

Data Submitted (UTC 11): 1/11/2020 3:10:42 AM

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Title:

Comments: January 10, 2020

Johnida S. Dockens

NEPA Coordinator

White Mountain National Forest

Androscoggin Ranger District

300 Glen Road Gorham, NH 03581

RE: Peabody West Integrated Resource Project

Dear Ms. Dockens,

Granite Backcountry Alliance ("GBA") represents backcountry skiers and provides low-impact human-powered backcountry skiing opportunities to the public in and around the White Mountain region of New Hampshire and western Maine. GBA is a current partner with the White Mountain National Forest ("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 collaborated on a restoration watershed project pursuant to a Stewardship Agreement executed in November, 2019.

The purpose of this comment is to propose additional low-impact glade zones in addition to the Pine Mountain Glade Skiing included in the project proposal to address issues related to safety, growing volume of users, and dispersing traffic in congested areas. Prior to that discussion, a brief history of the background of GBA's relationship to the WMNF is important.

To that end, GBA first proposed glade projects in January, 2017 to then Forest Supervisor Tom Wagner. The purpose was to (i) acknowledge and validate backcountry skiers as a bona fide user group; (ii) recognize the lack of recreational opportunities in the WMNF afforded for this user group; and (iii) propose low-impact glade projects to balance the recreational opportunities in the WMNF in compliance with the White Mountain National Forest Plan (2005). Although skiers had long been skiing the high-alpine environment in Tuckerman Ravine and beyond, at that time no below-treeline network of glades existed for users to safely recreate when avalanche risk or adverse weather conditions existed, drawing skiers up into the danger zones without alternative. Ultimately, to create a balance of recreation in the WMNF, reduce safety issues for skiers, and mitigate illegal cutting, the WMNF initiated the approval process for glade skiing.

One of the project areas discussed at that time was the development and expansion of Pinkham Notch Scenic Area as a destination ski area. The legacy of Tuckerman Ravine and springtime skiing since the 1930's has now expanded to the entire winter season as a result of increased volume of users. Newly-minted skiers are now consistently visiting the Pinkham Notch area to ski the John Sherburne Ski Trail ("Sherbie") and Gulf of Slides Ski Trail ("GOST") creating unsafe trail conditions based on the high volume of skiers using these two ski trails. The result is significant crowding and congestion. Often, skiers attempt to ski the woods and/or illegally cut glades in the woods, not as the trails were originally intended to be used. Times have changed and glade skiing represents modern skiing behavior - our suggestion is together with evolve together to stay in front of a growing sport.

GBA proposes that WMNF consider managing the skiing in the Pinkham Notch Scenic Area as a high-use and highly developed recreational area to "acceptable social and ecological standards" (MA 2.1) to give weight to the public demand and feasibility to the development of a glade network in this area. Despite the proposed glade

network being in a "Scenic Area" there are many arguments that support its inclusion, namely, improving the visitor experience, safety, accessibility (MA 8.5). The WMNF should continue to focus on the dispersal of skiers in highly concentrated area. All such glade proposals should adhere to the standards established in the Decision Memo.

Our proposal would include protecting wildlife and Bicknell Thrush by either glading below habitat areas or creating limited entry points prior to the hardwood sections, as we have done in both Maple Villa and Baldface. We propose a glade in or around the Sherbie at or below the end of the softwood section around elevation of 3,000-3,500. GOST would be another glade line and a third would be off the Graham Trail, which should be expanded and improved as GOST is a popular spot and the existing trail is hidden and not reflected on maps yet the WMNF uses the trail when it needs to access Gulf of Slides. Three lines utilizing braided and island glade methods and done so to accommodate wildlife issues is a reasonable response to the increased demand and a means for decreasing traffic on existing ski trails. The view shed will remain in place and not violate any element of the Forest Plan. See Zone 1 and 2 of EXHIBIT A.

Furthermore, in our meeting with Mr. Wagner, we also proposed glading on Little Wildcat, home of several Civilian Conservation Corp historic ski trails that are long abandoned. Initially approved, the project was later removed. We request the expansion of the project zone to include Little Wildcat as it represents reasonable expansion of skiing opportunities in the WMNF to reflect the public demand. In addition, together with Pine Mountain Glade, such project area would serve to not only reduce traffic in Tuckerman and send users further north, but has infrastructure with the partnership of Great Glen Trails. See Zone 3 EXHIBIT A.

We very much appreciate your review and consideration toward providing additional recreational opportunities in the WMNF that are in compliance with the Forest Plan. Please do not hesitate to contact me if you have any questions.

Very Truly Yours,

Tyler T. Ray
Granite Chief

CC:

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