Areas – The Bowl, Alpine Garden, and Nancy Brook. The proposed Forest Plan identifies several additional Research Natural Areas. None of the RNAs or Candidate RNAs will be affected by renewal of RMC’s special use permit.

#### **4.2f -- American Indians and Alaska Native Religious or Cultural Sites/Archaeological Sites, or Historic Properties or Areas**

An examination of cultural resources data followed by field surveys and consultation with the State Historic Preservation Office has revealed no known sites located in the permit areas, hence there will be no impacts to cultural, historic, or archeological sites. The permit areas will be re-evaluated with any future proposals that would involve ground-disturbing activity or other physical disturbance.

### **5.0 -- Public Involvement**

The White Mountain National Forest listed the renewal of RMC’s special use permit on the Schedule of Proposed Actions beginning in April 2005, and mailed 289 scoping reports to interested and affected parties on May 5, 2005. The majority of the respondents support the renewal of RMC’s special use permit. Supportive comments were varied in nature, but many addressed the contributions and stewardship of the Randolph Mountain Club, the safe haven the camps provide at high elevations; and the historic value of the camps. Other responses were supportive but included suggestions and concerns. Several respondents suggested lengths for the permits, either shorter or the maximum. There were some requests for further analysis to address resource issues and recreation uses, and some asked for less, or expedited, analysis. One person opposed the permit renewal, stating that “There is no room for privatization of our forests, they belong to the people and should be free to all, not run by clubs.”

See Appendix A for details regarding public comments and Forest Service responses.

### **6.0 -- Consistency with the Land and Resource Management Plan (Forest Plan) and other Applicable Laws**

My decision to renew the Randolph Mountain Club’s special use permit 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.

#### **6.1 – Forest Plan**

The purpose of the project is to allow RMC to provide public recreation opportunities in accordance with the Forest Plan. The Randolph Mountain Club facilities contribute to current

Forest Plan goals and objectives “to feature quality recreation opportunities not likely to be provided elsewhere on other lands (USDA 1986a, p. III-2).”

RMC’s facilities are in Management Area 6.2. One of the goals of the 1986 Forest Plan for this management area is to broaden the range of recreation options, mainly those forms of semi-primitive non-motorized recreation opportunities. General direction for recreation in this management area states: “Semi-primitive non-motorized recreation experience opportunities will be the dominant objective. Some areas will be managed for primitive recreation experience opportunities. Facilities and trails will be designed, constructed, operated, and maintained consistent with the recreation experience opportunity (USDA 1986a, p. III-52).” RMC’s facilities provide a semi-primitive non-motorized recreation opportunity not provided by the Forest Service in this area and are consistent with Forest Plan direction.

The goals and objectives in the Draft Forest Plan (revision of the 1986 Forest Plan, due to be finalized in 2005) state: “The Forest will work with the private sector through the Special Use program to provide recreation opportunities (areas, facilities, services and events) that the Forest alone is not able to offer (USDA 2004a, Ch.1, p.12).” The Draft Forest Plan also places Crag Camp, the Perch and Log Cabin in Management Area 6.2, and Gray Knob in Management Area 8.1. Although new facilities in MA 8.1 are prohibited, the existing RMC facilities (in MA 6.2 and MA 8.1) are consistent with the semi-primitive non-motorized recreation experience and provide a service that the Forest alone is not able to offer.

#### **6.2 -- Special Uses – Forest Service Manual 2700**

My decision to renew RMC’s special use permit complies with Forest Service regulations as stated in Forest Service Manual 2700, which directs the management of special uses in the national forests. The regulations provide the authority and terms and conditions necessary for granting and administering special use permits.

#### **7.0 -- Implementation Date**

Renewal of RMC’s special use permit may proceed immediately. A new permit is expected to take effect by January 1, 2006.

#### **8.0 -- Administrative Review or Appeal Opportunities**

This decision is not subject to administrative review or appeal, pursuant to 36 CFR 215.8.

#### **9.0 -- Contact Persons**

For more information, contact Katherine W. Stuart, District Ranger, or Marianne Leberman, Special Use Permit Administrator, at 300 Glen Road, Gorham, NH 03581; (603) 466-2713 (TTY 603-466-2856); email [kstuart@fs.fed.us](mailto:kstuart@fs.fed.us), or [mleberman@fs.fed.us](mailto:mleberman@fs.fed.us).

## 10.0 -- Signature and Date

I have concluded that renewing RMC's special use permit for the four facilities on Mount Adams (Gray Knob, Crag Camp, Log Cabin, and the Perch) may be categorically excluded from documentation in an environmental impact statement or environmental assessment, because the scope of activities will not individually or cumulatively have a significant effect on the quality of the human environment. My conclusion is based on the information presented in this document and in the Project File.

/s/ Katherine W. Stuart  
KATHERINE W. STUART  
District Ranger

09-13-2005  
DATE

## References

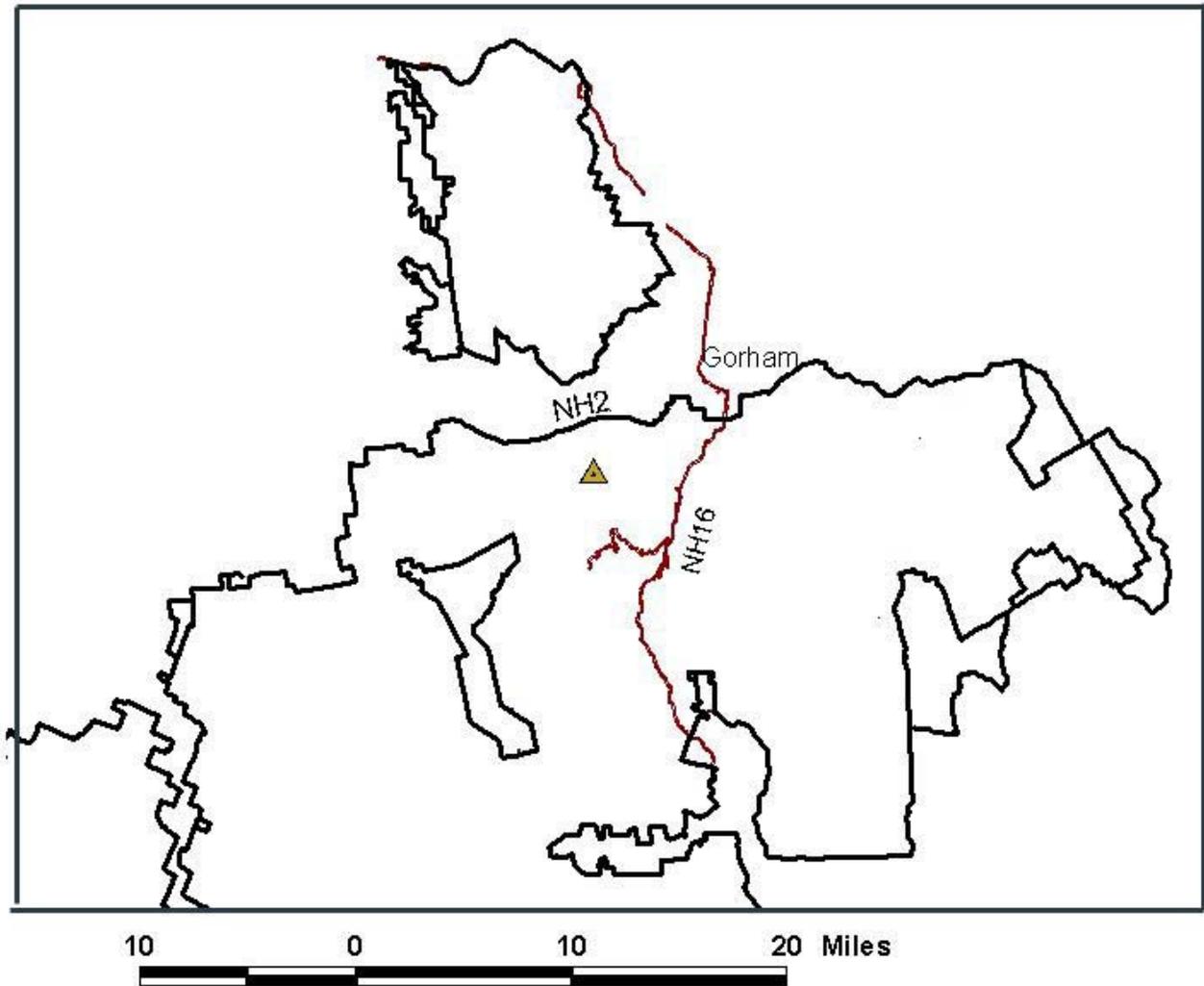
USDA (U.S. Department of Agriculture, Forest Service). 1986a. White Mountain National Forest Land and Resource Management Plan (As Amended). Laconia, NH: USDA-FS, Eastern Region, White Mountain National Forest.

USDA (U.S. Department of Agriculture, Forest Service). 1986b. Final Environmental Impact Statement: White Mountain National Forest Land and Resource Management Plan. Laconia, NH: USDA-FS, Eastern Region, White Mountain National Forest.

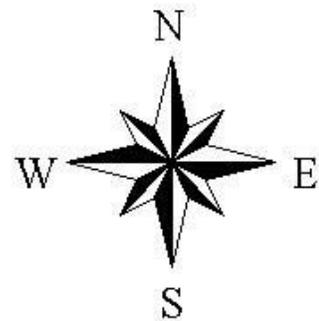
USDA (U.S. Department of Agriculture, Forest Service). 2004a. Proposed Land and Resource Management Plan. Laconia, NH: USDA-FS, Eastern Region, White Mountain National Forest.

USDA (U.S. Department of Agriculture, Forest Service). 2004b Draft Environmental Impact Statement: White Mountain National Forest Land and Resource Management Plan. Laconia, NH: USDA-FS, Eastern Region, White Mountain National Forest.

# Map 1: Vicinity Map Randolph Mountain Club Facilities

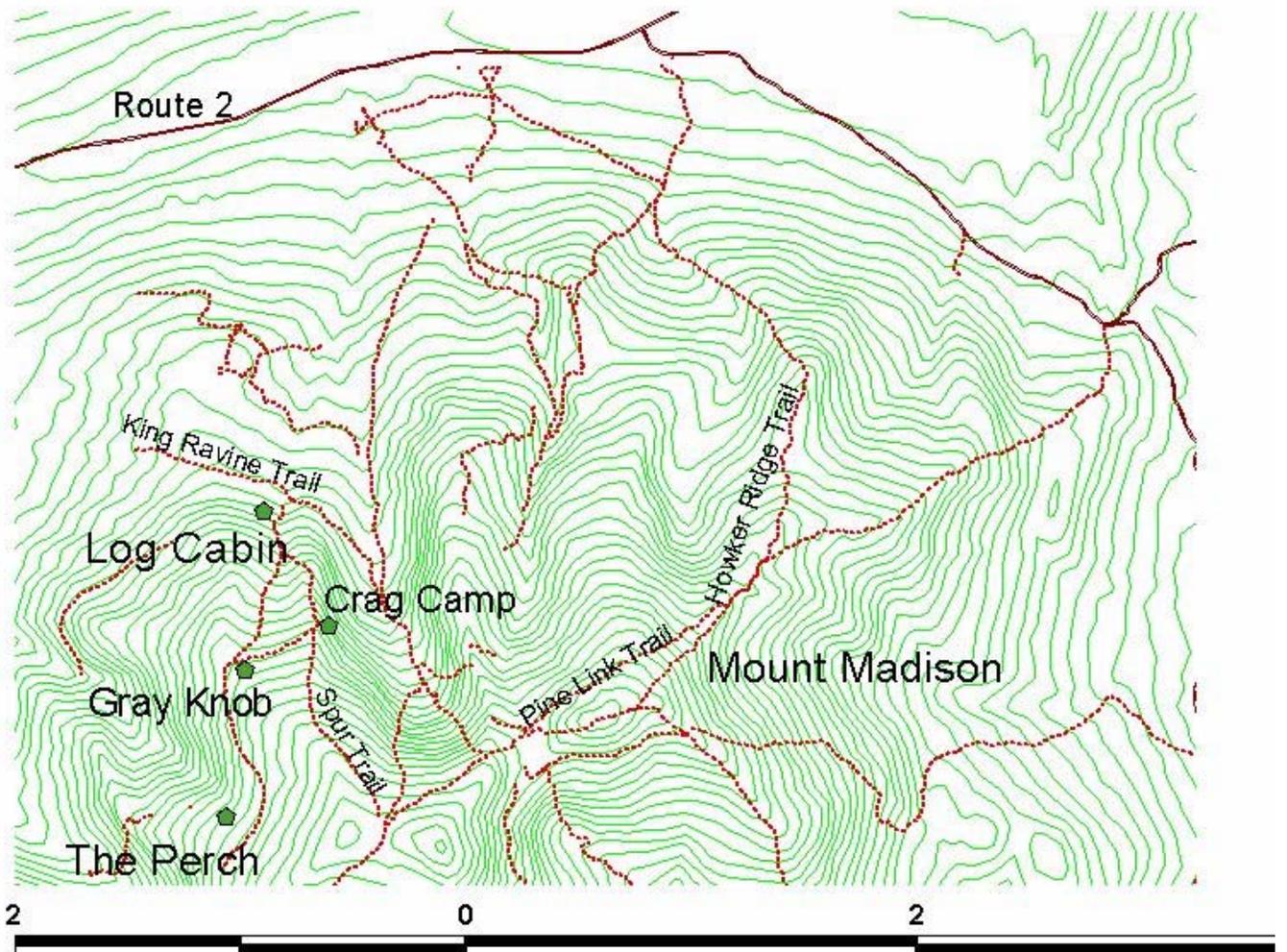


-  **Forest Boundary**
-  **RMC Facilities**
-  **Trails**
-  **Roads**

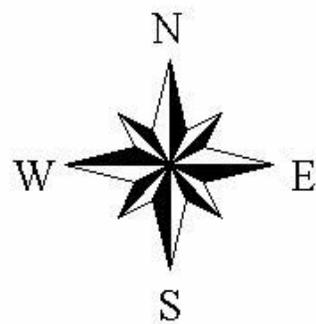


# Map 2

## Randolph Mountain Club Facilities



-  Rmc facilities.shp
-  Trails
-  Roads
-  Contours 100'



Appendix A  
RMC Special Use Permit  
Scoping Comments and Forest Service Responses  
Draft 08/31/2005

## **Public Involvement**

04/01/2005 - present: Listed on the White Mountain National Forest's Schedule of Proposed Actions. Available on [www.fs.fed.us/r9/white](http://www.fs.fed.us/r9/white) and [www.fs.fed.us/sopa/](http://www.fs.fed.us/sopa/).

May 5, 2005: Mailed 289 scoping reports to interested and affected parties and had several media outlets broadcast/publish the project description and contact information.

- 8 were returned as undeliverable.
- 18 requested to be kept informed of the analysis and decision, but did not comment on the proposal.
- 12 requested to be taken off the project list.
- 36 responded with comments.

## **Support of Proposed Action**

**All comments are noted and available in the project file.**

Twenty-eight respondents support the Randolph Mountain Club's special use permit renewal.

Reasons for support are:

- RMC contributes to the maintenance of trails in the White Mountain National Forest. Consider the good work of the RMC.
- RMC provides shelter to Appalachian Trail hikers.
- RMC and AT mission and goals are consistent with WMNF goals.
- The RMC facilities attract visitors and build support for the Forest. They are premier destinations.
- RMC facilities are historic and should be preserved.
- RMC staff are excellent stewards of the land, friendly, prepared, and knowledgeable.
- RMC facilities create less environmental impact than AMC huts.
- Appreciative of the investments RMC has made for the public appreciation of the White Mountains.
- The RMC facilities provide a safe haven, making winter travel easier and safer for all (consider that fewer search and rescue missions are needed).
- RMC facilities are a convenient, low-cost alternative to the more distant, higher-use cabins and campsites.
- The RMC facilities are an important, constant, historic thread in the fabric of Randolph.
- Support because the analysis is considering rare plants and historic resources, and because hikers are required to be responsible and clean up after themselves.
- Appreciate RMC's do-it-yourself philosophy.

- Continue with the permit –the RMC facilities provide all-season use at a nominal cost.
- Consolidation into one permit makes sense.
- The RMC facilities fit with the multiple-use management objectives of the Forest Service.
- RMC facilities have been a WMNF asset for many years, serving the public interests, and providing great service at a great price. Hope they will remain unchanged.
- Many people have fond memories of the RMC camps, and they should be available for future generations to enjoy.
- RMC benefits the forest and visitors.
- RMC facilities provide a quality, unique recreation opportunity.
- RMC provides great service, keeps the facilities in good repair, and operates them to appropriate standards.

**Additional Analysis or Modification of Proposed Action Suggested**

Seven respondents, most of whom express support for renewing the permits, note that more information, further analysis, or modification of the proposed action would be appropriate.

| Commenter #1                |   |
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| Comment #1a                 | Among the resource conditions to be considered I would expect that "floodplains and municipal watersheds" aren't particularly sensitive, though there may be some wetland issues particularly at the Log Cabin.   |
| Forest Service Response #1a | Renewal of the permit will not affect any wet or seepy areas on or near the trails around the Log Cabin or other facilities. However, we are aware of the situation; our efforts to minimize resource impacts in the area have centered on enforcement of the Forest Protection Area regulation that prohibits camping near the cabin, and promotion of Leave No Trace principles that encourage hikers to practice low impact techniques to protect soils, vegetation, and water quality. The RMC has assisted in efforts. |
| Comment #1b                 | I would wonder whether the four sites might be set off into two groups, since the Log Cabin and the Perch, as you noted, were private camps acquired by RMC earlier than the WMNF presence, while Crag and Grey Knob were acquired much later.  |
| Forest Service Response #1b | Though Crag Camp and Gray Knob where acquired by RMC later than the other two sites, this is not a determining factor in the type of permit issued. Permits are issued by the type and use of a facility and/or activity. Facilities can be under individual permits or grouped in permits. The Forest is discussing alternatives to efficiently administer permits with the Randolph Mountain Club; grouping of the facilities is one option.  |
| Comment #1c                 | Perhaps some interpretive activity would be a thought for all of them.  |
| Forest Service Response     | The "semi-primitive non-motorized" classification of the permit areas allows for just informal interpretive services at these sites. Some interpretation occurs through conversations with caretakers, photographs and other materials  |

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| #1c | within the facilities, and through signage at trailheads. The proposed Forest Plan emphasizes interpretation occurring off-Forest and at trailheads, and to a much lesser degree, in the backcountry. Extra signage in the backcountry is avoided except in unusual or unique circumstances (USDA 2005a p. 2-21). |
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**Commenter #2**

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| Comment #2a | [RMC facilities} are now forced to sustain heavy use far beyond their original planning. Environmental education and commercialization interests have fostered an awareness use of areas to a degree hardly sustainable in the future. RMC’s stewardship today is commendable; however, the Forestry Services should be aware of what a 20 year permit might prove fatal to ever curtailing excess public access. At this time it would be most wise to issue RMC’s permit on an annual basis. |
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| Forest Service Response #2a | The decision on length of permit is guided by special use permitting regulations and agency policy. Dependent on the “use code” ultimately assigned to these permits, the maximum tenure will be either 10 or 20 years. In general it is agency policy to grant the greatest tenure allowed under a use code as long as all conditions such as financial worth and solvency of the Permittee are met. This is so that a “business” investing in improvements on public land is able to function in a stable environment where some relatively long term commitments can be assured. It is important to remember that special use permits must be consistent with Forest Plans, including change that may occur over time. If the current or future Forest Plan revision finds evidence or information that would call into question the existence of a given special use permit, that permit would have to be re-evaluated. It is possible that as a result the permit would be modified or canceled. |
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**Commenter #3**

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| Comment #3a | Of all the organizations active in the White Mountains, the RMC has the best balance between the needs of the wilderness and the needs of the environmentally sensitive recreational user. I think their permit should be approved immediately and placed in a special file for semi- automatic renewal in the future. |
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| Forest Service Response #3a | Our regulations require us to examine natural resources and the potential impact on them each time we renew the permit. This allows us to consider the permitted activities in light of any new science, regulations, or guidance that may available at renewal time. For example, over time there may be changes in threatened, endangered, or sensitive species, or Forest Plan guidance may have changed, requiring a re-evaluation of the permit. Our regulations do include a process for expedited environmental analyses for permit renewals in cases where no changes have occurred or are proposed. |
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**Commenter #4**

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| Comment | I am in favor of renewing the subject permit especially with the same |
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| #4a                         | maintenance conditions intact.   |
| Forest Service Response #4a | The special use permit requires the development of an annual maintenance and operations plan, which the Forest Service must approve and insure is consistent with the terms of the permit. The renewed permits will retain the maintenance and oversight requirements of the expiring permits. |

**Commenter #5**

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| Comment #5a                 | Because the Forest Service did a perfunctory job with reviewing the AMC hut system special use permit renewal, I know the Forest Service will do the same thing with the RMC permit.   |
| Forest Service Response #5a | Procedures for evaluating Special Use Permit requests are found in Forest Service Manual (FSM) 2700 and 2300, and in Forest Service Handbook (FSH) 2709.11. Additionally, each evaluation follows agency regulations (FSM 1950) for conducting an environmental analysis of the permitted activities as directed by the National Environmental Policy Act. All Special Use Permit proposals are evaluated according to this extensive direction, consistent with all applicable policy, regulation, and law.   |
| Comment #5b                 | What should happen in the RMC permit renewal case is a full assessment of the type of recreational experience available on the north slope of the Presidential Range and how this experience would be altered by removing or modifying the overnight facilities offered the hiking public in that area. How would safety be affected by removing the camps and shelters? One recreational option would be to remove the overnight facilities and maintain the toilets. Or all facilities could be removed. Or the facilities could be open only in winter, as a safety measure.                        |
| Forest Service Response #5b | Within the scope of this analysis, the authorized official considered whether to approve or deny RMC's request to renew their current Special Use Authorization. If sufficient cause were found to deny the renewal, a subsequent determination would be made as to the disposition of the facilities, which are owned by RMC. Broad-scale analyses of recreation opportunities and use-patterns are made through the Forest Land and Resources Management Plan (LRMP). The current (1986) and proposed Forest Plans both acknowledge the appropriateness of developed sites at backcountry locations. |
| Comment #5c                 | The RMC permit letter does not even mention the fact that overnight camping is much easier now than prior to WW II because of equipment improvements, nor does it mention the fact that many hikers are able to maintain a high degree of physical fitness well into what used to be considered " old age." I urge the Forest Service to reassess the WMNF in light of today's conditions .But I know this will not happen.  |
| Forest Service              | The current and proposed Forest Land and Resource Management Plans address the need for the Forest to provide a range of (continued)   |

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| Response #5c                | recreation opportunities. This includes options for dispersed camping at undeveloped sites, no-cost camping at primitive tent sites and shelters, and more developed sites such as the RMC facilities. Maintaining the opportunity for those who prefer the more developed range of the scale does not limit the vast opportunity for more primitive recreation found at the other end of the spectrum.   |
| Comment #5d                 | The Forest Service has done a very poor job in its WMNF Plan revision. The Great Gulf Wilderness should extend over the spine of Jefferson and Adams, and extend a good distance down towards NH 2. Currently this is not being considered because of the RMC shelters and the AMC's Madison Hut .Thus, the area with some of the greatest access challenge (grade, weather, avalanche) in the White Mountains is not even being considered for Wilderness Area status.   |
| Forest Service Response #5d | Wilderness evaluations were done as part of the Forest Plan revision analysis; those conclusions are out of the scope of this analysis. Level of existing development in Inventoried Roadless Areas is one of many criteria used when evaluating areas for Wilderness recommendation. In the case of the Great Gulf Inventoried Roadless Area, it was determined that the facilities and activities of the RMC camps and AMC's Madison Hut are considered non-conforming uses for Wilderness, and removal would eliminate the services and resource protection they provide by concentrating uses. The historic and cultural value to White Mountain National Forest visitors would also be lost. |

**Commenter #6**

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| Comment #6a                 | I recommend that the renewal be considered routine and, therefore, be processed without the burden of lengthy analysis. Analysis should be abbreviated, especially if the people directly involved...feel comfortable with the current permit.  |
| Forest Service Response #6a | See Forest Service Response #3a.  |
| Comment #6b                 | If any citizen were to criticize the Permit, then maybe some quick cost-benefit estimates would be helpful to prove the good gained by the Permit.  |
| Forest Service Response #6b | Comment noted. While overall there is little opposition to renewing RMC's special use permits, one respondent is opposed (see Comment #8a). Many of the benefits and costs of renewing or not renewing the permits cannot be quantified at this time. They center on the value of the recreation experience provided by the facilities and the impact to natural resources afforded by concentrating use. Rather than the quantifiable cost-benefit analysis, we look at how the existence and operation of the facilities fits with our Forest Plan goals, objectives, and management area direction, and the effects on natural |

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|                             | resources.  |
| Comment #6c                 | I like the policy of making the camps available on a first-come, first-serve basis!   |
| Forest Service Response #6c | The first-come, first-serve policy is an operational policy instituted by the RMC, and is approved by the Forest Service as part of the permit.   |
| Comment #6d                 | I assume that control of erosion on trails, toilet facilities, and litter are taken care of in approved ways.   |
| Forest Service Response #6d | While trail condition and the trail work conducted by RMC are not directly connected to their special use permit to operate the camps, the RMC does maintain many miles of White Mountain National Forest trails consistent with Forest Service standards. The permit does address maintenance of the toilets, which are inspected by the permit administrator to insure compliance with the permit. The RMC also supports the Forest Service policies and initiatives for litter control and other low impact backcountry techniques as recommended in the principles of Leave No Trace. |
| Comment #6e                 | The 20-year term will act as a safety net for the Forest Service in maintaining ownership and providing ways to react to any unforeseen changes. For the Club, the 20-year projection into the future offers a great deal of stability for its investments and programs.  |
| Forest Service Response #6e | See Forest Service Response #2a.  |

**Commenter #7**

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| Comment #7a                 | Recognizing the rapid population growth that has occurred particularly in the northeastern united states in recent decades, along with the significant projected population growth for future years, it seems unavoidable that major increases in hiker volume will continue to occur and should be anticipated. With this thought in mind it is prudent to recommend that<br><br>...the new permit should be for a shorter term....a five year horizon would provide the Forest Service with much more flexibility to deal with unacceptable overuse situations that may result as population and visitor frequency expands. |
| Forest Service Response #7a | See Forest Service Response #2a.  |
| Comment                     | ...as I understand it, the capacity of the composting toilet systems currently  |

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| #7b                         | on place at each location, is not being exceeded at the present time. The Forest Service should continue to monitor these toilet facilities several times per year and revoke or suspend the cabin/shelter permit if an over capacity situation arises.   |
| Forest Service Response #7b | Monitoring systems to prevent resource damage is a part of the Forest Service administration of the permits. If in any case a system, such as the composting toilet, is out of compliance, the Forest Service permit Administrator will direct RMC to correct the problem or discontinue the use.   |
| Comment #7c                 | ...no future expansion of current facilities and no new facilities at other locations should be allowed.  |
| Forest Service Response #7c | <p>The overall level of new backcountry development is addressed in the Forest Plan. The current (1986) Forest Plan restricts expansion or new construction of recreation facilities to Development Levels 1 and 2, meaning minimum or little site modification, designed to protect resources rather than provide human comfort, and spacing that minimizes contact between users. Any new development must consider wildlife habitat, sensitive soils, and other resources (USDA 1986a, p. III-6, 7). The proposed Forest Plan states a goal of “maintaining a low development level at backcountry facilities in order to ensure the continued opportunity for this [non-motorized dispersed recreation] experience (USDA 2005a, p. 1-11).” The proposed Forest Plan provides specific Standards and Guides aimed at managing backcountry overnight facilities, including new development if needed to mitigate unacceptable resource or social conditions that cannot be otherwise mitigated. Minimum expansion of existing facilities may be allowed to better manage existing recreation use of the site and the surrounding area (USDA 2005a, p. 2-22, 2-23).</p> <p>The current proposal by the RMC is to renew their special use permits with no changes in use or facilities. Any future proposals to expand or re-configure the existing RMC facilities (or any others in the backcountry) would be examined with regard to Forest Plan direction, and would undergo environmental analyses.</p> |
|                             |   |

## Opposition

One respondent opposes the proposal.

| Commenter #8 |  |
|--------------|--|
| Comment #8a  | Please do not renew the RMC permits in the WMNF. There is no room for privatization of our forests, they belong to the people and should be free to all, not run by clubs. |

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| <p>Forest Service Response #8a</p> | <p>The camps in question are privately owned by the RMC, and have never been in federal public ownership. The special use permit issued by the Forest Service allows the facilities to remain on public land and sets the terms and conditions for that use. The camps are operated for public use and enjoyment, and fees charged overnight guests are used directly for the maintenance and operation of the camps. The Forest Plan directs the Forest to provide a range of recreation opportunities. Visitors have the option to choose dispersed campsites with no charge, tent site and shelter areas with no charge, or more developed sites where fees are charged. The Forest Service would be strained to maintain the specific opportunity these facilities provide without cooperator organizations such as the RMC.</p> |
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