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Jennifer Barnhart, District Ranger

White Mountain National Forest

Androscoggin Ranger District

300 Glen Road

Gorham, NH 03581

Dear Ms. Barnhart,

The Appalachian Mountain Club offers comments on the following two issues in response to the Peabody West Integrated Resource Project scoping newsletter.

Hermit Lake Complex

Over the past several decades there has been a consistent decline in use at Hermit Lake Shelters. This decrease in overnight use is at odds with use trends throughout the White Mountains and throughout major destinations in the Northeast. In the past 10 years the number of annual overnight visitors has decreased from a high of 5,621 in 2008 to a low of 3,704 in 2018.

As the current operator of the Hermit Lake Shelters, AMC caretakers can gain insights into these trends through talking with users. Many of these conversations point to the overnight accommodations not meeting the needs of the current population of users. This manifests through consistent requests for more tent camping options and comments that folks are not interested in staying in unheated, open shelters in the winter months or staying in communal shelters during the summer.

These observations lead us to support the removal of the shelters 6, 7 and 8 as well as the addition of more tent platforms or durable surfaces for camping. However, replacing the lost occupancy and footprint from these shelters with similar shelters seems to ignore current use trends within the ravine and beyond.

In addition to the feedback we receive at Hermit Lake Shelters, AMC has seen a decrease in interest for use of shelters throughout the White Mountains. It is not uncommon for the staffed shelter sites throughout the White to double up tents on platforms at a site before anyone claims a space in the shelter. Replacing the shelters at Hermit Lake with more shelters may be necessary to preserve the historical integrity of the complex but doing so will not meet the need of today's user.

AMC's hut system throughout the White Mountains has seen an increase in use during the same timeframe that Hermit Lake Shelters has seen a decrease. Focusing on the self-service season, one can see an increase from 6,762 in 2008 to 7,367 in 2018. During this time there has been an effort to build a rustic system of cabins in Vermont. The Vermont Huts Association and the Green Mountain Club's refurbishing of derelict cabins highlight the recognition of cabins meeting the needs and interests of current users. This recognition goes beyond the bounds of New England as seen through the efforts of the Alaska Huts Association, Summit Huts in Colorado and American Prairie Reserve in Montana to name a few.

The increased popularity of cabins for overnight accommodations can be seen year round but is felt particularly strongly in the winter. It is not uncommon when conducting rounds during the winter months to find tents set up inside both 3 and 4 walled shelters at Hermit Lake. Providing a 4 walled cabin with a basic heat source would

meet the needs of the user.

This infrastructure would serve another major recreation trend, backcountry skiing. Whether one considers the success of the Granite Backcountry Alliance locally or the broader backcountry skiing movement across the US, it is difficult not to recognize this new major player in backcountry recreation. The Peabody West IRP itself supports this increased demand through a glade cutting project on Pine Mountain. During this boom we have seen increased use in the ravine but a decreased use of overnight facilities. Heated cabins throughout the US have found success in accommodating backcountry skiers with new organizations and collectives popping up everywhere.

As a response to the above stated trends the AMC supports the construction of a small cabin in the former footprint of one of the current shelters. This cabin could be heated and house 8-12 overnight recreationists. Wood could be brought in from off-site via snow machine or helicopter. This project would remain within the current management guidelines of the Pinkham Notch Scenic area as laid out in the Forest Plan. It seems only logical to have such an offering in one of the most iconic backcountry skiing areas in the Northeast.

In conclusion, AMC supports the proposed action to remove old shelters and increase the number of tent platforms. AMC believes that a 4 walled heated cabin should be considered rather than adding another 3-sided shelter.

If you have questions about this comment please contact AMC Huts Director James Wrigley.

New Road Construction

The scoping newsletter states that the project will include one mile of new road construction, but provides no information on the actual location of this new road. We know that the project area includes part of the Great Gulf Inventoried Roadless Area, though this fact was not included in the scoping letter.

The AMC is not opposed to timber harvesting within those portions of IRAs designated as Management Area 2.1. However, we believe that such harvesting should be limited to areas accessible from the existing road network. Without further information we do not know what (if any) effect the new road would have on the Great Gulf IRA. We would oppose any expansion of the road network into the IRA, even if the road construction would be within the allowed limits designed to maintain the wilderness potential of the IRA.

If you have any questions about this comment please contact AMC Senior Staff Scientist David Publicover.

We thank you for the opportunity to provide these comments.