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September 2, 2022

Josh Sjostrom, District Ranger
White Mountain National Forest
Androscoggin Ranger District
300 Glen Road
Gorham, NH 03581

Re: Peabody West Integrated Resource Project #55659

Dear Mr. Sjostrom,

The Appalachian Mountain Club offers the following comments in response to the Peabody West Integrated Resource Project Draft Environmental Assessment.

Vegetation and Wildlife Habitat Management

We have no issues with the project as it currently stands regarding timber management.

Recreation

Hermit Lake Complex – we recognize that proposed improvements to Hermit Lake have been removed from this project EA to allow for additional engineering support to review potential design and scope. We appreciate that the activities at Hermit Lake remain a priority and look forward to cooperative planning and engagement as the Hermit Lake Special Use Permittee. As current operators of Hermit Lake, AMC can provide valuable insights on user trends, assessment of existing infrastructure, and improvements to infrastructure and experience that meet the current population of users. AMC looks forward to working with the White Mountain National Forest Androscoggin Ranger District in achieving shared goals and resulting investments.

Mountain Biking Trails – we recognize the value of enhancing mountain biking opportunities in the project as proposed. We would also encourage quality recreation opportunities to include multiple use trails that are graded and hardened to accommodate use by people of all abilities, not just hikers and mountain bikers that are athletically inclined. Improvements to Hayes-Copp and Leavitt’s Link backcountry ski trails as year-round mountain biking and multiple-use trails is one incremental step toward such opportunities.

The existing network of National Forest System Roads in the project area also present opportunities for a multiple use corridor that could be graded, hardened, sufficiently widen to accommodate groomers and two-way pedestrian use, and suitable for use by



people of all abilities including families with children, seniors, and persons that require mobility aids.

Specifically, (p. 9-10) “About 9 miles of existing and proposed National Forest System Roads (system roads) would be reconstructed, and about 3 miles of unauthorized road in the project area would be added to the Forest Service Road system...About 0.6 mile of new road are proposed for construction”. Reference to Figure 3 identifies roads or portions of roads to be reconstructed including FR 72 (Culhane Brook), FR 263 (Libby South), FR 2318 (currently unauthorized), and FR 264 (Jackknife). These road reconstructions, constructions, and improvements should be made such that a non-motorized multiuse trail is available that traverses the project area from the Dolly Camp Campground in the south, along FR 72 and FR 263, to the northern border of the project area (to be extended by others into the Town of Gorham).

Such a multiuse trail in this vicinity has been proposed and discussed over the last two or three decades. It not only would provide alternative recreational use for people visiting and staying at Dolly Copp Campground, but also day use by WMNF visitors looking for casual, family-friendly, close-to-nature experiences. Non-motorized multiple use and easy-access trails are not easily found and rarely present on the WMNF, and the USFS can “provide a sustainable range of quality recreation opportunities” through such investment.

Connectivity to current and planned recreation paths to the north (Gorham and Randolph) – and conceivably a connection to the multiple use Presidential Range Rail Trail - cannot be realized if the USFS does not consider such amenities on WMNF lands. An extension southward to Great Glen Outdoor Center and the AMC Pinkham Notch Visitor Center as a distant goal is not possible without a corridor through this project area. Please consider plans for a non-motorized multiple use corridor from Dolly Copp Campground to Gorham using Forest System Roads that are being reconstructed as part of the Peabody West Integrated Resource Project.

Thank you for the opportunity to provide these comments.

Sincerely,

Chris Thayer
Director of External Affairs and Contracts
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