



April 28, 2021

Johnida S. Dockens  
NEPA Coordinator  
White Mountain National Forest  
Androscoggin Ranger District  
300 Glen Road Gorham, NH 03581

**RE: Peabody West Integrated Resource Project (the “Project”)**

Dear Ms. Dockens,

Granite Backcountry Alliance (“GBA”) represents backcountry skiers and riders by providing low-impact human-powered backcountry skiing opportunities to the public in and around the White Mountain region of New Hampshire and western Maine. GBA submits these comments on behalf of its over 1,000 members from across New England and beyond as part of the backcountry community.

**PURPOSE**

The purpose of this comment is to support the construction of the “Pine Mountain Glade” (“Glade”) and designate GBA as the responsible entity manager and partner of the White Mountain National Forest (“WMNF”) to design, implement, and maintain the Glade.

**BACKGROUND**

Since 2017 GBA has developed eight (8) glade zones in New Hampshire and Maine together with five landowner partner types (federal, state, municipal, conservation, private) and maintains four (4) historic ski trails in the WMNF. GBA is a current partner with the WMNF and collectively has developed two ski glade projects in the WMNF authorized by a Backcountry Ski Trail Project Decision Memo dated March 2018 and currently has pending projects in the Pemigewasset Ranger District and Androscoggin Ranger District, the latter being the subject of this letter. Further, GBA collaborated on a WMNF restoration watershed project pursuant to a Stewardship Agreement executed in November, 2019. GBA is also creator and co-developer of “Ski Kind”, a backcountry code of conduct implemented by other user groups and avalanche centers nationally, across public lands including other national forests.



## GLADE MANAGEMENT

GBA requests designation as the responsible entity to design, implement, and maintain the Glade to maintain consistent management practices across WMNF glades. The Updated Scoping Newsletter (the “Newsletter”), dated March 29, 2021, indicates on Page 12 the proposed Glade would be constructed and maintained to the same standards as South Baldface and Maple Villa glades, both of which GBA designed (at its own cost) and implemented in partnership with the WMNF together with a small army of volunteers. GBA continues to manage both glade zones. In fact, GBA also manages Bill Hill Glade (which is referenced in the Newsletter, Page 12) and adopts the very same WMNF standards in this glade and in every other GBA glade, too. For purposes of forestry quality control and recreational enjoyment, GBA would contract with professional third-party glade service provider(s) at its own cost.

GBA’s members and volunteers, both locals and visitors, are accustomed to GBA’s practices for this type of off-season user activity and produce successful volunteer engagement and stewardship opportunities. In addition, GBA strategically integrates the local outdoor economy by incorporating local trail organizations and businesses to enhance the sense of community and shared purpose. As such, GBA is the appropriate party to designate for management of the Glade and to propose and perform the implementation plan, all in partnership with the WMNF.

To that end, GBA is concerned that parking is not a consideration of the Glade and/or Project. With a large investment in land development for recreational purposes additional due diligence is encouraged. Access from the town of Gorham for Bill Hill Glade is not secured by way of legal instrument and traverses private, municipal and state property. GBA is willing to collaborate with area and interested partners to develop and secure parking options including financing the project with non-Project dollars. This is an important component of the Glade and the Project and must be considered as part of the scoping process to ensure long-term success.

We very much appreciate your review and consideration toward providing additional backcountry skiing recreational opportunities in the WMNF. Please do not hesitate to contact me if you have any questions.

Very Truly Yours,

A handwritten signature in black ink that reads "Tyler T. Ray".

Tyler T. Ray  
Granite Chief

CC: Derek Ibarguen,  
WMNF Forest Supervisor