

Kevin A. Peterson
44 Britton Lane
Lyme, NH 03768

May 11, 2022

Brooke M. Brown, District Ranger
Pemigewasset Ranger District
White Mountain National Forest
71 White Mountain Drive
Campton, NH, 03223

Dear District Ranger Brown:

I am writing to strongly support selection and implementation of the “No Action” alternative in the White Mountain National Forest (WMNF) Pemigewasset Ranger District’s revised environmental assessment (EA) for the Tarleton Integrated Resource Project (Tarleton Project) as described on the project web site: <https://www.fs.usda.gov/project/?project=56394>. Further, I respectfully urge you to pursue a Forest Plan Amendment to re-classify the Lake Tarleton/Wauchipauka Pond/Webster Slide complex as a ‘Scenic Area.’ Taking these steps will fully recognize the outstanding natural, ecological, scenic, cultural and historical values of this extraordinary place AND honor the extraordinary public effort that was undertaken more than 20 years ago secure permanent protection for these values.

Concerns About the Current Proposal

The current proposal and related EA fall short in many respects. I would like to focus on the following three issues:

- 1) The EA assesses only two alternative actions—the proposed action and no action. It presents an ‘all or nothing’ choice that does not incorporate or analyze a reasonable *range* of alternative management actions for this area, such as different timber-management scenarios, trail connections to the nearby Appalachian National Scenic Trail, recreation enhancements, or other management designations such as Scenic Area or Natural Area.
- 2) The public input process did not engage key stakeholders, including lake users and Abenaki representatives. By your own admission, the Forest Service did not attempt to publicize the project scoping process, public meetings or public-comment periods to seasonal users of Lake Tarleton, despite the fact that thousands of people access the lake in both summer and winter AND the presence of New Hampshire Lakes Association’s “Lake Host” program volunteers at key points of entry to Lake Tarleton, who help educate users about lake stewardship, water quality and other issues. Abenaki representatives also were not consulted. Abenaki people have lived in and traveled through the Lake Tarleton area for millennia, and there are several active groups representing the Abenaki perspective, including the Winter Center for Indigenous Traditions in Hanover. Failure to engage lake users and Abenaki representatives significantly undermines the validity of the public-input process on the Tarleton Project.
- 3) The EA completely ignores the monumental conservation history in the late-1990s and early 2000s that brought these lands into public ownership. In 1994, developers proposed a massive resort surrounding the entire lake. The development proposal inspired a multi-year conservation effort to preserve Lake Tarleton and the surrounding landscape *in its natural state*. A dozen organizations, 600 individuals and businesses, the State of New Hampshire and the US Congress worked in partnership to raise \$7.5 million to purchase 5,300 acres around the lake, securing public ownership forever as part of the White Mountain National Forest. Conservation partners gathered to celebrate the protection effort in August 2000. “*Many of us here today have worked hard for a number of years to*

reach the point we are at today where we can proudly say that this pristine New Hampshire wilderness has been saved," said U.S. Senator Judd Gregg (emphasis added). "We are delighted to be celebrating the protection of this magnificent property," said David Houghton of the Trust for Public Land. "Lake Tarleton and its nearby lakes and forestland are a crucial piece of the Upper Valley landscape, so while this project has national significance, it is also very important at the local level," said Jeanie McIntyre of the Upper Valley Land Trust.

The complete lack of recognition of this critical action – without which the WMNF would not even be able to *consider* stewardship alternatives – is perhaps THE major shortcoming of the entire environmental-review process and undermines the integrity of the proposed action.

A Better Path

There is another way forward. As District Ranger, you have the power and authority to select the No Action alternative, then propose a Forest Plan amendment that would designate Lake Tarleton and the surrounding landscape as a Scenic Area. This approach 1) honors the legacy of the individuals, organizations and state and Federal leaders who worked together to bring Lake Tarleton into public ownership; 2) redeems the moral commitment to permanently protect these outstanding resources; 3) respects the ecological integrity of the highest-elevation lake within the Forest; and 4) ensures that current and future generations of Forest visitors can experience the beauty and serenity of this unparalleled lake-and-mountain landscape.

You will hear from others a wide variety of additional concerns about the EA and the process to create it. You will have plenty of legal, ecological and other grounds to make an informed decision. Most importantly, you have an *opportunity* to make the ethically appropriate choice: to do right by our Abenaki predecessors; to do right by the hundreds of people who came together for Lake Tarleton 22 years ago; to do right by current and future users; and to do right by the extraordinary place that is Lake Tarleton. In the end, I believe that yours is truly a moral decision, one that will long-reflect on the integrity of the White Mountain National Forest.

Thank you for the opportunity to comment, and I look forward to working with you on Lake Tarleton conservation in the weeks and months to come.

Sincerely,



Kevin A. Peterson

Former New England Regional Representative – Appalachian Trail Conservancy
Former environmental grants manager – NH Charitable Foundation
Former member, "Tilt'n Diner Group" (WMNF informal stakeholder group)
Elected Town Moderator, Lyme, NH

cc: Derek Ibarguen, WMNF Forest Supervisor
Senator Jeanne Shaheen
Senator Maggie Hassan
Representative Annie Kuster