

Data Submitted (UTC 11): 5/11/2022 4:00:00 AM

First name: Hawk

Last name: Metheny

Organization: Appalachian Trail Conservancy

Title: Vice President of Regional and Trail Operations

Comments: The Appalachian Trail Conservancy (ATC) appreciates this opportunity to comment on the Updated Draft Environmental Assessment report for the Tarleton Integrated Resource Project. We commend the White Mountain National Forest (WMNF) for taking a wide and inclusive approach to the future management of the Tarleton Project Area, and for including a variety of stakeholders. The Appalachian Trail Conservancy's mission is to protect, manage, and advocate for the Appalachian National Scenic Trail. Approximately 10 miles of the Appalachian Trail (A.T.) lie within the Tarleton project area. The A.T. on the WMNF is managed by the Management Direction described in the 2005 Land and Resource Management Plan (Forest Plan) through the Standards and Guidelines under Management Area 8.3 Appalachian National Scenic Trail (ANST). As described in the 2005 Forest Plan, the Purpose of the A.T. Management Area on the WMNF is fourfold: 1. Manage the segment of the Appalachian National Scenic Trail on Federal lands that traverses the state of New Hampshire and the White Mountain National Forest. 2. Provide for the conservation and enjoyment of the nationally significant scenic, historic, natural, and cultural qualities of the land through which the trail passes. 3. Provide opportunities for high quality outdoor recreation experiences, including a sense of remoteness and solitude. 4. Recognize and strengthen the level of partnership, cooperation, and volunteer efforts integral to A.T. management. The Desired Condition of the Land is stated as: [hellip][hellip]the management area will emphasize a remote backcountry recreation experience in a predominantly natural or natural appearing landscape.[hellip]. There are extensive stands of northern hardwoods and conifers in the A.T. management area. These stands will contain a mix of tree sizes and ages, visually dominated by mature trees. With the statements above in mind, ATC wishes to offer several comments on the current draft Environmental Impact report: [bull] The Updated Draft Environmental Assessment identifies only two alternatives analyzed (the proposed action and no action). There are likely other alternative actions that would satisfy some of the WMNF's goals as well as those of the surrounding communities. The Vegetation Management section within MA 8.3 of the 2005 Forest Plan includes G-1: in part: Where the A.T. management area adjoins MA 2.1, commercial timber management and salvage operations are allowed in that portion of the Appalachian Trail MA between the trail footpath and the 2.1 Management Area, but only outside the foreground area as defined in the Scenery Management System (SMS). The foreground zone is determined by site-specific analysis of the area as seen from the A.T. The Appalachian Trail Conservancy does not support timber harvesting in A.T. Management Area 8.3. ATC believes that the draft Environmental Assessment for the Tarleton Integrated Resource Project should include alternatives that eliminate harvests anywhere within the A.T. Management Area (8.3). The Updated Draft Assessment includes reference to a 500-foot no-cut buffer to the A.T. footpath, primarily where it is aligned in the former Sentinel Mountain State Forest portion of the IRP. There is, however, no clear indication in the draft EA how this 500-foot buffer width was determined, and ATC is unaware of whether any site-specific analysis of the foreground zone has been executed. If harvesting must occur within the A.T. Management Area (8.3), ATC requests an opportunity to conduct an on-site analysis with WMNF staff and other partners as appropriate. [bull] In the autumn of 2021, ATC staff conducted a visual impact assessment from the Webster Slide side trail and viewpoint. The primary view from Webster Slide is a southeast aspect overlooking Wachipauka Pond and the hills beyond. Secondary views to the southwest toward the IRP can be gained via obscure user-created paths but should not be considered part of the developed A.T. side trail. ATC concurs that the proposed action will have no appreciable impact on the viewshed of the A.T. and side trails in the northern part of the IRP. [bull] The Assessment mentions mitigation of visual and aural impacts to A.T. hikers through use of a buffer and winter-only harvesting in the vicinity. It is unclear whether potential impacts to users of the Ore Hill tent sites during winter were considered. [bull] In the land that comprises the Tarleton IRP, ATC recognizes a substantial wild and intact landscape of a scale uncommon throughout the length of the A.T. Acknowledging and protecting such areas is a central tenet of ATC's Wild East and large landscape initiatives. While timber harvesting is not necessarily incompatible with the principles therein, opportunities to maintain intact forests at this scale are few and far between and should be considered in this broader context. Further, the remote nature and outstanding viewshed

of Webster Slide Mountain and Wachipauka Pond together make it a strong candidate for Scenic Area designation. ATC greatly values our partnership with WMNF in managing the Appalachian Trail in New Hampshire and we look forward to continued collaboration in this process.