

# White Mountain National Forest

Final  
Environmental Impact Statement  
**Appendix A**  
**Public Involvement**

**This document is available in large print.**

**Contact the  
White Mountain National Forest  
Supervisor's Office  
1-603-528-8721  
TTY 1-603-528-8722**

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## Introduction

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The White Mountain National Forest, with 796,700 acres in New Hampshire and Maine, is the largest block of federally owned public land in the six New England States. As the largest public land area in New England, the Forest plays an important and unique role in people's hearts and minds. It is one of the most popular forests in the country, with upwards of 6 million visitors annually. The Forest is the recreational draw for outdoor enthusiasts with myriad interests; it is a place of refuge from the hectic pace of life on the eastern seaboard; and is the backyard business to outfitter guides, tourism services, and the wood products industry. The Forest is within a day's drive of 70 million people and home to 58 towns in New Hampshire and Maine. The Forest Plan Revision Public Involvement Plan was prepared with this diverse audience in mind.

A public involvement strategy — establishing ways for individuals, interest groups, and state and federal government agencies to become involved in the Plan Revision — was developed during the pre-revision phase of the planning process, in 1997. The strategy established opportunities for people to learn more about resource management and Forest Plan revision, while encouraging open dialogue within the planning time frame. The New England culture of relying on local collaboration to achieve solutions has guided the Forest Plan Revision process.

## Goal Statement

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Creating a way to involve White Mountain National Forest users is essential in producing a Revised Forest Plan that can be endorsed by the public, resource professionals, and employees. Support for the Plan is fostered by a widely held belief that people's concerns are heard and addressed in the planning process. Those involved in the planning process, and users of the White Mountain National Forest, should all feel an ownership in the Plan and actively support its implementation.

## Objectives

These objectives were established to meet the above goal:

**Listening** — We will listen to what people have to say about the management of their National Forest.

**Learning** — We will provide an environment for the public and ourselves to learn about concerns, new information, and trade-offs involved with management of the National Forest.

**Broad Picture** — We will provide opportunities for the public and ourselves to gain an understanding of the broad range of issues and the diversity of stakeholders involved with the Forest Plan Revision.

**Process** — We want all people to have opportunities to become involved in Forest Plan Revision. We will provide timely information.

**Credibility** — We will strive to ensure that information exchange is objective. We will provide opportunities for information exchange between groups

and forums that include more than Forest Service personnel. We will ensure that Forest Service personnel involved in meetings are well prepared. We will follow through on commitments we make.

**Support** — We want our efforts to provide a diverse base of people who actively support plan implementation and needed change. People support the plan based upon their feelings that their input was heard and considered in the process. We will continue to include and involve those who may have disagreements.

## White Mountain National Forest Audience

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To assist in the development of a framework for Plan Revision public involvement activities, four general groups of people were identified. Individuals may not fit within any one group and may be part of different groups at different stages in the process. Individuals' interests and activities determine their participation in the Revision process.

- **Active Participants** attend meetings, request information, and donate time to the planning process.
- The **Informed Concerned**, at a minimum, want access to information and an opportunity to provide input, but may not be active participants due to other commitments or distance.
- The **Need to Know** group includes government officials (local, state, and federal) with whom regulations require us to collaborate.
- **Other Forest Users** are all other users of the Forest and those with an interest in the National Forest that are not involved in the previously mentioned groups.

## Role of the General Public, Employees, Government Agencies, Tribal Governments, and Cooperators in Forest Plan Revision Public Involvement

### *Employees*

Forest Service Employees are in a unique position, because as citizens they have a stake in our National Forest that is equal to that of other members of the public. As employees, they are directly involved in management of the resource and the development of the Revised Plan and their support for the Plan is essential. Because of their daily work activities, they may be more familiar with the Forest than many members of the general public.

With the help of many others, such as contractors, permittees, and volunteers, they will be implementing the Revised Plan. If they understand the plan, they can pass on that understanding and get meaningful feedback in the process.

It was important to solicit input from employees, both as concerned citizens and resource managers. Their technical input has been essential during the interdisciplinary planning process, and will be displayed in analysis documents produced for the Revised Plan. Several employees have attended

public meetings to provide input as private citizens, and their comments and concerns are considered within the context of other public comments.

### ***Local, State, and Federal Government Agencies, and Elected Officials***

Regulations (CFR 36 219.7) require us to share information, seek input, and collaborate with federal, state, and local governments and associated agencies. For this reason, these individuals and agencies fall into the “need to know” group. Some of the representatives will be involved as the “informed concerned” or the “active participants” by their own initiative. For all representatives, we need to ensure some level of notification, so that they are informed about what is happening with Revision. Unless a representative explicitly requests to be dropped from mailing lists and other notification, we will continue to provide updates.

### ***Federally Recognized Tribal Governments***

American Indian tribes are sovereign governments, and the Forest Service will interact with them on a government-to-government basis. Each individual tribe is a separate government, and Forest Service line officers will take the lead in establishing and maintaining a relationship with elected tribal officials. This group will be engaged as “active participants” or “informed concerned” if possible. If they do not wish to be involved at those levels, we consider them a “need to know” group similar to other government agencies.

### ***Cooperators, Contractors, Permittees, and Groups with Existing Rights***

These individuals, organizations, clubs, companies, and groups with special interests could have a stake in the Forest Plan Revision process that is slightly different from others in the public. We will make contact with this group early in the process to ensure that they have the opportunity to become involved in the Plan Revision. We will emphasize the means of involvement that are available to the public and encourage them to become involved.

### ***General Public***

The public involvement effort for the general public will provide multiple forums, and interested people will be encouraged to select those that best match their level of interest. We will also provide different methods for people to become informed and involved with Forest Plan Revision. We will make extra effort during the scoping phase following the release of the Notice of Intent to notify this group of their opportunities to become involved in the process.

## **Collaboration with other National Forests**

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In July 1996, a joint planning team was established for the White Mountain and Green Mountain National Forests. Their objective was to lay the foundation for the revision of current Plans. The Forests met regularly for a year, discussing topics of concern that would determine the need for change and to outline how the public would be involved in the process. Joint public outreach meetings were held the following year in New Hampshire,

Massachusetts, and Vermont. These were followed by Public Planning Group meetings to review the results from the outreach meetings and help assign priorities for the Plan changes identified.

In 1998, Congress directed Plan revision to cease on all National Forests that had not yet filed a NOI in the Federal Register. The New Hampshire Congressional Delegation was successful in exempting the White Mountain from this language; however, regional planning allocations did not allow the Forest Service to proceed.

Funding in 1999 made it possible for the White Mountain National Forest Service to continue with the Forest Plan Revision. The Green Mountain National Forest was not funded for plan revision, however, so the collaborative effort between the two Forests ended. The Forests have continued to share information throughout the revision process, and participate in update meetings several times a year.

## Public Participation Opportunities

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### Pre-Revision Outreach — Identifying Needed Changes for the Forest Plan

In the January, 1997, outreach meetings were held in Gorham and Concord, New Hampshire, and Boston, Massachusetts. The public was asked what aspects of the current Forest Plan should be changed. Over 3,000 comments were received, ranging from broad to narrow, simple to complex, and technical to non-technical in nature. These were grouped into 31 topics of concern, and briefing papers were developed for each topic. The briefing papers summarized current Plan direction, monitoring information, any new information, and public or internal concerns. During the remainder of 1997, the public reviewed each of the briefing papers through a series of three all-day public planning meetings. The Forest then aggregated the 31 topics into 23, and used these to build a Need for Change document, which formed the basis for the formal proposal to revise the Forest Plan, the Notice of Intent (NOI).

The NOI for the White Mountain National Forest Plan Revision was published in the Federal Register on March 9, 2000, and initiated an official comment period that ended on May 23, 2000. The NOI resulted in 3,425 responses with 14,615 comments. This interest demonstrated the profound value of public land in New England. With 55 percent of the commentors from Massachusetts, 18 percent from New Hampshire, 10 percent from New York and New Jersey, 5 percent from Connecticut and Rhode Island, 3 percent from Maine and Vermont, 2 percent from Pennsylvania, and 1 percent from Maryland, the White Mountain National Forest is truly a northeastern resource.

In the Fall of 1999, Local Planning Groups (LPGs) were established in four geographic areas. Meetings were held monthly at these locations over a two year period. At each meeting, LPG attendees and members of the interdisciplinary plan revision team would discuss, in depth, the 23 topics

of concern. In late 2000 and early 2001, the Forest Service developed working papers to address each of the 23 topics of concern. These papers summarized public comment received during the NOI comment period. They also provided management options for how the Forest could deal with the topic during Forest Plan revision. As working papers were drafted, they were shared with federal and state agencies and LPGs. The Forest Service revised the working papers, after adding management options based on discussions at these meetings. Meetings were also held with Native American tribes, local governments, and private organizations and individuals.

## **Post-NOI Collaboration**

From November 2001 through 2002, collaboration continued as the 23 topics of concern were screened to see if they were relevant to Forest Plan-level strategic decisions as opposed to concerns about how the existing Plan had been implemented. This review focused on whether a concern was based on a change in resource conditions or on public demands. The result was that the 23 topics of concern became six need for change issues.

In May 2002, eight public meetings were held at locations throughout New England to present the six issues and receive comment. Through public comment, the six preliminary issues were narrowed or combined into three issues or concern areas to help guide the formation of alternatives. Options in working papers were also refined through public collaboration, and provided the basis for the four revision alternatives.

In May 2002, eight public meetings were held at locations throughout New England to present the six issues and receive comment. White Mountain National Forest District Rangers provided examples of changes in public opinion or need. Through public comment, the six preliminary issues were narrowed down to three.

Forest Plan Revision final resource issues and Forest Plan goals were presented to the public on June 22, 2002, at a meeting at Plymouth State University, Plymouth, NH. Approximately 100 people attended the meeting, where Forest Service resource specialists explained the issues and responded to questions from the audience.

Planning Team members presented and discussed conceptual alternatives at meetings throughout the month of November, 2002, in Littleton, NH; Gorham, NH; Chelmsford, MA; Plymouth, NH; and Bartlett, NH. Four proposed alternatives for the plan revision were presented to an audience of several hundred at a public meeting in Plymouth, NH, on March 29, 2003. In addition to discussion and comment at that meeting, an ensuing comment period drew some 3,700 further responses. The public response indicated that the four proposed alternatives were acceptable for analysis.

Personal contacts were also made with a variety of individuals and organizations to explain the planning process and receive their input. The Forest Supervisor routinely provided updates and briefings throughout the process with the Congressional delegation, State legislators, town and local officials, and other members of the public. Officials from 49 towns in New Hampshire and 9 towns in Maine received periodic updates and information



throughout the process.

Though there are no recognized tribes or tribal lands in New Hampshire, nor tribal lands within the immediate vicinity of the National Forest in Maine, Forest officials provided updates and briefings throughout the process to the four federally recognized tribes in the state of Maine and visited with the Tribal Chairmen or Governors during the process.

From March of 2003 through the spring of 2004, plan revision team members completed the Draft Environmental Impact Statement and Proposed Plan for the White Mountain National Forest. In April 2004 the Plan revision team attended District meetings to share information and discuss upcoming public meetings with employees.

Throughout April and May of 2004, meetings were held in Littleton, Bartlett, and Gorham, NH, and Chelmsford, MA, to provide an update about the upcoming months and help the public understand how to read, use, and comment on the DEIS.

## **Review and Comment on DEIS and Proposed Plan**

A 3-month public comment period began September 16, 2004, upon publication of the notice in the Federal Register that the Draft Environmental Impact Statement and Proposed Plan were available for review and comment.

A “Reviewer’s Guide” was provided along with the two documents to help readers to navigate through the documents and understand how to provide substantive comments. The documents were mailed to approximately 900 individuals, groups, agencies, and governments. They were also available at local libraries and through the Internet. One public meeting was held in central New Hampshire that coincided with the release of the draft documents. This was followed by six open houses at which the public could meet with members of the planning team and District Rangers to ask questions and gather information to assist them in preparing their response to the documents. An open house on the draft documents was also hosted by the Appalachian Mountain Club in Boston during the comment period.

## **Response to Comment and Preparation of Revised Forest Plan and FEIS**

Over the 3-month comment period, 6,160 letters, cards, emails, and faxes were received, comprising some 18,500 separate comments. These were read, coded, entered into a database, and summarized into Public Concern Statements. A detailed description of the public involvement process and Public Concern Statements is included in Appendix A of the FEIS.

## Communication Methods

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Public involvement efforts with the general public and with special interest groups provided forums for disseminating and collecting information. Public meetings, open houses and workshops, and verbal and written contacts contributed to the identification of the Need for Change and the development of issues and alternatives.

Periodic news releases, a website, and newsletters kept employees and the public informed about: revision issues, Forest Plan revision progress, public participation opportunities, and the location and time of upcoming public meetings.

Forest Plan Revision communication included:

- News releases, legal notices, and newsletters.
- Public postings of meeting announcements.
- Personal contact with individuals and various special interest groups.
- Information briefings for Congressional staff and state and local representatives.
- Radio and television interviews.
- Public information sharing meetings.
- White Mountain National Forest website.
- District office Forest Planning libraries.

## Response to Public Comments

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Over the 90-day comment period that followed release of the Proposed Forest Plan and Draft Environmental Impact Statement, some 6,100 communications were received from federal, state, and municipal agencies; from organizations; from Forest Service employees; and from interested individuals. Each letter, card, email, or fax was read, and 18,500 comments were identified. Substantive comments were categorized and incorporated into public concern statements, which were then sent to the Forest's Plan Revision Interdisciplinary Team for review and response. In many cases, comments resulted in changes and corrections to the planning documents. Where a concern referred to a site-specific situation, the information was forwarded to the appropriate Ranger District or resource team for review.

### Role of the Forest

- PC 10000-1: The Forest Service should protect National Forest land.**
- PC 10000-2: The Forest Service should keep the WMNF as a place of contrast from large urban and metropolitan areas.**
- PC 10000-3: The Forest Service should preserve the National Forest.**
- PC 10000-4: The Forest Service should preserve the White Mountain National Forest.**

The unique role of the Forest, cited in many public comments, is recognized in a number of places in both the Final Environmental Impact Statement (FEIS) and the Land and Resource Management Plan (Forest Plan) and is discussed by the Regional Forester in his Record of Decision. Specifically, the Introduction and Desired Future Condition of the FEIS (Chapter 1) and the Goals and Objectives of the Forest Plan (Chapter 1) describe the unique attributes of the White Mountain National Forest. These sections of the document have been reviewed and updated to ensure they reflect the comments received on the Draft documents.

The White Mountain National Forest is truly unique in the northeast landscape for ecological, social, and economic reasons. The Forest planning effort contributes to the conservation and protection of these unique values for current and future generations.

- PC 10000-5: The Forest Service should provide balanced land use in the National Forest.**
- PC 10000-6: The Forest Service should provide and manage for multiple uses of the Forest.**
- PC 10000-9: The Forest Service should favor certain forest uses in exclusion of other uses.**
- PC 10000-10: The Forest Service should provide for a healthy Forest.**



The Forest Plan is developed under the authority of the National Forest Management Act and the Forest and Rangeland Resources Planning Act to “provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term benefits in an environmentally sound manner.” These laws, in concert with a number of other laws and regulations, provide the overall context for determining the best possible “balanced approach” for the White Mountain National Forest.

In the Final Environmental Impact Statement, the Forest Service outlines the specific issues (Chapter 1), possible alternative approaches (Chapter 2) and the environmental effects (Chapter 3) associated with the many outputs, services, and experiences expected from the Forest. The Regional Forester, in the Record of Decision, outlines the preferred approach for balancing the management of the Forest based on the analysis in the EIS, available scientific information, experience on the Forest over the last 90 years, and public comment.

**PC 10000-17: The Forest Service should investigate ways and means to increase its visibility with regard to product availability.**

A commenter suggested that the Forest increase the visibility of the products produced from the Forest. It was suggested we consider a program such as “Owning a Piece of the Forest – WMNF” and use the revenues from the program to meet unfunded management needs.

To date, our focus for increasing public awareness has been through publications such as brochures, interpretive displays at facilities like the new White Mountain Gateway Information and Interpretation Center and at Ranger District offices, self-guided audio tours, signing at project locations, and interpretive trails such as the Discovery Trail. While the revised Forest Plan does not specify a marketing approach it would allow for different marketing approaches to be developed in the future to increase visibility.

**PC 99100-1G: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **It must be made clear to all Forest users and non-users alike that the WMNF is not a virtual preserve.**

Detailed descriptions of the kind of information requested are already included in the Forest Plan. Chapter 3 includes sections entitled “Purpose” and “Desired Condition of the Land” for each management area. Within these sections, a clear description is provided as to how each respective management area contributes to the overall management of the Forest.

## **Accessibility**

**PC 10000-16: The Forest Service should allow electric (motorized) wheel chairs.**

**PC 18000-5: The Forest Service should provide additional training regarding disability issues and awareness to unit managers; opportunities for people with disabilities should be more readily available.**

- PC 87200-1:**     **The Forest Service should revise the standards for accessibility in the Proposed Forest Plan.**
- PC 87200-2:**     **The Forest Service should increase outdoor opportunities available to people with disabilities.**
- PC 90200-4:**     **The Forest Service should maintain a professional relationship with agencies dealing with accessible trails to alleviate conflicts.**
- PC 91000-4:**     **The Forest Service should strengthen the accessibility standards and guidelines in the Forest Plan.**

There is much more awareness of disability issues today than when the 1986 Forest Plan was developed, and the White Mountain National Forest has come a long way in addressing outdoor opportunities. Every project on the Forest, whether new or proposed, is required to go through a stringent review to ensure that it will incorporate the highest level of access while taking the natural setting into consideration. Topography (steep grades which may create excessive cuts or fills), recreation setting, and historical or cultural sites are examples of conditions that may limit or modify application of the guidelines.

In the absence of guidelines to cover the natural environment, the Forest Service developed *Universal Access to Outdoor Recreation— A Design Guide*, and adopted it as internal policy from 1993 to 2000. When the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and Architectural Barriers Act Guidelines (ABAG) were combined, the Forest Service was again a leader, proposing a new set of standards for trails and outdoor recreation — FSTAG (Forest Service Trails Accessibility Guidelines) and FSORAG (Forest Service Outdoor Recreation Accessibility Guidelines).

The combined guidelines, known as the ADAABAG — *Americans with Disabilities Act / Architectural Barriers Act Accessibility Guidelines* (2004) — bring all local, state, and federal facilities together under one set of standards. They apply primarily to the more urban setting, although they do not exempt outdoor recreation areas from accessibility requirements.

Without other outdoor recreation-based guidelines, the more urban standards would be applied, which could radically change the setting and experience. For this reason, the Forest Service developed, and has worked toward adoption of, the FSTAG and FSORAG to address the natural outdoors recreation setting.

When the WMNF began Forest Plan revision, it was anticipated that the proposed FSTAG and FSORAG, then in draft form, would have completed the scoping process and been published in the Federal Register. However, these guidelines did not complete external scoping until April of 2005, so reference to them in the Plan has been limited to the glossary. The FSTAG and FSORAG have since completed the scoping process and are now legally supportable guidelines that the Forest Service will use within the National Forest System boundaries, including work undertaken by partners. The Forest Service will continue to use the most current federal and Forest Service accessibility guidelines available.

The outdoor recreation and trails guidelines allow for exceptions and conditions for departure where compliance would cause substantial harm to cultural, historic, religious, or significant natural features or characteristics; would substantially change the physical or recreation setting; would require construction methods or materials prohibited by law; or where it would not be feasible due to terrain or prevailing construction practices. Each site or proposal is considered individually to determine if exceptions exist prior to moving the project forward.

Training sessions for managers and employees are conducted every year, and there is a yearly accomplishment report completed on the accessibility improvements made on National Forests across the country. Each forest has an accessibility program leader with collateral responsibilities to help assure that the Forest follows all applicable guidelines, and also to promote the use of universal design in all projects.

There are a growing number of groups that provide information and training for the disabled user, including the newer forms of locomotion, and many of them use Forest Service land for their training sessions. Wilderness Inquiry, Project I.N.S.P.I.R.E., and Northeast Passage are a few of the groups that specialize in outdoor recreation experiences, and are an excellent source of information for different experiences. Alpine ski areas on the White Mountain National Forest also offer programs for disabled skiers, as well as information on adaptive equipment. The Forest Service has worked closely with these groups over the years, helping them develop and promote disability awareness. The WMNF was instrumental in promoting the accessible design of the Galehead Hut, the most remote hut on the Forest. As areas are upgraded, accessibility is always considered.

The Forest recreation team continues to look for and provide dispersed camping opportunities, bearing in mind that integration, not segregation, is important. All gated Forest roads (MA 2.1) that state “Foot Travel Welcome,” are also open to devices meeting the definition of a wheelchair for travel and “backpacking” and roadside camping. In addition, devices meeting the definition of a wheelchair, including motorized wheelchairs, are allowed on every facility and transportation route on the Forest, including those in Wilderness. There is no longer a separate list for accessible projects, because some level of barrier free design is integrated into every project on the Forest.

The new Gateway Visitor and Interpretive Center in Lincoln, NH, providing a history of the Forest and its evolution over time, was developed using the Smithsonian guidelines for accessibility, and has tactile hands-on displays as well as an audio-described tour. The Forest Service will continue to strive for opportunities in this important part of our mission.

The Forest Service acknowledges that, regrettably, there has been confusion and disagreement regarding application of various agency guidelines. With the 2004 combined ruling of the ADAABAAG, and the adoption of outdoor recreation and trails standards, there will finally be clear direction established for all lands under Forest Service jurisdiction.

Additional standards and guides have been added to the Forest Plan to clarify Forest policy, and numerous definitions have also been added to the Glossary. For example, the Glossary clarifies the definition of a wheelchair, which includes motorized devices developed for mobility by disabled users.

As stated, the FSTAG – Forest Service Trails Accessibility Guidelines, and FSORAG – Forest Service Outdoor Recreation Accessibility Guidelines, have now completed the scoping process and are awaiting publication. They can be found online at <http://www.fs.fed.us/recreation/programs/accessibility>. These guidelines are now legally enforceable policy within National Forest System (NFS) boundaries, including those undertaken by partners.

The ADAABAAG is available at <http://www.access-board.gov>. While the trails and outdoor guidelines apply to natural recreation areas such as campgrounds, dispersed recreation sites, and trails, the ADAABAAG applies to administrative sites, parking lots, boating and fishing sites, winter sports, playgrounds, hotels and lodges, and other more highly developed facilities.

The Forest Service has been upgrading developed recreation sites with improvements to restroom facilities, camping sites, trails and trail bridges, and overlooks in scenic areas. The Forest Service has developed lists of accessible campgrounds, trails (which will mostly be frontcountry due to terrain limitations), and waterbodies, with brief descriptions of what the user will encounter. These are available in hardcopy, including large format, upon request, and can also be found on the WMNF website: [www.fs.fed.us/r9/white](http://www.fs.fed.us/r9/white).

**PC 91100-47: The Forest Service should identify direction for special motorized dispersed recreation for people with disabilities.**

Federal laws, regulations, and policies that apply to Federal agencies, including Section 504 of the Rehabilitation Act of 1973 (as amended) do not require areas restricting or prohibiting OHV/ATV use for all people to make exceptions to such use because a person has a disability.

There is no public ATV use allowed on the Forest in the existing or proposed plan, except in the winter on snow cover because of the potential for resource and other environmental damage. Restricted use applies equally to people with disabilities and to the general public. Individuals who use assistive devices for mobility purposes may use their device as long as it meets the definition of a wheelchair (both manual and motorized). Motorized wheelchairs are also allowed in Wilderness areas, and other areas signed as “Foot Travel Only”.

**PC 91100-79: The Forest Service should develop a map overlay showing areas that are not suitable for disability access because of topography.**

It is the responsibility of all individual users to determine the difficulty and level of risk they choose to encounter. What one person may see as easy, the next may see as difficult, so it would be impossible for the Forest Service to accurately judge or label specific areas. The Forest Service, instead, can only generally describe all areas, and leave it up to the user to research a particular area and decide whether it is within their ability. There are trail guidebooks

available for purchase locally that provide physical descriptions of most major trails found on the Forest. Even though the Forest is open to all users of all abilities, personal responsibility is stressed.

All users are requested to be prepared, inform others of their plans, and become familiar with HikeSafe and other safety program guidelines, so they do not put their own welfare or potential rescuers at risk

**PC 34000-1: The Forest Service should clarify whether motorized wheelchair access would be allowed within the Rocky Gorge Scenic Area.**

Wheelchairs, or devices meeting the definition of a “wheelchair,” either manual or mechanized, are allowed in all places on the Forest, including Wilderness areas, in accordance with Federal Law. The Rocky Gorge Scenic area has been upgraded recently to incorporate universal access.

**PC 87200-3: The Forest Service should be judicious when constructing trails for Individuals with disabilities.**

The Forest Service is committed to incorporating barrier free technology when possible, without significantly altering the setting and experience. A decision to construct or upgrade a trail is based on benefitting the greatest number and variety of users in a given setting, while being mindful of protecting the experience for the user and the environment. Existing routes that are reconstructed are not considered within the limit of miles allowed within the planning period.

There is a misconception that all wheelchair accessible trails must be 6-foot wide, paved paths with little or no grade. Because the Forest Service tries to offer a wide range of experiences, a trail may be unsurfaced, 36 inches wide, with a grade up to 14 percent (or in some cases even steeper), depending on the physical limitations and setting, and still be considered barrier free. It may also include segments that cannot meet accessible standards. Challenged users look for a range of difficulty and risk, and will often use trails that do not meet any of the access standards. New technology in personal assistive devices provides disabled users the means and opportunity to get places that were once considered inaccessible.

Current federal law requires that all new facilities constructed or under major alteration, rented, leased, or purchased by a federal agency be accessible, including programs and activities. However, the ADAABAAG does not adequately address conditions found in the natural environment. The *Forest Service Trails Accessibility Guidelines* (FSTAG) have been developed by the Forest Service to recognize the natural setting of trails managed for pedestrian use found within National Forest boundaries. The guidelines allow the use of exceptions and deviations so that application will not alter the setting, purpose, or function for which the facility was designed. The Forest Service goal is to provide a diversity of challenge and risk, while removing barriers to insure integration of all users. These guidelines also recognize that at some locations the natural environment will prevent full compliance with some of the technical provisions.



## **Biodiversity / Ecosystems**

**PC 10000-15: The Forest Service should identify goals and objectives for natural disturbance activities on the National Forest.**

Natural disturbance regimes on the WMNF are discussed in Chapter 3 of the EIS (Vegetation section, Natural Disturbance subsection), and the effects of expected natural disturbance are described for each alternative in the Vegetation section. Natural disturbance in general is not addressed in the Forest Plan because the Forest Service does not propose management related to most natural disturbance events. Wildland fire use and invasive species are the exceptions, and are addressed individually because management direction is different for each type of disturbance. In the General Forest Management Zone, MA 2.1, the Forest Service will alter vegetative conditions through timber harvest and other activities. In all other MAs, natural disturbance will be the primary means through which changes in vegetative composition take place, though salvage harvest is allowed in some management areas.

**PC 14000-1: The Forest Service should more clearly analyze the regional context of old growth and roadless areas in maintaining biodiversity.**

The White Mountain National Forest's regional role in maintaining biodiversity was a key consideration during the development of alternatives. The Forest's role in providing mature and old forest habitat, as well as large areas without timber harvest and road construction, was part of the basis for the land allocations in the four proposed alternatives. That is one reason why none of the alternatives noticeably reduced the amount of land in management areas that emphasize forest development through natural processes.

The Forest Service did not specifically address the effects or contribution of inventoried roadless areas (IRAs) to biodiversity because IRAs are not a land allocation in the Plan. Their primary purpose is to identify lands for potential Wilderness designation. However, the Vegetation section in Chapter 3 of the FEIS does discuss the distribution of habitat types and age classes among management areas that allow timber harvest and road construction, and those that essentially prohibit these activities. The effect of the alternatives on this distribution and, as a result, on habitat conditions in the future also is analyzed in this section. The affected environment and cumulative effects discussions in this portion of the Vegetation section describe habitat conditions outside the National Forest, including current and expected future abundance of mature and old forest across the analysis area, and the regional importance of lands on the Forest. The importance of the large blocks of land that would remain in management areas that emphasize forest development through natural processes also is evaluated in more detail in the fragmentation discussion in the Wildlife section of the FEIS. The management indicator species discussion in the Wildlife section and the SVE evaluations in the Rare and Unique Features section of the FEIS describe how the current and expected future habitat conditions would

affect wildlife and plant species on the Forest and, regionally, in the analysis area. The analysis of habitat conditions based on land allocation considers the impact on biodiversity of having large areas in which timber harvest and road construction are essentially prohibited.

Concerns were raised about whether the planning team used all of the available science and literature, including that cited in Cline et al. (1999) and the Roadless Area Conservation Rule, in our analysis of the effects of unroaded areas and protection and development of old forest on biodiversity. Literature cited in Cline et al. (1999) was used in the revision process, especially during the alternative development process when land allocation and levels of even-aged regeneration harvest were considered. Literature that peer reviewers of Cline et al. (1999) indicated was lacking in that document also was used during alternative development. In evaluating the value of large unroaded areas and the effects of our land allocation proposals on habitat and species, the WMNF also used some of the literature cited in the Roadless Area Conservation Rule and other literature on these topics from local research that is more applicable to northern New England.

Additional discussion of old growth, its importance on the landscape, its current and future distribution on the Forest and regionally in the analysis area, and effects of alternatives on it was added to the FEIS (Chapter 3, Vegetation section).

- PC 14000-2: The Forest Service should manage for large scale biodiversity.**
- PC 14000-8: The Forest Service should designate Candidate RNAs with SPNM and SPM MAs that would allow for management of fire-dependent ecosystems and development of late successional stages.**
- PC 14100-2: The Forest Service should provide increased protection for streams in functional landscapes.**
- PC 14100-3: The Forest Service should increase both the number and size of areas managed solely for the uncommon habitats found on warm, southern exposure slopes that may have supported historic fire ecology.**
- PC 89100-1: The Forest Service should develop ecological control areas for each ecosystem type occurring on the Forest.**
- PC 89100-3: The Forest Service should increase protection of lower elevation slopes in the Saco River Valley.**
- PC 89400-4: The Forest Service should protect all forest types, especially in the Moat Mountain area.**
- PC 91100-2: The Forest Service should support the finding of the AMC and TNC that additional areas should be excluded from MA 2.1.**
- PC 91100-35: The Forest Service should allocate land so that some of every land or aquatic type, including highly productive lands, is in**

- management areas that do not allow commercial timber management.**
- PC 91100-40: The Forest Service should protect all forest types found on National Forest lands.**
- PC 91200-2: The Forest Service should increase protection of the rare ecosystems found in the eastern toe slopes of the Moat Mountains.**
- PC 91200-3: The Forest Service should increase protection to the Central Swift River Basin to protect the low gradient river reach, extensive wetlands, and associated valley bottom forest.**
- PC 91200-4: The Forest Service should expand the non-extractive management boundary to the west and southwest of Mount Moosilauke.**

The Forest Service is responsible for managing for biodiversity at all scales, as discussed in the Introduction to Biodiversity in Chapter 3 of the FEIS. For some aspects of biodiversity, this means placing large areas in management areas (MAs) having standards and guidelines that would result in changes primarily due to natural processes. For many components of biodiversity, management is desirable or can be done while protecting the species or system. Having goals, standards, and guidelines that guide management so it will maintain or increase biodiversity meets conservation objectives. As part of the biodiversity coarse filter, the Forest Service made sure that examples of each broad habitat type will be unavailable for commercial timber harvest in each broad elevational category (landtype association or LTA) due to MA allocation and land suitability. The Forest Service will protect existing old growth (Plan, Chapter 2, Rare and Unique Features) and increase old forest habitat across the Forest (FEIS, Chapter 3, Vegetation). Standards and guidelines for riparian areas, wetlands, and outstanding natural communities provide protection for these smaller ecosystems. Standards, guidelines, and monitoring for non-native invasive species should reduce the potential for these species to become established and alter the Forest's ecosystems. The planning team reviewed several natural communities identified by the NH Natural Heritage Bureau as needing specific protection. This resulted in classification of three additional outstanding natural communities: northern white cedar – hemlock swamp, northern white cedar seepage forest, and pitch pine – scrub oak woodland.

The Forest Service reviewed the ecosystems and habitat types identified in public comments as under-represented in “non-extractive” MAs. The Forest Service agrees that these systems are ecologically valuable and believes that the Selected Alternative provides appropriate protection without altering the proposed land allocation. Except low elevation habitats, which are addressed in PC 14000-3, the ecological systems mentioned in public comments are addressed individually as part of this response. In addition to the protections discussed in the preceding paragraph, specifics for each



of the other ecological systems mentioned in public comments are addressed individually in this response.

Roughly 40 percent of the rich and semi-rich mesic forest natural community occurrences on the WMNF would not be in MA 2.1 in the preferred alternative (Sperduto and Nichols, 2004) and are therefore protected from harvest. Given that surveys that resulted in documentation of occurrences of these communities have been focused primarily in MA 2.1, it is possible that an even greater portion of these communities is outside MA 2.1. In addition, the oldest examples of these communities are conserved as outstanding natural communities.

Roughly 15 percent of the ecological landtypes that include deep coarse outwash deposits are outside MA 2.1, including moderate to large blocks in the Pemigewasset Wilderness and Wild River Recommended Wilderness. In addition, several patches of these ecological landtypes are along 3<sup>rd</sup> and 4<sup>th</sup> order streams, which will have large riparian buffers that will minimize impacts to these areas.

The unique conditions associated with floodplain terrace forests and wetlands and low elevation, low gradient streams will be maintained in MA 2.1 through riparian standards and guidelines. This management direction was developed to ensure that streams and wetlands will achieve proper functioning condition, which should protect plant and animal communities and ecological processes.

The Forest Service did not identify a need to change the management area allocation of warm, southern exposure slopes because proposed management would allow for the maintenance and protection of the uncommon oak and pine habitats. Most management areas allow for prescribed fire, wildland fire use, or both (Plan, Chapter 1, Wildland Fire), so fire could remain part of the ecology of these areas. Wildlife habitat guidelines (Plan, Chapter 2, Wildlife) encourage retention of existing vegetative diversity, including the oak and pine habitats that often occur in these areas. The value of natural openings that may occur in these areas is addressed in the Terrestrial Habitat Management Guidance Document that is referenced in the Wildlife Standards and Guidelines (Plan, Chapter 2, Wildlife). The pitch pine-scrub oak community was added as an outstanding natural community in the FEIS to conserve this important habitat.

Northern white cedar swamps and northern white cedar seepage forest were added as outstanding natural communities in the FEIS to conserve these important habitats. As a result, timber harvest would be prohibited in these communities, even in MA 2.1.

**PC 91100-3: The Forest Service should move some roadless lands from MA 2.1 to other management areas in Alternative 2.**

The Forest Service evaluated all acres in inventoried roadless areas to determine how best to allocate them among management areas. The final allocation for each alternative was based on Forest goals and objectives and the way in which the alternative balances the various needs, uses and public values of National Forest land. The Forest Service believes that the allocation

of roadless acres among management areas in Alternative 2 is appropriate, given the other management proposed in that alternative.

**PC 91100-48: The Forest Service should place the sensitive portion of Wild River into MA 6.2.**

Much of the land in question was placed in MA 6.2 and other similar management areas, including MA 9.4 in the current plan. This was done in order to maintain the option for its consideration as recommended Wilderness in this Plan Revision process. The authorizing officer has made the decision, based on the Environmental Impact Statement, to assign these lands to recommended Wilderness, Management Area 9.1.

**PC 91100-69: The Forest Service should allow reentry into the 2004 IRA lands for future timber activity.**

**PC 91100-70: The Forest Service should remove the 2003 roadless lands from the timber base.**

Alternative 2 sets aside lands within the Wild River and Sandwich Roadless Areas for recommendation as Wilderness. The remaining lands within the roadless areas are allocated to several management areas. Most of the remaining lands that were allocated to MA's 2.1, 2.1A, 3.1 and 9.4 in the 1986 Plan are allocated to the General Forest Management Area under the Selected Alternative. Consequently, harvesting would be scheduled on these lands.

**PC 91100-73: The Forest Service should reclassify the small area classified as SPM in Alternative 2 adjacent to the SRW boundary as Recommended Wilderness.**

- **Because conflicts will arise between the wilderness and snowmobile advocates.**

The area in question was classified as Management Area 6.3 (Semi-Primitive Motorized) in the current Forest Plan, which was completed and approved in 1986. This 6.3 area was designated in order to provide flexibility for snowmobile trail management in the Flat Mountain Pond area. (The Flat Mountain Pond Trail to the pond has been on the snowmobile trail system for many years.)

There were no proposals during the first Forest Plan period (from 1986 to the present) to designate additional motorized trails in this area. The area currently contains no roads or motorized trails other than the Flat Mountain Pond Trail, which is a snowmobile trail in the winter and a hiking trail in the summer. There are dispersed hiking and camping improvements in this area including a shelter and composting toilet (near Flat Mountain Pond). This suggests dual recreation goals of summer hiking and winter snowmobiling that are better described by a MA 6.1 designation. Therefore, it is recommended that this area be reassigned from MA 6.3 to MA 6.1. This would more accurately describe the existing condition of the area, while not forfeiting future management options.

**PC 91100-74: The Forest Service should place all proposed roadless and wilderness lands in MA 6.2 to maintain their current qualities while waiting for wilderness eligibility.**

All recommended Wilderness is put into MA 9.1. The purpose of MA 9.1 is to: 1. Recognize the areas currently recommended for Wilderness pending higher-level decisions and 2. Manage the land to protect Wilderness values to protect eligibility for the Wilderness Preservation System. The standards and guidelines are designed to meet this purpose. The Forest Service believes this provides appropriate recognition and protection for recommended Wilderness. See PC 91100-57.

**PC 91100-75: The Forest Service should include the very bottom lowlands and the entire watershed of the Wild River as Wilderness.**

See responses to PC 14000-3 and PC 40260-2.

**PC 91400-3: The Forest Service used criteria for the roadless inventory that were more restrictive than necessary at the inventory stage and more applicable at the Wilderness evaluation stage.**

The roadless inventory criteria used on the WMNF was provided by the Regional Office, and was intended to clarify the more general, value-related terms associated with the Wilderness Act, and to promote consistency among National Forests. See the responses to PC 40000-5 and 40000-8 for further discussion of this topic.

**PC 91100-57: The Forest Service should allocate all Inventoried Roadless Areas to MA 9.1 or MA 6.2.**

An alternative was considered that allocated all Inventoried Roadless Areas to MA 9.1, Wilderness Study. The FEIS (Chapter 2) explains why this alternative was eliminated from detailed study. Alternative 3 did allocate much of the Roadless Inventory to various MA 6 areas — those areas subject to the 2000 Roadless Conservation Rule. The preferred alternative does not because Forest Planning guidelines allow areas not recommended for Wilderness Study to be allocated to other management areas according to Forest goals and objectives. In addition, eligibility criteria for roadless and wilderness east of the Mississippi allow a substantial amount of roads and evidence of harvesting to occur in an area. Therefore, management allocations are not critical for maintaining the eligibility of areas for future wilderness consideration. Finally, during project implementation, effects on roadless character are evaluated and considered.

Also see PC 40000-7.

**PC 14000-3: The Forest Service should provide greater protection for Valley Bottom LTA.**

**PC 91100-24: The Forest Service should illustrate in the Forest Plan the management area designations with regard to elevation.**

**PC 91100-28: The Forest Service should place low elevation lands of the Wild River Valley into non timber management because the Wild River would represent the only significant low-elevation valley bottom in natural area management.**

**PC 91100-34: The Forest Service should place more low elevation highly productive lands in “non-extractive” management areas.**

The Valley Bottom landtype association (LTA) primarily encompasses the lowest elevations in the valleys on the Forest, which typically contain land with strong spruce-fir tendencies. Because LTAs encompass hundreds of thousands of acres, the LTA descriptions in the FEIS are necessarily broad. Not all land in a LTA will meet all characteristics in the description. It is true that much of the Valley Bottom LTA on the WMNF is higher than 1,000 feet elevation. The LTA descriptions in the FEIS were modified to better describe the land encompassed by each LTA.

As shown in Table 3-15 of the FEIS, 23 percent of the Valley Bottom LTA is in management areas in which vegetation is altered primarily through natural processes. This includes several larger areas, including the Pemigewasset valley bottom in the Pemigewasset Wilderness. In addition, 22 percent of the land in the General Forest Management Area (MA 2.1) has been identified as unsuitable for timber harvest for various reasons (FEIS Table 3-27). More than 30 percent of this unsuitable land is lower elevation, wet ground that is part of the Valley Bottom LTA. Even within land available for timber harvest, riparian buffers limit harvest adjacent to perennial streams, providing additional protection to communities and species in these sensitive areas. Inclusion of valley bottom lands in Wilderness are shown in Tables 3-70 and 3-71.

**PC 14000-4: The Forest Service should manage for mature forest floor conditions in order to support proper nutrient cycling and habitat for native species.**

The Forest Service agrees that providing for nutrient cycling and habitat for native species is essential. Several aspects of our management under the revised Forest Plan would accomplish these goals. Land allocation, land suitability for timber harvest, habitat objectives, and the portion of harvest in uneven-aged management will ensure continued maturing of a majority of the WMNF. In addition, the Forest Service will protect existing old growth (Plan, Chapter 2, Rare and Unique Features) and increase old forest habitat across the Forest (FEIS, Chapter 3, Vegetation). Wildlife reserve tree standards and guidelines (Plan, Chapter 2, Wildlife) will ensure sufficient woody debris is available to support nutrient cycling and habitat needs, and the riparian management direction will further protect riparian areas. A majority of timber harvest occurs during winter months, reducing potential for forest floor disturbance. Also, the Forest Service limits conditions when whole tree harvesting could occur, retaining nutrients on-site. Therefore overall, existing management direction would allow the WMNF to maintain nutrient cycling and habitat conditions across the Forest.

**PC 99100-3P: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Recommendation that ecosystem variability, ecosystem diversity, and biodiversity be included in the Forest Plan Goals.**

Managing for ecosystem viability, which is part of the goals, requires maintaining biodiversity, including the full variety of species and ecosystems.

**PC 14100-1: The Forest Service should protect unique natural communities, particularly the most rare cliff and talus sites.**

The rarest cliff and talus communities, those with enriched rock or groundwater discharge, were addressed as outstanding exemplary communities in the DEIS (pages 3-250 to 3-254). Other uncommon natural communities also were evaluated in this section and explanation was given for why they were, or were not, considered outstanding exemplary communities by the Forest Service. In the FEIS, outstanding exemplary communities are renamed outstanding natural communities to avoid confusion with state classifications. Montane circumneutral cliffs remain an outstanding natural community. A number of additional natural communities were evaluated for the FEIS (Table 3-60) and three additional outstanding natural communities were identified. The revised Forest Plan (Chapters 1 and 2, Rare and Unique Features) includes a goal and a guideline to protect all outstanding natural communities.

**PC 14100-4: The Forest Service should amend the MA 8.1 Alpine Zone standards to allow highly site-specific vegetation management.**

**PC 14200-2: The Forest Service should provide specific management goals and objectives to preserve and reconstruct sensitive alpine, subalpine, and near-alpine ecosystems.**

**PC 38400-2: The Forest Service should develop a more comprehensive management plan for the Alpine Zone.**

**PC 38400-3: The Forest Service should monitor use in MA 8.1 and act upon any negative impacts found during monitoring.**

**PC 99100-1A: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The Alpine Zone MA should allow for management actions and include additional acres from other MAs to encompass all alpine, subalpine, and near alpine areas and barren rocky ledges.**

The Forest Service agrees that protecting all alpine and subalpine habitat from degradation caused by human disturbance and non-native invasive species (NNIS) is very important. That is what prompted the development of the new Alpine Zone Management Area. This MA includes restrictions on development of facilities and restrictions on some types of use, including camping, off-trail hiking, and geocaching. It also requires mitigation of



negative impacts to alpine communities from human use, and allows for management, area closures, or use limits if necessary to protect species and communities (Alpine Zone MA standards and guidelines, Plan, Chapter 3, MA 8.1).

As indicated in the Wildlife guidelines for the MA, changes in habitat should result primarily from natural processes. However, requirements to protect TES species occurrences and the NNIS guidelines for the MA indicate that protection of natural communities is a priority. Therefore, if monitoring indicates that human activity or NNIS are degrading alpine communities, actions would be taken to reduce, prevent, or correct that degradation (Plan, Chapter 3, MA 8.1). Management would be used that has the least impact, while still meeting the purpose of the MA, conserving the alpine and subalpine zones. Monitoring of the use and impacts in the Alpine Zone is included in the Monitoring Plan for the Forest, and will be part of the Monitoring Implementation Guide.

Based on review of the purpose, desired future condition, standards, and guidelines for the MA in the FEIS, the Forest Service did not believe it was necessary to alter MA 8.1 to protect alpine and subalpine habitats. To clarify the Forest Service's intent to protect even the small patches of alpine and subalpine communities that occur outside the Alpine Zone MA, a goal and Forest-wide guideline were added to the Rare and Unique Features categories (Plan, Chapter 1 and Chapter 2).

**PC 99100-1N:**

- **Standards and guidelines in the Rare and Unique Features section should be strengthened.**

Comments suggested Standard S-1 and G-2 in Rare and Unique Features should be strengthened. S-1 includes language to allow biologists to determine whether or not surveys are necessary. There are times when surveys are unnecessary (e.g., reconnaissance determines no suitable habitat is available for rare plants). Requiring surveys when other information is available would be a poor use of limited funding and staff time. All land exchanges evaluate the potential effects to TES species and habitats and land is often acquired to increase TES habitat. However, G-2 remains a guideline to give flexibility in situations where land exchange offers a greater good, e.g., to resolve safety issues or to acquire more habitat than what is being exchanged.

Some commenters were concerned that Standard S-2 in Rare and Unique Features might not apply to recreation activities. In addition, comments were suggested to clarify some of the language in the Canada lynx standards and guidelines within the Rare and Unique Features section. S-2 has been modified to make clear that all activities funded or authorized by the Forest Service apply. The Canada lynx has the luxury of having a national comprehensive conservation strategy already developed. As other species develop similar plans, they may be added to the Forest Plan through amendment if necessary. In some cases, conservation actions may require less direction than lynx, which may be affected by a variety of resource

areas. For the WMNF Forest Plan, the glossary contains habitat definitions under “Lynx Habitat” and G-7 has been corrected to include a missing word.

Comments suggested Canada Lynx Standard S-3b in Rare and Unique Features implied that alternative prey could compensate for lack of snowshoe hare. We agree with the comment that snowshoe hare must be available in sufficiently high numbers for lynx to occur and that alternate prey alone would not be enough to support lynx. The Biological Evaluation describes in detail the importance of snowshoe hare. We disagree that standard S-3 implies otherwise.

Suggestions were made that the goals describing Rare and Unique Features include additional language to protect critical habitat and key habitat features from all uses and human interactions, with special emphasis on all recreation uses. The Goals and Objectives (Plan, Chapter 1) apply to all activities in all resource areas, so the language, as written, is adequate. Potential effects from recreation activities was a consideration when drafting many of the new Standards and Guidelines (Plan, Chapters 2 and 3), to clarify that recreation activities and other human uses pertain.

Some comments noted that standards and guidelines to direct prevention, control, and eradication of non-native invasive species seemed to apply only to certain management areas. A review of the language did not indicate a need to change the wording, which is intended to apply to the entire Forest. However, with the expectation that budgets and staff will be limited, language was added to indicate the management areas that should receive top priority for prevention and eradication efforts.

It was pointed out that Standard S-2 in Rare and Unique Features as written might unnecessarily limit existing activities. The Standard has been modified to clarify that the 100-foot restriction for plants and ¼ mile restriction for fixed wildlife habitat features refers to *new* land uses, although changes to existing uses may still be considered in individual site prescription recommendations.

Some people felt that Guideline G-1 in the Nuisance Wildlife section should place more emphasis on campers’ responsibility in preventing human-wildlife encounters. Human accountability is an important part of public education on this topic. Prevention and education measures identified in Nuisance Wildlife guideline G-1 have conveyed this message in the past and are intended to do so in the future.

**PC 99100-3R: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Recommendation to clarify Forest-wide Rare and Unique Features standards and guidelines to apply to all Forest activities, not just timber harvest.**

Forest-wide management direction for all resource areas applies to all Forest activities, unless something in the standard or guideline specifically limits what activities it applies to. Language was added to the Preface to the Plan highlighting that this direction applies not only across all MAs but also across all activities.

**PC 99100-7: The Forest Service should include a section on plants to follow wildlife in the Plan.**

Plants are indeed an important resource on the Forest and are addressed in a number of locations, most notably under Rare and Unique Features. Multiple plant habitats are also addressed in the Vegetation Management, Riparian and Aquatic Habitats, and Non-Native Invasive Species sections. An additional section specific to plants would be redundant with these other sections.

**PC 14200-3: The Forest Service should include specific management standards to protect alpine ecosystems adjacent to the AMC huts.**

The Forest Service conducted a complete review of the AMC hut permit in 1999 when the permit was reissued with updated management requirements. The Notice of Intent for Forest Plan revision indicated that the Forest Service would not revisit that decision. The new permit for the huts prohibits expansions in the footprint on the land or in capacity of the huts. It also includes mitigation and monitoring requirements designed to protect ecological resources around the huts. Protection of TES species is an important part of the Forest Plan, and action would be taken if necessary to minimize impacts to TES species occurring near huts. However mitigation will not prevent all impacts, especially in an area in which use is concentrated as it is around the huts. The potential for impacts to alpine habitats from recreational use is discussed in the Rare and Unique Features section of the FEIS.

**PC 99100-1C: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Stress that the effects of human activity must be minimized in the Alpine Zone MA.**

The Desired Future Condition for the Alpine Zone MA includes several references to the fact that natural processes will be the major force in this MA, with limited evidence of human activity.

**PC 99100-1SS: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Modify the Wildlife Reserve Trees standards and guidelines.**

Retention of large snags and wildlife trees is always desirable as they benefit a wide array of species (FEIS, Chapter 3, Wildlife section). Guidance for surveys and control of NNIS is in Forest-wide standards and guidelines (Plan, Chapter 2, NNIS). It may not always be desirable for uncut patches to be near rock habitats as some of the species that use these habitats prefer open conditions. G-3 in this category refers only to deadwood protection during harvest activities. Firewood collection of down logs is allowed in some areas. So little of this activity occurs on the WMNF that the resulting loss of some down logs is not a habitat concern.

**PC 14300-1: The Forest Service should more carefully define the structural characteristics of “old growth” or “late-successional forest.”**



**PC 14300-2: The Forest Service should protect the remaining patches of old growth forests, particularly those at lower elevation.**

The Forest Service has revised the definition of old growth in the Glossary to better describe what is classified as old growth forest habitat, including structural characteristics, and to encompass both large and small areas of suitable habitat. This definition applies to habitat at any elevation, as does the prohibition on timber harvest in old growth (Plan, Chapter 2, Rare and Unique Features). Additional discussion of old growth, the need to protect it, and its current and future distribution on the Forest was added to the FEIS (Chapter 3, Vegetation section).

**PC 14000-7: The Forest Service should acknowledge the benefits of natural disturbances, including insects and disease.**

Additional information has been added to the Natural Disturbance and Forest Health discussions in the Vegetation section of Chapter 3 of the FEIS acknowledging the various roles natural disturbance plays in local ecology.

**PC 14400-2: The Forest Service should document the existence of insects and disease and their impacts on ecosystem health.**

The existence of insects and diseases within the forest is not inherently undesirable nor a threat to ecosystem health. Native insects and diseases are integral components of healthy ecosystems. Usually, the level of insect and disease infestations is relatively limited on the WMNF. Insects and diseases can become a problem when they are out of balance with other resources, or when non-native species are introduced. The WMNF works closely with the State and Private Forestry branch of the Forest Service to monitor insect and disease occurrences on the Forest. We also work closely with New Hampshire and Maine agencies to respond to outbreaks or natural disturbances.

**PC 99100-1L: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The DEIS says “presently there are no major insect and disease issues in the WMNF.” What about Beech Blight?**

The statement regarding major disease issues on the WMNF is correct. The concern expressed about “Beech Blight” that presumably is referring to Beech scale–nectria complex is addressed on page 3-93 of the DEIS. It reads “Beech bark disease (beech scale nectria complex ) is present throughout the Forest, and has been for several decades. However, American beech continues to remain a sizeable component of many northern hardwood stands.

**PC 14500-1: The Forest Service should locate and eradicate exotic invasive plants, insects, and diseases.**

**PC 14500-6: The Forest Service should prevent the spread of NNIS through implementation of standards and guidelines.**

An entirely new section devoted to non-native invasive species (NNIS) was added to the revised Forest Plan (Chapter 2, NNIS) to demonstrate the

importance of this topic to the Forest Service. Non-native invasive species standards and guidelines include direction for both prevention and eradication.

**PC 14500-2: The Forest Service should allow outbreaks of invasive species left to natural processes.**

Native and non-native invasive species have the ability to cause substantial effects, although ecosystems are usually able to withstand periodic infestations of native species because they have evolved together with associated checks and balances. However, ecosystem conditions can be rapidly degraded by non-native invasive species, which are not kept in check by co-evolved competitors or predators. Non-native invasive species may proliferate and become dominant, sometimes leading to the extirpation of native species and communities. The Forest Service has a responsibility to manage for self-sustaining ecosystems (see FEIS, Chapter 1, Desired Future Condition), which may not occur if non-native invasives are allowed to proliferate on the Forest without controls. Additional information has been added to the affected environment portion of the Non-native Invasive Species section in order to better inform the public about the significant consequences of leaving invasive species unchecked. In addition, the distinction between native and non-native invasive species has been clarified in Forest Plan standards and guidelines.

**PC 14500-3: The Forest Service should establish educational outreach to promote responsible bait management in order to protect soils from the effects of invasive species.**

We agree that non-native earthworms can potentially cause ecological damage in some areas. The Midwest has a number of examples where discarded bait worms have colonized an area and changed the local plant composition and structure. At present, there appears to be little that can be done to eradicate non-native worms once established, so the only effective approach is prevention, and we will work with state agencies and other partners to address this within the WMNF. In addition, education is a significant factor in prevention efforts with all non-native invasive species. If effective eradication tools are developed in the future, the Forest Service would consider an amendment to the Forest Plan. In the meantime, we will add this to our list of environmental education topics.

**PC 14500-4: The Forest Service should work with other state and national agencies as well as Special Use Permit holders to address the potential adverse effects of non-native invasive species.**

We agree with the comments summarized in this statement. In this revision process, a new section was added to the Forest Plan specifically to address non-native invasive species, including animals and plants. New goals, objectives, standards, and guidelines were designed that provide direction for controlling or eradicating existing infestations, as well as preventing new infestations from occurring. The Non-Native Invasive Species cumulative effects section in the FEIS notes that multiple partners throughout

the region will be required to effectively manage invasive species. The Forest Service recently added a new special use permit clause to add direction for invasive species prevention and control.

**PC 14500-5: The Forest Service should strengthen the protection of roadless areas because road construction and maintenance facilitate the spread of NNIS.**

Roads can serve as routes for the spread of non-native invasive plants. The decision-making process carefully considered the trade-offs among the alternatives. The environmental effects portion of the Non-Native Invasive Species section (FEIS, Chapter 3) uses miles of road construction as a measure to evaluate the differences between the alternatives. The Selected Alternative has the second-lowest amount of new road construction compared to the other alternatives. As the environmental effects section points out, many occurrences on the WMNF are along major highways or town roads outside Forest Service jurisdiction. Roads managed by the Forest Service tend to be smaller and more shaded, which helps reduce the probability of invasive species becoming established. New standards and guidelines will help to direct prevention and eradication efforts specifically along roads, regardless of alternative. In addition, ongoing work with partners such as the New Hampshire Department of Transportation will help control the spread of these species on roads not managed by the Forest Service.

**PC 14500-7: The Forest Service should consider a contingency plan in case hemlock wooly adelgid spread into the Forest.**

Hemlock wooly adelgid is indeed a concern for the Forest Service and we are working with the State and Private Forestry branch of the Forest Service, as well as other partners, to identify the spread of this species, as well as treatment options. A management plan is the next logical step, but this type of document would not be included in the Forest Plan. Although there is still much to be learned about hemlock wooly adelgid, it is thought that direction in the Forest Plan is sufficient to be able to treat any infestations found on the WMNF.

**PC 99100-1D: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **A citation is missing from the Literature Cited; clarification is needed as to whether biodiversity, as used in the EIS, includes managed habitats or only those that lack human-induced changes.**

The citation was added to the Literature Cited section of the FEIS. Biodiversity includes all lands and habitats. The term “natural communities” was used to distinguish them from human-oriented communities.

**PC 99100-3C: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **DEIS, C-183, bottom of page: “There are no known non-native species of flora or fauna in the area.” Map 3-03 shows some non-native species near the Forest Service campground.**

There was a discrepancy between Appendix C in the DEIS and Map 3-03, which shows known non-native invasive plant occurrences. Appendix C has been edited to correct the error in occurrence information.

**PC 99100-3D:**

- **Direction regarding weed-free gravel and control plans in the Non-Native Invasive Species section should be strengthened by making them standards**

The requirement for weed-free gravel and fill was made a standard to emphasize its importance. However, because not all gravel pits or potential fill areas have been surveyed, it is unknown the magnitude of infestation in the existing pits on and around the Forest. The Forest Service strategy is to work with cooperators to get pits eradicated of invasive species so that all gravel and fill will ultimately be weed-free. However, there must be an interim period for those actions to occur without unreasonably stopping other necessary projects. The monitoring and eradication required provides for a transition as the Forest moves towards more stringent requirements. Non-Native Invasive Species standard S-7 has been edited to include the missing word.

Non-Native Invasive Species guideline G-1 is not a standard because it may not always be necessary to require control plans of smaller special uses, for example, a communication antenna placed on top of an existing building. All special uses will be considered and only those that are deemed unnecessary will be exempted from this guideline.

**PC 91100-36: The Forest Service should preserve enough low elevation lands in one large concentration so that these lands can maintain, through natural disturbances, a healthy functioning ecosystem.**

Maintaining healthy, properly functioning ecosystems is a key part of the Forest's goals and desired future condition. The Forest's land allocation, habitat and harvest objectives, and management direction were developed with this goal in mind. Land allocation places more than 15 percent of land below 1,500 feet elevation in management areas that do not emphasize timber harvest or facility development (not MAs 2.1, 7.1, or 9.2). Suitability and habitat objectives will result in almost 10 percent of the low elevation land in MA 2.1 being unavailable for harvest and therefore changing almost solely through natural processes. Proposed timber harvest will result in much of MA 2.1 being managed through uneven-aged methods that retain land in mature forest conditions and largely mimic natural disturbance regimes (Seymour et al 2002). Standards and guidelines will ensure retention of snags, down logs, riparian conditions, rare species, and unique natural communities that are essential to maintaining ecosystem health. Nothing proposed by the Forest Service would prevent large or small scale natural disturbances from occurring. Therefore the natural disturbance regime should not be noticeably altered. Additional information on the effects of proposed management on low elevation habitats was added to Chapter 3 of the FEIS in the LTA discussion in the Vegetation section. Overall, the Forest will retain substantial low elevation areas in conditions that allow for maintenance of healthy, functioning ecosystems.

## Soils

**PC 53000-1: The Forest Service should soil survey and map the Forest beyond the Ecological Land Type to be consistent with information from surrounding forests.**

**PC 53000-5: The Forest Service should use the National Cooperative Soil Survey for land and resource management decisions on the WMNF.**

**PC 91800-1: The Forest Service should ensure all soil and water resource information, research and mapping is of the highest quality in order to make sound management decisions on Forest land and resource utilization.**

The White Mountain National Forest has devised a soil survey mapping legend in cooperation with the Natural Resources Conservation Service (NRCS) during three recent field seasons. Three watersheds were classified and mapped. This is in addition to existing soil survey in Carroll County, NH. Additional conversations have been held with NRCS. Beyond building a survey legend, the specific purpose of this effort is to better assess the usefulness of soil survey in the interpretation of soils related to atmospheric deposition. The short-term desire is to establish three similar-sized watersheds for long-term monitoring. The watersheds were selected to represent the range of potential calcium concentrations in the soil based on initial development of the till source model. Ecological land types (ELTs) were originally devised and mapped on the White Mountain National Forest because its forest and soils information provides a useful way to characterize natural communities, successional trends, and soil erosion, deep soil slump, and dry debris slide interpretations. Ecological land types were one biological framework for development of the FIBER Model for growth and yield estimates on the White Mountain National Forest, and other areas in New England. In addition, ELTs were an element in development of the wildlife and vegetative goals for both the 1986 and revised Forest Plan.

**PC 53000-2: The Forest Service should expand and adequately define the analysis area for soil productivity.**

The Forest Service expanded the analysis area for soil productivity to all management areas in the Proposed Forest Plan. Originally, it only applied to MAs 2.1 (and 3.1). See the introductory discussion in the FEIS (Soil Productivity section).

**PC 53000-3: The Forest Service should consider body burial on the National Forest.**

The impact on soil organic matter would be immeasurably small compared to other sources of carbon, such as deadfalls, tree branches and leaves.

**PC 53000-4: The Forest Service should consider special silvicultural standards and guidelines for rich northern hardwood communities because**



**the Forest has a small proportion of moist nutrient-rich soils and site conditions.**

The Forest Service does apply specific guidelines to the management of rich northern hardwoods as described in the comment. In particular, sugar maple-ash enriched sites will be managed, as has been the case under the 1986 Forest Plan, by uneven-aged silviculture, primarily selective or very small group harvest. These sites were among those in the 1986 Forest Plan that were placed into an uneven-age category to meet the wildlife goals of the Plan. This approach will maintain native tree species, especially sugar maple, white ash and yellow birch, in accord with forest habitat classification (Leak, 1982). Occasionally, basswood will be present. Uneven-aged silviculture will foster a balance of age (and size) classes with a multi-story canopy, including large diameter trees. In fact, enriched sites often have the largest maximum tree diameter among all hardwood sites on the White Mountain National Forest. Winter harvest is already most commonly practiced on these sites because soil moisture conditions, mostly related to a soil hardpan layer, will not allow operation during non-frozen ground conditions without unacceptable soil rutting. Rotation lengths are already lengthy on such sites, and will not be extended further, because the current rotation length strikes a reasonable balance between timber quality and other resource values. Concerns about the practice of whole-tree harvest need to be considered at the project level of analysis, where the site-specific trade-offs with other values, such as aesthetics, can be better considered. The guidelines for whole-tree harvest were strengthened in the Proposed Plan making it necessary to consider all resource values, not just soil impacts, when whole-tree harvest is considered.

**PC 53100-1: The Forest Service should consider cumulative effects of continued acid deposition and timber harvesting on the long term health and productivity of soils in the Forest.**

**PC 53100-2: The Forest Service should address interactive effects of acid deposition and forest harvesting.**

**PC 53100-3: The Forest Service should consider the cumulative effects of continued acid deposition and timber harvesting on the long term health and productivity of the soils and forest.**

Cumulative effects were considered, including early land use near the turn of the century; past, present, and future acid deposition; and the potential impacts of timber harvest by different silvicultural systems. See the FEIS discussion of soil productivity. This discussion was strengthened to incorporate more consideration of possible impacts across all management areas. It also incorporated more discussion about recovery due to the Clean Air Act and its Amendments. Two methods of cumulative effects analysis are applied.

**PC 53100-4: The Forest Service should consider scientific evidence demonstrating that soil conditions that cause decline in forest**

**productivity exist across the White Mountain National Forest, and that when combined with acid deposition and timber harvest, may cause irreversible damage to long term soil productivity (and stream quality).**

See the Soil Productivity section of FEIS (Chapter 3) for a discussion of soil productivity, including direct, indirect, and cumulative effects. This section has been expanded since the DEIS. In addition, the Administrative Record has detailed, technical consideration of some of the very specific scientific analysis of the DEIS provided by public comment. An expanded discussion of irreversible impacts can be found under cumulative effects in the Soil Productivity section of the FEIS.

**PC 53100-5: The Forest Service should determine if acid deposition is having a deleterious effect on trout populations.**

While Forest Planning regulations do not require the National Forest to identify research priorities in Forest Plans, Forest Service research stations and experimental forest stations do request input from National Forest managers regarding potential risks to ecosystem sustainability. There has been, and most likely will continue to be, a focus by Forest Service research staff to improve our understanding of the effects of acid deposition on soils, water chemistry, and aquatic life.

**PC 53200-1: The Forest Service should consider the timber harvesting effects on nutrient cycling and biomass nutrient removal in the Forest Plan.**

The effects of timber harvest on nutrients are discussed in the FEIS, Soil Productivity section. Direct, indirect, and cumulative effects are included. This discussion has been expanded based on public comment.

With respect to biomass nutrient removal, some definition of terms may help in replying to this comment, in particular, what is meant by biomass harvesting and whole-tree harvesting.

Biomass harvesting in the 1986 Forest Plan meant repeated harvest by clearcut, whole-tree removal on short rotations (namely 40-year vs. 120-year final harvest cycle). Whole-tree harvesting means removing the entire tree (tops, limbs, and bole), no matter what the rotation length (40 vs. 120) or silvicultural method (even- or uneven-age). Both methods were envisioned as a means to support New England's wood-fired energy needs, as they were understood at the time.

No analysis of "biomass" harvesting appears in the FEIS because this method of harvest has been discontinued as a silvicultural tool due to Forest Service and public concern about the possible long-term impacts on soil productivity rotation length. Concern about "biomass" harvest was originally expressed based on small watershed mass balance studies at Hubbard Brook Experimental Forest (Federer et al., 1989).

Whole-tree harvest, though more strictly controlled than in the 1986 Forest Plan, does appear, with standard and guidelines, in the Proposed Forest Plan. In this case, there is programmatic analysis of whole-tree and bole-

only harvest, including consideration of possible impacts on forest productivity, forest health, and forest species composition. See FEIS, Soil Productivity section.

**PC 53200-2: The Forest Service should consider that acid deposition has caused substantial harm to the forest (and the waters) of the WMNF, and limits the ability of acid sensitive areas of the forest to sustain harvest.**

The FEIS has been expanded to better address this concern (see the Soil Productivity section). In addition, the Administrative Record includes consideration of some very detailed, technical comments bearing on this concern. The following are some specific comments that are best replied to here.

One comment suggested that “Post harvest measurements collected over the fifteen years are used to dismiss concerns over the loss of exchangeable calcium (Johnson, 1997 and Johnson, 2004) and reject the contrary conclusions from the extensive body of research out of HBEF. However, these harvesting studies were initiated after the time when much of the calcium is estimated to have been leached from these systems.”

No one has yet provided, nor have we found, contrary evidence to the Johnson et al. (1997) soil pit data for the whole tree harvest clear cut study at HBEF. It is correct that this study was conducted after the most intense period of acid deposition; however, the intensity of harvest was much greater than what occurs in ordinary commercial timber harvest on National Forest System lands. This study was conducted using 60 soil pits.

The FEIS includes results from other studies at HBEF that document calcium leaching (Likens, 1996; 1998). However, earlier forest cutting experiments at HBEF (W4 strip cut in the early 1970s and W2 clearfell in the early 1960s) have resulted in normal or expected regeneration and biomass accumulation (Martin and Hornbeck, 1989; Reiners, 1992), indicating no harmful impacts on forest productivity associated with calcium leaching losses at HBEF. We have since found forest floor chemistry data that reveals no significant change in calcium content based on plots measured between 1976 and 1997 at HBEF (Yanai, 1999). Reports that 50 percent of the exchangeable soil calcium at HBEF has been lost, which we could not substantiate or find data to support, are discussed in the FEIS Soil Productivity section. A comment suggested that the Forest Service till source model suggests areas of the Forest may be low in soil calcium. The till source model estimates total soil calcium in soil parent material (c-horizon), generally outside the rooting zone of most trees. It does not yet incorporate surface soil weathering or landscape position. When it is complete, and this follow up work is done, then it may be possible to use the till model to say something about soil calcium availability in the rooting zone. At this point, the till model indicates there may be a range of calcium in the soil parent material. One comment suggests that Al:Ca ratios provide an important indicator of the capacity of the soil to support forests (Cronan and Grigle, 1995). The review article by Cronan and Grigle covered studies done on seedlings grown in greenhouses



or controlled environments. Their conclusions have yet to be validated under forest conditions, and represent a hypothesis.

In addition to the above, the White Mountain National Forest is proactively involved in a long-term, ongoing monitoring effort with the Northeast Research Station (Durham and HBEF) with respect to soil chemistry and forest conditions. This work is not yet complete, but it has established some benchmark conditions. In particular, 40 permanent monitoring sites have been established across the Forest. Site selection was specifically designed to encompass the likely range in soil calcium (and other base cation) concentrations on northern hardwood forest sites with similar soils and topographic position. Detailed data are being collected to provide a baseline to monitor change in the future; forest plot measurements have been made, as well as the data collected to calculate forest biomass. Repeat measurements will be made in the future.

**PC 53200-3: The Forest Service must identify and exclude areas of concern from the suitable timber base in all alternatives.**

Lands generally above 2,500 feet of elevation have already been determined unsuitable. This was done for reasons other than acid deposition. Factors which made these lands unsuitable resulted from site-specific stand examinations, and land suitability determinations such as inoperable terrain, inadequate stocking, and access requirements which would make the land not cost efficient to manage. These determinations were subsequently reflected in the 1986 Plan management area designations of lands deemed appropriate for timber management. In revising the Plan, both site-specific suitability determinations and the original management area designations were considered in identifying suitable lands that remain above 2,500 feet in elevation, and boundaries were refined where necessary.

For lands generally below 2,500 feet of elevation, see the land suitability determination for timber management related to soil productivity in the Administrative Record. Also see the Soil Productivity section of FEIS with respect to impacts on soil productivity, including irreversible impacts and soil recovery from the impacts of acid deposition.

This is not to suggest that there is no soil impact on suitable lands from acid deposition. This has been documented by watershed observations (Federer et al., 1989; Bailey, 2003), experimental watershed acidification (Fernandez, 2003), and retrospective soil analysis (Lawrance, 1997; Bailey, 2005). However, we need to be careful not to rely on the concept that any clear statements can be made about forests as a whole. All pollution effects, including acid deposition, are species- and site-specific. The effects vary within species with developmental stage of the tree (seedling, sapling, pole) and within season (dormant, early active, late active), to say nothing about genetic variability (e.g., white pine has a huge range of ozone tolerances). The effects vary within site with the mix of stressors both biotic and abiotic operating during the exposure period and on land-use history. These are known scientific facts that affect tree responses through the decades of time over large geographic regions.

Long-term monitoring at permanent plots on experimental forests and on National Forest System lands will continue to evaluate trends in biomass accumulation. In addition, forest plots and soil chemistry change sites are being established across a range of locations on the White Mountain National Forest in order to establish trends. Because there is no known metric that captures the current status of the soil with respect to cumulative impacts of acid deposition, repeat measurements over time at experimental forests and other research sites is fundamental to keeping abreast of the possible impacts to forest productivity, health, and composition.

**PC 53200-4: The Forest Service should not cite biomass studies from the Bartlett Experimental Forest as a reasonable indicator of Forest health.**

There is a concern based on work by Lawrence et al. (1997) that Bartlett Experimental Forest is at the high end of calcium availability, while the Environmental Impact Statement reports it is at the low end, and therefore it is not a reasonable indicator of forest health. To the extent that available forest floor calcium is known, Bartlett Experimental Forest, at the single site studied, is high compared to other sites examined by Lawrence (1997) in a regional survey. Lawrence's data (1997) is about calcium concentration, not total capital, so it is not necessarily very informative about available calcium. In addition, soil calcium in the upper mineral soil horizon is about the same as all other sites examined. Mineral soil horizons are also a significant source of soil calcium. Further, Table 2 (Lawrence et al., 1997) reveals that the weathering potential is low to moderate at BEF, which suggests that replenishment rates might be fairly low. Bartlett, therefore, may actually be average for available soil calcium.

In addition, there may be a concern that BEF is the most (soil) buffered site, and therefore is also unrepresentative, at least when considered along with Cone Pond and HBEF. However, there is no reason to believe BEF is the most buffered. Data are from only one soil pit at this site, it has a base saturation as low as Cone Pond, and the site data are based on exchangeable calcium, not the total calcium capital. Therefore it is not possible to conclude it is more buffered. While these sites are useful as reference sites, we would expect substantial spatial variability across the landscape in available soil calcium due to differences in parent material soil mineralogy and its possible implications for soil development and available calcium content (Bailey, 2003).

Bartlett Experimental Forest is one of a number of sites relied upon by the Forest Service with respect to biomass accumulation (and its relationship to soil productivity), forest decline and dieback, and possible changes in species composition. It is one of the very few long-term data sets of biomass accumulation in New England. The WMNF also used Leak (1982), who relied on data from throughout the Conway, NH area; Nuegsigkapien (1998), who relied on data at BEF and HBEF, Bowl Research Natural Area, and Waterville Valley; Martin et al. (1998), who relied on data from the Bowl Research Natural Area; Martin and Hornbeck (1989) and Reiners (1992), who relied on data from HBEF; and Fay and Leak (1998), who relied on data from the

sites across the White Mountain National Forest. In addition, we used stocking survey data collected at clearcut and uneven-aged final harvest sites across the entire WMNF since 1986 at a variety of elevations, topographic positions, and soils.

One commenter suggests there may be some “different dynamic” at uneven-aged stands, such as those at Hubbard Brook Experimental Forest. However, according to research scientists there, there is no difference in stand structure between HBEF and BEF for stands that have not been experimentally treated. That is, early 1900s harvesting has resulted in similar stand structure, with canopy trees at both areas being essentially even-aged — about 80-90 years old. Both areas have similar understory structure. This appears to be confirmed by early documentation indicating that stands at HBEF are typical of second-growth forest in northern New England; also, “some time after 1900, the entire HB watershed was logged”; also, “a scattering of large old culls as well as some smaller trees was left.” (Bormann and Likens 1979) The evidence, therefore, does not support the suggestion of some kind of different dynamic.

**PC 53300-1: The Forest Service should consider whole tree harvesting in rich soil types on the National Forest with a pressing management objective.**

**PC 53300-2: The Forest Service should continue with the plan to disallow whole tree harvesting on the National Forest.**

The Forest Plan only allows whole-tree harvest based on site-specific analysis and when it meets specific management objectives. This is a revision of the standard in the 1986 Forest Plan, when there did not have to be a compelling management objective (e.g., visual quality along a highway). One reason for strengthening the standard is because there is a continuing concern about calcium depletion in the Northeast, and its possible impacts on forest health and productivity. Whole-tree harvest removes about 35 percent more calcium from a site than conventional, bole-only harvest. A second reason it was strengthened was to encourage greater examination of the trade-offs between potential soil nutrition impacts and resource management objectives. Consideration of whole-tree harvest on all soil conditions will be determined based on site-specific analysis and evaluation.

## **Water Resources**

**PC 62000-1: The Forest Service should use large watersheds as a basis for Forest management.**

**PC 62000-2: The Forest Service should not use large watersheds as a basis for Forest management.**

Using a watershed approach to protect and restore watersheds and water quality coordinates activities and integrates resource information within watersheds of many sizes. As a result, multiple resource activities can be synchronized to collect information and address resource issues. Watershed

assessment occurs at many levels, depending on the purpose of the assessment. For example, a small-scale assessment could be used for fish habitat, while a broader scale might better coordinate wildlife, recreation, fish, and timber harvest activity.

**PC 62000-3: The Forest Service should provide greater protection for watersheds than proposed in the DEIS.**

Protections for watersheds, including riparian areas, are described in the Revised Plan, Chapters 2 & 3, in the Riparian and Aquatic Habitats and Water Resources sections. As stated, the protection of watersheds includes the mandatory use of soil and water conservation practices (SWCPs) for all activities that could affect water and soil resources, as well as design criteria for stream crossings. In addition, the standards and guidelines for riparian areas and associated riparian management zones meet or exceed states of New Hampshire and Maine Best Management Practices. These BMPs, standards and guidelines, and SWCPs are all based on current research, and incorporate on-the-ground, project-level design to ensure these areas are appropriate to stream type, including gradient, slope, and bed material. There are also guidelines which address watershed scale processes, such as the limit on even age regeneration harvests within first and second order watersheds. In addition, site specific assessments, and mitigations are applied at the project level to reduce effects and protect from cumulative effects as explained on in the FEIS. For example, in Chapter 3, Riparian and Aquatic Habitats, decisions to commercially harvest for a specific resource benefit in riparian management zones would be made at the project level and would incorporate on-the-ground knowledge of riparian conditions. This protects resources at the site level as well as at watershed scale.

**PC 62200-1: The Forest Service should ensure that surface water quality in the Forest is protected to meet State of NH Outstanding Resource Waters standards.**

Clean water and watershed protection were considered extensively during Forest Plan revision. Watershed assessment and restoration, protection and maintenance of water quality, and streams which are properly functioning are all goals stated in Chapter 1 of the Plan. A new goal has been added to include the protection of outstanding resource waters on the Forest.

Standards and guidelines to achieve these goals are found in the Water Resources, Riparian and Aquatic Habitats, and Air Resources sections of the Plan in Chapters 2 and 3. By using these management practices, progress is made towards achieving the goals and objectives, including clean water and watershed protection. One standard incorporates the protection of water quality in outstanding resource waters by using language similar to Env-Ws 1708.05 in the New Hampshire Code of Administrative Rules. The protection of existing and designated uses has been added to this standard. All of the Water Resources standards and guidelines combine to protect water quality and existing and/or designated uses. Additional standards to protect existing and/or designated uses are located in the Riparian and Aquatic Habitats section.

It is understood and acknowledged in Chapter 3 of the FEIS that surface waters on the White Mountain National Forest are designated “outstanding resource waters” (ORW) by state water quality agencies. The maintenance and protection of water quality in these waters is a standard, found in Chapter 2 of the Forest Plan, in the Water Resources, Soil and Water Conservation Practices section. The protection of existing and/or designated uses such as fisheries and swimming has been added to this standard.

Chapter 3 of the FEIS, under Water Resources, provides a description of water quality conditions based on a dataset of results from Forest-wide, project, and research activities. It recognizes that aluminum levels in surface waters on the WMNF often exceed the chronic criteria for freshwater aquatic life exposures, most likely due to atmospheric deposition impacts. While these exceedences of the standard are not violations, they are likely to result in a listing of non-supporting or impaired, based on state water quality criteria for the use of a fishery. When management activities are proposed, the status of current water quality is assessed and characterized in terms of water quality standards and existing and/or designated uses within the watershed at the appropriate scale for the project type. The effect of proposed management activities on existing water quality and uses is assessed during this project-level analysis. As stated in the Plan, Chapter 3, under Water Resources, Soil and Water Conservation Practices (SWCPs) are prescribed on a site-specific basis to ensure that soil and water resources are protected. This includes water quality. Standards and guidelines listed in Chapters 2 and 3 of the Plan are also applied to the proposed activities during the project planning stage to help achieve resource goals. Monitoring to assess the effectiveness of these standards and guidelines is described in the Monitoring Guide. If needed, adjustments in management practices will be made to ensure water quality and associated existing and/or designated uses are protected and maintained.

**PC 62200-2: The Forest Service should not allow management activities that affect water quality.**

A review was done of the water quality dataset and monitoring reports, as summarized in the Water Resources section, Chapter 3 of the FEIS, and notes that aluminum levels are of concern in several streams and rivers on the Forest. The FEIS also includes a discussion of 305(b) and 303(d) reports from New Hampshire and Maine which lists surface waters that do not support uses or are impaired. The states are responsible for determining water quality impairment and support of existing and/or designated uses using a standardized methodology. The reports referenced in the FEIS did not have any impairment assessed on the WMNF for aluminum.

There is a programmatic discussion in the FEIS (Chapter 3, Water Resources, Environmental Effects) of the effects of management activities which could have effects on water chemistry and quality, and which noted that proposed management activities such as timber harvest do have the potential to affect water quality. The effect of atmospheric deposition on water chemistry is also discussed in the FEIS, including the potential for Forest management activities to worsen this effect. Timber harvest activities were considered



unlikely to worsen water chemistry, based on the levels of harvest proposed combined with standards and guidelines. However, to further address the potential for Forest management activities to add to the cumulative effect of atmospheric deposition on water quality, including increased aluminum levels, an additional guideline is being added to the Forest-wide management direction for Vegetation Management. This guideline is based on research at Hubbard Brook Experimental Forest (Martin et al., 1986), which concludes that clearcutting about 15 percent of a watershed did not measurably change the chemistry of the major streams in the watershed.

In addition, monitoring of this guideline to assess the effect of management practices is one of the general monitoring requirements described in Chapter 4, Monitoring and Evaluation, and will be included in the Monitoring Guide. The new guideline will ensure that the WMNF moves towards attaining an added goal of maintaining and protecting water quality and existing and/or designated uses within the outstanding resource waters.

Another Forest-wide standard has been edited in the Water Resources section to clarify that existing and/or designated uses must also be maintained and protected, and that all practical and appropriate Soil and Water Conservation Practices (SWCPs) are to be used to reduce impacts to water quality. In addition to protecting water quality during management activities, the existing and/or designated uses of the water, such as a fishery, where appropriate, must also be protected and maintained. Through these standards and guidelines, along with planning and cooperative watershed management, water quality is protected while providing for management activities to occur.

**PC 62200-3: The Forest Service should recognize the limitations of water quality as a monitoring technique for management actions.**

The information in the revised Plan (Chapter 4, Monitoring and Evaluation) is strategic, and provides a conceptual framework within which specific monitoring and evaluation criteria can be built. The current water quality monitoring plan, which focuses on large streams, has been revised to include both smaller streams and watersheds, and should prove a better way to identify the effects of Forest activities. See the Monitoring Guide for more detail.

**PC 62200-4: The Forest Service should determine realistic goals for water quality and aquatic habitats.**

As explained in the Preface to the revised Plan, “Goals are broad statements that describe the conditions the Forest Service will strive to achieve through implementation of the Forest Plan. They are generally timeless and not measurable, and their achievement is not required.” Goals do not reflect existing conditions, but rather describe a target, a desired condition toward which we strive. The Water Resources goals in Chapter 1 include water quality and the protection of aquatic habitat on the White Mountain National Forest. Additional goals related to aquatic habitat are in Chapter 1, Riparian and Aquatic Habitats.



The goals in Chapter 1 provide a framework for the desired conditions which are described in the FEIS (Chapter 1, Purpose and Need for Change). The Standards and Guidelines (Plan, Chapters 2 and 3) guide Forest management activities to maintain or achieve these conditions. Sustainability of watersheds and aquatic habitats, while not specifically stated as a goal, is part of the desired condition for these resources. The goal of using a watershed approach to guide planning and activities ensures streams are at proper functioning condition, provides high quality water, and protects existing and designated uses, including providing high quality water for public water supplies. All are part of protecting and maintaining water quality and aquatic habitat.

**PC 62300-1: The Forest Service should clarify policy regarding water flow rates and withdrawals in the context of outstanding national resource waters designation.**

Two changes have been made to the Revised Plan to clarify water withdrawals. A goal has been added to the Water Resources section (Plan, Chapter 1) to clarify the context of outstanding resource waters (ORWs) within the White Mountain National Forest, and a redundant standard has been removed from MA 7.1, Alpine Ski Areas (Plan, Chapter 3).

Where there are no water withdrawals, water flow occurs naturally. However, when water sources are not available off the Forest, uses on the Forest are authorized which withdraw water from surface water sources for a variety of purposes. As described in the FEIS, these include development of springs for domestic water use, withdrawals for public water supplies, and snowmaking at alpine ski areas. All are legitimate uses of water from surface water features, and are consistent with outstanding resource water designation, provided that existing instream uses, and the level of water quality and quantity needed to protect those uses, are maintained. The Plan has several standards and guidelines to ensure that water quantity is preserved at levels which protect water quality and the existing uses. Several standards in the Water Resources section ensure that remaining water is maintained at levels that will protect aquatic species, their habitats, and water quality. This is assessed on a project-by-project, site-specific basis, including consultation with appropriate agencies as required by standards in this section. The point of withdrawal and the location of use are both considered during the project assessment. For larger withdrawals requiring state and federal permits, this assessment will be cooperative with state and federal agencies. In this way, water quantity is maintained at levels which preserve water quality. This, in turn, provides protection for the existing and designated uses in the ORWs of the WMNF.

**PC 62300-2: The Forest Service should identify more appropriate goals than PFC regarding water flow rates.**

PFC (proper functioning condition) is not a method to determine or regulate the water flow rates of streams. It is a way to assess the physical functioning of a stream and its riparian area through a consideration of hydrology, vegetation, and soil/landform attributes. Energy dissipation of high water

flows is an important component of a properly functioning stream — through woody material, meanders, or other characteristics — depending on the type of stream. Streams that do not dissipate the energy of high flows — as a result of straightening, lack of riparian vegetation, or other factors — are at risk from erosion and loss of higher functions like aquatic habitat. The White Mountain National Forest does not use PFC to prevent or limit high flows.

**PC 62300-3: The Forest Service should manage permanent stream crossings to accommodate high water flow rates.**

We agree that it is important for permanent stream crossings to allow the bankfull discharge to pass unimpeded and to accommodate high flows. New standards and guidelines in the Forest Plan ensure that permanent stream crossings on the White Mountain National Forest are built or improved to this standard, thereby improving the functioning of streams.

**PC 62300-4: The Forest Service should not allow water withdrawals for ski areas.**

The Revised Plan includes standards and guidelines for water withdrawals within the White Mountain National Forest. Two standards, in Chapter 2, Water Resources section, Water Uses, require that aquatic species, their habitats, and water quality are protected when water is withdrawn from surface water features. They require a site-specific assessment and, when appropriate, agency consultation to determine instream flow requirements and water withdrawal limits. As a result, all activities which withdraw surface water will undergo an assessment to determine the appropriate levels and discharges to maintain. Other standards and guidelines also apply to water withdrawals, including standards under Soil and Water Conservation Practices. One of these requires the use of Soil and Water Conservation Practices when activities occur that could affect water and soil resources, apply to projects which withdraw water to ensure that mitigations are used. Another standard in this section requires that water quality and associated designated and existing uses of that water are maintained and protected. Through the application of these standards and guidelines, water uses from the Forest can occur while protecting resource values that depend on that water.

Ski areas are one of the many uses that occur on the White Mountain National Forest, and MA 7.1 was designated to manage that use. The Desired Condition of the Land states that “Management and operating practices are aimed at enhancing permitted recreation activities at the area while protecting the natural resources and visual characteristic.” Water withdrawals for snowmaking purposes, when not available off-Forest, are part of reaching this desired condition. In addition, the Record of Decision which identifies Alternative 2 as the Revised Plan states that “this alternative provides the best balance of products, services, and experiences while maintaining the core ecological processes of the Forest for the future.” Water withdrawals at ski areas are one example of how the Forest provides a product (water) in order to support a service (snow making) which allows for the recreational experience of downhill winter sports. At the same time,

the core ecological processes of the Forest remain functional through the application of standards and guidelines.

**PC 91800-6: The Forest Service does not adequately use existing science to define the impacts of various uses and conditions on water resources.**

Existing science from many sources is used to define impacts of uses and water resource conditions. The discussion on Water Resources in the FEIS, Chapter 3, is based on current water resource data, including studies at Hubbard Brook Experimental Forest, and includes information on the effects of timber harvest on water quality. Water quality data was compiled from the Database for Chemical Contents of Streams on the White Mountain National Forest (Hornbeck, et al., 2001), as well as Forest-wide water quality monitoring results. Currently, atmospheric deposition has caused elevated levels of hydrogen and aluminum ions in surface waters across the WMNF. Timber harvest does have the potential to worsen this effect by mobilizing monomeric aluminum, which can be toxic to fish, into the water. From this information, combined with experience, a guideline has been added to limit timber harvest to levels that will prevent water chemistry changes. Monitoring, described in the Monitoring Guide, will assess the effectiveness of this practice. On this way, new and existing science is used to respond to the concern about atmospheric deposition.

Water quality impacts from other activities, such as recreation, are also being addressed. A watershed improvement needs database is maintained to track existing water quality issues, and to ensure that they are prioritized and addressed. Several standards were added to the Forest Plan to mitigate erosion and sedimentation at ski areas (see Chapter 3, MA 7.1, Alpine Ski Areas). In addition, the standards and guidelines found in Chapter 2, under Water Resources, also apply. Many of these practices are long-standing and well known for their effectiveness in protecting water resources. Several have been taken from earlier plans. In this way, the Forest Plan is an adaptive document, taking what works from older plans, updating, and moving forward with additional and new information to continually improve forest management.

The condition of stream stability and geomorphology is partially related to the historic activities which have occurred on the Forest, both natural and human-related. The discussion of impacts from historic logging and fires is based on assessment of stream condition and woody material/debris, which is discussed further in the Riparian and Aquatic Habitats section in the FEIS. The Riparian Classification developed in the 1970s will continue to be used at the project level to guide riparian zone mitigations, stream crossing design, and other activities. In a variety of ways, science is used in assessments and monitoring of Forest activities in order to understand effects to water resources within the WMNF.

**PC 91800-7: The Forest Service should follow the standards and guidelines in the 1974 Forest Plan to reduce downstream impacts, since monitoring showed they were effective.**

This Forest Plan revision is based on the 1986 Forest Plan, which included some standards and guidelines from the 1974 Unit Plan as determined through that revision process. The purpose and need for the current revision is based on four indicators listed in Chapter 1 of the FEIS. Two of the indicators provided the impetus for revising, adding, and removing standards and guidelines affecting water resources: “Results of monitoring and evaluation suggest the need for revision” and “New information from the Forest Service, universities, and organizations that study forest ecosystems and forest management is available.”

For example, monitoring and evaluation results suggested the need for revising standards and guidelines from the 1986 Forest Plan. The Analysis of the Management Situation (AMS) document, which was made available to the public, summarized this information. In particular, a 1996 review of standards and guidelines assessed the implementation of the 25 percent limit on clearcut area within a watershed greater than 1,000 acres in a 10-year period. It was found that the limit was rarely approached and never exceeded. As a result, this standard and guideline was removed. Other standards and guidelines were given the same scrutiny.

## **Riparian and Aquatic Habitats**

**PC 64000-1: The Forest Service should establish buffer specifications that meet currently accepted standards for protection of riparian areas, either for water quality or wildlife protection.**

**PC 64400-1: The Forest Service should expand the minimum no-harvest riparian buffer to meet aquatic habitat and water resource objectives.**

The Environmental Protection Agency, the federal agency responsible for administering the Clean Water Act, defines “vegetated buffers” as “strips of vegetation separating a waterbody from a land use that could act as a nonpoint pollution source. Vegetated buffers (or simply buffers) are variable in width and can range in function from a vegetated filter strip to a wetland or riparian area.” The agency continues, stating: “This term is currently used in many contexts, and there is no agreement on any single concept of what constitutes a buffer, what activities are acceptable in a buffer zone, or what is an appropriate buffer width.” The WMNF examined state laws, state BMPs, recommended guidelines from regional experts, and utilized our professional on-Forest experience to formulate the guidelines presented in the Forest Plan.

Revised goals for riparian and aquatic habitats focus on 1) protection and maintenance of habitat to sustain viable populations; and 2) restoration and enhancement of aquatic, fishery, riparian, and wetland habitats. Land allocations in Alternative 2 place a large proportion of perennial stream riparian areas in semi-primitive and areas, isolated completely from timber harvesting and developed recreation. In the General Forest Management area (MA 2.1), standards and guidelines are designed to insure streams are in “properly functioning condition” and provide for both protection and

maintenance of habitat. In addition, riparian and aquatic resource objectives allow for accelerated restoration and enhancement projects to occur along some perennial streams.

**PC 64100-1: The Forest Service should identify vernal pools in the spring when they are visible in order to protect them year-around.**

The Forest Service will use a variety of methods, including aerial photos and ground reconnaissance, to identify vernal pools.

**PC 91000- 9: The Forest Service should take note that vernal pool standards may not be implementable as stated in the plan.**

Forest-wide management direction regarding vernal pools (Plan, Chapter 2) comprises guidelines, not standards. Decision-makers have the flexibility to modify guidelines if site-specific conditions warrant. We have also made some editorial clarification in the direction for vernal pool protection in Chapter 2 of the final Plan.

**PC 64300-1: The Forest Service should write standards to define the size of riparian areas around intermittent and ephemeral streams as well as the measures to be taken to ensure their protection.**

The range of channel types of intermittent streams and the abundance of these watercourses make it difficult to establish specific standards for Forest-wide application. Because of this, intermittent or ephemeral streams have specific protection measures prescribed on a site-by-site basis during project planning. However, a new guideline has been added (Plan, Chapter 2, Riparian and Aquatic Habitats) to ensure that an important component of intermittent and ephemeral streams is considered during planned timber harvest activities.

When combined with other Forest-wide standards and guidelines, water quality will be maintained and appropriate Soil and Water Conservation Practices (also known as Best Management Practices) will be used to protect soil and water resources. Another Forest-wide guideline states that, “Intermittent and ephemeral stream channel should not be permanently filled or relocated because of skidding operations.” This direction allows for protection of watercourse stability and water quality within intermittent and ephemeral channels.

There are, in addition, two Forest-wide guidelines in Chapter 2 that provide direction for restoration activities within riparian and aquatic habitats. Both support the goal of restoring and improving these features to their ecological potential (see Plan, Chapter 1, Riparian and Aquatic Habitats), and provide that natural rehabilitation methods will be used in preference to traditional engineered solutions, such as riprap.

**PC 64300-2: The Forest Service should clean the stream that bisects Alpine Garden leading to Raymond’s Cataract.**

The Forest Service is aware of concerns with this location and is assessing the situation to find a solution. Specific watershed problems which require assessment and restoration are recorded in a watershed improvement needs



database. Projects are added to this list in a variety of ways, including public input. Maintenance and cleanup activities on trails, recreation areas, and backcountry are assessed on the ground throughout the year by district personnel. If additional treatment or assessment is needed, these projects are prioritized and, depending on budget and other Forest priorities, are scheduled for accomplishment each year. Where water resource issues extend off-Forest, cooperative efforts will also be used. In addition, Forest-wide standards and guidelines found in the Revised Plan apply within the Research Natural Areas (RNAs), including the Alpine Garden. Standards include the use of Soil and Water Conservation Practices to protect water and soil resources (see Plan, Chapter 2, Forest-Wide Management Direction, Water Resources, including the protection and maintenance of water quality).

**PC 64300-3: The Forest Service should add to the list of 3<sup>rd</sup> and 4<sup>th</sup> order streams in Appendix J.**

Some 3<sup>rd</sup> and 4<sup>th</sup> order streams were mistakenly left out of Appendix J. The list has been updated and is included in the Final Land Management Plan as well as in the Final EIS.

**PC 64300-4: The Forest Service should manage stream segments to meet their ecological potential rather than expect uniform conditions along entire streams.**

The Forest Service does not expect uniform conditions along all streams of the White Mountains. Resource goals are broad in nature. A variety of resources and guides (riparian classification system, stream channel classification systems, large woody debris classification, etc.) as well as site-specific information will be used for making management decisions within and adjacent to stream channels at the project level.

**PC 64300-5: The Forest Service should remedy existing stream buffer impacts, and should use natural vegetative rehabilitation.**

The revised Forest Plan does provide direction for managers to consider restoring impacts to riparian areas during the planning phase of site-specific management activities. Impacts from currently used roads and facilities constructed many years ago may not be restored if doing so could cause more resource damage or if funds are not available. Some streams may have already adjusted to historic impacts and therefore may not be worth the investment it may take to restore the area. Decisions to address these impacts and the actions taken will be based on local site conditions, the latest technology available, and the availability of funds.

**PC 64400-2: The Forest Service should base RMZ width on riparian types and floodplain considerations rather than on stream order.**

WMNF staff agrees that riparian areas are ultimately defined by the valley type through which a stream flows, and this is the basis of the WMNF riparian classification system. One concern with this system, however, is that it does not consider the size of the stream for determining the size of the riparian area, only the shape of the valley. Proposed riparian widths for



stream order in the revised Plan are provided in the absence of riparian mapping. The guidelines for riparian widths by stream order can be replaced by actual site-specific riparian mapping of a project area if necessary. Site-specific mapping would use the riparian classification system, but recommended buffer widths may differ from those recommended in the 1986 Forest Plan due to stream size.

**PC 64400-3: The Forest Service should develop a specific set of guidelines for riparian forest management that enhances habitat for American Woodcock.**

Except for threatened, endangered, and sensitive species, development of species-specific management direction was avoided. Instead, habitat composition objectives identified in the Forest Plan were designed to provide habitat for the hundreds of species indigenous to the Forest, including woodcock. The Selected Alternative allows for 940 acres of even-aged regeneration harvest per year over the next ten years, about double that currently provided. Also, up to 1 percent of Management Area 2.1 can be managed as permanent wildlife openings. Many of the current openings are historic apple orchards and farms that are located near streams. Revised guidelines for riparian areas of the WMNF would allow for treatments within riparian areas that benefit resource values such as woodcock habitat. Lowland perennial streams dominated by tag alder could be managed to provide regenerating tag alder openings that woodcock could use. In addition, even-aged regeneration harvest could be applied within 500 feet of 1st to 3rd order streams to provide singing habitat.

**PC 64500-1: The Forest Service should not allow timber harvest in forested wetland areas.**

**PC 64500-2: The Forest Service should inventory all wetland areas, identify links to wildlife use, and eliminate all possible negative impacts.**

Forested wetlands on the White Mountain National Forest are protected by standards and guidelines that reduce negative impacts to them. In the Forest Plan (Chapter 2, Water Resources, Floodplains and Wetlands), guidelines G-1 through G-5 are designed to protect wetlands of all types. These guidelines direct that new campgrounds and other facilities should be located outside of wetlands (G-1), natural drainage to wetlands will be maintained during nearby management activities (G-2), all practical mitigations will be used to protect wetlands (G-3), fragmentation of wetlands should be avoided (G-4), and wetlands should be managed for “no net loss” (G-5). Guidelines G-2 and G-3 have been rewritten to include all management activities that could affect wetlands.

Some public concern was expressed that the Rare and Unique Features effects analysis indicates that more acres of harvest occur under Alternative 3 than under Alternative 2, and therefore there would be more potential for impacts on forested wetlands in Alternative 3 than in Alternative 2. Table 3-29 in the FEIS shows the projected acres of harvest for each alternative. Combining the totals for decades 1 and 2 (the analysis timeframe is 20 years) for each

alternative shows that more acres would indeed be treated under Alternative 3 than under Alternative 2, but that the treatments would be primarily uneven-aged harvest instead of even-aged regeneration cuts.

The White Mountain National Forest uses the National Wetlands Inventory maintained by the US Fish and Wildlife Service to identify wetlands on a broad scale across the Forest. These maps are prepared from the analysis of high altitude imagery at the 1:24,000 scale. Wetlands are identified based on vegetation, visible hydrology, and geography. In addition, project-level planning includes a detailed on-the-ground inspection to provide site-specific data regarding wetlands. It is also during project analysis that impacts to wetlands and links to wildlife are assessed.

**PC 64500-3: The Forest Service should prohibit any new construction in the 100-year floodplain.**

There are locations where new construction related to facilities or structures is unavoidable within the 100-year floodplain, including bridges, roads, parking areas, and trails. When these must be placed within the 100 year floodplain, standard (S-1) ensures that they are constructed to maintain the beneficial values of the floodplain and public safety. In addition, several guidelines in the Forest Plan, Chapter 2 do limit construction in the 100-year floodplain. New campgrounds and facilities should be located outside it (G-1), and fragmentation of floodplains should avoided when planning corridors, such as power lines, roads, and trails (G-4). The standards and guidelines work together to protect floodplain values and benefits.

**PC 64600-1: The Forest Service should consider that, under Riparian and Aquatic Communities guideline G-2, beaver activity may be more likely on type 40.**

Type 40 was renamed “type 35” in later versions of the riparian classification system. The descriptions for the two are identical: a stream flowing through a wide valley bottom. This type also generally flows at a very gentle slope, thus allowing it to meander frequently.

**PC 64800-1: The Forest Service should incorporate additional goals into the Forest Plan that protect and enhance habitats for native trout.**

Changes to goals are found in Chapter 1 of the final Forest Plan. The WMNF will emphasize management that promotes native/indigenous species over non-native/non-indigenous species. Some desired non-native species (i.e., rainbow trout) were favored outside the National Forest, and have now become established within the Forest. Without barriers, it may be difficult to eliminate these species in waters connected to, but outside, the Forest. Some sub-watersheds managed for wild brook trout could be identified for removal of non-indigenous species, if the need is demonstrated, in cooperation with state fisheries agencies. At this time there is no reliable way to distinguish wild brook trout (hatchery heritage) from native brook trout.

## **Vegetation**

**PC 60000-1: The Forest Service should not allow any logging.**

One of the reasons that the Congress established a National Forest System is to provide a sustainable source of timber products. Production of timber on a sustainable basis has been included in congressional direction from the inception of the Forest Service through more recent legislation such as the National Forest Management Act of 1976. Harvesting is done on the WMNF to accomplish a variety of objectives, including habitat management, fuels reduction, and enhancement of forest health, as well as commodity production. Alternative 2 provides for timber to be harvested from the Forest on a sustainable basis, with harvest levels projected to be at similar levels to what has been averaged over the past 20 years. An alternative with no harvesting was considered, but eliminated from detailed study, and is discussed in Chapter 2 of the EIS.

**PC 60000-2: The Forest Service should allow only the most limited harvesting.**

Harvesting is done for a multitude of reasons, including habitat management, commodity production, maintenance of forest health, and demonstration of sound forest management practices. The White Mountain National Forest clearly recognizes that the forestry program should be well integrated with the heavy recreational use that takes place across the Forest, and we believe that Alternative 2 provides a balanced means of accomplishing this. Standards and guidelines ensure harvesting is done with minimal impact to the land.

**PC 60000-3: The Forest Service should allow for managed harvesting at moderate levels.**

The gist of this concern deals with providing a sustainable level of harvesting while insuring that resource values are protected. There is support for using Alternative 3 to accomplish this. Resources such as old growth are protected under any of the alternatives. Both alternative 2 and 3 can be implemented in a manner that will produce high quality sawtimber. However, Alternative 2 was selected in part because it yields a higher percentage of sawtimber and provides for greater habitat diversity.

**PC 60000-4: The Forest Service should provide sustainable balanced harvesting such as proposed in the preferred alternative.**

The general support for Alternative 2, the preferred alternative, is acknowledged. The impacts of opening up inventoried roadless areas to road construction are not as great as they might seem. Many of the inventoried roadless areas already have a developed road system. The relative density of roads, not the absence of roads, is what permitted inventoried roadless areas to remain on the inventory. In many of these areas, harvesting under Alternative 2 could take place with little or no additional road construction.

**PC 60000- 5: The Forest Service should maintain or increase harvesting.**

**PC 60400-10: The Forest Service should not reduce ASQ, based on increased land ownership and years of model silviculture.**

Alternative 2 provides a sustainable and balanced approach to managing timber and wildlife habitat, allows for continued tending of forest stands to develop high quality sawtimber, provides a source of forest products to local industry, and permits the harvest of high quality timber that has developed from decades of investment in stand improvement activities. While the ASQ under Alternative 2 is lower than that prescribed by the 1986 Forest Plan, it is very close to the amount of harvest that actually took place under that Plan. This alternative provides the best balance of products, services, and experiences, while maintaining the core ecological processes of the Forest for the future.

**PC 91100-33: The Forest Service should include the elimination of short rotation harvesting in the standards and guidelines.**

In the 1986 Plan, MA 3.1 included a goal of growing small diameter trees for fiber production. Under the Selected Alternative, growing small diameter trees for fiber production is not a goal in the General Forest Management Zone. The commodity goal is to produce high quality sawtimber. In doing so, sound silvicultural practices aimed at culturing stands for sawtimber production will produce sizeable quantities of fiber.

**PC 60000-6: The Forest should continue the excellent and exemplary timber management on the Forest.**

Alternative 2 is highly compatible with the sentiments expressed in this concern. The primary difference lies in the fact that Alternative 2 calls for regeneration harvesting to be implemented with stand sized openings (up to 30 acres). Maintaining scenic integrity will continue to be an important element of planning all harvesting activities. Experience has shown that although openings up to 30 acres are permitted, in actual practice, opening size averages well under 20 acres when integrated prescriptions are developed.

**PC 60000-7: The Forest Service should clarify firewood gathering by stating “wood that is both dead and down on the forest floor may be gathered.”**

The intent is to permit only trees that are on the ground to be harvested under the Forest-wide standard firewood permit. The wording of the standard has been modified to make it clear that standing dead trees will not routinely be included under firewood permits.

**PC 60000-8: The Forest Service should ensure that logging activities do not degrade important cultural and historic sites.**

Protection of heritage resources will be accomplished in accordance with the standards and guidelines in the Forest Plan, Chapter 2, Heritage Resources.

**PC 60000-9: The Forest Service should manage National Forest timber resources for beneficial outcomes such as forest diversity and wildlife habitat.**

Under the preferred alternative, timber harvesting is closely tied to establishing desired wildlife habitat. While habitat is not the exclusive reason for harvesting, it plays a very important role in the development of integrated prescriptions for harvest treatments. Even-aged regeneration harvests and both single-tree and group selection treatments are used to achieve wildlife habitat objectives. Thinning is a harvest method used to improve stand conditions to improve the quality of timber for future harvest. While it does allow remaining trees to increase in size, which can be beneficial for some wildlife species, it is not a treatment that is usually used for habitat development. That is why thinning did not receive much discussion in the Wildlife section of the DEIS. The value of dead wood in the Forest is discussed in the Vegetation section.

**PC 60000-10: The Forest Service should reduce or prohibit clearcutting.**

**PC 60200-1: The Forest Service should reduce or eliminate clearcutting.**

Each of the alternatives evaluated in the FEIS included clearcutting as a means of attaining desired wildlife habitat conditions. Clearcutting is a tool that can provide age, structure, and tree species diversity across the Forest. The need for some level of clearcutting was identified by an external committee of scientists and natural resource professionals. The relative amount ranged from a low of approximately 480 acres per year under Alternative 3 to a high of approximately 1,700 acres per year under Alternative 1 in the first decade. The Selected Alternative calls for approximately 940 acres per year for the first decade. Most of the General Forest Management area (MA 2.1) was harvested at the turn of the 20<sup>th</sup> century, so cutting virgin forest is not an issue. Harvests in second growth forest are planned using both even-aged and uneven-aged treatments. Also see PC 60000-11.

**PC 60000-11: The Forest Service should manage certain areas to create or protect existing old growth forest.**

Timber harvest is prohibited in old growth forest (Plan, Chapter 2, Rare and Unique Features). In addition, old age-class objectives (Plan, Chapter 1, Wildlife) and management area allocation would result in substantial portions of the Forest evolving into old growth forest in the future. See the FEIS, Chapter 3, Vegetation section for additional discussion.

**PC 60000-12: The Forest Service should not salvage mortality simply for the sake of timber volume.**

The FEIS and the Plan both recognize that deadwood resulting from mortality in the Forest is an important component of a healthy forest ecosystem. Most of the standards and guides listed under the “wildlife reserve tree” section of the Plan (Chapter 2, Wildlife) address the need to retain deadwood, snags or residual patches of forest to serve assure recruitment of dead and down material into the future.



The specific conditions under which salvage harvests may take place are to be evaluated in a site-specific analysis, depending upon a number of factors including overall forest health issues, the value of the timber that is threatened, fire management concerns, and compatibility of potential salvage treatments with other resource needs. It is recognized that some insects and diseases are an integral part of healthy ecosystems.

As for the accounting for salvage in the modeling and analysis, the Forest Service projected an average of \$386 thousand/year in revenue from salvage, based on our experience in fiscal years 2000 through 2003. The Forest Service does not currently engage in free use of timber resources, therefore the non-charged volume would be zero.

**PC 60000-13: The Forest Service should meet New Hampshire Sustainable Standards Work Team Guidelines specified in “Good Forestry in the Granite State.”**

The “Good Forestry in the Granite State” guidelines were utilized heavily in the development of standards and guidelines in the revision process.

**PC 60000-14: The Forest Service should reduce harvesting, especially clearcutting, to reduce global warming.**

There is an on-going debate on whether global warming is related to human activity. If it is, carbon dioxide has been identified as a “green house gas” that could contribute to this effect when out of balance. There is no evidence that clearcutting alone results in a net increase in atmospheric carbon. In general, as long as the clearcut area remains forest and is not converted to another land use, there would be no net increase in carbon dioxide over time. Forests and wood products are a temporary storage area for carbon. Whether trees die and decay, or are harvested and made into products, or burned, the carbon returns to the atmosphere eventually. If the forest regenerates, the trees and vegetation will absorb carbon dioxide from the atmosphere as they grow and thus complete the carbon cycle.

The Forest Service is actively involved in research related to global warming. Its Northern Global Change Research Program is located in Newtown Square, Pennsylvania ([www.fs.fed.us/ne/global](http://www.fs.fed.us/ne/global)). The Bartlett and Hubbard Brook Experimental Forests, which are located on the WMNF, are also involved in on-going studies related to carbon and forest ecosystems. The WMNF will continue to monitor research results within and outside the agency.

**PC 60000-15: The Forest Service should manage the Forest to keep it thin and reduce forest fires.**

The occurrence of catastrophic wildfires has not been common on the WMNF since it was established in the early 20<sup>th</sup> century. In general, the Forest is moving toward a greater component of softwoods on the landscape, and this may increase the risk of wildfire. Thinnings and treatment of slash are prescribed for a variety of reasons, one of which might be to limit the potential for catastrophic wildfires to occur.



**PC 60000-17: The Forest Service should manage for herbaceous and shrub understory floral composition.**

Forestry practices are guided by broad ecological objectives included in management area descriptions and standards and guidelines. Practices are designed to have effects well within the natural range of ecological processes. Soil information reflected in mapped Ecological Land Types helps guide harvest objectives. The Wildlife and Vegetation sections (FEIS, Chapter 3) discuss this in more detail. Prior to harvest activity, sites are reviewed for the presence of threatened, endangered, or sensitive species.

**PC 60000-18: The Forest Service should harvest timber with greater sensitivity to recreational and scenic values.**

Maintaining recreational and scenic values has been, and will continue to be an important element in conducting timber harvesting on the WMNF. The Forest Plan (Chapter 1) identifies this as a goal. Harvest activities are planned only within Management Area 2.1, which encompasses less than 45 percent of the WMNF. It is not intended that harvest activities be undetectable from all recreation facilities, rather, it is intended that they be reasonably compatible with those recreation activities in the limited amount of the Forest where harvest activities are planned.

Vegetation Management guideline G-1 is a guideline rather than a standard to permit professional judgment to be utilized in developing treatments that best fit the specific on-the-ground situation. As the Plan Preface points out, managers are expected to follow guidelines unless they provide rationale for deviating from them.

**PC 60000-19: The Forest Service should manage timber in the Inventoried Roadless Area consistent with the rules applicable to RARE II areas.**

The preferred alternative allocates lands within the inventoried roadless areas to several management areas. Some of the lands are allocated to MA 2.1, the General Forest Management Area. In these lands, harvest treatments would be planned in accordance with the standards and guides contained in the final Forest Plan. In some of these lands, a road system already exists and harvesting has been going on for decades; in most of them, as recently as the 1980s and 1990s. Also see PC 40000-1.

**PC 10000-13: The Forest Service should receive true fair value for timber products and invest the return into other forest services provided to the public.**

The White Mountain National Forest does receive fair value for timber sold. Timber sales are put up for bid. While the value of an individual sale may not cover the cost of sale preparation, in almost all cases, bidding is highly competitive, with multiple bids submitted for each sale. The disposition of receipts from National Forest timber sales is prescribed by laws and regulations, and is beyond the scope of decisions to be made in the Plan revision process.

**PC 60000-20: The Forest Service should accurately recognize their timber values and market conditions.**

- **Because Timber sold from the National Forest does nothing for the local economy because jobs are created for Canadian loggers and lumber is exported.**

The issue of log exports or labor importation is beyond the scope of the decisions being made in the Forest planning process. However, all of the timber sales sold recently from the WMNF have been sold to businesses or individuals from the United States. The majority of these are from Maine, New Hampshire, and Vermont.

- **Because the WMNF timber program shows continual losses and growth and yield estimates are inflated. Costs associated with timber sales have been undervalued.**

In recent years, the value of timber sold from the WMNF annually is substantially higher than the annual cost of the timber program, including overhead. The costs used in the SPECTRUM analysis are direct costs associated with the program. Direct costs were used as they permit the most appropriate means of comparing alternatives. The concern about the costs of mitigation measures not being considered in setting stumpage values is accounted for due to the fact that the stumpage prices from WMNF timber sales reflect the sale of “average conditions.” Bidders are required to incur numerous costs such as seeding, slash disposal, road improvements including construction, reconstruction, bridging and erosion control measures such as water barring and other drainage features. They are aware of the work required on sales put up for bid and adjust their bids accordingly. Therefore the costs of doing this work are taken into account in the form of reduced stumpage prices.

- **Because the Forest Service is underestimating the value of low-grade products such as pulpwood.**

The issue of marketing low quality forest products, especially pulpwood, has been a concern on the WMNF and across much of New England for many years. It is true, that in the past two years (since 2003), the prices being paid for pulpwood are substantially higher than in the past. Whether this trend will continue is uncertain. From the late 1980s through 2002, the prices paid for pulpwood on the WMNF stayed constant at about \$10 per cord. At the same time, sawtimber prices rose steadily, nearly tripling. While it is possible that pulpwood prices may stay high or even rise further, it was not considered appropriate to use the sudden, very recent rise as a reasonable estimate of long term trends. Therefore, the projections for marketing pulpwood took into account the longer term experience that the WMNF has in marketing pulpwood.

- **Because Alternative 3 should not be the least efficient timber program as the DEIS indicates.**

Among the reasons that Alternative 3 is the least cost efficient of the alternatives is the fact that it results in the lowest per acre yields of any of the alternatives. The yields it produces are the result of many acres being

treated with harvest methods such as single tree selection harvesting. On a per MBF basis, the cost of preparing and administering large amounts of this type of harvesting is greater than with some of the even-aged treatments that are more heavily incorporated into the other alternatives.

Timber sale planning costs shown in Table B-11 (FEIS, Appendix B) include the costs for specialists to determine and evaluate the environmental effects consistent with the NEPA requirements. Furthermore, the costs of implementing mitigation measures to protect resources are accounted for in two ways. The sale planning and preparation activities include mitigation measures for a variety of resources and the costs of these mitigation measures are accounted for accordingly. Another way mitigation costs are captured is in the appraisal of the sale that will identify specific mitigation measures that are required in the performance of the sale contract. These costs are effectively passed to the sale purchaser, and are therefore reflected in the successful purchaser's bid and are subsequently reflected in the stumpage values for the sale. Costs associated with post-sale rehab, planting (rare on the WMNF), and regeneration activities, where necessary, are indirectly paid by the sale purchaser and returned to the Forest under provisions of the Knutson-Vandenberg Act.

- **Because the time period used as a basis for determining timber values is too limited.**

A three-year time period was used to determine stumpage values because of the recent history of timber sales on the Forest. Timber sales were not sold from the spring of 1999 through 2001 while the WMNF updated its management direction for threatened and endangered species. This resulted in a period of more than 30 months in which no bidding transactions took place to help establish a market value for forest products on the WMNF. The logical point in time to use for determining values appeared to be the point at which sales began to sell after the hiatus in the program ended. Thus, the period from 2002 forward was selected.

- **Because stumpage values in the SPECTRUM model are inflated and could lead to more land being declared suitable than is appropriate.**

The prices used in the SPECTRUM model came from three sources; the recent bidding history on the Forest, quarterly stumpage data published by the New Hampshire Timberland Owners Association and stumpage data from the New Hampshire Department of Revenue Administration. The concern that this approach would inflate the projected timber values unrealistically is not supported by more recent trends in stumpage prices. Through 2004, the stumpage prices received for forest products in each of the species groups evaluated is higher than the values shown in Table B-10 of the DEIS. The only exception to this is paper birch mill wood, which is no longer marketed as mill wood but now sold as either pulpwood or sawtimber.

Nonetheless, we are noticing recent increases in the stumpage values for high quality hardwoods on the WMNF. Over the long term, it is likely the market for high quality hardwoods will remain strong due to the lack of

similarly managed stands of comparable quality in the northeast. The investment in time and resources necessary to manage stands for high quality hardwoods has been part of the WMNF's management strategy for several decades. Because of this strategy, the stumpage values used in the analysis are most likely very conservative as opposed to being inflated.

Also as part of this concern, two commenters performed their own analysis of the stumpage prices used in the DEIS and concluded that the average of the three sources of stumpage values presented was calculated incorrectly. Further investigation of their analysis revealed that they failed to convert stumpage values that were provided in dollars per hundred cubic feet (\$/CCF) to dollars per thousand board feet (\$/MBF). If this had been done correctly, their analysis would result in the same values found in the DEIS.

**PC 60000-21: The Forest Service should manage its timber.**

The White Mountain National Forest has made substantial investment in a road system and decades of improvement harvest. Subsequently, timber products are above average quality and are important to local industry. Alternative 2 provides a means of satisfying these concerns in a manner that is in balance with the many other uses on the Forest.

**PC 60000-22: The Forest Service should require that wood products from National Forest timber sales are processed within the US with US labor.**

Establishing controls on the processing of forest products from National Forest timber sales is outside the scope of decisions to be made in the Forest planning process.

**PC 60000-23: The Forest Service should analyze cumulative economic effects of National Forest timber sales on private timberland owners.**

This concern has been addressed in the FEIS, where we have augmented the cumulative economic effects section of Alternative 1 to include a discussion of the possible effects on private timberland owners. The effects, if any, are expected to be the most pronounced in Alternative 1 and are therefore not repeated in Alternatives 2-4.

**PC 60000-24: The Forest Service should enact a policy that encourages small local forest businesses.**

The Forest Service offers timber for sale in accordance with the laws and regulations governing bidding procedures on National Forest timber sales, and in cooperation with the Small Business Administration. Current regulations require that sales be set aside specifically for small businesses in the event that large businesses are getting an excessive number of successful bids. Small business bidders also have the option of having the Forest Service contract for more expensive road construction packages rather than expecting a small business to do that work.

**PC 60000-25: The Forest Service should receive direct revenue from timber sales and recreation to provide a source of income to offset the expenses to maintain the Forest.**

The disposition of receipts from National Forest timber sales is closely regulated by federal law and is beyond the scope of the Forest planning process. In some cases, such as under the Knutson-Vandenberg Act and the Recreation Enhancement Act, receipts are retained to accomplish specific projects on the Forest.

**PC 60000-26: The Forest Service should limit sale prescriptions on even-aged harvest and all aged harvest to maintain the greatest diversity of tree species whenever possible.**

Maintaining species diversity is an important aspect of silvicultural prescription development. This may be accomplished at times by retaining species that are relatively uncommon in a given area. However, maintaining species diversity in the long run is most often achieved by applying a variety of silvicultural treatments to ensure that a range of site conditions are available for the regeneration of a variety of species. For that reason, even-aged treatments are generally used to regenerate species such as aspen that are intolerant of shade. Tolerant species such as American beech will respond well to uneven-aged treatments that retain a fairly closed canopy. In the first two decades, Alternative 2 would use even-aged harvesting, on average, on about 64 percent of acres treated.

**PC 60000-27: The Forest Service should reduce riparian group cut guideline G-2 to a quarter acre in size.**

The intent of riparian goals and guidelines is to promote the ecological potential of the stream. The majority of streams on the Forest are coldwater streams, therefore the treatment (i.e., one acre gap) should not convert a coldwater stream to a warmwater stream. The intensity of timber harvest within any watershed would be limited by two factors. First, the habitat management units (HMUs) guide the types and amounts of treatment, and force the treatments to be spread across the Forest landscape (rather than focused in one watershed). Second, site-specific environmental analysis would identify any direct, indirect, or cumulative effects to stream temperatures, and how the treatments would effect ecological potential and riparian values.

**PC 60000-28: The Forest Service should quarantine from winter motorized and non-motorized recreation or trespass, those areas where NNIS are found, until all threat of NNIS is eliminated.**

To date, the NNIS occurrences on or near the WMNF are located primarily along roads or were intentionally planted (e.g., in private gardens). Hiking trails, with the exception of a few locations, are relatively free of invasive species. Although we can see the merits of the suggestion offered, it is not necessary to implement such drastic measures.

**PC 60000-29: The Forest Service should include in their vegetation management strategy consideration for traditional forest uses such as hunting and fishing.**

The vegetation management strategy is based on broad ecological principles and goals. No single wildlife species is the focus. Within these principles



and goals are objectives to maintain or enhance wildlife habitat, including fisheries habitat. By maintaining this diverse habitat, consideration is given to traditional uses, such as hunting and fishing.

At the project level, District Rangers consider input from Forest users in making their decisions on how best to implement broader Forest Plan direction. This can include providing better access for traditional uses, creating wildlife openings, and setting aside funds for stream restoration projects, to name a few.

**PC 60000-30: The Forest Service should consider future (multiple) uses in areas harvested.**

This comment includes a specific request for a guideline that would provide an area within 5 to 10 feet of the circumference of regeneration cuts that would be slash free and smoothed to make it available for mountain biking or other non-motorized use such as cross country skiing. A regeneration harvest site is not necessarily suitable for the types of recreational use suggested; many other factors must be evaluated before developing a mountain biking or cross-country trail. Further, the Selected Alternative prohibits the cross-country, off-trail mountain bike use that would apply in this situation. These are considered at the project analysis level of a proposal, not at the level of a Forest Plan. In specific situations, harvesting could be used to develop or enhance trails of this nature, within the limits set by the Forest Plan.

**PC 60100-1: The Forest Service should emphasize uneven-aged management.**

Generally, high quality timber can be produced using either even- or uneven-aged silvicultural treatments. The growth projections for each of the alternatives were developed using the FIBER growth model. Under the model, Alternative 3 resulted in the smallest sawtimber outputs and highest pulpwood yields.

Under Alternative 2, both even-aged and uneven-aged treatments will be applied. While patch clearcuts will be part of this, the intent is to use some larger sized clearcuts, particularly for the purpose of attaining habitat diversity. Any such treatments will be guided by the standards and guidelines contained in the Plan to assure that a variety of resource concerns are taken into account when projects are designed. Alternative 2 balances wildlife habitat needs with visual concerns in designating the proportion of even- and uneven-aged harvest. In the first two decades, Alternative 2 would use even-aged harvesting, on average, on about 64 percent of the acres treated.

**PC 60100-2: The Forest Service should implement the vegetation management age class objectives proposed for Alternative 2.**

**PC 60300-3: The Forest Service should offer the timber volume associated with Alternative 2.**

**PC 70400-3: The Forest Service should implement the wildlife/habitat strategy in Alternative 2.**



**PC 70500-1: The Forest Service should implement Alternative 2.**

- **Because it promotes the best possible ecosystem-based habitat management strategy.**
- **Because it provides the best management of timber and habitat**
- **Because it is the best multiple-use alternative.**
- **Because it will preserve the Forest for future generations.**
- **Because more early-successional habitat is needed.**

As outlined in the Record of Decision, the Forest Service selected Alternative 2 to provide the best balance of outputs, experiences, and services.

**PC 60100-3: The Forest Service should emphasize even-aged management.**

In the first two decades, on average, about 64 percent of the harvesting will be done with even-aged practices. Ultimately, the choice between even-aged and uneven-aged management is based on both ecological and site-specific factors. At the broader level, Forest soils favor the establishment of more softwoods over hardwoods than currently exist. Uneven-aged management is better suited for the management of softwoods (red spruce and balsam fir) on the Forest. Even-aged management is ideal for the perpetuation of early- to mid-successional forest types such as aspen, paper birch, red oak, and white pine. Other resource concerns can also influence the choice, such as scenery, nearby recreational developments, wildlife use, etc. Alternative 2 provides the best balance of outputs, experiences, and services.

**PC 60100-4: The Forest Service should retain even-aged management and clearcutting up to 15 acres.**

**PC 60200-2: The Forest Service should allow clearcutting up to 30 acres in size.**

Alternative 2 permits even-aged regeneration harvests as large as 30 acres to be implemented. Some wildlife prefer larger forest openings, and the 30-acre limit allows a range of sizes to meet objectives. Scenery management has been, and will continue to be, an important part of managing the WMNF. In many cases during site-specific project analysis, clearcut sizes have been less than the maximum in order to meet some other resource objective.

**PC 60100-5: The Forest Service should maintain the existing percentage of softwood in MA 2.1 and 3.1 stands.**

The vegetation management strategy under Alternative 2 is built upon maintaining biological diversity. In order to do this, the WMNF evaluates forestry practices based on land capabilities as described by Land Type Associations and Ecological Land Types. Favoring forest types associated with specific Land Types ensures that those forests will be better able to respond to natural and human events. The Selected Alternative acknowledges the fact that, due largely to heavy harvests across the landscape 80 to 120 years ago, many ecological land types that are naturally softwood sites have been dominated by hardwood species. As time passes,

there is a natural tendency for many of these sites to support increased amounts of softwood.

**PC 60100-6: The Forest Service should limit regeneration group cuts to less than one acre in size in riparian zones.**

The intent of this guide is not to promote group cuts one acre in size immediately adjacent to streams, but to allow for some flexibility in achieving habitat objectives within riparian zones. These zones are generally not stands in and of themselves. Stands often border on streams, with only a small percentage of the stand actually falling within the riparian zone. There may be specific objectives, such as the regeneration of aspen for beaver habitat, that would best be achieved by locating groups nearly an acre in size within the riparian zone. The State basal area laws would be taken into account when designing treatments of this nature.

**PC 99100-1K: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The Final EIS and Management Plan should specify which sorts of silviculture would be prioritized for accomplishing the different goals of forestry in the Forest.**

The in depth information that is described will be part of a reference document that will be utilized to guide silvicultural treatments on the Forest. It will contain information very similar to that which is included in the Appendices to the 1986 Forest Plan; in particular, the information included in Appendix C-1 through C -10.

**PC 99100-1M:**

- **Why doesn't the Forest Plan call for softwood planting if "more and older softwood is needed."**

Artificial regeneration, such as planting or seeding, is rarely needed on the WMNF. Silvicultural treatments are applied to work with the natural tendencies of specific ecological land types to establish the desired regeneration naturally. In the case of softwoods, many of these sites are currently stocked with hardwoods as a result of logging in the early 1900s and subsequent slash fires. These sites will naturally convert back to softwoods over time.

**PC 60200-3: The Forest Service should carefully evaluate the locations and placement of clearcuts.**

The scenic integrity of the WMNF is an important consideration, and is taken into account during project analysis when deciding the size and location of harvest units on the Forest. This does not mean that harvest units will not be visible, but the intent is to place them on the landscape in a manner that the scenic integrity of the WMNF is maintained or enhanced.

**PC 60300-1: The Forest Service should offer more timber volume.**

The Selected Alternative calls for harvesting 24 MMBF per year. This is based on achieving specific wildlife habitat objectives and also having a harvest

program that has the scenic, social, and resource impacts described in the FEIS. Based on available information, the Forest Service considers this a reasonable ceiling for the timber program over the next 10 to 15 years, and does not believe higher production levels could be sustained. Objectives and outputs will be monitored over the life of the Plan, and if projections are substantially off, the ASQ could be adjusted through a revision or amendment to the Plan.

**PC 60300-2: The Forest Service should offer less timber volume.**

The 24 MMBF program is intended to be compatible with recreational use on the Forest. Based on an average of the first two decades, in a typical year harvest operations of any kind (thinnings, selection harvests, clearcuts, etc.) would take place on approximately 0.8 percent of the General Forest Management area (MA 2.1) and on only 0.4 percent of the overall WMNF. This is an intensity that permits manageable impacts to recreational users. Furthermore, harvest operations in heavy recreational use areas are frequently scheduled during periods of the year when recreational use is at a minimum. The impacts upon other resources, such as scenic integrity, are also evaluated prior to harvest.

**PC 60300-4: The Forest Service should offer the timber volume associated with Alternative 3.**

The rationale for the selection of Alternative 2 is disclosed in the Record of Decision.

**PC 60300-5: The Forest Service should explain the numbers used to justify the ASQ, growth and yield projections, and evidence of sustainability.**

The Forest Service used computer models to assist the decision makers in developing optimal solutions for some of the critical elements of the timber management program, including the growth and yield projections and ASQ. For a further discussion of the role and use of these models, please see Appendix B of the FEIS.

The SPECTRUM model was used as a tool to help develop programmatic timber harvest sale schedules for each alternative. It was not intended to be used to develop a site-specific harvest plan for future timber sales. The model results are particularly useful in a comparative analysis between the alternatives used in the selection of a preferred alternative. By applying a consistent modeling approach and varying the inputs consistent with the design of each alternative, decision makers can see the impacts expressed in a broad range of outputs. Acres treated, mix of treatment strategies, and the potential to support other related management objectives, such as wildlife habitat management, are some of the outputs that were compared across the alternatives and evaluated in the selection of the Selected Alternative.

One part of this concern questions the variation between decades in the estimates of timber management practices found in the proposed and probable practices. Entries into sale areas are planned on a 20 year period

so if the model selected a large amount of uneven-aged treatments in the first decade, re-entries into these stands would not be made again until the 3rd decade; thus setting the stage for some variance in the treatments from decade to decade but far less variable when being viewed on a 20 year basis.

Another factor that influences this behavior is the requirement for the model to provide a solution that conforms to the policy of providing non-declining yield for each decade of the planning horizon, in this case 150 years. There may be sequencing issues in a much later decade that set up this condition in the first and second decade. The complexity involved in calculating an optimal solution for the model can only be done by a computer. This shift in the proportion of acres allocated to uneven age management between the first and second decade was reviewed and determined by the interdisciplinary team to be acceptable.

Another part of this concern statement requests an explanation of why, given that the volume of harvest in the ASQ comparing Alternative 1 to Alternative 2 drops by 31 percent, the amount of acres treated with regeneration harvesting drops by 47 percent. In comparing alternatives, it would be an oversimplification to assume the percentage of acres treated with a particular management strategy should somehow be consistent between alternatives. A discussion of the design considerations and modeling results for timber resources can be found in the FEIS, Appendix B.

The reason why there is a wide range of harvest outputs between Alternatives 1 and 2 is that the Forest planning process requires a reasonable range of alternatives to be analyzed. Alternative 1 is essentially a continuation of harvest levels planned in the 1986 Forest Plan. Alternative 2 most closely resembles the harvest activities that have actually been accomplished under the 1986 Plan.

The economic analysis is done to provide a comparison of alternatives. Values for timber products were based on stumpage values from FY 2002 through FY 2004. Recent bidding patterns and long term timber demand studies would indicate that the values used are probably very conservative. Timber value relates closely to quality of the products being sold, and the WMNF is in a position to sell a percentage of high quality material in future timber sales, so the most likely scenario is that returns from future sales could be considerably higher than the returns projected in the SPECTRUM model. However, we were unable to obtain long-range forecasts of market price trends suitable for applying to this analysis.

Another part of this concern requests a display of the projected timber program costs and revenues. This information is provided in Table B-20 of the FEIS. The Forest Service develops its budget requests consistent with parameters identified within the Forest Plan. The Forest Service allocates resources to the timber program to support multiple resource objectives including habitat management, forest health, recreation and scenery objectives to name a few. Not all of these objectives result in sales that are above cost, but they are necessary to meet other multiple use objectives.

**PC 60300-6: The Forest Service should limit logging to areas with existing roads.**

A road system already exists across the vast majority of the lands on the WMNF on which harvest activities are planned. For that reason, it is anticipated that road construction on the Forest will not exceed 10 miles per decade. Although road construction is expected to be limited, it will be necessary in some locations to accomplish resource management objectives.

**PC 60300-7: The Forest Service should explain how the FIBER model was validated for the WMNF, and how growth and yield coefficients were “evaluated” against published results.**

Part of this concern statement questions how the growth and yield results were evaluated for the WMNF. The Forest Service relied on the expert opinion of the members of the growth and yield team, which included three professional foresters and a research silviculturist, to evaluate the results of the FIBER model. The validation method used in this case was expert opinion. Previously published research include “Growth Response of Managed Uneven-aged Northern Conifer Stands,” (Solomon et al., 1983); “Silvicultural Guide for Northern Hardwood Types in the Northeast (revised),” (Leak et al., 1986); “Changes in Species, Grade, and Structure Over the 48 Years in a Managed New England Northern hardwood Stand,” (Leak et al., 2002). A scientific evaluation of FIBER and its performance can be found in “Test of Four Growth Simulators for the Northeastern United States,” (Schueler et al., 1993).

**PC 60300-8: The Forest Service should explain why the increased outputs in the 1986 Plan need to be reduced, given that the Forest is larger and has had more timber growth.**

Part of this concern statement originates from a comment that asks what the justification was for the Forest Service’s need to reexamine the vision of the 1986 Forest Plan that included calling for increasing outputs over time. The justification for this need primarily comes from an examination of what the Forest’s harvest history has been since the inception of the 1986 Plan. In reality, harvest levels have dropped through the planning period, averaging about 24 MMBF per year. This is contrary to the planned allowable sale quantity (ASQ), which would have risen from the initial ASQ of 35 MMBF per year to 42 MMBF per year in the third decade of implementation. The fact that the Forest Service did not achieve its objectives demanded a review of the 1986 Plan’s vision objectives to determine if the reasons for not achieving the planned ASQ were the result of unanticipated changes affecting timber resource management on the Forest.

This review concluded there have been changes in the timber resource management environment which increased the amount of time and resources necessary to execute timber sales on the ground. The analysis and documentation necessary to prepare a timber sale has grown significantly. The analysis for a typical 2 MMBF timber sale used to result in a six to eight page environmental assessment and today can amount to a hundred pages or more. At the time of the 1986 Forest Plan, appeals of vegetation management projects were extremely rare. By 1994, the majority of projects were being appealed. As new appeal points were raised, other



projects that were in the planning phase were reworked to take into account the appeal points. Also, the rapid expansion and growth of residential developments on private lands around the Forest increased the amount of concern expressed over timber harvesting on the Forest and consequently increased the amount of time spent by Forest Service employees to explain and educate the public on these projects. The results of litigation on harvest projects across the country have placed additional requirements on the White Mountain National Forest to insure the projects are in compliance with the most recent interpretations from the courts. Also, support to fire related activities across the country have increased since 1988. The use of White Mountain National Forest personnel to assist in these emergencies has delayed some of the projects and further hindered the ability of the Forest to achieve the ASQ objectives envisioned in the 1986 Plan.

Given the changes in timber harvesting on the Forest that have occurred since the adoption of the 1986 Plan, the range of the ASQ in the alternatives was established with the 1986 plan's ASQ as the upper bound as reflected in Alternative 1. The preferred alternative's ASQ of 24 MMBF/year establishes a timber objective that the Forest can sustain but also deliver. The ability of the Forest to reliably deliver its timber resource objectives to the timber industry was a critical consideration in establishing the preferred alternative's ASQ. If conditions change, and there is a compelling need to change the ASQ during the planning period, the Forest Service will consider those needs through the amendment process.

**PC 60400-1: The Forest Service should use slope and soils information, logging costs, and acid precipitation concerns in determining lands suitable for timber harvest.**

Slope was used to identify inoperable terrain, generally above 2,500 feet in elevation. These areas were eliminated from further consideration in Stage I of the suitability determination. Timber harvesting on the WMNF uses either skidder or forwarding equipment that is capable of operating on the lands not excluded due to inoperable terrain. Soils were also considered because the suitability analysis excluded areas in the Forest data base that are inoperable due to wet or shallow soils. Acid precipitation was not used in the suitability analysis. See the Soil Productivity section (FEIS, Chapter 3) for a description of the effects of acid precipitation.

There was no evidence of significant variation in logging efficiencies. With few exceptions, the existing Forest road network provides sufficient access for forestry activities. The combination of reasonable skidding distances, modern harvest equipment, and good timber values indicated that cost efficiency would not be useful in the suitability analysis. See Appendix E of the FEIS for a full description of the suitability analysis.

**PC 60400-2: The Forest Service should adjust harvest activities to account for the long term effects of acid deposition.**

See PC 53200-1 for a response related to biomass and whole-tree harvesting. There is a strong recommendation that lands with impaired soils should be identified and removed from the suitable timber base. See PC 53200-3 for a



response to soil productivity and suitable land. See the determination of land suitability related to soil productivity in the Administrative Record.

A comment suggested that the Forest Service err on the sides of caution and adjust its timber program downward, based on a belief that large areas of the WMNF have undergone substantial changes as a result of acid deposition, and that land use, geology, and soil has made the Forest relatively sensitive to further disturbance.

One response to this concern has been to make the standard for use of whole tree harvest more restrictive, limiting its use and thereby conserving about 35 percent of the calcium otherwise lost when tops and limbs are removed from the woods. This estimate was calculated based on Likens et al. (1998), and is filed in the Administrative Record (Bailey, 2004). The revised standard requires that more attention be paid to the balance between potential soil impacts and attainment of other resource objectives.

A second response was to eliminate biomass harvesting (see the response to PC 53200-1 for details). This eliminates the most intense harvest practice that was available under the 1986 Forest Plan. Notably, it was never applied during the planning period.

In addition, the proposed ASQ of 24 MMBF (Alternative 2) is about 50 percent of the long-term sustained yield of the Forest. While this was selected for a variety of reasons, it also serves to reduce the removal of calcium from the Forest. Furthermore, about 23 percent of the harvest forecast by the SPECTRUM Model is the less intense prescription, thereby further reducing calcium taken away from the site.

Another comment suggested that timber harvest can significantly exacerbate the situation, due in substantial part to acid deposition. However, this is not even true for Hubbard Brook Experimental Forest. Detailed chemistry of 60 soil pits measured pre- and post-intense whole-tree harvest clearcut has shown no change in exchangeable soil calcium 15 years after harvest (Johnson, 1997; Johnson, 2004). The intensity of this harvest, where an estimated 93 percent of the biomass was removed, is far greater than any harvest applied on the White Mountain National Forest.

Regarding a comment suggesting that logging should be scaled back even more in light of what we are learning about the impacts of acid rain on forest growth capacity in the Northeast, the FEIS Soil Productivity section and the above response cover this in detail.

**PC 60400-3: The Forest Service should adjust land allocations in some areas.**

- **Because timber harvesting should be scheduled in MA 6.2 lands as productive forest land should not be allocated to “large expanses of relatively undisturbed landscapes.”**
- **Because selective harvest should take place in MA 6.2 to the extent that roads already permit access.**

The management of timber resources in MA 6.2 under the revised Forest Plan is intended to be essentially the same as it was under the 1986 Forest Plan. These tend to be higher elevation lands, and the goal reflected an

emphasis on recreation. Refinements to the boundaries between MA 6.2 and the General Forest Management area (MA 2.1) were made as part of the revision process to reflect better site-specific information. This included putting some suitable lands into MA 2.1 and moving some unsuitable lands into MA 6.2. Neither planned sales nor salvage sales are allowed in MA 6.2.

- **Because harvesting should be permitted in MA 6.3.**

The MA 6.3 land base includes only 15,300 acres or less than 2 percent of the WMNF. Much of the land contained within this MA is on Ecological Land Types that are not suited to timber harvesting. Each of the Alternatives called for managing this land for semi-primitive winter motorized recreation without planned timber harvest.

- **Because the Forest Service must “identify land as unsuitable for timber production if there is not adequate information available ... to project responses to timber management practices.”**

Land suitability was determined in the planning process for the 1986 Plan and refined during the revision process. All of the lands harvested under the 1986 Forest Plan have been adequately restocked and maintained for long-term productivity.

- **Because confusion exists as to the suitability of lands in riparian zones for timber harvesting.**
- **Because confusion exists as to the suitability of lands in Wild and Scenic River corridors for timber harvesting.**

There is no confusion as to the suitability of lands contained within the general riparian zones across the WMNF or in the Wild and Scenic River corridors. Simply including lands in either of these categories does not make it unsuitable. In both cases, restrictions exist upon the type of treatments that might be implemented. For this reason these lands were not included in the landbase used to make allowable sale quantity projections, but they were not classified as unsuitable.

- **Because harvesting should not take place in the Green’s Grant area.**

Some of the land within Green’s Grant is classified as part of MA 2.1, lands on which harvesting activities are planned. Any harvesting that takes place will be designed in accordance with scenery management standards guidelines to assure protection of visual resources.

- **Because the WMNF should consider expanding harvest opportunities in MA 8.3, the Appalachian Trail Corridor, to areas besides where this MA abuts MA 2.1.**

There are very limited opportunities along the Appalachian Trail corridor to expand harvest opportunities beyond those lands that abut MA 2.1. Much of the land is high elevation, often steep and rocky and not well suited to timber harvesting. On the AT Corridor lands that are not as steep or rocky, it is more appropriate to manage these lands consistent with the adjacent management area’s primary purpose. Attempting to expand timber management in the AT Corridor for the purpose of educating the public about the appropriate role of land management and silviculture in the

conservation of natural resources would require redesignating those lands into management areas that permit commercial timber harvesting. From a public education standpoint, given the availability of more easily accessible locations, this would not be appropriate. On the Forest, there are kiosks at some of the scenic turnouts, information signs posted near recent timber harvest activity, and the Discovery Trail — all designed to help inform the public about the role of silviculture in the conservation of natural resources. In addition, the Forest Service continues to provide educational walks and talks throughout the year to help inform the public about the multiple use management approach and the role of silviculture in the conservation of natural resources.

**PC 91100-22: The Forest Service should conduct logging activity only below 1,750 foot elevation in the Presidential Range.**

This concern deals specifically with an area of MA 2.1 land on the lower slopes of the Presidential Range between the Castle Trail and the Pinkham B road. In essence, it calls for allocating all of the land on the north slopes of the Presidential Range above 1,750 feet into MA 6.2, thereby eliminating any timber harvest in this area.

The management area boundaries between MA 6.2 and the General Forest Management area (MA 2.1), in the vicinity described, are essentially the same under Alternative 2 as they were in the 1986 Forest Plan. The 2,000 foot elevation is a common limit to the General Forest Management area throughout the forest, as the terrain usually becomes too steep for harvest equipment above this point. Any timber management activities that are proposed for this area will be evaluated to assure scenic integrity continues to be maintained.

**PC 99100-3V: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **According to WMNF personnel, MA 2.1 excludes lands above 2,500 feet.**

This concern relates to generalized statements made in the DEIS concerning the lands above 2,500 feet in elevation that generally are not considered suitable. These statements are not intended to be screening criteria that would govern land suitability determinations. They contain qualifying words such as “generally” and “with few exceptions” and they accurately portray conditions which characterize some of the land not considered suitable. Determinations of land suitability were made based on site-specific surveys and stand exams, which more accurately evaluate land conditions in order to further evaluate their suitability. Elevation was not used as a filter or criteria in land suitability determinations.

**PC 91100-27: The Forest Service should only allow timber harvesting in lands that are suitable, with reliable data in place ensuring these lands are suitable.**

Land suitability determinations were performed in accordance with the requirements of 36 CFR 219.14. The data collected to support these

determinations were the result of stand examinations leading up to the land suitability classifications in accordance with FSH 2409.13 and are recorded in Forest Service databases for use in project and Forest planning. Appendix E of the FEIS consists of a table that shows how the suitable lands were derived for each alternative. Factors such as steep slopes, soils, water, and other management area allocations are used to arrive at the suitable lands figure.

**PC 91100-38: The Forest Service should reduce timber productivity if the General Forest Area lands are reduced.**

Growth and yield estimates were made to ascertain whether or not, harvest expectations could be met with the land allocations included in each of the alternatives. Alternative 2 includes sufficient land to sustainably meet the 24 MMBF allowable sale quantity target associated with it. If major changes are made to the lands allocated to MA 2.1, then the ASQ would need to be reevaluated.

**PC 99100-1J: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The table on pages 2-3 and 2-4 of the Plan indicates that salvage logging is allowed in MAs 2.1, 6.1, 7.1, and 9.2; but it is also allowed in Management Area 8.5, and in MA 6.3. Vegetation standard S-2 and Wildlife guideline G-1 conflict with each other.**

The table on pages 2-3 and 2-4 of the Proposed Plan contained several errors and proved to confuse rather than help readers. We decided to remove it from the document.

The inconsistency between Vegetation standard S-2 and Wildlife guideline G-1 in MA 6.3 was an error. This error, and a similar one in MA 6.2, was corrected in the final document.

**PC 91700-19: The Forest Service should provide in the Vegetation Management Standards and Guidelines an in-depth, thorough description of the silvicultural methods that will be used on this Forest.**

The in-depth information requested is part of a separate reference document that will guide silvicultural treatments on the Forest. It contains information similar to that which appears in the Appendices to the 1986 Forest Plan, in particular, the information included in Appendices C-1 through C-10.

**PC 99100-1cc: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Developed recreation sites, trails, scenic overlooks and undeveloped recreation sites (temporary but often visible) should be subject to closure if humans prove to be a nuisance to wildlife.**

Guideline G-4 under “Wildlife – Nuisance Wildlife” allows for closure of recreation sites if wildlife /human conflicts cannot be resolved.

**PC 91800-3: The Forest Service should only allow timber harvested after software has been developed to provide accurate modeling information.**

The Forest Service openly acknowledged the limitations of the modeling software used in the Plan revision process. However, this does not mean that the models used are inaccurate. Understanding the shortfalls and potential error introduced through the assumptions used in the modeling process is essential to correctly interpreting the results. We did make adjustments to the model outputs based on a careful review of the outputs as discussed starting on pages 3-111 and B-31 of the DEIS. The utility of the models, after making appropriate adjustments to correct its shortcomings, was still evident in its ability to provide many required data elements to support the timber harvest scheduling analysis and other analyses in the plan revision process.

**PC 91100-39: The Forest Service should have in place a standard and guide regulating salvage logging in MA 2.1.**

In the event salvage harvesting is necessary, treatments will be prescribed in accordance with the standards and guidelines applicable for specific management areas, and will be guided by monitoring ecologic processes. The range of events that could lead to the need to conduct salvage operations is far reaching. Drafting specific standards or guidelines to follow for the unforeseen events that may come up is not feasible. For instance, limitations on the size of salvage harvests may be nearly meaningless if something such as a major windstorm blows down hundreds or even thousands of acres in a single event.

**PC 60400-4: The Forest Service should adjust ASQ based on soil productivity.**

For those lands that are within Management Area 2.1 (and 3.1), available evidence does not indicate differences in soil productivity, when it is measured by trends in observable biomass accumulation, which is the agency direction (FSH 2509.18). See the complete biomass accumulation discussion in the FEIS (Chapter 3, Soil Productivity section). Also see the response to PC 60400-2. Examination of biomass accumulation for different forest habitat types, ranging from hardwoods to softwoods, is a good example of soil productivity being similar across landscapes (Leak, 1982). The FEIS (Chapter 3, Soil Productivity section) discusses the impacts on exchangeable soil calcium.

**PC 60400-5: The Forest Service should manage Forest lands and set management strategies according to Land Type Association.**

With respect to Forest harvesting, this is essentially what has been done. The General Forest Management area is made up of two Land Type Associations (LTAs) — Valley and Mountain Slope. The Valley LTA favors the growth of softwoods and mixedwoods, while the Mountain Slope LTA favors the growth of northern hardwoods. LTAs are further broken down into Ecological Land Types at the project level of analysis. Ecological Land types have been inventoried on the Forest and are used to identify opportunities and choices



for vegetation projects. The habitat composition objectives included in the Forest Plan also use ELTs to determine desired levels of softwoods, mixedwoods, northern hardwoods, paper birch, and aspen.

**PC 60400-6: The Forest Service should manage aspen and alder stands separately from birch.**

While a few wildlife species prefer aspen over birch, most species use these forest types interchangeably. In addition, aspen and paper birch are frequently commingled in stands, particularly at lower elevations. As a result, they have been combined for the purposes of conducting analysis of habitat diversity. Both species require similar conditions for regeneration, and therefore are managed with similar silvicultural methods — often involving clearcutting. Alder is important to several wildlife species, but it is naturally limited on the WMNF and is not tracked separately in our vegetation database. A habitat composition objective of its own is not appropriate and would be difficult to monitor. However, the riparian standards and guidelines do allow for management of alder thickets if it would benefit ecological resources in the area. When projects are proposed and analyzed in order to implement the Forest Plan, silvicultural prescriptions are developed that address specific stand conditions in order to meet management objectives.

**PC 60400-7: The Forest Service should recalculate ASQ based on corrections in the suitable land base.**

The process used to determine the suitable base was in compliance with NFMA. Our analysis has shown the cost efficiency of the lands identified as tentatively suitable is dependent on the silviculture technique applied to the land. However, the Forest Service recognizes the non-priced benefits that the Forest provides to the ecosystem values as well as to recreational users. Taking these non-priced benefits into consideration, we often apply silviculture treatments that are not necessarily designed to produce the greatest present net value.

The suitable base that is identified in the FEIS admittedly can support a higher timber output based purely on biological potential. The long-term sustained yield for Alternative 2 is calculated to be approximately 46 MMBF/Yr. In designing the alternatives, we looked at several additional factors not accounted for in the timber harvest schedule modeling in order to arrive at the ASQ, including the design intent of the alternatives. As disclosed in the FEIS, the design of Alternative 2 included an ASQ that was similar to what the Forest had actually harvested since the 1986 Plan, less the period we halted timber sales to study threatened and endangered species habitat concerns. The decision maker utilized this analysis along with a variety of other considerations to arrive at the decision to establish the ASQ at 24 MMBF/Year in the preferred alternative. As we proceeded with the modeling, we ran the timber harvest schedule model limiting the ASQ to 24 MMBF/Year as described in Appendix B of the FEIS.

**PC 60400-8: The Forest Service should recalculate ASQ based on NFMA's 219.14, which says "suitable lands on National Forests will be**



**determined in part, by whether or not a unit of land will generate a financial profit.**

The cited regulation identifies the process used to determine land suitability. The regulation requires that lands that are not cost-efficient, over the planning horizon, in meeting Forest objectives, which include timber production shall be tentatively identified as not appropriate for timber production. The lands that fall in the unsuitable category because they are not cost efficient were identified and removed from the tentatively suitable land base, as required by the regulation. These determinations resulted from site-specific surveys and land suitability classifications and are accounted for in Appendix E of the FEIS as LSC 820 –Not Cost Efficient.

Our analysis determined that the cost-efficiency of the tentatively suitable base was dependent on which timber management treatment strategy was applied to the ground. All analysis units can be cost-efficient if we use the most cost-efficient harvesting techniques. However, there are other non-priced benefits associated with these lands that ultimately will have to be considered at the project scale. Some of these non-priced benefits, such as maintaining healthy ecosystems and preserving scenic integrity, result in the selection of harvesting techniques that are not always the most cost efficient from a purely financial perspective. The modeling was not designed to provide site-specific management prescriptions; rather it is a programmatic evaluation of the Forest at the forest scale. If an analysis unit in the model's solution has a negative present net value (NPV), it is a result of a management prescription that is less cost efficient – which is not a result of the suitability of the land. These less cost-efficient treatment strategies result from constraints in the model that are designed to achieve objectives that meet regulatory guidance and provide non-priced benefits. If these constraints were lifted, the same analysis unit could be assigned a management prescription that would have a positive NPV.

**PC 60400-9: The Forest Service should revise the ASQ because it was determined with the objective of maximizing ASQ.**

This concern takes exception with the selection of the objective function used in the timber harvest schedule modeling. As described in Appendix B of the FEIS, the Forest Service developed the harvest levels for each alternative using criteria that extended beyond just the maximum biological potential of the land. The Forest Service reviewed the harvest history and experience since the inception of the 1986 Forest Plan in light of various social and operational conditions that influence timber management on the Forest. In light of these conditions, as well as acknowledging the conceptual design of the alternatives, Alternative 2's annual allowable sale quantity (ASQ) was set at 24 MMBF/Year. The model results for Alternative 2 reflected a maximum biological capability of 40 MMBF in the first decade of implementation without any adjustment for some of the model's design limitations, and 30 MMBF with adjustment. These results provided the assurance that the suitable lands identified for timber management would support the ASQ for Alternative 2 of 24 MMBF/Year.

Following the decision to establish Alternative 2's ASQ at 24 MMBF/Year, it was necessary to run the timber harvest schedule model again, this time using the ASQ as a constraint in order to develop the harvest schedule data. The interdisciplinary team reviewed results of running the model using various objective functions, including maximizing present net value, maximizing volume, and maximizing the amount of aspen – paper birch regeneration to satisfy habitat composition objectives. The results of using present net value as an objective function showed how aggressively the model would pursue regeneration harvests at the expense of other silviculture treatments. It became apparent the most cost-efficient treatments were contrary to the desired future condition and goals and objectives of the Forest. It was also noted how sensitive the results were to stumpage values. Given the dynamic nature of the timber market around the Forest, and historic fluctuations in stumpage values, we believed it would be more appropriate to apply the “maximize volume objective” function as the first objective function the model would solve, followed by the “maximize aspen – paper birch regeneration,” followed by the “maximize present net value.” We concluded that over the 150 year planning horizon of the model, silviculture treatments that produced higher volume would retain their value and the Forest could better fulfill its goal and objectives of having a special emphasis on sawtimber and veneer. The “maximize present net value objective” function results showed a much higher use of regeneration harvest would not lend itself as readily to achieving these goals and objectives.

Another part of this concern statement contends that because of the Forest Service's selection of the maximize volume objective function, the requirements of 36 CFR 219.14 to identify lands suitable for timber production were violated. The Forest Service used the best information available to exclude harvest units based on their not being cost-efficient to support timber production. After excluding these not-cost efficient areas, the analysis units that were left were the only areas considered for timber production. As shown in Table B-09 of the DEIS, there was a 29 percent reduction between the acres identified for timber management and the analysis units used in the timber harvest schedule modeling in Alternative 2. This reduction included lands that were not cost efficient for timber production. The remaining analysis units, as revealed through the modeling, could all sustain cost efficient timber management through the application of cost-efficient harvesting methods.

The Forest Service is obligated to consider both priced and non-priced benefits in the course of arriving at its management decisions. There are occasions where the non-priced benefits outweigh the priced benefits in the course of timber management, which result in the selection of less cost-efficient timber management treatments. For example, the Forest Service considers the non-priced benefits of preserving the scenic integrity of the landscape and may select uneven age management while a regeneration harvest may be most cost-efficient. These are site-specific project-level decisions, beyond the scope of the programmatic analysis done at the Forest Plan revision scale. These decisions are made within the process defined in the National Environmental Policy Act (NEPA), which requires analysis and

disclosure of the effects of the proposed action on the resources of the Forest, specific to that project. Therefore, the analysis units identified in the model done for revising the Forest Plan is not intended to be site specific. It would be a misuse of the modeling results to apply them to specific areas and attempt to make cost-efficiency evaluations for a particular analysis unit based on the treatment assigned in the model and consider that for the land suitability analysis. Those lands that are not cost-efficient for timber production were already removed and are not included in the analysis units.

**PC 60500-1: The Forest Service should manage 6.1 lands for limited timber harvest as well as other semi-primitive uses.**

Because of the overall management objective of 6.1 lands, these lands only allow timber salvage and insect and disease control. This management allocation helps meet the need for a balanced allocation between lands with active vegetation management and lands that are relatively undisturbed.

**PC 99100-1I: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Management schedules in the Plan should be revised to meet current vegetation management needs as well as to address and offset the vegetative management shortfalls of the previous Plan.**

This comment suggests that we increase harvest levels to not only maintain the levels projected in the last plan but to also make up for shortfalls that occurred. This EIS examines the tradeoffs associated with a range of harvest levels. Alternative 1 would harvest at the rate projected in the 1986 plan while the other alternatives would range down from those levels. After evaluating the tradeoffs depicted in Chapter III of the EIS, we decided to select the lower level of harvest identified in Alternative 2 feeling this best balanced the needs of the public.

**PC 60600-1: The Forest Service should reassess how to set standards for scenery management.**

The guideline regarding 3 percent of the viewshed affected by regeneration cutting per entry has been determined to be a realistic guideline under which vegetation composition goals and wildlife habitat needs can be met. This guideline is derived from a comprehensive research project completed for the Forest in 1998 and is supported by visual simulations completed as part of the project. The development of the guideline involved an integrated approach that included vegetation and wildlife management staff and has received intensive evaluation and review. Modeling for vegetation management goals has also shown that vegetation composition goals and wildlife habitat needs can be achieved under this guideline for all but Alternative 1. The text of the guideline and related definitions of terms used are being improved to clarify its use and application.

Regarding restrictions on observed acreage of openings, it should be noted that the guidelines outlined under the revised plan give more latitude in size of units under different conditions than the current plan. Where the new guidelines allow for up to 4-5 acres of observed opening in areas with

a High Scenic Integrity Objective, the current plan only allows for 1 acre of observed opening in similar situations, and only under certain conditions. For other situations, guidelines outlining acreage restrictions for openings have been eliminated and more discretion is given the project planners in the design and size of openings.

Also see PC 52000-1.

**PC 60600-2: The Forest Service should employ logging chutes on steeper ground.**

Even within the “inventoried roadless areas” there is only a small amount of suitable timber land that is not already adequately roaded. Many of these lands have a long harvest history, which continued to the late 1990s. Roads are rarely built on steep ground, as skidding is the typical method for bringing forest products down to roads at lower elevations. If chutes were used, they would most likely replace skid trails, not roads, and the chutes would provide little benefit from a resource protection standpoint. In addition, modern harvest equipment is considerably safer than chutes.

**PC 60600-3: The Forest Service should not hide harvest activities from public exposure.**

This comment incorporates support for carefully planned harvest activities to lessen visual impacts, but objects to the idea of hiding harvest activity. The sentiment that is expressed is consistent with the scenery management guidelines in Chapter 3 of the revised Forest Plan. The purpose of these is to maintain scenic integrity, not to hide harvest activities.

**PC 91000-1a: The Forest Service should ensure the Forest Plan meets all NEPA requirements because bias may exist toward larger clearcuts and even-aged management.**

How much even-aged regeneration is appropriate, and the rationale for proposing such harvests in all alternatives, are discussed in the response for PC 70100-1. Prohibition of clearcutting is addressed in the response for PC 60000-10.

**PC 91000-17: The Forest Service should discontinue the use of the term “vegetative management.”**

These terms are commonly used in National Environmental Policy Act (NEPA) analysis to clearly define projects that alter vegetative composition. The term is broader than “forestry,” which is the science of managing forests, and focuses on trees. Vegetation management on the WMNF also includes management of invasive plants, botany, maintaining wildlife openings, etc.

## **Wildlife**

**PC 70100-1: The Forest Service should maintain important habitat areas.**

- **Because declining habitat trends are working against species viability.**

- So that future generations can enjoy wildlife.
- PC 70300-2: The Forest Service needs to optimize early-successional habitat.**
- Because current levels of aspen-birch continue to be below goals and capacity.
  - Because decline of habitat affects the food supply of many species.
  - Because species habitat is lost as forests age.
- PC 70400-1: The Forest Service should reassess early successional habitat.**
- Because more is needed for wildlife and bird species.
  - So that it bases management decisions on the best available science.
  - Because it has incorrectly assessed habitat availability.
  - Because the plan fails to recognize drastic decline in aspen-birch habitat so that a more diverse range of habitat can be developed to better address Forest goals and objectives.
- PC 70400-2: The Forest Service should provide less early-successional habitat.**
- Because there is already ample early successional habitat in land surrounding the Forest.
  - Because the Forest should be providing a diversity in habitats.
  - Because there is no clear need for additional early successional habitat.
  - Because it impacts visual resources.
- PC 14000-5: The Forest Service should reconsider its objectives to increase early successional habitat because accepted scientific research does not support increasing species that were unusual or unknown prior to large scale human disturbances.**
- PC 60000-16: The Forest Service should apply scientific data suggesting regeneration harvest carefully because, presumably, the Forest formerly reproduced by gaps from tree fall and small disturbance and by rare large disturbances.**

How much regeneration-age forest the White Mountain National Forest should provide through management was part of one of the three issues that were the basis for the alternatives in the DEIS. It was identified as an issue because there is substantial disagreement among the public regarding how much is appropriate and for what purposes the Forest Service should create this habitat. There is similar, related disagreement about how much of certain early-successional forest habitat types (e.g., aspen-birch forest habitat) the Forest should provide.

Science, in the form of peer-reviewed literature, provides support for all positions in this debate. It identifies a large number of wildlife species in



northern New England that benefit from these habitats and documents that populations of several of these species are declining substantially as habitat decreases (Hunter et al 2001; Thompson and DeGraaf, 2001; Litvaitis, 2001). The habitat provided on the WMNF is different than that provided in residential areas or rights-of-way because there is less human interaction and different adjacent habitats, so it provides higher quality habitat for some species than is available elsewhere. Scientific literature also documents historic disturbance regimes for the habitats that comprise the WMNF, showing that regeneration age forest and aspen-birch forest habitats were naturally uncommon (Lorimer and White, 2003, Seymour et al., 2002). Limited habitat availability makes it likely that species needing these habitats also would have been limited in the area. The planning team reviewed the range of scientific literature on this topic, evaluated species that prefer more or less of these habitats to determine whether viability is a concern, and considered the role of the Forest in the larger regional landscape while developing the four alternatives presented in the DEIS.

The decision to have some amount of even-aged regeneration harvest in all alternatives was based on the value of aspen-birch and regenerating forest habitat to numerous wildlife species and the need for the Forest to provide a diversity of habitat to support all native and desired non-native species. The 4,800 acres per decade that is shown as the minimum amount of even-aged regeneration harvest (Alternative 3) is intended to keep a viable component of aspen-birch type on the landscape and provide a small amount of regeneration-age forest in other habitats, in keeping with the natural range of variability.

For the FEIS, additional discussion was added concerning the importance of these habitats for some species, the effects of managing for these habitats on other species, and the science behind these conclusions (Chapter 3, Vegetation and Wildlife sections). This discussion should better display the complexity of this issue, the trade-offs associated with different levels of management for these habitats, and why the Forest Service believes that Alternative 2 strikes the appropriate balance.

**PC 70100-2: The Forest Service should work with other agencies to review site plans and sensitive species.**

The Forest Service works with the US Fish and Wildlife Service, New Hampshire Natural Heritage Bureau, New Hampshire Fish and Game Department, Maine Natural Areas Program, Maine Department of Inland Fisheries and Wildlife, New England Wild Flower Society, Audubon Society of New Hampshire, and others to survey for, and monitor, rare species and determine the best management at known sites. This is not specifically documented in the Forest Plan because working with partners to effectively meet Forest goals is part of every program. Such collaboration is part of the Desired Future Condition in the FEIS (Chapter 1).

**PC 70100-3: The Forest Service should include the effects of increasing traffic on major roads.**

- **Because roads cause fragmentation.**



- **Because roads have increasing capacity, speed, and use.**

The effects of existing roads and expected increases in traffic on species of concern in all habitats are discussed in the Rare and Unique Features section (FEIS Chapter 3). Additional discussion was added to the Fragmentation discussion in the Wildlife Section (FEIS Chapter 3).

**PC 70100-4: The Forest Service should include the Species Viability Study in the final plan because management objectives need to be more clearly defined.**

The project record for the Species Viability Evaluation (SVE) that was conducted as part of Forest Plan Revision is enormous. Just providing all the information gathered on the species tracked as species of concern throughout the revision process would overwhelm Plan readers without adding more substance to the management direction. The Rare and Unique Features section in Chapter 3 and Appendix F of the FEIS summarize much of what was learned about these species. Additional information is available on the Forest's web page.

The results of the SVE were reviewed to ensure that proposed habitat objectives would not result in a loss of viability for any species on the Forest. As documented in the Rare and Unique Features effects analysis (FEIS Chapter 3), the management resulting from the different habitat objectives for each alternative would not alter viability outcomes for most species of concern (see Appendix F).

**PC 70100-5: The Forest Service should strengthen the DEIS effects analysis by addressing the effects of recreation activities, particularly in heavily used areas, on wildlife.**

- **Because recreation use is growing.**
- **Because the proposed recreation strategy is to concentrate use, and the effects on wildlife in heavily used recreation areas is lacking.**
- **Because the effects of recreation use on low elevation birds is lacking.**

Potential effects of recreation on wildlife are a concern, especially since there is little information available on the subject and recreation use is growing. For this Forest Plan revision effort, the Forest Service chose to focus attention on the habitats that are most likely to be at risk from high recreation use levels. Based on expected use trends in the Recreation Affected Environment (FEIS, Chapter 3), the types of use being promoted on the Forest, adequacy of direction in the 1986 Plan, and available information on species status, emphasis was placed on alpine, high elevation spruce-fir forest, and rock/cliff habitats. Ecological indicators were identified for these habitats as a way of evaluating effects on a representative group of species that use these habitats and may be affected by human use levels.

The potential for increased and concentrated recreational use to affect habitat conditions is covered in the Vegetation section of the FEIS (Chapter 3), while effects on rare wildlife species are addressed in the Rare and Unique Features

section. The impact of recreation on more common wildlife species should be similar to effects on rare species, but without the risk to viability in the foreseeable future. The choice of Alternative 2 as the Selected Alternative reduces the potential for impacts because no new developed recreation sites would be proposed and new trails would be limited. While concentrating use may affect species in a localized area, the portion of the WMNF that would be affected should be limited.

Monitoring will be used to evaluate impacts from recreational use. If these efforts indicate that use is affecting communities and species, management actions will be required to address the effects. In addition, results showing unacceptable impacts should prompt the Forest Service to expand monitoring to additional habitats, including lower elevation forests.

**PC 70200-1: The Forest Service should provide effects on the full range of species.**

- **Because the Forest has included only activities covered by revision issues.**
- **Because no mammals have been included in the ranges given (watershed and aquatic health).**
- **Because the narrow range makes it impossible to study the effects of management actions.**
- **Because the MIS list proposed is insufficient in meeting the requirements of NFMA and NEPA.**

The Forest Plan and Environmental Impact Statement address a wide range of wildlife and plant species. Goals and objectives are provided in the Forest Plan (Chapter 1) for Rare and Unique Features (including TES species), Riparian and Aquatic Habitats, Vegetation Management (which addresses terrestrial wildlife habitat), and Wildlife. In the FEIS, the Biodiversity section at the beginning of Chapter 3 explains the framework for the Forest Service's evaluation of wildlife, fish, plants, and their habitats using both coarse and fine filter approaches. At the coarse filter (broad) scale, terrestrial wildlife *habitats* are discussed in the Vegetation section. Management Indicator Species are used to explain how changes in habitats as a result of vegetation manipulation will affect wildlife *populations* (Wildlife section). Ecological Indicators describe the effects of recreation use on the most sensitive community types (Wildlife section). The Wildlife section also discusses effects of fragmentation and landscape connectivity, as well as effects to migratory birds. Aquatic species and their habitats are addressed at the coarse filter scale in the Stream Fisheries and Associated Riparian Areas section.

Fine filter (specific) effects are described for all federally endangered, threatened, and sensitive species in the Biological Evaluation (FEIS Appendix G), and are summarized in the Rare and Unique Features section of the FEIS, Chapter 3. This section also summarizes the results of a comprehensive Species Viability Evaluation which considered hundreds of individual species that might be at risk of viability loss.

Some public comments focused on Management Indicator Species (MIS) and the process used to select them, although the comments did not include suggestions for alternative species. Because this was a Plan revision and not a zero-based Forest Plan creation, knowledge gained through monitoring over the last planning period was used to focus attention on the areas and activities most likely to change over the course of the next planning period. The revision issues were therefore used to focus selection of indicators. The planning regulations at 36 CFR 219.19 state: “In order to *estimate the effects of each alternative* on fish and wildlife populations, certain vertebrate and/or invertebrate species present in the area shall be identified and selected as management indicator species and the reasons for their selection will be stated. These [Management Indicator] species shall be selected because their population changes are believed to *indicate the effects of management activities*.” (Emphasis added.) Therefore, it is appropriate to focus selection of MIS on the activities that may result in a change in species population and that differ between alternatives in the planning process. Ecological Indicators were also selected to serve as a barometer for recreation-related effects. In this case, MIS were not appropriate because a single species could not be found that would effectively represent other species with similar habitat requirements. Species communities were selected instead.

Specifics regarding MIS selection are documented in the Administrative Record at the Supervisor’s Office in Laconia. Eighty-five species were considered for MIS, including 63 birds, 21 mammals, and 1 reptile. A number of factors went into the selection process, but one of the more important was that the species show a strong relationship to a particular habitat type. Past experience with the MIS in the 1986 Forest Plan showed that using a species with general habitat requirements made it difficult, if not impossible, to tie changes in population to management actions in specific habitats. Because of this factor, the majority of species considered were birds, since they generally show the tightest habitat relationships of all vertebrates.

Other selection criteria were based on monitoring feasibility and how much baseline population data was available. The latter is important because populations generally do not change evenly, but often fluctuate somewhat from year to year, requiring a number of years of data in order to determine trends. A strong reason to use songbirds for MIS is that the monitoring protocols for these MIS (as well as other sensitive species such as Bicknell’s thrush) will use some form of breeding bird survey in which all breeding birds heard or observed are recorded. This is similar to the protocols that were used on the Forest over the last planning period. Some thirteen years of bird monitoring data are already in place, to which additional information can be added. Regardless of what bird species are selected for MIS, all breeding birds are evaluated during data analysis and trends of all are documented (e.g., see McFadden, S. and D. Capen. 2000. White Mountain National Forest Wildlife Monitoring Program: Analyses of Bird Surveys on Permanent Plots, 1992-1999, University of Vermont, Burlington, VT, 79 pp; Deming, L. 2000. White Mountain National Forest Wildlife Monitoring Program, High Elevation Bird Survey Data Analysis, Audubon Society of New Hampshire, Concord, NH, 13 pp plus appendices and maps). Therefore,

the individual species selected as MIS are less critical. Neotropical migrants have a complicating factor in that their populations may be affected by changes in wintering habitat rather than from WMNF activities. However, they are still better choices than the other resident bird species, or the other mammals and reptile considered, because their habitat relationships are tighter, they have strong baseline data already in place, and there is other information available (e.g., national Breeding Bird Survey transect data, Audubon Christmas Bird Count results) with which trend results on the Forest can be compared. Using this broader data will allow us to evaluate Forest trends with larger regional trends to determine if population changes are a result of local management on the Forest or are part of a larger trend. Finally, MIS are just one mechanism to evaluate changes to wildlife populations. In addition to MIS, a number of other species will be monitored (Forest Plan, Chapter 4), including threatened, endangered, and sensitive plants and animals (e.g., winter tracking for all medium and large mammals and surveys specifically for snowshoe hare as it relates to Canada lynx habitat); Ecological Indicators (e.g., determining effects of rock climbing and hiking on rare plant communities); fisheries (e.g., brook trout population changes); and aquatic invertebrates (e.g., macroinvertebrate presence/absence surveys in various watersheds). All of this information will be used to identify possible changes in population trends of many species, and to evaluate effects from management activities.

**PC 70300-1: The Forest Service needs a program for development and maintenance of wildlife habitats, including openings.**

- **Because planned openings do not consider the lands outside of MA 2.1.**
- **Because openings are needed along trails, roads, and public spaces.**
- **Because they will help counteract human activities.**
- **Because large, undisturbed habitats are scarce elsewhere.**

**PC 70300-5: The Forest Service should rewrite wildlife standards in MA 6.1, MA 7.1, and MA 9.2 to allow maintenance of wildlife openings.**

- **Because in MA 6.1, vegetative management is already allowed for recreation and salvage objectives.**
- **Because in MAs 7.1 and 9.2, ski trails can serve as wildlife openings in the off-season.**

Wildlife habitat improvement is a complex management program that includes efforts to implement the habitat composition and age class objectives through timber harvest and other vegetative manipulation, including opening maintenance. The goals, objectives, standards, and guidelines for wildlife habitat in the revised Forest Plan, as well as the recommendations in the Terrestrial Habitat Management Guidance Document (referenced in Chapter 2 of the Plan, Wildlife), represent the habitat management program. They were developed to benefit the whole range of wildlife species that use the Forest. Most activity is limited to MA

2.1 because the desired future condition in many other MAs is for a natural appearing landscape. Standards and guidelines were updated to allow creation and maintenance of wildlife openings in MAs 6.1, 7.1, and 9.2.

**PC 70300-3: The Forest Service should reduce the need for game species habitat.**

- **Because the Forest is placing too much emphasis on managing for game species.**
- **Because there is already concern about overpopulations of certain game species.**

**PC 70600-1: The Forest Service should consider and include the negative effects of managing for deer and moose.**

- **Because it could impact other bird, mammal, or plant species.**
- **Because the Forest approach appears to be biased.**

**PC 93000-4: The alternatives should address the full range of wildlife species because game species need to be included.**

The Forest Service's wildlife habitat objectives were developed with the whole range of wildlife species that use the Forest in mind including, but not limited to, game species. The FEIS (Chapter 3, Vegetation, Wildlife, and Rare and Unique Features Sections) addresses the potential positive and negative impacts to plant and animal habitat and species from implementing the composition and age class objectives. Implementing the age class objectives would result in both increased regeneration forest and increased late-successional and old growth forest habitat on the WMNF over time. Composition objectives would maintain aspen-birch and oak-pine habitats while also increasing softwood habitat toward levels indicated by land capability. Overall, objectives would benefit a wide array of plant and animal species, including game and non-game species. Overpopulation has not been identified by biologists or ecologists as a concern for any game species in the White Mountains at this time.

Forest-wide recreation goals and standards indicate that the Forest will be managed to provide hunting, fishing, and trapping opportunities across the WMNF. The Forest Service will continue to work with state fish and wildlife agencies, consistent with the Sikes Act, to determine species population levels and hunting, fishing, and trapping limits that are appropriate to the Forest.

**PC 70300-4: The Forest Service needs to further develop and explain its wildlife habitat objectives.**

- **Because objectives do not include the full range of species.**
- **Because objectives do not include a complete range of habitats.**
- **Because it does not adequately explain the differences in HMUs.**
- **Because it does not adequately explain the specific biological goals.**



- **Because the second and old growth areas have not been investigated thoroughly enough to develop sound rationale.**
- **By presenting composition objectives and projections for MA 2.1/3.1 and for the Forest as a whole.**

The Forest Service's wildlife habitat objectives were developed with the year-round habitat needs of the whole range of wildlife species that use the Forest in mind. They were designed to ensure that the Forest will support all native and desired non-native plant and animal species. Because the needs of all species cannot be met by broad habitat goals and objectives, more specific goals, objectives, standards, and guidelines were developed to ensure that within-habitat features and processes (such as dead wood) are retained and that rare species and habitats will be protected. The wildlife objectives address all broad habitat types that occur on the Forest. The proposed abundance of various habitats is based on current condition and land capability in MA 2.1, natural disturbance history, and habitat needs to maintain wildlife and plant diversity. For wildlife species, input was gathered from local experts and habitat needs for breeding, foraging, and migration were considered. If future information indicates that these habitat objectives will not provide the level of habitat needed to support viable populations of some species, the Plan would be amended to modify objectives as needed. The Species Viability Evaluation indicated that the proposed objectives would support viable populations of all species to the degree that viability is within the Forest Service's control.

Habitat composition and age class objectives were developed only for MA 2.1 because it is the only area in which the Forest Service can actively manage stands to alter habitat types and forest age. Developing similar objectives that encompass the entire Forest could give the impression that the Forest Service will be treating the entire Forest to achieve these objectives when such management will be restricted to MA 2.1. The FEIS does include discussion of expected trends in habitat composition and age class across the entire Forest and within MA 2.1/3.1 (Chapter 3, Vegetation section, Wildlife and Plant Habitat subsection).

Habitat Management Units (HMUs) are areas of land on the Forest, approximating watersheds in size and shape. They are used to apply Forest-wide habitat composition and age class objectives on the ground. MA-wide objectives were developed based on the array of habitats found across the Forest. However most habitats are not evenly distributed on the Forest — some areas have no oak-pine and others have a high proportion of aspen-birch. When timber harvest or other vegetative management is proposed, it is important to know what management would move the Forest toward the habitat objectives. The easiest way to determine this is to identify what conditions in an area could be achieved and would contribute to the Forest-wide objectives. HMUs are blocks of land in which projects will occur. In each HMU, current habitat condition, land capability, and other uses are evaluated to determine what habitat could be provided and what management would help move conditions toward the desired objectives. They are not intended to represent unique conglomerates of species or



habitats, but to make the task of determining how to move toward habitat objectives easier.

In reviewing the MA 2.1 age class objectives in preparation for finalizing the EIS and Plan, it was discovered that an error was made in calculating the old age class objectives for each alternative. That error was corrected for the FEIS (Chapter 2, each alternative) and revised Plan (Chapter 1, Wildlife).

**PC 99100-1E: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Proposed edits to Wildlife Habitat Management standards and guidelines.**

The 66-foot buffer in S-3 (Plan, Chapter 2, Wildlife) is a minimum and is based on recommendations in Good Forestry in the Granite State, as the comment recommended. Language was added to highlight that the buffer would often be larger based on site conditions. G-2 already acknowledges that it is important to have aspen-birch habitat on the landscape, so it was not revised, though it is G-3 in the revised Plan. G-7 remains a guideline because there may be situations where a deer yard cannot be avoided and the proposed activity would not alter the yard significantly, or where a deer yard is not known. A guideline is supposed to be followed unless a deviation is justified in a project analysis, so deer yards will be protected. G-8 was not added to the roads section as well because the Plan is written to avoid duplication since standards and guidelines for all resources apply to all appropriate projects. G-9 remains a guideline because there is potential for some projects, such as a single small tower for use at a facility, to be proposed that would not be expected to substantially impact wildlife species. However for most proposals, the guideline indicates that surveys need to be completed. G-10 was kept a guideline, but language was changed to recommend implementation of mitigation measures for wind and cell towers, not just consideration of these measures.

**PC 99100-3Q:**

- **The term “habitat type” in Appendix G is not accurate and the Forest Service should not propose management to promote aspen or birch forest types.**

Habitat type is the term used in the document from which the information in Appendix G was taken. It is acknowledged in the FEIS (Chapter 3, Vegetation section) that aspen and birch are not climax forest types. However they provide an important habitat type for many wildlife species that has probably always been present on the Forest, resulting from natural disturbance. The FEIS (Chapter 3, Vegetation section) describes the current distribution of aspen-birch habitat, explains why maintaining this habitat on the landscape is important for wildlife, and discusses the effects of each alternative on aspen-birch habitat. All alternatives would result in a substantial decline in this habitat type across the Forest. The Selected Alternative would maintain current levels in MA 2.1 to meet Forest wildlife goals and objectives (Plan, Chapter 1, Wildlife).

**PC 70400-4: The Forest Service should not implement the wildlife/habitat strategy in Alternative 2.**

**PC 70500-2: The Forest Service should not implement the timber/habitat objectives of Alternative 2.**

- **Because it will adversely impact already declining wildlife species preferring early-successional habitats.**
- **Because there is already adequate early-successional habitat.**
- **Because the Forest Service cannot meet the benchmarks it has set for itself .**
- **Because the proposed timber management strategy needs to be reassessed .**
- **Because projected wildlife benefits are questionable.**
- **Because multiple geographic contexts should have been considered.**

The alternatives proposes four different levels, and the FEIS analyzes the effects of these various levels on wildlife and plant habitat and species (Chapter 3, Vegetation, Wildlife, and Rare and Unique Features Sections). None of the levels of even-aged regeneration harvest proposed would result in a loss of viability for any species. Based on a review of the effects of each alternative, the Regional Forester determined that the strategy proposed in Alternative 2 represents the most balanced approach.

The habitat and timber objectives were developed based on current vegetative conditions, existing science regarding ecosystem sustainability, the Forest's ecological and economic role in the region, and research on scenery management on the Forest. The objectives would ensure that the Forest Service will meet our National Forest Management Act (NFMA) obligation to support all native and desired non-native plant and animal species and continue to supply a sustainable level of high quality timber products to the local community. They include a balanced mix of even-aged regeneration harvest and uneven-aged selection harvest to meet these goals. The limit on clearcut size was based on an agency limitation of 40 acres and what the Forest Service accomplished over many years of arranging harvests on a highly visible landscape. For the most part, the objectives were not developed with individual species in mind, but with the goal of providing a diversity of habitats distributed across the Forest. Whether management will improve conditions for certain wildlife species will depend on site-specific decisions such as when and where to implement different types of harvest. Management direction in the Plan is designed to increase the likelihood that the benefits to wildlife described in the FEIS will be realized. Also see 70100-1.

**PC 70700-1: The Forest Service should include further research on specific species in the Plan.**

- **Because some species of concern were not included in the plan.**

- **Because additional emphasis or information should be included in the plan.**
- **Because sightings and reviews are contradictory to statements in the plan.**

As discussed in the Wildlife and Rare and Unique Features sections of the FEIS (Chapter 3), it is infeasible and unnecessary to address every species in the EIS and Plan. The Species Viability Evaluation considered more than 1100 plant and animal species that could be considered of concern. Based on information from literature and local experts, the Forest Service identified 108 of these species as of viability concern on the Forest during the next planning cycle. These are the species that were addressed in detail in the Rare and Unique Features section. Other species may be experiencing declines in habitat or populations, but were not identified as of viability concern in the short-term on the Forest. For species that are of enough concern to warrant listing as threatened, endangered, or sensitive, the Plan includes goals, standards, and guidelines to protect or enhance species and their habitats as necessary to maintain viability. This direction applies to all listed species. The conservation approaches developed to meet Rare and Unique Features Objective 2 (FEIS, Chapter 1) would include specifics for each species and review sighting information to validate what is presented in the FEIS. The Forest Service will continue working with researchers and other local experts to track species' status and determine which species require specific attention.

**PC 70700-2: The Forest Service should consider habitat requirements needed for reintroduction of specific species.**

Decisions regarding reintroduction of federally listed species fall under the jurisdiction of the US Fish and Wildlife Service and the State wildlife agencies. Nothing in the revised Forest Plan would prohibit such actions. The US Fish and Wildlife Service has reviewed the Forest Plan and Biological Evaluation and concurs with the determinations identified for wolves and other federally listed species.

**PC 91400-1: The Forest Service should address the goals and objectives of our wildlife partners, support these in the Forest Plan, and develop strategies for achieving these goals.**

The Forest Service recognizes the multiple efforts ongoing throughout the Northeast to develop various wildlife plans and strategies. Many of these efforts have included participation from Forest staff and expectations are that cooperation and collaboration towards common objectives will continue. However, although partnerships have been and will continue to be viewed as important, it is unnecessary to include such dialogue in the Forest Plan.

## **Rare and Unique Features**

**PC 55000-1: The Forest Service should re-examine its approach to natural communities.**

- PC 55000-2:**    **The Forest Service should protect exemplary communities through MA designation and Standards and Guidelines, and should consult with state Natural Heritage programs.**
- PC 99100-8:**    **The Forest Service should correct inconsistencies in its “coarse filter” “fine filter” approach to natural communities.**
- PC 99200-4:**    **The Forest Service should consider providing additional protection to certain natural communities that occur largely in MA 2.1 land under Alternative 2.**

As discussed in the Introduction to Biodiversity in the FEIS (Chapter 3), there are many approaches to maintaining biological diversity, including several different coarse filter and fine filter approaches. Some coarse filter strategies deal with broad ecosystems based on dominant vegetation (e.g., northern hardwood forests); others address all natural communities identified in a more detailed community classification system (e.g., semi-rich mesic sugar maple forest). Which approach is most appropriate depends on the planning landscape and goals. The WMNF coarse filter focuses on managing for an ecologically-based distribution of broad habitat types, each of which includes several natural communities. Additional information was added to the Introduction to Biodiversity in the FEIS to clarify the Forest Service’s approach and the rationale behind that strategy.

The Forest Service agrees that maintaining high quality examples of common natural communities, as well as most occurrences of rare natural communities, is important to conserving biological diversity. However placing all exemplary communities, as identified by state Natural Heritage programs, outside MA 2.1 or otherwise prohibiting timber harvest is not always necessary to protect the health and biodiversity of these communities. The states of Maine and New Hampshire have identified many high quality examples of common natural communities on the WMNF, many of which have been actively managed through timber harvest. If they qualify as high quality occurrences with past harvest, there is no reason to assume they would not remain high quality examples with continued management. In addition, the identification of exemplary communities can be imprecise, depending in part on the condition of other occurrences in the state or on criteria that are not documented so that people surveying project areas for species and communities of concern could identify them. Therefore the Forest Service did not propose a standard or guideline requiring protection of all exemplary communities; instead, these will be evaluated at the project level. The Forest, Rare and Unique Features, and Wildlife goals and objectives emphasize the Forest Service’s intent to maintain healthy ecosystems and conserve the habitats or communities necessary to sustain all native and desired non-native species. Additional information on the effects of proposed management on low elevation habitats was added to the FEIS in the LTA discussion in the Vegetation section.

The Forest Service evaluated uncommon and rare natural communities that occur on the WMNF to determine whether additional management direction is necessary to protect these communities (FEIS, Chapter 3, Rare and Unique

Features section, Outstanding Natural Communities subsection). Several communities were identified as requiring specific protections; these were classified as outstanding natural communities. A number of additional communities were reviewed in response to public comment, resulting in the addition (FEIS, Chapter 3, Rare and Unique Features) of two outstanding natural communities that were not in the DEIS. Additional description of the process and rationale for identifying outstanding natural communities was added to the FEIS. The Forest Service expects to work closely with partners, including state agencies, on inventory and monitoring of biodiversity and evaluating whether additional species or communities need specific protection.

**PC 99100-3B: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Gray Wolf guidelines G-1 and G-2 are unclear and Canada Lynx Guideline G-10 should be a standard that is more restrictive.**

Gray Wolf guideline G-1 (Plan, Chapter 2, Rare and Unique Features) is intended to facilitate the location of timber harvest treatments to create early successional habitats in areas where it appears wolves may colonize. At the site-specific project level, this would provide extra incentive to locate good browse areas near suitable cover. The guideline is intended to direct management within the context of the existing vegetation management objectives. Guideline G-2 is also intended to give extra emphasis to wolf prey habitat and should be followed whether or not wolves are present.

Canada Lynx guideline G-10 (Plan, Chapter 2, Rare and Unique Features, now G-8 in the revised Plan) is intended to limit upgrading roads when there is a specific concern that increased traffic volumes or speeds may potentially lead to increased lynx mortality as a result of vehicle collision. Road upgrades that do not result in these conditions would not need to be restricted.

**PC 99100-3O:**

- **Recommendation was made to add information on preservation of TES species, important habitats, etc. to the issue statements.**

The issues are subjects about which there is widespread public or internal debate concerning the direction the Forest should take. Protecting rare and unique species and habitats is accepted by almost everyone as an important component of everything the Forest Service does. Therefore it is part of our desired future condition and goals, but not the issue statements.

**PC 55100-1: The Forest Service should review the list of sensitive species that occur on cliffs, ledges, and other open rocky openings with NH Heritage staff.**

New Hampshire Natural Heritage Bureau reviewed the list of species of concern addressed through our Species Viability Evaluation. The list of rock species in the FEIS takes their comments into account.



**PC 55100-2: The Forest Service should consider other threatened and endangered species as priority species in the Forest Plan.**

All plants and animals listed under the Endangered Species Act were considered during this Forest Plan revision. Management direction was developed specifically to protect listed species and their habitats (see Forest Plan, Rare and Unique Features Goals and Objectives, as well as Standards and Guidelines). In addition, the revised Forest Plan contains a number of goals, objectives, and standards and guidelines intended to conserve species that may not be listed under the Endangered Species Act, but are rare within New Hampshire or Maine. For example, one of the Goals under Rare and Unique Features is: “The White Mountain National Forest will provide sufficient habitat and protection to preclude the need for species listing under the Federal Endangered Species Act due to National Forest habitat conditions or effects of activities.”

There are other rare species for which specific standards or guidelines were not developed. This is because other, more general, direction was felt to be sufficient. For example, conserving outstanding enriched upland forest, cliff, and talus slope natural communities (Rare and Unique Features, guideline G-1) will protect a number of rare plants without the need for developing additional species-specific direction. In many cases, especially with rare plants, it is somewhat unclear why so few occurrences exist on the Forest. In other words, some kind of microhabitat requirements are needed, but are as yet unknown, so direction cannot be further developed. As new information regarding rare species habitats is learned, conservation approaches can lead to Forest Plan amendments to provide species-specific direction. In the meantime, direction to develop individual site prescriptions for all known rare plant occurrences or fixed wildlife habitat features (Rare and Unique Features, standard S-1) will help to protect occurrences. Monitoring will also help identify if and when alternative or additional management action is needed.

**PC 55100-3: The Forest Service should resurvey alpine plant species populations.**

The occurrence information for all species of concern, including those in the alpine zone, comes from the New Hampshire and Maine Natural Heritage programs’ databases of species tracked by each state and from our own survey records. The state Natural Heritage programs define occurrences in such a way that several subpopulations that are in close proximity may be identified as one occurrence. Therefore the occurrence numbers in Appendix F of the FEIS do reflect the number of plants or even the number of patches containing a given species. However it is likely that there are additional occurrences of some species that have not been documented and submitted to the states or WMNF. There is no way for us to know about these occurrences as they are not part of the available information that was used for this revision effort. If members of the public locate occurrences of state listed species, they should inform the appropriate state so the occurrences can be documented and updated information on known

populations can be recorded. In the Monitoring Implementation Guide, the Forest Service proposes monitoring for TES plant species, including those in the alpine, and for the alpine communities that are ecological indicators.

**PC 55100-4: The Forest Service should defer discussion relative to future management of the Gray Wolf because no restoration effort is anticipated.**

Although there is no active restoration effort planned for the White Mountains area, restoration may still occur through passive recolonization of the area. The direction provided in the revised Forest Plan is simply to allow for conservation efforts, including habitat management, to occur if future conditions warrant. Conditions to support wolves on the Forest could be achieved within the context of the other goals, objectives, standards, and guidelines, but it is important to address federally listed species that have some chance of relocating to the Forest in the next planning period.

**PC 55300-1: The Forest Service should acknowledge that high quality foraging habitat means an abundance of snowshoe hare and their associated early successional habitat.**

The definition of lynx foraging habitat has been clarified to demonstrate the focus of lynx foraging habitat is high quality snowshoe hare habitat.

**PC 55300-2: The Forest Service should remove the Canada lynx from the Forest Plan if it is not verified.**

**PC 55300-3: The Forest Service should preserve lynx habitat.**

We recognize that there are a number of rare species for which recent verified occurrences on the Forest are lacking. However, many of these species have extensive historical records of occurrence and are often difficult to find. The Canada lynx is a good example of a species that is highly mobile with verified recent occurrences within dispersal distance of the Forest. New Hampshire (and especially the White Mountains) holds the majority of historic lynx records in the Northeast, so it is not unreasonable to think lynx may one day reoccupy the Forest, especially if source populations in Maine continue to expand. The lynx is a federally threatened species listed under the Endangered Species Act, with apparently suitable habitat and an extensive record of historic occurrences on the Forest. The WMNF has an obligation to conserve lynx habitat as best we can. Forest staff will continue to work with the US Fish and Wildlife Service, New Hampshire Fish and Game Department, and Maine Department of Inland Fisheries and Wildlife to further our understanding of lynx recovery potential. If future information leads to a conclusion that lynx are unlikely to reoccupy the Forest, the Forest Plan can be amended to remove conservation measures that may be deemed unnecessary.

Goals, objectives, and standards and guidelines developed specifically for Canada lynx can be found in the Forest Plan. Additional information on lynx can be found in the FEIS, Appendix G (Biological Evaluation).

**PC 55500-1: The Forest Service should add a species-specific section for Robbins' cinquefoil, similar to other Federal ESA species.**

Dwarf (Robbins') cinquefoil is a rare plant found only in the White Mountains. It was recently removed from the Endangered Species list as a result of cooperative recovery efforts by Forest staff and partners. However, based on a suggestion provided through public comment, a specific goal for dwarf (Robbins') cinquefoil has been added to the Rare and Unique Features section of the Forest Plan. Continued monitoring and cooperative efforts should help to maintain recovery of this species.

**PC 55500-2: The Forest Service should list additional rock and cliff plant species in the Appendix section of the DEIS.**

In Appendix F, species that are restricted to the alpine zone are listed only for this habitat. If they use a specific habitat within the alpine, such as cliffs, that is noted in the habitat column of Table F-01. As a result, it is true that there are a few more species of concern that use rock and cliff habitats than are listed under that heading. Language was added to Appendix F to clarify distribution of species among the habitats in this document. The list of species of concern was developed with extensive input from the Maine and New Hampshire Heritage programs and other local botanists, ecologists, and biologists. Based on comments on the DEIS and new information, five species were added to the list, none of which are rock and cliff species outside the alpine zone. The Forest Service does not believe there are any other species that should be on the species of concern list.

**PC 55600-1: The Forest Service should consider human activities that limit the recovery of other rare species.**

The revised Forest Plan has a number of references to potential effects from human activities, and the designation of Ecological Indicators is one tool for tracking them. Many of the effects result from human activity negatively impacting vegetative conditions (e.g., hiker trampling in the alpine zone, climbers scraping out vegetation from cliffs). The high elevation spruce-fir zone is the most obvious place where human use levels are high, but there is no apparent substantial change in suitable vegetative conditions. In other words, trails are more or less established, so vegetative changes are relatively minor. This will be a good first place to research the question of non-motorized human use on wildlife populations, and a specific study to examine this relationship is identified in the Monitoring Guide, referenced in Chapter 4 of the Forest Plan. Results from this study could help guide future research on this topic in other areas.

In addition to monitoring and research actions, the revised Forest Plan also includes new direction in the Recreation section to address this concern. Recreation Goals and Objectives are designed specifically to address the effects of human use on both ecological resources and recreation experience.

**PC 55600-2: The Forest Service should modify the standard and guideline for Bicknell's Thrush on page 2-16 to consider the potential of entire**

**high-elevation land units (those above the threshold previously described) to develop attributes favorable to the species.**

We agree that conservation of rare species such as Bicknell's thrush is a high priority objective. Additional language has been added to the Forest-wide Standards and Guidelines that allows more flexibility in manipulating vegetation on a limited basis for TES species such as Bicknell's thrush. Also, the Vegetation Environmental Effects describes how natural disturbance processes such as wind and ice storm events (which naturally maintain habitat for Bicknell's thrush) are not suppressed and will continue to create new patches of habitat over time. The Forest Plan strives to create a balance between providing habitat for the range of wildlife species present on the Forest (including rare species such as Bicknell's thrush) and maintaining a range of recreation opportunities (including semi-primitive).

**PC 99100-1B: The Forest Service should use stronger or additional wording in the proposed alternative.**

**Add language reflecting the importance of TES and rare features to the Desired Future Condition for MA 2.1.**

Language reflecting this concept was added.

**PC 91800-5: The Forest Service should network to find out new information on canker resistant butternut survivors.**

The Forest Service already has a program underway focused on locating and protecting potentially resistant trees in native forest stands. Measures are taken to protect butternut trees on sites proposed for harvest.

**PC 91800-8: The Forest Service should revise the standards and guidelines for Bicknell's thrush to incorporate new science.**

Utilizing new science is an inherent part of implementing the revised WMNF Forest Plan. With that in mind, the language that described suitable Bicknell's thrush habitat in the Rare and Unique Features standard has been deleted. A new definition in the glossary allows for changes in the definition of suitable habitat to occur based on new science as it is identified.

## Recreation

### Conservation Education/Visitor Information

**PC 18000-1: The Forest Service should improve visitor information through better signing and information at points of entry.**

We strive to achieve a balance between posting necessary rules and regulations and keeping signs to a minimum. Major trailheads, where information kiosks exist, contain messages appropriate to the season, including carry-in-carry-out requirements. Some smaller trailheads may not contain a kiosk, thus some information that may be desirable cannot be posted at the site. Visitor centers provide both verbal and written information regarding safety and ethics. We continue to try to improve our visitor information program consistent with available budget and personnel.

- PC 18000-2: The Forest Service should allocate more funding to education and interpretation, including historic and cultural information, because public education will help build public support for Forest programs.**

A commitment to education and interpretation was made when a Conservation Education specialist was hired in 2004. This specialist is working with Forest Service program leaders, educators, and other partners to develop an active education program about the Forest and all resource programs.

Historic and cultural interpretation displays have been developed at numerous sites along the Kancamagus Scenic Byway, including a visitor center developed and managed jointly by the Forest Service, State of New Hampshire, and White Mountain Attractions. These sites provide extensive interpretation about the cultural and natural history of the White Mountains. An additional interpretive site is being developed at the Dolly Copp Homestead, located within the Dolly Copp Campground. Projects will be evaluated for interpretive or educational opportunities as they are implemented. Friends and partners will work with the Forest Service to implement these projects as appropriate.

- PC 18000-3: The Forest Service should improve its conservation education program to include the information about the need for and reasons behind timber harvest, as well as its benefits to wildlife and species diversity because effective resource management education will increase understanding of management activities and reduce controversy and conflict over management decisions.**

- PC 18100-1: The Forest Service should be a leader in natural resource education, particularly in regard to timber and wildlife habitat management because it is important for new generations to understand the goals of forest management and the impacts of human use of the environment.**

- PC 18100-2: The Forest Service should establish an objective for environmental education regarding vegetation management because an objective will provide a measurable and accountable target for accomplishment.**

Helping people understand why National Forests were created, and how they are still managed for the greatest good, is important to the Forest. As opportunities arise and funding is available, field seminars and classroom presentations about Forest management will be conducted. Conservation education staff will actively work with partners, communities, and educational centers to assure all aspects of Forest management are clearly communicated to both visitors and local residents.

The Forest Discovery Trail along the Kancamagus Scenic Byway is a showcase for all types of management activities, including different harvest



techniques, riparian area management, and wildlife openings. Exhibits at visitor centers provide information about wildlife and vegetative species diversity on the WMNF, and how Forest Service specialists manage the land.

**PC 18000-4: The Forest Service should use a portion of recreation fees to distribute Leave No Trace brochures and information. Leave No Trace supplies should be available for purchase wherever parking permits are sold.**

While decisions on where to spend recreation fees is outside the scope of Forest Plan revision, the recreation fee demonstration program does support the Leave No Trace message. More than 500 trowels were distributed to hikers in 2004. Some items are available through the White Mountains Interpretive Association outlets at the Saco and Androscoggin visitor centers. Leave No Trace principles are included in current publications and in exhibits at the Gateway Visitor and Interpretive Center in Lincoln and at the trailhead at Lincoln Woods.

**PC 18000-6: The Forest Service should require ski area/mountain bike park permittees to provide funding and personnel for improved signing, literature, and environmental interpretation and education.**

The Special Use Permit does not “require” permittees to provide funding and personnel for improved signing, literature, and environmental interpretation and education. However, the Forest Service does work with the ski areas to provide educational/interpretive programs (i.e., “Ski With a Ranger”) at some of the ski areas, as well as Fishing Derby’s on a cooperative basis. Several of the ski areas have their own interpretive programs and nature trails. They also partner with other local organizations like the Tin Mountain Conservation Center. Most of the ski areas have joined the National Ski Area Association’s “Sustainable Slopes” initiative, an environmental charter which demonstrates a commitment to good environmental stewardship.

Regarding signage, the ski areas pay for their own signage. However, Section III. E. in the Special use Permits says that “[s]igns or other advertising devices erected on National Forest lands, shall have prior approval by the Forest Service as to location, design, size, color and message. Erected signs shall be maintained or renewed as necessary to neat and presentable standards, as determined by the Forest Service.” The Forest Service works with the ski areas to provide National Forest banners, flags and “Entering the National Forest” signs. More recently, the Forest Service offered a sign describing the Forest Service/Ski Area Partnership history and roles.

**PC 18000-7: The Forest Service should identify the hikeSafe program as a specific goal and objective for the recreation program because elevating its importance in the management plan will help to prioritize funding and attract national partners and increased visibility.**

**PC 18100-5: The Forest Service should require visitors to successfully complete a hiker safety course.**

The “hikeSafe” program is included in the Forest-wide management area recreation education direction. Several years ago the State of New Hampshire, in cooperation with the Forest Service, instituted a “reckless hiker statute” which allows the state to recover costs for search and rescue incidents where the “victim” was deemed to have acted irresponsibly. As a further attempt to reduce the need for search and rescue, the NH Fish and Game Department and the WMNF embarked on a cooperative education campaign called “hikeSafe,” to increase hiker awareness and personal responsibility. HikeSafe includes a hiker responsibility code as well as reminders of essential gear to bring on any hike, safety tips, and the overall tag that “You Are Responsible for Yourself.” While the campaign is only two years old, we feel confident that it is catching on and will continue to grow, especially throughout the Northeast. The effort is aimed at increasing awareness and responsibility before a hiker needs help. More information on hikeSafe can be found at [www.hikeSafe.com](http://www.hikeSafe.com).

Also see PC 95300-1.

**PC 18000-8: The Forest Service should make information and education available in French.**

The Forest Service recognizes the value in providing information to French Canadian visitors. This service will be addressed as funding to obtain accurate translations and printed materials becomes available. Meanwhile, the Appalachian Mountain Club provides basic safety and awareness information in French at their Pinkham Notch Visitor Center.

**PC 18100-3: The Forest Service should emphasize environmental education in the backcountry.**

We have clarified the Plan’s direction for environmental education (see Plan, Chapter 2, Forest-wide Management Direction, Recreation) We recognize the importance and effectiveness of face-to-face and on-site education and information delivery, but there is also a need to balance this against visitor experience. In the more remote locations of the backcountry, some users seek out freedom from humans, including evidence of their presence such as printed signs. In other places (such as the Huts) education and information delivery may be effective and appropriate. Our revised direction is intended to provide for this balance.

**PC 18100-4: The Forest Service should establish cell phone-free zones and information in the “hikeSafe” program.**

**PC 30300-4: The Forest Service should prohibit cell phones in certain areas.**

Many hikers can think of times when their peace and quiet have been disturbed by an inconsiderate person who takes out a cell phone and begins a loud, intrusive conversation on a beautiful mountain summit. Cell phones have also been used in place of proper planning or knowledge to ask for help. On the other hand, for many people, responsible use of a cell phone

provides an extra link in their planning and safety considerations. The WMNF believes that cell phones are better regulated through peer pressure and education than through legal closures. Legal prohibitions would be extremely difficult, if not impossible, to enforce, and would punish responsible cell phone users along with irresponsible users.

That said, the Forest Service will continue to work with hikers and partners to protect the backcountry experience. This includes messages on proper cell phone use in our written information, as well as in relevant talks and presentations on backcountry safety through the hikeSafe program and Leave No Trace ethics.

**PC 18100-6: The Forest Service should include all consequences and impacts of logging in “outdoor classroom” activities.**

All aspects of forest management can be used as “outdoor classroom” activities. These include harvesting trees for wildlife habitat improvement and to produce goods and services; fisheries; minerals; air and water; recreation; and providing areas of mature forest. Conservation education staff will carefully develop programs that ensure participants understand benefits and trade-offs associated with all activities taking place on managed forests, including society’s need for wood products.

**PC 99100-1T: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Recommendations to enhance direction for safety and self responsibility codes and education efforts to impart these responsibilities to Forest visitors.**

This is important direction, and the Forest Service believes it is best addressed in standards and guidelines rather than at the goal level. The Planning Team has revised several guidelines within the Plan so that programs such as “Leave No Trace” and “hikeSafe” are included in guidelines relating to direction for education programs. See also PC 18000-7 and PC 30000-5.

**PC 99100-1V:**

- **Suggestions to clarify education direction in the Alpine Zone.**

The intent of the standards and guidelines is to make sure that education and education materials meet the needs of the user but that they are provided consistent with the ROS Class objective. The Forest Service has revised the education direction in the Alpine Zone to be consistent with that in the AT management area (8.3), that is,

Consistent with ROS objectives, education and information delivery:

1. Should be concentrated primarily at visitor centers, classrooms, and other off-Forest locations, or at trailheads and developed facilities when delivery can be effectively accomplished at those locations.
2. To a lesser degree may be conducted at backcountry locations when effective delivery cannot be accomplished at developed or frontcountry locations.”

**PC 30000-1: The Forest Service should improve visitor information services, including signing.**

One of the overall recreation goals for the Forest is to “provide a range of quality recreation activities and opportunities”. To that end, different areas necessarily will have differing regulations. For example, ski areas and developed campgrounds will have more stated rules and considerable signage, while Wilderness will have less.

As a programmatic document, the Forest Plan does not address site-specific implementation. Rather, it provides the recreation direction that results in visitor information differing by location. Suggestions for improving visitor information services at Lincoln Woods have been noted by recreation program leadership.

A comment that the Forest Service should help the public locate designated campsites in the Pemigewasset Wilderness is beyond the scope of the Forest Plan, but has been noted and is among possible mitigation measures for the monitoring component of the Wilderness Management Plan (Appendix E).

**PC 99100-1R: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Forest-wide Education guideline G-4 should include Leave No Trace principles.**

Conservation education guideline G-3 indicates that Leave No Trace will be emphasized on the Forest. In addition, new Forest goals for conservation education include national programs, such as Leave No Trace, that address resource impacts from outdoor recreation activities.

**Recreation Opportunities and Use**

**PC 30000-2: The Forest Service should improve management of the recreation fee program – specifically use email/web for parking sticker.**

**PC 30000-3: The Forest Service should eliminate the recreation fee program.**

**PC 34200-4: The Forest Service should adjust fees within campgrounds to encourage midweek use.**

**PC 95200-1: The Forest Service should make better use of parking fee dollars.**

**PC 95200-2: The Forest Service should not charge fees.**

**PC 95200-3: The Forest Service should develop non-fee opportunities “elderly fee exception, Livermore road as non-fee,” etc.**

**PC 95200-4: The Forest Service should continue to charge fees.**

The 2004 Federal Lands Recreation Enhancement Act (REA) granted a 10-year authority to collect and retain fees on federal lands across the United States, including National Forest lands. REA enables federal Agencies, including the Forest Service, to collect user-generated fees and retain receipts for reinvestment into the sites and areas where the fees are collected.

Over 95 percent of the revenues generated from the White Mountain National Forest recreation fee program remain on the White Mountain National Forest and are reinvested into annual recreation facility maintenance and backlog recreation projects. Revenues from the recreation fee program also help fund Forest information services and education programs such as hikeSafe to visitors on the White Mountain National Forest.

Recreation fees make up only a portion of the recreation funds required to maintain and provide public recreation on the White Mountain National Forest. This program, along with Forest volunteers and partnerships, provides valuable contributions and helps achieve the Forest Plan goals of providing quality recreation opportunities and experiences on the WMNF.

**PC 30000-4: The Forest Service should manage recreation.**

- **To equally balance between all non-motorized recreation uses.**
- **To emphasize primitive and semi-primitive non-motorized opportunities.**
- **To protect the quality of the recreation experience.**

**PC 54000-7: The Forest Service should add language that recreation opportunities be provided in keeping with the overall noncommercial social and environmental setting.**

- **Because recreation opportunities should be consistent with the appropriate setting.**

The Forest's recreation niche (FEIS, Chapter 3, Recreation), describes what is unique about the White Mountain National Forest and how it has been, and is being, used by recreationists. It goes on to explain how we use a national recreation planning framework called the Recreation Opportunity Spectrum (ROS) to zone the Forest into a range of recreation opportunities and activities. For example, some zones allow for motorized use while others do not; some zones are managed for opportunities to experience primitive recreation activities while others provide more developed opportunities. Chapter 3 of the EIS describes how each of the four alternatives would affect the various ROS classes, as well as the Forest niche.

Based on these effects and public input, Alternative 2 was chosen as best providing the balance of recreation opportunities that people want from the Forest. This choice does not equally balance between recreation uses for several reasons. In the first place, Forest conditions are not conducive to an even split. For example, not much of the Forest trail system is suitable – nor in demand – for equestrian activities. Also, public interest in other activities varies greatly. While there is a solid demand for rock climbing and mountain biking, that demand is not near to the demand for hiking opportunities. Many people told us that they want us to protect the recreation experience and opportunities currently provided. Our approach in doing this is outlined under the Forest Recreation Goals and Objectives, in Chapter 1 of the Forest Plan. Also see the response to PC 32400-1 for an explanation of why some additional restrictions have been placed on mountain biking in the revised Plan.



- **To support local tourism economies.**

Some people said our recreation management should focus on supporting local tourism economies. The Forest Service supports working with tourism partners. Our social and economic analysis of the different alternatives is displayed in the FEIS (Chapter 3, Social and Economic). The economic impacts from Forest activities (Tables 3-103, 3-105, 3-107, and 3-109) show very similar total income for recreation activities across the alternatives. As stated in the conclusions section, recreation is expected to continue to grow throughout the Forest over the Plan period

**PC 30000-5: The Forest Service should place limits on the intensity of recreation use, mountain bikes, use of wood for campfires, and groups.**

**PC 99100-1S: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **In the Alpine Zone standards and guidelines, Recreation, General, S-1, “some areas” should be defined and the group size should be clarified.**

The White Mountain National Forest will provide goods and services, including recreation, while maintaining the ecological and experience base of the Forest. The management approach for recreation described throughout the Plan and the FEIS relies on limiting additional recreation developments and maintaining, or lowering where appropriate, development levels. This is stressed in the Recreation Goals and Objectives section of Chapter 1 in the Forest Plan as well as in the revised recreation section on Forest-wide direction (Chapter 2 of the Plan). Restrictions are one part of our effort to deal with impacts caused by recreation use. Education, through programs such as Leave No Trace, plays a key role in minimizing the impact of users. Day-to-day monitoring, as well as the monitoring outlined in the monitoring guide, will be used to determine if additional education programs or user restrictions are needed.

The goals and objectives under the Recreation section (Plan Chapter 1) outline the limits on additional facility development. The Recreation section of Chapter 3 in the EIS describes the use of the Recreation Opportunity Spectrum to deal with a range of intensities of use. In the Plan Forest-wide standards and guidelines under recreation in Chapter 2 describe the limits on mountain biking, special use group size, and use of wood for campfires. Management area direction in Chapter 3 provides additional standards and guidelines specific to each management area for similar activities. For example, under MA 5.1 (Wilderness), standards limit group sizes to 10 people and, in some cases, prohibit special use permitted groups. Appendix E of the Plan displays the Wilderness management plan, which outlines the approach of restricting use in Wilderness areas.

Also see PC 32400-1 for a further description of the limits on mountain biking.

**PC 30000-6: The Forest Service should limit or reduce recreation facilities and general development levels in backcountry locations.**

The management approach for recreation described throughout the Plan and the FEIS relies on limiting additional recreation developments and maintaining, or lowering where appropriate, development levels in the backcountry (Forest Plan, Chapter 1, Recreation). The revised Plan prohibits additional backcountry facilities in Wilderness, the Alpine Zone, Research Natural Areas, and Scenic Areas (Forest Plan, Chapter 3, MAs 5.1, 8.1, 8.4, and 8.5). It also provides for only limited additions to the Forest's recreation facilities and infrastructure over the next 15 years. The Plan allows for a net increase of up to 20 miles of new snowmobile trail, 25 miles of new non-motorized trail, and a net increase in capacity of up to 40 people in backcountry facilities (Forest Plan, Chapter 1, Recreation). Huts are not allowed to increase in capacity, and changes in physical structure are limited to responses to safety or health concerns (Forest Plan, Chapter 2, Recreation).

New shelters, cabins, and tent platforms are only allowed when “unacceptable resource or social conditions exist that cannot be otherwise mitigated.” Although the Plan does not require removal of backcountry facilities, it does provide direction that they should be removed when “not clearly needed to protect natural resources, maintain a desired recreation use opportunity or pattern, or conform to the Forest recreation management approaches” (Chapter 2, Recreation).

**PC 30000-7: The Forest Service should manage recreation to protect natural resources.**

**PC 99100-1gg: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Recreation goals and objectives should be strengthened with specific responsibilities and limitations.**

One of the goals of the Forest Plan is to “provide recreation and other opportunities, experiences, and benefits, some of which are not readily available elsewhere.” In doing this, there will be some potential impacts to the natural and social environment. The Forest Plan provides the direction for making recreation resources available while preserving, protecting, and managing natural resources.

Potential and actual impacts from management activities on the Forest are identified and discussed in the FEIS under the affected resource. For example, the impacts to wildlife from recreation activities can be found in the Wildlife section (FEIS, Chapter 3, Wildlife). Standards and guidelines in the Forest Plan address these potential impacts to Wildlife and are found in the Forest Plan, Chapter 2, Wildlife).

The Alpine Zone has been identified as an area of particular concern in the revised Plan because of its unique natural communities juxtaposed with high recreation use. It has been given its own management area designation (MA 8.1), with its own set of standards and guidelines that include recreation issues. Although management area direction does not mandate a permit system at this time, it does provide direction that “If monitoring indicates declines in alpine communities because of human use, mitigation actions

must be taken.” There is other direction, as well, to manage recreation and protect the natural resource (Forest Plan, Chapter 3, MA 8.1, Recreation.)

When the AMC Huts Special Use Permit was up for renewal in 1999, the Environmental Impact Statement included an alternative that would remove alpine huts. This alternative was not, ultimately, selected, and the Forest Plan revision process did not revisit that decision.

Another management decision, made by recreation planners in consultation with biologists, is that restricted winter camping can occur in the Alpine Zone without undue impacts on its alpine dry-mesic heath/meadow and alpine snowbank/wet ravine habitats (Plan, Chapter 3, MA 8.1)

Other examples of managing recreation to protect natural resources include standards and guidelines (Plan, Chapter 2) for non-native invasive species (NNIS); for riparian and aquatic habitats; for rare and unique features; and to prevent Forest management actions from dispersing use from high use areas to low use areas in order to focus resource impacts at already highly impacted areas and to minimize impacts in low use areas (Plan, Chapter 2, Recreation).

**PC 30000-8: The Forest Service should clarify how the Recreation Visitor Days total were determined and how the data will be used.**

These data came from the specialist report titled, “Report on Forest Recreation Use.” (Administrative Record.) The Length-of-Stay (LOS) factors are used to change the number of visits (a non-time dependent measure) to Recreation Visitor Days (RVDs) a time dependent measure and vice-versa. RVDs reflect the estimated amount of time an individual would spend doing any specific activity. Originally a nationwide estimate, they have been modified at various times to reflect local situations. A table of LOS factors is included in Appendix 1 of the Report.

Reported use includes:

- Actual counts taken largely during the full use season of those facilities — some of the Huts, the Alpine Ski areas, the cross-country ski areas, and developed campgrounds.
- Actual counts during part of the use season – some Huts when operated under the full service/caretaker format and some backcountry facilities when operated with/without caretakers. Use during non-caretaker times is estimated based on use history of specific areas.
- Estimates modeled from various studies and reports
  - Fishing and hunting used a report, “The 1994 Economic Impacts of Fishing and Hunting and Wildlife Related Recreation on National Forest Lands” (American Sportfishing Association, 1996), and growth was estimated from the date of the study to the present by looking at national growth estimates in these activities.
  - Snowmobile use was determined based on the work done by Robert A. Robertson of the University of New Hampshire (Assessment of Snowmobiling in New Hampshire, 1996). It then applies some of his findings to the Forest, based on state

snowmobile registrations and miles of snowmobile trail on National Forest land compared to snowmobile trails in New Hampshire.

- Estimate of Driving for Pleasure was modeled on the total yearly traffic from the New Hampshire Department of Transportation for key highways that traverse concentrated recreation use areas on the WMNF.
- Estimates based on similar off-Forest activities. Summer motorized use for potential trail systems in Alternative 1 and 4 was estimated based on use at similar ATV trail systems on private land near the Forest.
- Estimates combined with actual use counts. Cross-country skiing use estimates were determined by combining reported use at permitted cross-country areas with estimates of cross-country use on the Forest trail system.
- Estimates modeled on sample counts. The methodology used to determine trail use was to categorize all Forest trails as very high, high, medium, or low use, then to apply an average number of visits (determined from trailhead registers at sampled trails) to obtain an estimate of total hiking trail use.
- Estimates modeled on fee collection. Use of picnic site use based on fee tube counts at some picnic areas.

As stated in the FEIS for some of these use estimates, “Since establishing accurate use figures is difficult and some numbers cited are estimates based on modeling, not actual counts, they have a high margin of error. Therefore, they should be used as a guide not as an absolute tally.” (FEIS, Chapter 3, Recreation)

Estimates of projected annual growth were determined using local use figures if the data was for a substantial length of time, other local data sources (e.g., growth in snowmobile registrations or ATV registrations), or the National Survey on Recreation and the Environment.

Use estimates helped in determining the economic impacts, the effect on the capacity of current recreation facilities, the projected importance to society of specific recreation activities based on growth of that activity, and the ability of the Forest to meet the projected demands.

Also see PC 30200-3 for a discussion of use estimates in the Alpine Zone.

**PC 30000-9: The Forest Service should not rename a peak within the Forest for former President Ronald Reagan.**

The authority for renaming geographic features lies with the US Board on Geographic Names, a federal body created in 1890 and established in its present form by Public Law in 1947. Comprised of representatives of federal agencies appointed for 2-year terms, the Board establishes and maintains uniform geographic name usage throughout the federal government.

- PC 30000-11: The Forest Service should expand the Glen Ellis Falls area to the south to include a scenic viewpoint from the top of the road cut along NH Route 16.**

The Forest Plan is a programmatic document providing overall management direction for the White Mountain National Forest. While it does not address site-specific implementation such as identifying specific scenic viewpoints, the recreation team has been made aware of the suggestion.

- PC 30000-12: The Forest Service should change the way the “4,000 Footer” organization is managed.**

The 4,000 Footer Club, formed in 1957, is a private organization with no connection to the Forest Service. It is administered by a volunteer committee of the Appalachian Mountain Club, and suggestions should be addressed directly to them.

- PC 30000-13: The Forest Service should make guideline G-1, under Non-Motorized Dispersed Recreation – General, a Standard.**

We reviewed G-1, “Use should be managed to prevent negative impacts to natural and cultural resources and to the recreation experience,” and believe it should remain a guideline because some operational flexibility is required to maintain a workable balance. The Preface to the Forest Plan explains the difference between standards and guidelines.

- PC 30000-13a: The Forest Service should clarify how standard S-2, under Non-motorized Dispersed Recreation – Trails, will be monitored.**

Standard S-2 requires closure of existing trails under specific circumstances (if continued use causes unacceptable resource or social impacts that cannot be mitigated, or if the trail does not meet overall objectives for the trail system). Unacceptable impacts to resources, such as TES species, or unacceptable changes in the recreation experience would be monitored in the course of ongoing management activities (trail maintenance, backcountry patrol, water quality monitoring, bridge inspections, TES occurrence monitoring, stream survey and fisheries work, etc.)

- PC 30000-14: The Forest Service should develop Best Management Practices for recreation in each management area.**

Forest-wide and management area standards and guidelines represent best management practices. Recreation-related Forest-wide and management area standards and guidelines describe general approaches and specifics the Forest Service has developed to limit change and decrease the effects of Forest recreation use on natural and social resources. Also see PC 30000-4, PC 30000-5, PC 30000-6, and PC 30000-7.

- PC 30000-15: The Forest Service should ban dogs and related pets from the Forest.**

The Code of Federal Regulations (36 CFR 261.14j) requires control of animals in developed recreation sites, and a Forest Supervisor’s order prohibits dogs from certain cross-country ski trails in winter. Based on our experience to



date, however, we see no need to ban dogs or other pets from the entire Forest. We believe educating pet owners is the best means of dealing with concerns raised about pet impacts on the Forest. If this approach fails, we can move to specific site restrictions.

**PC 99100-1U: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Suggestions for revising several guidelines in the Recreation section of the Plan.**

There is a need for different education messages in different locations, but there is also a need for some consistency. In the education category under “Non-motorized Recreation” The plan provides direction for consistency of education efforts in location (G-1 and G-2), emphasis (G-3) and general messages (G-4). The recreation management team believes this is enough direction to provide consistency as well as providing a measure of flexibility to address site-specific situations.

Forest-wide direction for education includes the Alpine Zone but there are additional guidelines for education addressed in the Alpine Zone MA (8.1) itself.

Forest-wide direction under “Education” lists four guidelines promoting education and stewardship in all management areas of the Forest. We believe there is no need to repeat it in specific management areas.

**PC 99100-1X:**

- **Recommendation for revising the recreation goal as stated in the Plan.**

Forest Plan Goals are threefold: 1) sustain a healthy forest, 2) provide recreation and other opportunities, experiences and benefits, some of which are not readily available elsewhere, and 3) recognize the Forest’s support to local economies while realizing the importance to society of a natural appearing landscape. Taken together these three goals seem to sufficiently describe the ecological, recreational and social goals of the Forest.

**PC 99100-1V:**

- **The statement of “alpine ethics” should be expanded in the Desired Condition statement for the Alpine Zone**

The Desired Condition now states “staying on established trails” as an example of alpine ethics and have revised the desired condition to make it consistent with ROS descriptions elsewhere.

**PC 99100-1Z:**

- **The direction prohibiting camping unless on two feet or more of snow cover in the Alpine Zone should be strengthened**

This comment suggested not using a specif snow depth for prohibiting camping. While we understand the concern, there are times when such a policy could create problems — it would be difficult to enforce a prohibition

that included terms such as “snow covers the general area.” Instead, we will continue to work with partners on education efforts for an alpine ethic, both summer and winter.

**PC 30200-1: The Forest Service should clarify whether new Huts will be constructed, or whether use limits will be imposed on trails.**

The Forest Plan provides direction for limits on changes to the Hut System to meet Forest Recreation Management Approaches and to address recreation use in the Alpine Zone. The Plan prohibits construction of additional Huts, prohibits the expansion of Hut capacity, and, except for health, safety, and resource impact concerns, prohibits expanding existing Huts in physical structure (Plan, Chapter 2, Recreation)

The Forest Plan does not prescribe use limits on trails, but does have language that could lead to imposing limits if conditions warrant. The selected alternative includes direction for

1. Recreation Management Approaches that provide recreation managers with a more complete framework within which to consider management actions (Plan, Chapter 2, Recreation). They evaluate how management actions fit within the overall goals of preventing increased development levels in the backcountry and protecting and managing both high and low use areas and facilities. The Forest Service’s Wilderness Management Plan (Forest Plan, Appendix E) follows a similar process, and could serve as a model – recognizing that other management areas have different management objectives and would require different indicators, thresholds, and education or management actions.
2. Recreation special uses that allow for an allocation study to determine the need for limits if certain conditions are met. (Plan, Chapter 2, Recreation)
3. The Alpine Zone (Plan, Chapter 3, MA 8.1) that requires mitigation actions “If monitoring indicates declines in alpine communities because of human use ...”
4. For Forest Supervisor’s Orders to “restrict or close activities or uses in order to prevent, mitigate, or correct existing or potential resource impacts, trail development, health and safety issues ... or other management concerns.” (Plan, Chapter 2, General)

**PC 30200-2: The Forest Service should clarify capacity figures for the effects of overcapacity use of backcountry facilities.**

**PC 32600-5: The Forest Service should construct additional shelter/tent platform sites to accommodate recreation use.**

**PC 32600-6: The Forest Service should allow for reasonable expansion at certain shelter/tent platform sites to address existing issues of overuse.**

**PC 32600-8: The Forest Service should prohibit or restrict construction or expansion of shelters, cabins, and tent platforms.**

**PC 38200-16: The Forest Service should identify areas along the AT with chronic high use, add pads or platforms, but not include these areas in the additional 40 people that have been proposed in the Plan.**

We did not try to determine optimum figures for backcountry facility increases at specific facilities – the Forest Plan is a programmatic document, not site-specific. One aspect of the Recreation Management Approaches outlined in the FEIS and Plan is assuring that development levels in backcountry settings do not increase. A primary phase of implementing these approaches will be enacting an inventory and monitoring process that will provide baseline information for decisions to be made regarding use of backcountry facilities (and other amenities). Once these data are assembled, we will have a better idea of what management actions are appropriate in certain areas.

Other public comments pointed to certain backcountry locations where we have allowed managed overflow use. WMNF staff verified that this use has been expressly allowed at specific locations for some time. Even though not part of defined backcountry facilities, we will revise the current condition to include the overflow capacity that has been specifically allowed at particular backcountry facilities. (FEIS, Chapter 3, Recreation) These numbers will not affect the “net increase in capacity of backcountry facilities of up to 40 people.”

The net increase in capacity of backcountry facilities in the selected alternative was meant to allow for reasonable expansion to address issues at specific sites. This increase is programmatic direction central to the Forest Service’s Recreation Management Approaches, especially “Limit additions to the Forest’s recreation facilities and infrastructure over the next 15 years.”

The FEIS indicates that increasing overnight visitation to the backcountry not accommodated at backcountry sites would overflow as dispersed camping to nearby locations on the Forest (FEIS, Chapter 3, Recreation). Environmental consequences of dispersed recreation are discussed in the various resource sections of the FEIS.

**PC 30200-3: The Forest Service should clarify estimates for use figures in the Alpine Zone.**

The FEIS states: “Since establishing accurate use figures is difficult and the numbers cited are estimates based on modeling, not actual counts, they have a high margin of error. Therefore, they should be used as a guide not as an absolute tally.” (FEIS, Chapter 3, Recreation) The methodology for determining trail use was modeled by categorizing all Forest trails as “very high,” “high,” “medium,” or “low” use, based on the best professional estimate of field and recreation managers using field experience and sporadic monitoring counts over the years. An averaged number of visits (determined by trailhead register sampling) was then applied to each use category to estimate total hiking trail use. In 1998 and 1999, trails were randomly selected

and sampled with trailhead registers in each of these categories to determine an average of people per day (PPD), an averaged noncompliance rate (hikers who don't register as determined by trailhead sampling), and a verification of the trails' use category.

Combining the registered and estimated unregistered use (noncompliance rate) gives a total use by category of trail. This number is multiplied by the number of trails in each category, and then by an estimated use season of 148 days sampled (mid-May through mid-October, which includes the "summer" season, most of the "Fall shoulder" season, and part of the "Spring shoulder" season). This yields an estimate of total hiking trail use for the primary hiking season.

The same methodology was applied to the Alpine Zone to determine estimated recreation use there. In this case, overnight use figures from facilities in the Alpine Zone are included in the hiking use estimates.

**PC 30300-1: The Forest Service should manage recreation to avoid conflicts between recreation users.**

The Forest Recreation Program uses the Recreation Opportunity Spectrum (ROS), a national recreation planning framework, to manage for a range of recreation activities and opportunities and to minimize conflicts between recreation users. ROS combines physical, social, and managerial settings to help define a range of outdoor recreation conditions, activities, and opportunities (USDA, undated). The *physical setting* attributes include remoteness, size, and evidence of humans (modification of the natural environment, evidence and kind of trails, and presence of structures). The *social setting* is the level of contact with others. The *managerial setting* is the presence and amount of regimentation and controls (signage, presence of backcountry patrols, etc.). These combinations are grouped into five ROS Classes: Urban (U), Rural (R), Roaded Natural (RN), Semi-Primitive Motorized (SPM), Semi-Primitive Non-motorized (SPNM), and Primitive (P). Appendix H of the Plan provides a detailed description of each of the ROS Classes. In general, however, the experience opportunities range from areas with more modified settings, accommodating greater numbers of visitors (U, R, RN), to those offering a choice of solitude and challenge (SPM, SPNM, P)." (FEIS, Chapter 3, Recreation).

Each management area has ROS Class objectives. For example, Management Areas 5.1 (Wilderness) and 6.2 (Semi-Primitive Non-Motorized Recreation) have ROS classes towards the less developed end, whereas Alpine Ski Areas (MA 7.1) are at the more developed end of the ROS range. ROS guarantees that there will be places on the Forest where each type of user can enjoy a chosen activity with minimal possibility for conflict.

**PC 30300-2: The Forest Service should allow dogs on the Livermore Road in Waterville Valley.**

**PC 30300-3: The Forest Service should, manage the Livermore Road in Waterville Valley for multiple recreation uses in winter.**

These comments are outside the scope of the Forest Plan, which, as a programmatic document, does not address such site-specific implementation. The comments have been noted by recreation program leadership and the Ammo/Pemi Ranger District leadership.

**PC 30300-5: The Forest Service should develop appropriate management of the Virginia Lake area.**

The Forest Plan is a programmatic document, and this comment deals with an enforcement problem of inappropriate use at a particular location. The comment will be addressed by personnel on the district.

**Non-Motorized Dispersed Recreation**

**PC 99100-1mm: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **There is a difference between the objective and the standards and guidelines for non-motorized dispersed recreation.**

We have revised the objective slightly; it now states, “Allow for a net increase of up to 25 miles of new non-motorized trails.” This is an objective, not direction, and that is why it is not repeated in the standards and guidelines. Guideline G-3 clearly provides direction for how to consider any proposals for additional non-motorized trails within this overall objective of up to 25 miles of new trail. We believe there is no need to repeat the objective in the direction included in G-3.

**PC 32100-1: The Forest Service should prohibit dispersed camping on stream bank sites.**

See PC 30000-7 for a discussion on managing recreation to protect natural resources. Forest-wide standards and guidelines protect water quality regardless of management area designation. In addition, the Forest Service can also implement (and has implemented) site-specific prohibitions through Forest Supervisor’s Orders when necessary.

**PC 32200-1: The Forest Service should provide greater emphasis on hunting, fishing, and trapping in the EIS and Plan.**

Hunting, fishing, and trapping were not Forest Plan issues, but we recognize they were not described as recreation activities in the draft planning documents. Consequently, we have revised the final Plan to include a section on “Wildlife Related Recreation” (Plan, Chapters 1 and 2, Recreation).

**PC 32200-2: The Forest Service should prohibit hunting and trapping.**

Hunting, trapping, and fishing are allowed on National Forest lands. Hunting and trapping are regulated by the New Hampshire Department of Fish and Game and the Maine Department of Inland Fisheries and Wildlife. For the purposes of consistency and enforcement, any regulations established by these state agencies apply equally to White Mountain National Forest lands.



- PC 32400-1:** The Forest Service should allow mountain biking in all areas of the Forest.
- PC 32400-2:** The Forest Service should not limit mountain biking.
- PC 32400-3:** The Forest Service should prohibit or limit mountain biking on the Forest.
- PC 32400-4:** The Forest Service should manage mountain biking consistent with the DEIS/LRMP.
- PC 32400-5:** The Forest Service should allow mountain biking in certain areas.
- PC 32400-6:** The Forest Service should adopt a policy of “open unless closed” for mountain biking.
- PC 32400-7:** The Forest Service should adopt a policy of “closed unless open” for mountain biking on Forest System Trails.
- PC 32400-8:** The Forest Service should consider incorporating unofficial trails into the Forest Trail System.
- PC 32400-9:** The Forest Service should engage in area specific travel management planning to determine appropriate management strategies for all users.
- PC 32400-10:** The Forest Service should work cooperatively with mountain bikers and advocacy groups to identify and implement appropriate management for mountain bikes.
- PC 90200-2:** The Forest Service should strive to maintain professional working relationship with area bike associations for effective enforceable travel management policy.
- PC 90200-5:** The Forest Service should reevaluate its closed unless open policy in regards to bicycling on National Forest lands.
- PC 91000-23:** The Forest Service should add a broad spectrum of mountain biking management tools to the Forest Plan.

As the Need for Change section of the FEIS indicates, the 1986 Forest Plan did not anticipate the high levels of growth in this activity. Chapter 3 of the FEIS (Recreation) describes some of the effects from, and on, mountain bike use. Refer to the Glossary for the definition of travel corridor and incidental trails.

Over the last few years, we became concerned about uncontrolled, user-developed, mountain bike trails in a few areas. Cross-country travel in these areas has led to the establishment of paths, to which users subsequently added water crossings, cleared brush (and sometimes trees), and even added signs. Based on this, we decided some restrictions are necessary to prevent unacceptable damage and to manage use. The draft Plan proposed

prohibiting cross-country travel and restricting use to the trail system outside Wilderness and Appalachian Trail corridor. In addition, it allowed mountain biking only on travel corridors that were signed open. Since funding for identifying these travel corridors and signing them is expected to be very limited, the approach would have effectively closed many temporary roads and skid trails to mountain bike use for a number of years. While there was general public acceptance for prohibiting cross-country travel, restricting mountain bikes to travel corridors signed as open seemed unnecessary to many commenters. We had recently developed a positive working relationship with the mountain biking community, and wanted to use that, along with education, to correct problems. They suggested using specific area closures where this approach wasn't working. As a result, we have slightly modified our decision to allow mountain bike use on travel corridors unless they are signed closed. This less restrictive direction still prohibits cross-country travel but does not close off the acceptable use that now exists on travel corridors. As for uncontrolled trail establishment, should we find this is occurring, we will control it through area closures. We believe this modified approach allows us to eventually achieve our goal of establishing a well-defined trail system. It allows travel corridors to remain available to mountain bike users while we define this system; and, it is more in line with our general practice of relying on education rather than restrictions to address management problems. We believe being responsive to the concerns raised will help build on the relationship with the mountain bike community, and engage them in achieving this goal. It is important to note that we are only using the category of travel corridors as a temporary means to identify potential trails for mountain bike use. By working closely with the mountain biking community, we will work toward evaluating the potential of each of these corridors for inclusion in the Forest trail system, a process that we anticipate will take several years. As the recreation trail guideline G-2 (Plan, Chapter 2, Recreation) states, we will also continue to evaluate incidental trails to see if they should be added to the trail system, or closed.

**PC 32400-11: The Forest Service should clarify the definitions of “trail,” “cross-country,” and “travel corridor.”**

**PC 91700-13: The Forest Service should clarify the meaning of “cross-country” in regards to mountain biking activities.**

The definitions for “trail” and “cross-country travel,” have been added to the Glossary. See PC 32400-1 for a broader description of the concern related to these terms, and the reasons for our decisions.

**PC 32400-12: The Forest Service should improve visitor information services to clarify mountain bike management policy.**

The Forest Service has made efforts to educate the public as to where they can ride and why they can't build their own trails. Because the Selected Alternative represents a change in current policy regarding mountain bikes, there will be additional visitor education to bring users up-to-date. However, the actual development of that visitor education plan is not part of a Forest-level, programmatic Plan.

**PC 32400-13: The Forest Service should change the interpretation of the 1964 Wilderness Act to allow mountain bikes within Congressionally-designated Wilderness.**

**PC 32400-14: The Forest Service should adjust management area designations and the boundaries of proposed Wilderness to allow mountain biking on certain existing trails.**

**PC 91100-50: The Forest Service should allow mountain bikes in Wilderness areas.**

The WMNF manages designated Wilderness consistent with direction provided in the 1964 Wilderness Act, the 1975 Eastern Wilderness Act, individual enabling legislations as well as Forest Service policy. The 1964 Wilderness Act specifically prohibits “mechanical transport.” In proposing additional areas for Congressional Wilderness designation, the Forest Service has considered the trade-offs in Alternative 2. We do not support changing the interpretation of the Wilderness Act.

Also see PC 91100-12 and PC 91100-45.

**PC 32500-1: The Forest Service should provide greater recreational opportunities for equestrians on the Forest.**

**PC 32500-2: The Forest Service should restrict equestrian use on the Forest.**

The Forest’s terrain and trail systems do not, for the most part, lend themselves to equestrian use. As a result, we receive limited demand for this use, and there is no indication that use of horses on the White Mountain National Forest is reaching levels that require Forest-wide action at this time.

Currently, the only restriction on equestrian use is on the Appalachian Trail, where horses are prohibited on the AT footpath and within 500 feet of the trail, except where it crosses or is located on Forest System, state, or county/town roads, or along a designated snowmobile trail.

**PC 32600-1: The Forest Service should manage the special use permit for the Appalachian Mountain Club Hut System.**

**PC 32600-2: The Forest Service should not allow construction of additional huts or expansion of existing huts consistent with the DEIS/LRMP.**

**PC 32600-3: The Forest Service should allow construction of additional huts to allow for increased access and use on the Forest.**

Forest Plan revision did not revisit the AMC re-permitting decision, based on a 1999 EIS. That EIS included evaluation of an alternative to remove alpine huts. We have direction in the Plan to not build additional huts or to allow increases in capacity of existing huts to protect the alpine zone and to limit development in the backcountry. Also see response to PC 30200-1.

**PC 32600-9: The Forest Service should recognize the importance of the Harvard Cabin in Huntington Ravine.**

The Harvard Cabin in Huntington Ravine, operated under special use permit, is only open in the winter for use by ice climbers. We have revised the “Desired Condition of the Land” for the Pinkham Notch Scenic Area to include the statement, “Maintain the Harvard Mountain Cabin permit to provide overnight shelter for ice climbers.” (Plan, MA 8.5)

**PC 32600-11: The Forest Service should manage overnight facilities in the Wildcat Wild and Scenic River management area to prevent site deterioration and protect water quality.**

A guideline specific to this management area (MA 8.6) directs the way in which overnight facilities are to be managed, including placement, design, and operation. Under the heading “Water Quality” in this section several standards also prevent site deterioration and protect water quality. Based on public comment, S-2 has been revised in the final Plan.

Additionally, there are many Forest-wide standards and guidelines (Chapter 2 of the Forest Plan) which guide activities, prevent site deterioration, and protect water quality.

**PC 99100-1nn: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The difference between a “designated” and an “established” campsite needs to be explained in the Glossary.**

Definitions offered included; Designated: a managed, hardened site, often with obvious constructed features (i.e., signing, constructed tent pads or platforms, toilets, etc.” and “Established: an unofficial visitor-created site that is well impacted.” These definitions match Forest Service definitions of “Backcountry Facility” and “Dispersed campsites” included in the Glossary.

**PC 99100-3A: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **The calculation of the projected increase in the number of visits per year is incorrect for road accessible camping and for the Nordic skiing**

This concern correctly identifies some typographical errors in the DEIS which were corrected in the FEIS. All the dependent calculations are correct.

**Alpine Ski Areas**

**PC 34100-1: The Forest Service should continue to manage existing alpine ski areas under Special Use Permits.**

- **But only as single-season operations to protect summer wildlife habitat.**
- **To manage the effects of higher rates and volumes of snowmelt on soils .**
- **To mitigate the effects of common variety mineral collection.**

- **To allow for greater flexibility regarding future permits and agreements.**
- **To manage effects on water quantity and quality .**
- **Considerate of wildlife habitat and TES concerns.**
- **To prevent introduction of non-native invasive species.**

Alpine ski areas are assigned Management Area (MA) 7.1, which determines to “broaden the range of recreation opportunities by recognizing the potential for year-round recreation facilities at alpine ski areas managed by the private sector.” (FEIS, Recreation section, Alpine Ski Areas). This MA allows modifications to the natural environment to enhance recreation activities, while maintaining vegetation and preventing soil erosion. The primary purpose of this MA is recreation, although each ski area must comply with all applicable laws and regulations, including the Endangered Species Act.

Lands on the White Mountain National Forest that are in either MA 7.1 or MA 9.2 total 5,900 acres, or .74 percent of the total acres of National Forest. Monitoring of ski area operations by the Forest Service is ongoing, and each area’s management plan is reviewed to ensure no environmental harm will occur.

Based on construction and spring thaw monitoring on ski trails, the standards and guidelines (both Forest-wide and for MA 7.1) for soils are adequate to protect trail conditions. Standard S-1 under MA 7.1 (Plan, Chapter 3) requires permit holders to have an approved erosion control, drainage, and revegetation plan.

Operations within the permit area would follow Forest-wide standards and guidelines. Forest-wide standard S-2 (Plan, Chapter 2, Geologic and Mineral Resources) states, “[s]ites must be stabilized between periods of use.” The approved erosion control, drainage, and revegetation plan would be in place to mitigate any potential impacts.

Ski area special use permits are issued under the authority of the Ski Area Permit Act of October 22, 1986 (Title 16, United States Code, Section 497b), and 36 CFR Sections 251.50-251.64. The Act has very clear terms and conditions to which both the Forest Service and permit holders must adhere.

Direction and guidance for Special Use Permits is not addressed in a Forest Plan. This is found in Forest Service Manual 2720 and Forest Service Handbook 2709.15.

If a ski area proposes to expand its operations, an environmental analysis would be required under NEPA. The analysis would disclose the direct, indirect, and cumulative effects of the proposal, including water withdrawal. Forest Plan standards and guidelines (Chapter 2, Water Resources) identify standards for water withdrawal.

Ski areas withdraw water from water bodies based on permits issued by state and federal agencies. These permits are typically specific in the amount of water that can be withdrawn, or in flow rates that must be maintained in the rivers and streams.



We agree that ski areas can provide useful wildlife habitats in addition to desirable recreation opportunities, and that compromises can be made to incorporate both of these objectives. For example, Management Area 7.1 (Alpine Ski Areas) prohibits mowing or clearing of trails and trail edges between May 1 and July 15 (unless the objective is to control invasive species) so that birds that use this kind of habitat can successfully fledge their young. Guidelines for Canada lynx also provide direction to protect habitats in and around ski areas. Goals, objectives, standards, and guidelines for rare and unique features are designed to protect and conserve habitats for all rare species, and would be applied to all projects, including ski areas. Additional specifics regarding how each ski area will operate during the summer are evaluated at the project level and documented in the operation and maintenance plan.

Forest-wide standards and guidelines have been established for non-native invasive species (Plan, Chapter 2, NNIS), and surveys are conducted if deemed a priority and as budgets allow.

- **Considerate of the effects on the local economy.**

There is a potential for impacts on the local economy, both positive and negative, from alpine ski area development (FEIS, Recreation section, Alpine Ski Areas), however, all ski areas on National Forest System lands must comply with the National Environmental Policy Act (NEPA), which requires that the public and agencies be involved from an early state in decision-making on federal lands. An important part of this strategy is public scoping, which the CEQ regulations describe as the process for determining the “scope of the issues to be addressed and for identifying significant issues related to the proposed action” (40 CFR 1501.7). This process of identifying significant issues helps determine the direction and level of detail of the analysis. Any socioeconomic issues raised during public scoping would be addressed in the NEPA analysis.

**PC 34100-1a: The Forest Service should disclose the effects of expanding to four-season use of Alpine Ski Areas on local businesses.**

There may be minimal competition between local retail, lodging and restaurants and those at ski resorts, but competition between ski areas and local businesses has not been a significant issue. Most retail establishments are on private land and there are no hotels or condominiums on National Forest land. Ski resorts do not pay property taxes on Federal land; however, they are charged a fee which is based on the gross income of the ski area. Ski resorts are not agents of the federal government; they are special use permit holders.

Also see PC 34100-5.

**PC 34100-2: The Forest Service should revoke Special Use Permits for Alpine Ski Areas to reduce impacts on natural resources and social conditions.**

The National Forests are managed for multiple use, and alpine skiing has been determined to be an appropriate recreation use. Ski area Special Use

Permits are issued under the authority of the Ski Area Permit Act of October 22, 1986 (Title 16, United States Code, Section 497b), and 36 CFR Sections 251.50-251.64. The Act has very clear terms and conditions to which both the Forest Service and permit holders must adhere, including environmental compliance. Ski areas on the White Mountain National Forest comprise 0.74 percent of the total landbase.

**PC 34100-3: The Forest Service should allow development of new Alpine Ski Areas.**

**PC 34100-4: The Forest Service should not allow development of new Alpine Ski Areas.**

There is no current demand for additional alpine ski areas, and the Notice of Intent to revise the Forest Plan stated that new ski areas would not be permitted during the life of this Plan (Notice of Intent, page 32).

**PC 34100-5: The Forest Service should allow expansion of existing Alpine Ski Areas.**

- **But should clarify the environmental review process for such expansions.**

The purpose of MA 9.2 is to “recognize the potential need for ski area expansion and manage the lands so as to not preclude future ski area development.” Each expansion proposal from a ski area is considered, and a determination is made at that time regarding the necessary level of environmental analysis. Ski area special use permits require the permit holder to provide the Forest Service with a Master Development Plan (MDP) that covers existing facilities as well as potential facilities. When the Forest Service analyzes a ski area proposal, cumulative effects are analyzed, including potential “incremental” expansion.

- **To allow habitat manipulation for specific TES species.**

Forest Plan direction does not prohibit softwood treatments to improve habitat for Bicknell’s thrush (or other rare and unique species) in management areas 2.1, 7.1, and 9.2. For species that use regenerating softwoods in high elevations, some habitat may also be created through salvage harvest or treatments for insects or disease in Management Area 6.1. In addition, new language was added to allow limited cutting for TES species. Also see PC 55600-2 and PC 34100-1.

- **At Loon Mountain .**

The Record of Decision (ROD) for the Loon Mountain Development and Expansion EIS approved expansion into a portion of MA 9.2, and allowed the remaining acres to remain in MA 9.2 for possible future expansion. Forest Plan revision did not revisit this decision.

**PC 34100-5a: Alpine Ski Expansion Areas should include vegetation management, wildlife habitat, and alpine skiing.**

The purpose of this management area is to “recognize the potential need for ski area expansion and manage the lands so as to not preclude future ski

area development.” Vegetation and habitat management may preclude or be compatible with alpine skiing, so projects would be limited and carefully designed. During this planning cycle, the volume of timber in MA 9.2 was not considered part of the available timber supply.

**PC 34100-6: The Forest Service should manage Alpine Ski Area expansion in the context of the regional ski industry, long-term needs, and economic factors.**

The Forest Service recognizes that changing technology and customer demand affect the mix of available terrain. The goal of MA 9.2 lands (alpine ski area expansion) in the revised Plan is to “recognize the potential need for ski area expansion and manage the lands so as to not preclude future ski area development.” The Forest Plan revision Notice of Intent did not identify a need for change in the current Forest Plan direction pertinent to alpine ski area management on the WMNF.

Although the development of new ski areas was not considered in the 1986 Forest Plan or in the revised Plan, the Forest Service will maintain and provide quality alpine skiing and related opportunities on the National Forest through partnerships with the private sector. The Forest Service recognizes that ski market trends and technological changes in the ski industry have resulted in the perceived design deficiencies at ski areas.

A site-specific ski area expansion proposal, such as that analyzed in the 2002 Loon Mountain Ski Resort Development and Expansion FEIS, would have to comply with the National Environmental Policy Act (NEPA). The Forest Service would analyze the effects of the proposed actions and alternatives on the human and natural environment. The effects analysis would include economic factors, and the cumulative effects (past, present and foreseeable future actions) would include trends in terms of the regional ski industry.

**PC 34100-8: The Forest Service should clarify goals, objectives, standards, and guidelines for Management Area 7.1.**

- **Because they are inconsistent with other Forest-wide and MA direction.**
- **Because the management direction is too vague.**
- **And should consider combining MA’s 7.1 and 9.2, making vegetation and habitat management the first priority.**

The purpose of MA 7.1 is to allow for developed alpine ski areas and their associated year-round use. Standards and guidelines were formulated to consider their impact on other resources, including vegetation management and wildlife, but recreation is the primary focus. The Forest Plan is only one source for management direction for ski areas, however. They also must comply with all terms and conditions of their Special Use Permit, as well as state, federal, and local laws.

Management Areas 7.1 and 9.2 have substantially different purposes (refer to the Plan for a full definition of these purposes). MA 9.2 allows the Forest Service to designate areas that would be appropriate for ski area expansion,

and would consider projects only in these areas and following site-specific environmental analysis and public involvement.

Vegetation and habitat management are considered during development of new ski trails, but are only one planning concern. Slope, aspect, soils, visual goals, and other tools are used as well to construct a trail that will satisfy a skier/rider, have stable soils, and have trail edges that undulate.

- PC 34100-9: The Forest Service should coordinate with the State of New Hampshire to implement the Cannon Mountain Ski Area Master Development Plan and enter into a land exchange to make this happen.**

The Forest Service has worked, and will continue to work, with the State of New Hampshire in a land exchange adjacent to Cannon Mountain Ski Area. This land exchange, when proposed, would undergo site-specific environmental analysis.

- PC 91100-6: The Forest Service should include the area north of Wildcat Ski area in MA 9.2.**

The Forest Plan revision Notice of Intent did not identify a need for change in the current Forest Plan direction pertinent to alpine ski area management on the WMNF. At present, a demand for new alpine ski areas (MA 7.1) or changes in alpine ski area expansion lands (MA 9.2) has not been identified and is not anticipated for this planning cycle. If there is a demand in the future, an environmental analysis would be completed before a decision was made to amend the Forest Plan.

#### **Developed Recreation**

- PC 34200-1: The Forest Service should create more Day Use Areas.**

- PC 34200-2: The Forest Service should not develop new campgrounds, but contain expansion within existing campgrounds.**

- PC 34200-3: The Forest Service should not expand existing campgrounds.**

The Forest Plan is a programmatic document and does not address site-specific implementation such as actions at particular developed sites. Specific comments on more day use picnic areas and the Wild River campground have been noted by recreation program leadership.

Millions of people visit the White Mountain National Forest each year, using facilities such as trails, shelters, roads, fishing and boat access sites, overlooks, restrooms, campgrounds, and ski areas. Growth in demand, expanded marketing, and improvements in outdoor recreation equipment has increased use and activities during all seasons, and this may affect ecological conditions and recreational experiences. To address this concern in developed recreation campgrounds and developed day use areas, the Forest Plan specifies only limited additions to the Forest's recreation facilities and infrastructure over the next fifteen years, and provides direction to manage development levels in campgrounds. The Plan states that existing campgrounds may be improved or expanded, but new campgrounds may

not be constructed. And although this does not prohibit expansion of existing campgrounds, it does put restrictions on any increased capacity. The Forest Plan allows for a maximum increase of up to 32 additional developed campground sites (Plan, Chapter 1, Recreation).

**PC 34200-6: The Forest Service should offer simple, low-cost, year-round cabins to the public.**

The Forest offers eight cabins, 34 shelters, and 24 tent platform sites for public use. Some are free; others have fees. While the Plan does not propose building new cabins, it does allow for limited expansion of capacity of up to 40 people in backcountry facilities (Plan, Chapter 1, Recreation).

**PC 34300-1: The Forest Service should monitor the effects of dispersed roadside camping on natural resources and restrict use appropriately.**

**PC 34300-2: The Forest Service should limit party size on the Tripoli Road and minimize inconsistencies with Forest Protection Areas.**

Standards and guidelines are in place that address new and existing development, including roadside camping areas, related to effects on natural resources. Some areas are closed to roadside camping. In addition to management area direction, the Forest Service can implement site-specific closures through Forest Supervisor's Orders when necessary.

**PC 99100-1kk: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The Rocky Gorge Scenic Area has a guideline, G-3, that allows trailside camping.**

This is an error, and the guideline will be deleted. The prohibition of dispersed camping is the appropriate direction in this small Scenic Area adjacent to the Kancamagus Highway.

**PC 34400-1: The Forest Service should restrict expansion of trailhead parking lots.**

The revised Forest Plan provides direction that appropriate levels of trailhead development (e.g., paved or gravel, size, toilets provided/not provided) should be based on the objectives of the backcountry areas they serve. That is, we will avoid inadvertently increasing use in low use areas of the backcountry by developing facilities at the trailheads that might result in increased access (Plan, Chapter 2, Recreation).

We are working with the State of New Hampshire Department of Transportation, Appalachian Mountain Club, and Friends of Tuckerman to resolve the issue of overflow parking at Pinkham Notch Visitor Center.

**PC 34400-2: The Forest Service should monitor impacts and reduce trailhead parking lot size to manage effects on natural resources.**

The Forest Service monitors parking areas and responds to resource concerns as they arise. Some of this monitoring would result from standard



management activities, e.g., facility maintenance, backcountry patrol, water quality monitoring, road inspections, TES occurrence monitoring, NNIS monitoring (see Plan, Chapter 2, NNIS, for requirements to prevent NNIS during construction or reconstruction work). When problems such as NNIS concerns, presence of TES, or drainage or soil concerns are identified, they will be addressed accordingly.

Any reconstruction or construction of new trailheads requires site-specific analysis under NEPA before implementation. In the analysis, storm water drainage requirements, consideration for fragile soils, TES, and the potential for NNIS introduction would be among the areas evaluated and, if necessary, mitigated.

**PC 34400-3: The Forest Service should allow expansion of trailhead parking lots.**

**PC 34400-4: The Forest Service should allow expansion and improvements within trailhead parking lots to manage access, control use, and improve visitor information.**

**PC 34400-5: The Forest Service should allow development of new trailhead parking lots at certain locations for safety and access reasons.**

The Forest Plan allows for restricted expansion of, and improvements within, trailhead parking lots. However, they should not be constructed, improved, or expanded solely to accommodate increased recreation use without considering the effect on the backcountry area served. If safety concerns exist, the parking area may be modified to address those concerns (see Plan, Chapter 2, Recreation).

Also see PC 34400-1.

**PC 34400-6: The Forest Service should develop a shuttle service to address overflow issues at trailheads.**

The Appalachian Mountain Club operates a shuttle service between trailheads on the Forest, and this addresses overflow issues at some trailheads, provides for the safety of parked vehicles, and alleviates the need for spotting cars at beginning and ending points. The Forest Service has submitted a proposal to the Federal Highway Administration for an Alternative Transportation system to encompass the “100 mile loop” of the Kancamagus Highway, Bear Notch Road or Route 16, Route 302, and I-93. If the program receives funding, there are a number of very difficult issues that would have to be resolved, such as who would operate it, parking lots to accommodate Park and Ride type transportation, the effect on use in the backcountry, etc.

**PC 34000-2: The Forest Service should ensure that developed recreation mitigates impacts to natural resources.**

The anticipated impacts of developed recreation on other Forest resources can be found under each resource section in Chapter 3 of the FEIS. For example, the impacts of recreation activities on wildlife are covered in the

“Wildlife” section; on specific species, in the “Rare and Unique Features” section. Forest-wide and management area-specific direction to mitigate anticipated impacts can be found in the standards and guidelines in the Forest Plan, in Chapters 2 and 3 respectively. In addition, any proposed developed recreation management action would require site-specific analysis under NEPA, including public input, before the project could be undertaken.

**PC 34000-3: The Forest Service should modify Alternative 2 in the FEIS to allow for developed recreation to better adjust to changing recreation demands.**

**PC 91700-11: The Forest Service should include boat launching facilities and fishing accesses in the Forest Plan.**

The Forest Service believes that the direction for developed recreation in Alternative 2 does allow flexibility for addressing changing recreation demands over the life of the Plan – through limited expansions and improvements of facilities. For example, existing campgrounds and day use areas (boat launch facilities, picnic areas, fishing access, etc.) may be improved or expanded. However, any improvement must be analyzed to see how it affects the range of development levels of these facilities across the Forest (Plan, Chapter 2, Recreation).

**PC 30000-10: The Forest Service should provide electric hookups at some developed campsites.**

**PC 34200-5: The Forest Service should allow an increase in fees and installation of showers, dump stations and electricity, water, and waste hookups in existing campgrounds to protect natural resources, improve visitor enjoyment, and offset maintenance costs.**

The Forest Plan is a programmatic document and does not address site-specific implementation such as identifying which campgrounds would have electric hookups. However, the Plan does allow for campgrounds to be improved or expanded, while at the same time providing for a range of developed recreation opportunities. It includes evaluation of any construction, reconstruction, or rehabilitation projects in terms of the effects on both an individual site and Forest-wide development levels (Plan, Chapter 2, Recreation).

The Plan further directs that the Forest Service must determine appropriate development levels for campgrounds, day use areas, and trailheads (Chapter 2, Recreation). Currently, a task group is taking a systematic look at all campgrounds and major day use sites on the Forest to determine how they fit into a range of recreation opportunities for our visitors, now and in the future.

#### **Motorized Recreation Use**

**PC 36000-6a: The Forest Service should increase the area of the White Mountains where automobiles cannot be seen or heard.**

**PC 36000-8: The Forest Service should prohibit petrol fueled vehicles in the WMNF.**

**PC 51000-3: The Forest Service should reduce roads in order to minimize noise and place a priority on quiet.**

Appendix D of the FEIS discusses the mixes of road types in and around the Forest, including Interstate 93, many state highways, and other local roads outside the jurisdiction of the Forest Service. Completely prohibiting petrol fueled vehicles from the Forest is not within the scope of the Forest Plan decisions and would not be practical given the location of the Forest within many communities.

The Selected Alternative does manage approximately 53 percent of the Forest in management areas that emphasize dispersed recreation within unroaded landscapes. Based on the analysis within the document the Forest Service believes it has provided a balance of experiences for a broad array of Forest visitors. This includes people utilizing automobiles on roads to access popular attractions or driving for pleasure and other areas that provide people an unroaded, quiet, backcountry experience.

**PC 36000-3: The Forest Service should restrict snowmobiles, ATVs, and trail bikes.**

**PC 36000-4a: The Forest Service should prohibit snowmobile trail construction, and permanently remove existing trails because many miles of trails exist on private land in NH, outside of the WMNF.**

**PC 36200-2: The Forest Service should prohibit snowmobiles in the WMNF.**

**PC 36200-3: The Forest Service should restrict snowmobiles in the WMNF.**

**PC 36200-4: The Forest Service should restrict or prohibit further snowmobile trail construction.**

The Environmental Impact Statement and Forest Plan provide a wide range of activities for the public while ensuring long term sustainability of resources and experiences. The FEIS (Chapter 3, Recreation) recognizes the unique role the Forest plays in the statewide trail system while at the same time restricting snowmobile use to designated trail corridors. The preferred alternative also limits snowmobile use to specific management areas (2.1, 6.1, 6.3 and 8.2) to further minimize conflicts between other Forest visitors and important resource concerns. The preferred alternative limits the overall growth to the snowmobile trail system to 20 additional miles over the life of the plan.

The potential effects of snowmobiling are described in Chapter 3, Recreation, of the FEIS. The Regional Forester reviewed these effects and concluded that continuing to authorize a snowmobile trail system is an appropriate recreational experience to be provided on the Forest and also provides a limited growth of the trail system over the life of the plan. His decision also provides large areas of the Forest that are not open to snowmobiling use consistent with the commenters' points.

**PC 36200-1: The Forest Service should allow snowmobiles in the WMNF.**

The Selected Alternative continues to authorize approximately 400 miles of designated snowmobile trails on the Forest and provides for a limited growth (5 percent/20 miles) of the system over the life of the plan. The Environmental Impact Statement (Chapter 2, Alternative 2) explains the overall recreational approach for the Forest which responds to the concerns expressed about overuse of the Forest and the effects of trails on resources such as wildlife.

**PC 36200-6: The Forest Service should provide trails for cross-country skiers and snowshoers separate from snowmobile trails because motorized vehicles do not mix well with non-motorized recreation.**

The Environmental Impact Statement (Chapter 2, Alternative 2) covers the allocation of management areas within the Forest Plan which is one approach to separating use where appropriate. In addition, the Forest Service has specific cross country ski areas (Bretton Woods, Jackson Ski Touring Foundation), and cross country ski areas associated with alpine ski areas at Waterville Valley, and Loon Mountain operated under special use permits where snowmobile use is not permitted. In some cases it is necessary for skiers and snowmobilers to share a trail system in order to minimize the amount of total trails on the Forest. State trail agencies and snowmobile trail clubs have worked hard on ensuring appropriate trail etiquette to avoid trail conflicts where possible.

**PC 36000-1a: The Forest Service should prohibit vehicles and motorized use in the White Mountain National Forest.**

**PC 36000-2: The Forest Service should prohibit motorized recreational use in the WMNF.**

**PC 36000-2a: The Forest Service should restrict vehicles and motorized use in the White Mountain National Forest.**

**PC 36000-3a: The Forest Service should prohibit off-road motorized use in the WMNF.**

**PC 36000-4b: The Forest Service should prohibit ATV trail construction, and permanently remove existing trails because many miles of trails exist on private land in NH, outside of the WMNF.**

**PC 36000-5a: The Forest Service should prohibit motorized devices.**

**PC 36000-7: The Forest Service should provide stronger protection to save the Forest from ATVs.**

**PC 36300-1: The Forest Service should prohibit ATVs from the White Mountain National Forest.**

**PC 36300-2: The Forest Service should prohibit ATVs from the White Mountain National Forest because there are other areas available for their use, and more will be developed if the user demand is there.**

- PC 36300-3: The Forest Service should restrict the use of ATVs in the White Mountain National Forest.**
- PC 36300-7: The Forest Service should prohibit summer motorized use, including ATVs and trail bikes.**
- PC 36300-12: The Forest Service should prohibit ATVs because they are not compatible with WMNF management goals.**
- PC 36300-14: The Forest Service must prohibit ATVs to protect the Forest's integrity, and the integrity of WMNF staff that is charged with protecting the Forest and its values in perpetuity.**

One of the significant issues addressed in the revision of the Forest Plan is to consider how the increased use in recreation may affect ecological conditions and the overall recreation experience provided by the White Mountain National Forest. This issue included the consideration of requests for the Forest to provide summer motorized trails that have not been provided during the implementation of the 1986 Forest Plan. Over the last twenty years the use of All Terrain Vehicles has increased over both public and private lands. Discussions about ATV access and potential concerns relative to their use have occurred at local, statewide and the National level.

Providing for ATV's on summer trails was considered with two different approaches in Alternative 1 and Alternative 4 of the Draft Plan (Chapter 2). Chapter 3 estimated the effect of providing this new recreation activity on the Forest and the potential effects on the land, resources and other current uses of the Forest. Based on comments to the Draft Plan additional information was added to the final to better understand the trade-offs and benefits associated with this new use.

The Regional Forester outlines in the Record of Decision (ROD) that he decided to continue with the approach outlined in Alternative 2 to not provide All Terrain Vehicle use on the Forest on summer trails during this planning period. He recognizes the importance of this recreational pursuit and has provided for it in other National Forests in the Forest Service Eastern Region. However, based on the analysis and public input provided on the White Mountain National Forest Draft Plan has decided that there is sufficient reasons to not open summer trails on the Forest at this time. These include: the Forests current importance in providing non-motorized backcountry recreation in the Northeast, the mountainous terrain of much of the Forest that increase the potential for erosion and other resource effects, the heavy use already experienced by the Forest and the need to administer and maintain the existing recreational infrastructure. There also appears to be other state and private lands that are better positioned to provide this emerging recreational activity.

A number of other comments about ATV use on the Forest were negative, non-productive, and reflected personal values about motorized uses. The Forest Service has not responded to these comments here because they were either non-substantive or beyond the scope of a Forest Plan decision.



**PC 36300-11: The Forest Service should prohibit ATVs because our Congressional mandate does not allow them.**

The only Congressional mandate that has a specific reference to the prohibition of ATV's would be the 1964 Wilderness Act that prohibits mechanical and motorized devices within designated wilderness. We are not proposing summer ATV trails within the current or proposed wilderness areas.

**PC 36300-16: The Forest Service should consider allowing ATV use in Maine.**

**PC 36300-18: The Forest Service should review summer motorized recreation opportunities on a case-by-case basis as allowed in Alternative 1.**

**PC 36300-20: The Forest Service should prohibit ATV trail development and use in the Moat Mountain area.**

**PC 36300-21: The Forest Service should not allow ATV trail development and use in the Landaff area.**

The Draft Forest Plan considered 30 miles of ATV use in either the Moat Mountain or the Landaff area in Alternative 4. In addition, Alternative 1 proposed 60 miles of summer ATV trail use to be considered on a case by case basis. The environmental, social, and economic effects of ATV use is discussed in Chapter 3, specifically in the Soil, Stream, Riparian and Fisheries, Non-Native Invasive Species, Wildlife, Recreation, Scenic, and Social/Economic sections. Based on this analysis and public comment, the Regional Forester decided to select Alternative 2, which will not provide any locations for summer ATV trail use during the planning period. Also see response to PC 36000-1a.

**PC 36000-1: The Forest Service should allow motorized recreation use in the WMNF.**

**PC 36300-4: The Forest Service should allow ATVs in designated areas.**

**PC 36300-5: The Forest Service should allow use of ATVs in the White Mountain National Forest.**

**PC 36300-6: The Forest Service should allow ATVs for administrative, emergency, or maintenance use only.**

**PC 36300-8: The Forest Service should allow trail bikes and dual sport bikes.**

**PC 36300-13: The Forest Service should allow ATVs because ATV use is compatible with Forest Plan Goals.**

**PC 36300-19: The Forest Service should reconsider summer motorized use in the future.**

**PC 51400-1: The Forest Service should allow ATV use on Forest Roads.**

The selected alternative outlined in the Record of Decision would allow ATV use on the White Mountain National Forest on designated winter trails during snow cover consistent with state law, on open Forest roads by street legal vehicles and for emergency and limited administrative and maintenance activities.

Expansion of ATV use by providing summer trails was considered in Alternative 1 and 4. The Regional Forester decided not to provide this use during this planning period because of concerns outlined in the FEIS analysis and public comment on the recommended alternative. Specific concerns relate to the effect on the overall dispersed non-motorized backcountry experience, potential resource effects, the heavy recreational use already existing on the Forest and the impacts from adding to the infrastructure and maintenance needs of the Forest. He also recognizes that ATV summer trail opportunities are provided or being developed on other lands that may be better positioned to manage this use.

The Regional Forester in the Record of Decision commits the Forest Service to looking closely at current efforts to provide ATV opportunities on other non-National Forest lands to ascertain if in the future ATV trail use would be appropriate to consider in the next revision of the plan.

**PC 16100-2: The Forest Service should work with the States of New Hampshire and Maine to secure adequate funding for summer ATV trail development, maintenance, and patrol.**

**PC 36300-22: The Forest Service should work with groups to explore appropriate use of ATVs in the White Mountain National Forest.**

**PC 36300-23: The Forest Service should look at the success of other states that have ATV trail systems.**

**PC 36300-24: The Forest Service should recognize that ATV clubs and partnerships can be as successful in land stewardship as snowmobile partnerships are.**

The Forest Service did consider other trail systems within and outside the State, and we do have a good understanding of what could be expected with implementation of Alternative 1 and 4. The Forest Service also met with State Agencies in New Hampshire and Maine to become better informed based on their management experience. In addition, many employees on the Forest have worked with ATV trails and organized clubs to help manage trail systems on public land. Additional information on other systems in other states is included in the project file for the Final Environment Impact Statement.

These examples are helpful in understanding the possible benefits and challenges associated with establishing a summer trail system on the White Mountain. They don't however speak well to areas where the primary focus for a long period of time has been in providing non-motorized dispersed backcountry use. In addition, and many of these areas do not have the

existing heavy recreation use that is already a concern in some areas of the National Forest. While the Forest Service would expect help in managing summer trail systems from organized clubs and responsible state agencies we would also still have a need to have base level funds for overall management, maintenance and potential law enforcement issues. The Forest Service will continue to monitor these efforts on adjacent lands for consideration during the next plan revision.

**PC 36300-15: The Forest Service analysis of ATV use is lacking in the Forest Plan and DEIS.**

**PC 93200-5: The Forest Service should further evaluate motorized recreation.**

Chapter 1 of the Environmental Impact Statement outlines the desired future condition of the Forest and the potential issues associated with achieving it. One of the significant issues addressed in the revision of the Forest Plan is to consider how increased recreation use may affect ecological conditions and the overall recreation experience provided by the White Mountain National Forest. This issue included the consideration of requests for the Forest Service to provide summer motorized trails that were not provided during the implementation of the 1986 Forest Plan.

Providing for ATVs on summer trails was considered, with two different approaches, in Alternative 1 and Alternative 4 of the DEIS (Chapter 2). Chapter 3 estimated the potential programmatic effects of providing this new recreation activity (as described in these alternatives) on the land, resources, and other current uses of the Forest. Based on comments to the DEIS, information was added to the FEIS to better describe the trade-offs and benefits associated with this new use.

Forest Service specialists (Chapter 4, Contributors, Interdisciplinary Team) evaluated each of the alternatives for programmatic effects using their education and experience gained from their chosen disciplines, their familiarity with the Forest and activities on the Forest, information from others with specialized knowledge, visits to sites that allow activities not currently provided on the Forest, related documents and publications, as well as public opinion surveys. In addition, there was interdisciplinary participation among various combinations of specialists throughout the entire process. The potential programmatic effects of ATV use as proposed in Alternatives 1 and 4 are described in the Environmental Effects section (FEIS, Chapter 3) in each of the resource areas. The programmatic effects are portrayed, not judged.

The Regional Forester, based on the analysis and public input provided on the White Mountain National Forest Draft Plan, indicates in the Record of Decision (ROD) that he has decided to continue with the approach prescribed in Alternative 2 to prohibit summer All Terrain Vehicle use on the Forest during this planning period. The decision reflects his understanding of what the balance between competing activities should be on the WMNF at this time. He recognizes the importance of this recreational pursuit, and has provided for it on other National Forests in the Forest Service Eastern Region. However, he has decided that there are sufficient reasons to not open summer

trails on the WMNF at this time. These include the Forest's current importance in providing non-motorized backcountry recreation experience in the Northeast, the mountainous terrain of much of the Forest that increases the potential for erosion and other resource effects, the heavy recreational use already existing on the Forest, the need to administer and maintain the existing recreational infrastructure, and the impacts from adding to the infrastructure and maintenance needs of the Forest. He also recognizes that ATV summer trail opportunities are provided, or being developed, on other lands that may be better positioned to offer and manage this emerging recreational activity.

The selected alternative described in the ROD would allow ATV use on the White Mountain National Forest on designated winter trails when snow cover is consistent with state law, on open Forest roads by street legal vehicles, and for emergency and limited administrative and maintenance activities. The Regional Forester in the ROD also commits the Forest Service to looking closely at current efforts to provide ATV opportunities on other non-National Forest lands to ascertain if, in the future, ATV trail use would be appropriate to consider in the next revision of the Plan.

**PC 36000-4a: The Forest Service should prohibit all two-stroke vehicles because they are too noisy and polluting.**

**PC 36200-15: The Forest Service should join with partners to promote new technology engines and educate snowmobilers at trailheads about cleaner 4-stroke engines.**

While regulation of engine types and fuel emission standards is outside the scope of the Forest Plan, the White Mountain National Forest will continue to monitor and encourage the development and use of quieter, clean burning low emission engines by working with user groups and the appropriate state and federal agencies. This effort will enhance cooperation among user groups and minimize effects on the environment.

**PC 36000-5: The Forest Service does not consider the effects of noise from motorized recreation use in the EIS.**

Sound effects from recreation activities are identified in various locations under direct and indirect effects, most often in relation to summer motorized use. Noise impact is also described in effects associated with alpine ski area activities. State law requires that motorized recreation vehicles meet specific decibel level restrictions before they can be licensed. The discussion of sound impacts in the EIS has been expanded to reflect this additional information.

**PC 36000-6: The Forest Service should address motorized recreation impacts on sensitive wildlife habitats by adding a standard that would avoid sensitive and critical wildlife habitat and deer wintering areas.**

The Draft and Final Environmental Impact Statement and the revised Forest Plan recognize the importance of addressing potential impacts to critical wildlife habitat. The Selected Alternative does not allow summer motorized

trails and restricts winter use to the designated trail system. Forest guidelines (Chapter 2, Rare and Unique Features and Wildlife sections) provide the Forest Service with the ability to restrict use in critical and sensitive habitats and to protect deer wintering yards.

**PC 36300-9: The Forest Service should apply the same rules to all groups.**

The commenter expressed an opinion that the Forest Service analysis favored some groups over others in the Draft Forest Plan by not proposing summer ATV trail use on the Forest. Over the last 75 years, the White Mountain National Forest has been known for both the developed and dispersed recreation opportunities that it has provided to millions of people. It is a unique place that provides opportunities not always readily available in other places in the Northeast. These opportunities include: driving and sightseeing for pleasure on the many Forest roads, camping in one of the Forest's campgrounds, downhill and cross country skiing, snowmobiling and backcountry hiking/camping and wilderness challenges and experiences.

Members of the public asked the Forest Service to look at specific opportunities to provide summer ATV trail opportunities during this planning process. Two different approaches for doing this were proposed to the public and analyzed and the Draft Environmental Impact Statement. Based on this analysis and public input on the DEIS the Regional Forester has decided to not have summer ATV trail use on the Forest at this time. The Regional Forester has attempted to balance all the demands, needs and expectations for the White Mountain National Forest and select the approach that best meets long term ecological, social and economic objectives. For this issue, this results in a restriction of a certain kind of use in order to meet the broader vision for the Forest.

All rules and regulations that are in place to help the Forest Service carry out its land management mission are administered fairly, consistent with Federal law.

**PC 36000-7a: The Forest Service should recognize the trend in our aging population, and allow use of ATVs and snowmobiles for people with disabilities.**

**PC 36300-10: The Forest Service should accommodate disabled people by allowing ATV use.**

The revised Plan and Final Environmental Impact Statement do recognize the aging of the American population and the need to ensure access to the National Forest for people with disabilities (Plan, Chapter 1, Accessibility; FEIS, Chapter 3, Recreation). The Forest Service has worked hard over the last 10 years to improve access to the many facilities, services and unique experiences provided on the White Mountain National Forest. Federal law prohibits discrimination in regard to access to programs and activities offered on Federal land, however, the person with the disability must be able to achieve the purpose of the program without fundamentally altering the nature of the program or activity. In the preferred alternative, a decision



was made to not change the overall summer recreation trail experience on the Forest from non-motorized to motorized. Federal laws prohibiting discrimination do not require the Forest Service to make exceptions or fundamentally alter the non-motorized policy, for persons with disabilities. The selected alternative does, however, provide for access by a wheelchair, which can be motorized, may be permitted wherever foot travel is permitted including designated wilderness areas

In regards to winter access there are over 7,000 miles of snowmobile trail in New Hampshire and 13,000 miles in Maine. Currently, there are approximately 400 miles of designated snowmobile trails open to the public on the Forest. These trails are open for use by snowmobiles and to ATV's consistent with state law.

**PC 36200-14: The Forest Service should prohibit winter ATV use on snowmobile trails when there is snow cover.**

The Forest Service has permitted winter ATV use on some trails under the current Forest Plan. This use is allowed over the snow on designated trails consistent with areas where snowmobile use is allowed and in agreement with the State of New Hampshire's trail policies. While there have been some concerns about maintenance and grooming, these cases have been minimal. It also occurs at a time of year when overall recreation use on the Forest is lower. The Forest Service will continue to work with user groups to address potential problems, and to monitor overall effects of recreation use, including impacts from winter ATV use.

**PC 36300-17: The Forest Service must assess the costs incurred in monitoring and policing summer motorized recreational use.**

The Forest Service considered the costs incurred in monitoring and law enforcement of summer ATV use in the FEIS, Chapter 3, Recreation and Social and Economic sections.

**PC 91700-20: The Forest Service should appropriately identify all recreation users as people, not "machines," as in "ATVs," in order to avoid stereotypes.**

We have worked in final documents to be clearer on our use of terminology that reflects commenter concerns.

**PC 36000-9: The Forest Service should prohibit or monitor wheeled vehicles.**

See PC 36300-1 through 8 (general motorized), PC categories 36200 and 36300 (snowmobiles and summer motorized respectively), and PC category 34200 (mountain bikes).

**PC 36200-5: The Forest Service should un-designate some of the existing low-use snowmobile trails**

Both motorized and non-motorized trails on the Forest vary widely from high to low use. A major Forest recreation goal is to provide a range of quality recreation activities and opportunities, and the variation between high use and low use is one measure of this range. Staff from each of the

Forest's three Ranger Districts looked at this concern closely, and found no reason to "un-designate" existing low-use snowmobile trails.

**PC 36200-7: The Forest Service should remove snowmobile trails where they abut water sources, riparian areas, or wetlands.**

Forest-wide and management area specific standards and guidelines are designed to mitigate potential impacts to water sources and riparian or wetland ecosystems (see Chapters 2 and 3 of the Plan under those resource areas). Motorized trails are monitored consistent with 36 CFR 295.5 (see the Monitoring Implementation Guide). The WMNF believes that sufficient direction and safeguards exist in the Forest Plan to operate the Forest snowmobile trail system while protecting the natural resources.

**PC 36200-8: The Forest Service should be prepared to develop an alternate north-south snowmobile route through Wild River and Evans Notch.**

**PC 40260-8: The Forest Service should not designate the Wild River as Wilderness unless a snowmobile connector trail is provided.**

**PC 91100-42: The Forest Service should address the snowmobile trail issue, starting in 1983, in the Wild River area.**

The original basis for allowing a snowmobile trail through the floor of the Wild River area was a 5-year temporary allowance (with a 2-year extension) until a permanent North-South corridor trail could be developed on the east side of the Forest. A permanent corridor route, including both NH Corridor 19 and ME ITS 80 along portions of Route 113, was subsequently established and has been used for several years. The Forest Service believes that this route meets the needs of this part of the Forest.

There are about 6.5 miles of Route 113 in the Evans Notch vicinity that correspond to the North-South corridor trail. About 1.75 miles already has a bypass built for previous timber sale operations. Although 113 is a state road, the portion in question is surrounded by National Forest land with no private in-holdings. There is no guarantee that the State of Maine will not open the road for winter vehicle travel in the future. If and when that occurs, the Forest Service would mitigate the possible effects.

**PC 91100-52: The Forest Service should clarify why the use of snowmobiles in MA 6.1 in the Pinkham Notch area is allowed.**

Pinkham Notch (about 1 1/4 miles along Route 16 has been under a Scenic Area designation since 1964 (currently MA 8.5). Public snowmobile use is not allowed in the Pinkham Notch Scenic Area.

Each MA has a unique purpose, desired condition of the land, and standards and guidelines (FEIS, Chapter 3). Management areas are labeled for their predominant management emphasis. For example the purpose of MA 6.1 is to provide semi-primitive recreation opportunities, both motorized (snowmobiles use on designated trails) and non-motorized. On the other hand the objective of MA 6.2 is semi-primitive non-motorized recreation,

and is so labeled. The standards and guidelines for each management area clearly define the activities and under what conditions they are allowed.

The Forest Service took a careful look at each of the proposed management allocations. The MA designation at this location expresses what the Forest Service believes this particular piece of land is capable of providing considering its general site capabilities including suitability for timber, elevation, and road access. These MA 6.1 areas as well as the MA 2.1 areas in the same vicinity, allow snowmobile use on designated trails. Although snowmobile trails are allowed, any proposal, for a snowmobile trail, would require site-specific analysis under NEPA. Effects on current uses of the area would be one of the factors included in that analysis.

**PC 91100-56: The Forest Service should include the area from East Pond to the Kancamagus Highway as Wilderness because it is virtually inaccessible to snowmobilers due to the steep terrain and small parking area.**

This comment refers to the area in the roadless inventory that lies northwest of the existing Sandwich Range Wilderness, along Scar Ridge, called the “Sandwich 4” inventoried roadless area. The reference to snowmobiling is the East Pond Trail corridor, which crosses Scar Ridge. It is located in MA 6.3, which allows snowmobiling on designated trails. Although the trail is a designated snowmobile trail, in its current condition it would make a challenging ride

Early in the process of considering extensions to the Sandwich Range Wilderness, the Forest Service considered the area off the northwest corner of the current Wilderness for Recommended Wilderness under Alternative 3. This would have placed the portion of Scar Ridge past the Greeley Ponds Scenic Area and Mount Osceola west to the East Pond Trail into MA 9.1 under this alternative. The Forest Service believed that the trail would make a logical stopping point because 1) going beyond that point would create a long appendage, more difficult to manage and not contributing to the main “core” of the current Sandwich Range Wilderness, and 2) motorized use by snowmobiles is allowed across the ridge at that point. None of “Sandwich 4” inventoried roadless area was included for Wilderness recommendation in Alternatives 1, 2, or 4.

After discussions with the public and our evaluation of inventoried roadless areas, the Greeley Ponds Scenic Area became the western boundary of the “Sandwich 4” proposed Wilderness extension in Alternative 3. We felt this was a logical cutoff to consider because the Scenic Area and popular hiking/ mountain biking trails connecting it with Waterville Valley restrict the inventoried roadless area to a narrow neck at this point.

Alternative 2, our Selected Alternative, has not included any of the “Sandwich 4” inventoried roadless area for Recommended Wilderness, although it does include the other extensions to the Sandwich Range Wilderness. The “Sandwich 4” area differs from the other proposed extensions in that it would be an attachment or appendage to the existing block of Wilderness. The other extensions actually reduce the miles of perimeter while enlarging the core Wilderness area.

Appendix C (Inventoried Roadless Area Evaluations) of the Final Environmental Impact Statement contains detailed discussions of all the inventoried roadless areas surrounding the Sandwich Range that were considered for Wilderness recommendation.

**PC 91100-78: The Forest Service should allow only traditional uses such as camping and hiking on National Forest lands south of Route 2 on the northern slopes of the Presidential Range.**

The Forest Service took a careful look at each of the proposed management allocation changes. The MA designation at this location expresses what the Forest Service believes this particular piece of land is capable of providing considering its general site capabilities including elevation, and road access. Decisions on management area designations as well as activities allowed in management areas become complex and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions. It does not mandate, only allow various management activities. Any proposal for management activities would require site-specific NEPA to analyze the particular location for suitability for that activity. There are also Forest-wide standards and guidelines to follow regarding TES, NNIS, riparian areas etc.

**PC 91700-2: The Forest Service should continue using the correct terminology when describing bicycle type activities. (We particularly appreciate that the new Draft Land and Resource Management Plan refers to bicycling as “mountain biking” rather than “mechanized travel.”)**

We have used mountain biking in the Forest Plan but the Forest Service considers mountain biking “mechanical transport” in relation to Wilderness uses as shown in FSM 2320.6.

**PC 91700-21: The Forest Service should define and clarify “formally designated mountain biking on the Wild River Trail.”**

This should have said simply that mountain biking occurs on the Wild River Trail. The phrase “formally designated” has been deleted.

**PC 91700-15: The Forest Service should develop more comprehensive and easy to read maps showing mountain bike impacts near wilderness boundaries.**

The maps in the FEIS, of necessity are of a scale to show the overall concepts for readability. Details come from working maps. These maps are available at the District or Supervisors offices. They can also be found using the “GeoBook” disc mailed with each of the Forest Plans.

**PC 95300-1: The Forest Service should develop and evaluate several small areas for classification as Zones of No Rescue.**

- To increase user safety by enforcing a code of personal responsibility.

- **To reduce the need, expense, and threat to search and rescue and retrieval efforts in areas of extreme conditions.**

Lead responsibility for search and rescue on the National Forest resides with the states of New Hampshire and Maine. (The only exception is within the Cutler River Drainage on Mt. Washington from December 1 to June 1 when, through agreement with the state, the WMNF assumes lead responsibility.) Any discussion of “no rescue zones” needs to have their concurrence.

While some people would probably welcome the challenge and independence of a No Rescue Zone, it's not clear that it would be well received by most people, especially in the face of a life or death situation. Unlike some parts of the country where access is extremely limited, there would be no real way to stop people from initiating their own rescue. As opposed to truly being an area of “no rescue”, the idea might serve to encourage inexperienced people to attempt rescues rather than having one of the many highly skilled rescue groups within the area provide help in a safe manner. Since the White Mountains are so accessible, it seems that this would likely create more of a problem by encouraging inexperienced and ill-equipped friends and family to perform their own rescues.

Several years ago the state of New Hampshire, in cooperation with the Forest Service, instituted a “reckless hiker statute”. This allowed the state to recover costs through civil statute for search and rescue incidents where the “victim” was deemed to have acted irresponsibly. As a “phase two” attempt to reduce the need for search and rescue, the NH Fish and Game Department and the WMNF embarked on a cooperative educational campaign called hikeSafe. The idea behind this effort is to increase hiker awareness and personal responsibility. HikeSafe includes a hiker responsibility code as well as reminders on essential gear to bring on any hike; safety tips and the overall tag that “You Are Responsible for Yourself”. While the campaign is only 2 years old we feel confident that it is catching on and will continue to grow, especially throughout the Northeast. This effort is able to increase awareness and responsibly before a hiker needs help. More information on hikeSafe can be found at [www.hikeSafe.com](http://www.hikeSafe.com).

**PC 10000-18: The Forest Service should join the AMC and redesign the Highlands Center/Crawford Notch snowmobile trail.**

NH Bureau of Trails staff met with White Mountain National Forest employees and the AMC and agreed to suspend use of the Highland Center/Crawford Notch snowmobile trail for the winter of 2005-2006. As part of this agreement, the NH Trails Bureau will make improvements to the snowmobile trail along the Base Road that will offset the loss of the closed trail around the Highland Center. Work on the improvements (primarily widening) began in August and are expected to be completed by October of 2005.

The future of the Highland Center/Crawford Notch Trail will depend on whether the Base Road trail can adequately accommodate the heavy snowmobile use this area traditionally receives. This use will be monitored during the upcoming winter season.



**PC 36200-9: The Forest Service should provide semi-primitive destination opportunities for winter motorized recreation.**

There are two parts to this comment: 1) using existing un-groomed roads and trails that connect to designated trails and, 2) access to hunting and fishing destinations.

Snowmobiles are only allowed on Forest-designated snowmobile trails in specific management areas. Existing un-groomed roads and trails cannot be used by snowmobiles unless they are designated a snowmobile trail. Any proposed designation requires a site-specific analysis under NEPA. Once a trail is designated, grooming becomes the responsibility of the trail maintaining organizations – the states for Corridor/ITS trails, and local clubs for other trails. If needed, the Forest Service will work through the states to develop a range of grooming standards and implement them through Forest Service/Agency Memorandums of Understanding.

There are winter hunting sites, ice fishing spots, and backcountry facilities already being visited on designated snowmobile trails in appropriate management areas.

**PC 36200-10: The Forest Plan and EIS discussions of snowmobiles are lacking.**

- **Because the EIS makes no mention of present and cumulative snowmobile impacts on soil erosion.**

Effects of recreation and other activities causing soil erosion are described in the FEIS, Soils section. It notes that for timber sales, the frozen condition of roads in winter minimizes impact and the risk of soil erosion from heavy equipment use. Although not stated, snowmobile use on frozen trails, due to their much smaller size and weight, would have even less effect. The FEIS has been expanded to clarify the specific effect of snowmobiles on soil erosion.

- **Because it does not address the effects of petroleum leaks on water sources and impact of emission held in snowpack that eventually enters water bodies .**
- **Because it does not address the effects of exhaust on air quality.**

The effects of snowmobile related pollutants on water sources are discussed in the Water Quality section (FEIS, Chapter 3), which points out that emissions have the greatest potential to impact water resources by settling onto the snow. Best Management Practices are used to reduce this effect, and include restricting use to designated trails which are located away from water sources. Although not specifically stated, the effect of accidental petroleum leaks from snowmobiles on water sources would be the same as any hazardous waste spill and would be cleaned up accordingly. The FEIS has been augmented to clarify the effect of snowmobiles on water resources.

The effects of motor vehicle exhaust, including snowmobiles, are found in the Air Resources section (FEIS, Chapter 3), where Table 3-88 summarizes the effects expected related to this use and other activities which occur within the White Mountain National Forest. In addition, information regarding emissions from snowmobiles is presented in the Water Resources, Water Quality section of the EIS.

- **Because it does not address present and cumulative effects on the terrestrial habitats ability to sustain viable wildlife populations.**
- **Because it does not address direct and cumulative effects on deer wintering yards.**
- **Because it does not address the effects on large mammals.**
- **Because it does not address the present and cumulative effects on plants and species of concern.**

Snowmobiles could impact terrestrial plants and wildlife species in two ways: direct impacts to habitat and species from trail construction, and noise disturbance. The effects of trail construction are addressed for all habitats in the Rare and Unique Features section of Chapter 3, FEIS. Noise disturbance from snowmobiles is only a concern for those species, primarily large mammals, that are present and active on the Forest in winter. This topic was addressed briefly for the landscape-scale species of concern, Rare and Unique Features section of Chapter 3, DEIS. A description of how noise disturbance may affect these species was added to the FEIS to better clarify the potential impact. Additional discussion of potential to TES species from snowmobile trails and use is in the Biological Evaluation (Appendix G).

Deer wintering yards are not specifically addressed in the effects analysis because deer are not a management indicator species or a species of viability concern. Deer are one of many species that rely on mature softwood habitat, and the effects of changes to this habitat from proposed management, including trail development, are addressed in the Vegetation section of Chapter 3, FEIS. Both the 1986 and the revised Forest Plan include direction that trails should be located outside of deer wintering areas, so the potential for impacts from snowmobile trails and use should be minimal.

- **Because it substantiates continued use in MA 6.1 lands in Mill Brook Valley, NH**

Each management area represents a discrete mix of management activities. It reflects our understanding of what is needed to provide a balance among competing activities on the Forest. Management area allocation programmatically describes what can be allowed throughout the Forest. At one end of the spectrum, MA 2.1 has extensive and intensive activities, while at the other, MA 8.4, Research Natural Areas, activities are heavily restricted. Between these extremes there are various levels. Snowmobile trails are integral to the goals and desired condition of MA 6.1, one of 16 management areas on the Forest and one of only four MAs that permit such use. The management area primarily provides non-motorized recreational opportunities, but it also allows single purpose roads for timber salvage, mineral exploration, etc., and snowmobile trails. It prohibits scheduled commercial timber harvest. Currently, there are no authorized snowmobile trails in the vicinity of Mill Brook Valley, in either MA 2.1 or MA 6.1, although there is a State Corridor Snowmobile Trail in the adjacent I-93 corridor. Before any new activity, including a snowmobile trail, could be implemented, there would be a site-specific analysis consistent with NEPA and allowing for public involvement.

Also see PC 36200-11.

- **Because it does not address the direct and cumulative effects on the wilderness experience of cross-country skiers; of snowmobiles for disabled access, safety, and administrative uses; and of winter campers in MA 6.1 lands**

Recreation experience impacts are addressed in various parts of the FEIS. The discussions on Recreation Management Approaches, Management Area Allocation, and Recreation Opportunity Spectrum all describe the differences in effect by alternative on locations where motorized use is or is not permitted. Obviously, where not permitted there would be limited sound and no physical experience impacts to non-motorized users and vice-versa. Although we did not specifically identify noise or experience impacts on the “wilderness” ( i.e., backcountry) experience, as the effects of differing snowmobile trail objectives (in those management areas allowing them) by Alternative, this can be inferred from statements such as, “There would be increased use on Forest snowmobile trails, resulting in more traffic and congestion ...” We have clarified these statement to include noise and non-motorized experience.

See also PC 87200-1 for a discussion on accessibility.

- **Because it does not address the economic effects to local communities and the contribution to the social fabric**

As described in Appendix B, and in Table B-20 of the FEIS, the economic impact of snowmobiling to local communities was evaluated as part of the economic impact analysis. Snowmobiling’s economic impact is included in the summary category of “Recreation” shown in Tables 3-103, 3-105, 3-107, and 3-109. We did not identify any difference among the effects of the alternatives in the total amount of snowmobiling on the Forest. Snowmobiling is expected to grow, and the Forest’s trail system has the capacity to accommodate this growth throughout the planning period. Therefore, the economic impact in terms of jobs and income due to snowmobiling is expected to be the same among the alternatives. Snowmobiling’s portion of the “Recreation” summary category shown in Tables 3-103, 3-105, 3-107, and 3-109 amounts to 44 jobs and approximately \$1,000,000 in income. This only considers the income and jobs resulting from snowmobilers riding on the Forest and the impact they have on the four county analysis area around the Forest.

Snowmobiling’s contribution to the social fabric was not expected to change significantly as a result of the alternatives presented. The analysis of their contribution to the social fabric was reviewed in light of the potential for snowmobiling to contribute economically in terms of jobs and income. Additionally, the public’s attitudes toward natural resource management and motorized off-highway recreation on the Forest was reviewed in light of several studies, described in the Social and Economic section of Chapter 3 of the FEIS. This information, in addition to public input received throughout the planning process, provided the context for the design of the alternatives as they relate to snowmobiling, and an acknowledgment of snowmobiling’s contribution to the social fabric in the region.

**PC 36200-11: The Forest Service should suspend snowmobile use in MA 6.1 lands.**

Management areas are an integral part of the Forest Plan. Each MA has a unique purpose, desired condition of the land, and standards and guidelines. (FEIS, Chapter 2, Management Areas). The purpose of MA 6.1 is to provide for non-motorized use generally, but to allow for snowmobile use on designated trails in winter (Plan, Chapter 3, MA 6.1).

**PC 36200-12: The Forest Service should prohibit snowmobiling in Canada lynx habitat.**

The intent behind the Canada lynx direction is to conserve existing habitat until more information is developed regarding lynx habitat needs. In the absence of a recovery plan, the Forest Service will use the most up-to-date information about lynx habitat. That is why the guideline for no net increase in over-snow routes is included. Prohibiting snowmobiling on the Forest may improve lynx conditions, but no evidence exists that lynx require completely undisturbed areas to persist. If new information is discovered that would suggest existing snowmobile trails negatively impact the Forest's ability to contribute to lynx recovery, action to close trails could be taken at that time.

**PC 36200-13: The Forest Service should provide an alternative that reduces snowmobile use.**

As was stated under "Concerns with Current Forest Plan Direction" in the Analysis of the Management Situation, "The 1986 Forest Plan's allowing winter-motorized use on identified trails consistent with management area direction seems to be acceptable. The role of the Forest as an important factor in the region-wide snowmobile trail systems, as opposed to a Forest opportunity itself, needs to be made clearer." Reduction of the current snowmobile trail system did not surface as an issue over the years of public involvement leading up to the release of the draft documents. As a result, the DEIS did not address drastically different snowmobile management scenarios. Rather, it looked at the broader recreation issue of how to manage increasing use in all recreation activities. The EIS evaluated the effects of changes to the snowmobile trail system ranging from 10 miles of new trail (Alternative 3) to 50 miles of new trail (Alternative 4). We believe the alternatives proposed provide a range of reasonable alternatives consistent with the larger issue.

Also see PC 36000-3.

**PC 36200-16: The Forest Service should support private landowners to work with snowmobile clubs to create and maintain trail systems outside the WMNF.**

The Forest Service has no direct responsibility or authority outside the Forest Proclamation Boundary. There are organizations within the New Hampshire and Maine state governments that provide support for cooperation between

snowmobile clubs and private landowners. They have been very successful in providing trail systems outside the WMNF.

**PC 36200-18: The Forest Service should eliminate snowmobiles on the Bolles, Liberty, and Beeline Trails.**

The Forest Service maintains its decision to include the Bolles and Liberty snowmobile trails as part of the Forest snowmobile trail system to honor past obligations. The Bolles snowmobile trail was included in discussion on Congressional designation of the Sandwich Range Wilderness. The Bolles and Liberty snowmobile trails were also part of an agreement reached on designation of the Mt. Chocorua Scenic Area in the 1986 Forest Plan. The Beeline Trail, although identified in the 1986 Plan as allowed in the Mt Chocorua Scenic Area, is not now an authorized snowmobile trail, and the exception in the Draft Forest Plan allowing this trail in the Mt Chocorua Scenic Area has been deleted in the revised Plan.

**PC 36200-19: The Forest Service should address numbered corridor trails, not just ITS trails, in Maine.**

“Corridor trails” in Maine are equivalent to “primary trails” in New Hampshire, and Maine “ITS (Interconnected Trail System) trails” are equivalent to New Hampshire “Corridor trails.” The Forest Plan directs that Corridor/ITS trails will not be interrupted by other Forest management actions in order to maintain the integrity of the statewide snowmobile systems (Plan, Chapter 2, Recreation). Maine corridor trails and New Hampshire primary trails are evaluated on a case-by-case basis whenever a management action could interrupt them, however, extending such direction to all primary trails, as this comment recommends, would be impractical and too restrictive on other Forest uses.

**PC 36200-20: The Forest Service should construct educational signs at trailheads and parking areas in order to teach snowmobile operators about safe operation and how to avoid damage to Forest resources.**

This is a programmatic document, and development of a visitor education plan (content, location of signs, etc.) for a specific recreation activity is not within the scope of the Forest Plan. This is a good suggestion that we will take into account in continuing our partnership with the states in strengthening existing educational programs for snowmobilers.

**Unique Recreation Opportunities**

**PC 38100-1: The Forest Service should manage rock and ice climbing opportunities on the Forest with specific standards and guides, permitting processes, and education.**

**PC 38100-2: The Forest Service should consider developing a management plan for permanent vs. non-permanent climbing hardware in and outside Wilderness boundaries.**



- PC 38100-3: The Forest Service should consider revising the Recreation Management Approach regarding rock/ice climbing activities.**
- PC 38100-4: The Forest Service should include additional clarification in the Forest Plan regarding rock/ice climbing.**
- PC 38100-5: The Forest Service rock/ice climbing policy contradicts trail standards for plant surveys.**

The Forest Service believes that the Plan presents a sensible approach to managing this activity and mitigating the negative impacts to cliff and talus communities. Updated Forest-wide standards and guidelines designed to manage social and biological impacts may place some restrictions on climbing. Historically, the user has identified and developed climbing routes. While the Forest is open to rock and ice climbing, within specific standards and guidelines, the Forest Service retains the authority to establish closures, restrictions, or other management actions if unacceptable resource or social conditions become evident. Various resource specialists, including WMNF staff involved in climbing, worked together as an Interdisciplinary Team to develop the current rock and ice climbing standards and guidelines. We also incorporated information from non-Forest Service technical experts.

Some Forest-wide resource area standards and guidelines that have always affected climbing will continue; for example, limits on rock climbing techniques or equipment, and authorization to close routes or cliffs as necessary to protect TES species or other natural resources. Ecological indicators have been identified for cliff habitats. If monitoring shows an impact to TES species from climbing, climbing plans would be developed and routes or cliffs could be closed to mitigate the impacts (Plan, Chapter 2, Recreation; FEIS, Chapter 3, Rare and Unique Features).

Management direction also prohibits some techniques that could have adverse resource impacts (e.g., chipping to create foot and hand holds, gluing to stabilize features, and attaching artificial handholds). New direction describes acceptable equipment for cleaning the rock face, and allows for temporary or permanent closure of specific areas if climbing creates unacceptable resource or social impacts. Some areas will have site-specific climbing plans when standards and guidelines themselves are not sufficient to address concerns. As use increases, climbers may find access limited at some locations, and additional requirements may change the general feeling of self-determination that many climbers seek.

A new Forest-wide guideline to conserve calcareous cliff natural communities may restrict climbing at certain locations.

Public comments expressed concern about the wording of a particular climbing Guideline. There was some unintended confusion between guidelines G-7 and G-8. Guideline G-7 has been rewritten to clarify common tools used for fixed anchor installation and maintenance, (hand drills, battery powered rock drills (except in wilderness), hammers, crowbars, and wrenches). Fixed anchor installation and maintenance is a safety issue and integral to sport climbing. The intent of G-8 is to allow reasonable clearing

of climbing routes. It has been rewritten to clarify the kinds of tools (wire brushes, hand brooms and toothbrushes) that are recognized as standard for this purpose (Plan, Chapter 2, Recreation). Installing fixed anchors at specific locations and using hand brooms etc. for reasonable clearing of routes does not appear to be the same as constructing new trails.

The Forest has an evolving database identifying climbing areas, though not individual climbing routes. These are not presently identified as traditional or sport climbing areas.

The use of fixed versus removable protection is the basic difference between traditional climbing and sport climbing. Fixed anchors are integral to sport climbing, whereas in traditional climbing they are used infrequently, if at all. Traditional climbing usually involves ground-up ascents of features, where removable protection is placed by a leader and retrieved by a second, following, climber. This style of climbing generally offers a higher degree of uncertainty and a greater sense of exploration than sport climbing. Risk of injury is often greater, as skill in placing and evaluating protection quality is required. Sport climbing involves ascents of routes established with fixed protection, usually bolts and hangers, designed to provide an increased level of safety and the opportunity to focus on gymnastic difficulty with lower risk of injury.

The concern about fixed anchors is not only a visual one; it also relates to traditional climbing sites evolving into sport climbing sites. The Forest Plan direction prohibiting fixed anchors on new climbs in Wilderness is a way to ensure that Wilderness values are protected, while maintaining a component of traditional climbing.

**PC 38100-6: The Forest Service should monitor climbing impacts on heritage resources.**

Rock and ice climbing guideline G-5 (Forest Plan, Chapter 2, Recreation) states: "Climbing should be restricted where there is potential to impact heritage resources." This includes already known cultural resources and the possible discovery of currently unknown cultural resources. Where sites are known to be associated with climbing activity, management will take action to protect resource values. If that is not possible, restrictions to climbing may occur. Site monitoring will take place through the Forest's Heritage Resource Management and Recreation Management programs. Site information will either be restricted or made available through interpretation, to be determined on a case by case basis.

GIS map overlays of Climbing Areas and Cultural Sites will be kept current, possible impacts will be assessed, and management plans will be developed as necessary.

Potential impact to heritage resources falls under the direction of federal laws and regulations, and requires coordination with State Historic Preservation and Tribal Historic Preservation offices. Public notification and involvement would occur under the provisions of NEPA if monitoring indicates an impact beyond the current acceptable climbing activities.

**Appalachian Trail**

**PC 38200-1:**    **The Forest Service should reduce the size of the Appalachian Trail corridor to provide a wide spectrum of resource opportunities to a greater number of people.**

**PC 38200-3:**    **The Forest Service should decrease the size of the Appalachian Trail corridor to 500 feet.**

**PC 91100-68:**    **The Forest Service should eliminate MA 8.3.**

The Forest Service has taken action consistent with the National Trails System Act that designates the Appalachian National Scenic Trail. Decisions on management area designations, as well as activities allowed in management areas reflect a range of tradeoffs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and national designations all had to be considered to strike the balance reflected in our revised Forest Plan. Outside the Forest Proclamation Boundary, the AT management area is delineated by land acquired by the National Park Service for AT protection in New Hampshire. This was administratively transferred to the USDA Forest Service under a Memorandum of Agreement. The boundaries of these areas reflect each purchase boundary rather than any set width.

Although over the last fifteen years the Forest Service has managed the AT within the Forest Proclamation Boundary with little controversy, we made the decision, in consultation with the Appalachian Trail Commission and the AT clubs, to apply an Appalachian Trail Management Area (1/2 mile either side of the Trail, the defined foreground zone under the Visual Management System) that is generally consistent with other National Forests through which the AT passes, thus giving it easily identifiable boundaries. The revised AT management area consists largely of management areas that under the current Plan had similar non-motorized objectives. The few parts of the AT management area that are adjacent to MA 2.1, General Forest Management, were left as they were in the 1986 Plan. Other criteria applied to the AT management area delineation included not overlapping Wilderness (MA 5.1), the Alpine Zone (MA 8.1), and the Wildcat Ski Area (MA 7.1).

**PC 38200-2:**    **The Forest Service should rewrite the standards and guides as they relate to timber harvest and scenic viewing in the Appalachian Trail management area.**

**PC 38200-4:**    **The Forest Service should reword the Forest Plan for management practice clarification.**

**PC 91100-80:**    **The Forest Service should designate a specific management area to the Appalachian Trail corridor that does not include timber harvesting.**

Public comments identified several corrections needed to AT management direction, and these have been done.

In the 1986 Forest Plan, the AT management area only existed where the Trail passed through MAs 2.1/3.1. In those locations, the management

direction was the same as in the revised Plan. Vegetation Management guideline G-1 clarifies where commercial timber harvest can occur so it will not impact the AT, limiting it to areas outside the actual mapped foreground zone of the AT treadway (Plan, Chapter 3, MA 8.3). The Appalachian Trail Conservancy (ATC) and the trail maintaining clubs (AMC and DOC) feel this direction has worked satisfactorily since 1986 and will continue to protect the AT experience in the future.

**PC 38200-5: The Forest Service should continue to propose Alternative 2 as the Preferred Alternative because it provides the highest level of protection for the Appalachian Trail.**

**PC 38200-7: The Forest Service should designate the Appalachian Trail as Management Area 8.3.**

**PC 38200-9: The Forest Service should continue to support primitive recreational experiences.**

**PC 38200-18: The Forest Service should continue to support roadless and roadless characteristics next to the AT system.**

**PC 38200-20: The Forest Service should maintain the viewing characteristics of the AT.**

In the revised Forest Plan, we gave the Appalachian National Scenic Trail its own management area (MA 8.3) to help clarify our overall management approach for this nationally significant trail and to maintain the AT character. This is consistent with the National Trails System Act that designated the Appalachian National Scenic Trail, and also reflects our decision that balances management area designations as well as the activities allowed within management areas. The Desired Condition of the AT management area is described in the Plan, Chapter 3, MA 8.1.

**PC 38200-6: The Forest Service should have a minimum 500 foot buffer between the proposed Wild River Wilderness area and the Appalachian Trail.**

**PC 38200-19: The Forest Service should manage the AT as either part of the Wilderness, or bring the Wilderness boundary to the AT, but not manage as a Wilderness corridor.**

**PC 40260-12: The Forest Service should exclude the Appalachian Trail from the Wild River Wilderness area.**

**PC 61000-9: The Forest Service should clarify which trails are within the boundary of the proposed Wild River Wilderness in Alternative 2.**

The Forest Service is not recommending that the Wild River Wilderness extend to the AT footpath, or that the AT be a corridor within Wilderness. The Selected Alternative does not include the AT footpath in the recommended Wild River Wilderness.

The National Wilderness Preservation System and the National Scenic Trail designations are based in two different laws. There are some compatibilities, but there are enough important differences in national direction that combining the two could create unnecessarily complex management of the AT footpath and facilities, as well as inconsistencies in Wilderness management objectives. Although in other National Forests the AT passes through Wilderness, on the WMNF, except for a short section of the AT in the Great Gulf, Wilderness has been delineated by Congress to exclude the AT. We are not proposing to manage the AT as a Wilderness corridor.

Also see responses to PC 67000-1, -4, -5, -6, -7, and -10.

**PC 38200-8: The Forest Service should develop a monitoring evaluation of the AT experience which will set visitor limits once recreation experiences, developed resources, and natural resources begin to deteriorate.**

**PC 38200-14: The Forest Service should include appropriate levels of permitted commercial use on the AT consistent with Forest direction on use levels and visitor satisfaction.**

**PC 38200-15: The Forest Service should complete the AT Opportunity Zone Spectrum Project and apply the findings to the AT management plan.**

Many comments expressed support of the Recreation Management Approaches identified in Alternatives 2 and 3. These were developed to address the effect of projected growth and expansion in recreation activities on the Forest Recreation Niche, a major issue in Forest Plan revision. We believe discussion of the more specific Appalachian Trail Opportunity Zone concept is best left as a site-specific project after Plan implementation. The Forest is already heading in a similar direction Forest-wide with the Recreation Management Approaches. They allow for limiting commercial and general use should such limits be needed to address resource and social concerns (Plan, Chapters 1 and 2, Recreation for recreation direction in general, and Chapter 3, MA 8.3 for direction specific to the AT).

**PC 38200-10: The Forest Service should continue to make AT management decisions based on its standards and guides, and explore options presented by Forest Partners only when decisions revolve around the recreational or social structure of the clubs.**

The Appalachian National Scenic Trail is administered by the Secretary of Interior in consultation with the Secretary of Agriculture, and is legally managed as a partnership between the National Park Service AT Park Office, the USDA Forest Service, local Appalachian Trail Clubs, and the Appalachian Trail Conservancy (ATC). Management of the AT must follow the National Trails System Act, as amended (P.L. 90-543). These partners are integral partners in management of the Appalachian Trail. They have been involved in the development of the AT management area and its associated management direction.



**PC 38200-11: The Forest Service should maintain all AT signing and blazing consistent with the entire AT system.**

**PC 61000-6: The Forest Service should use both trail names on signs where the Appalachian Trail has a local trail name.**

**PC 67000-7: The Forest Service should evaluate human impacts in Wilderness and adopt management direction for recreation consistent and compatible with the Appalachian Trail Management Area.**

Wilderness and the Appalachian Trail are both Congressional designations. In the WMNF, the AT passes through a section of the Great Gulf Wilderness. When differing direction applies to the same piece of ground, applying the most restrictive direction presents the best way to remain true to overall intent of both. The Forest Service will keep the direction that, "...where the AT passes through Wilderness, management direction in Management Area 8.3 Appalachian Trail, and MA 5.1, Wilderness, apply. Where there is a conflict, as in signing, the stricter standards must be followed." In the case of the Great Gulf Wilderness, this means following the Wilderness signing standards.

The Forest Plan is a programmatic document, and does not address such site-specific implementation as applying blazes and naming trails. However, public comments addressing the concern of long distance AT hikers with "poor" AT blazing have been noted by the Forest Service.

Where the AT follows a local trail, the distinctive AT blazing is used. It is also WMNF policy to include both AT designation and local trail name on signs. When the Appalachian Trail was designated through the White Mountains it coincided with many existing locally built and locally named trails. Many hikers on the WMNF are as familiar with local names as with an AT designation. We continue to work toward full implementation of Appalachian Trail signing principles.

**PC 38200-12: The Forest Service should explore the opportunities along the AT for end-to-end hikers.**

**PC 38200-13: The Forest Service should evaluate the opportunity for a new hut to be built between the Imp Shelter and Osgood tent site.**

One of the major Forest issues addressed in this Plan revision the effect of projected growth and expansion in recreation activities. As one possible resolution, the Forest Service is moving toward limiting backcountry recreation facilities. The Selected Alternative prohibits additional Huts and existing Huts are not allowed to increase in capacity. New shelters, cabins, and tent platforms are only allowed under special conditions (Plan, Chapter 2, Recreation). There would be opportunities for limited increases in existing cabins, shelters, and tent platforms (Plan, Chapter 1, Recreation). Currently, backcountry facilities exist along the entire length of the AT in New Hampshire and it is possible to address concerns about specific facilities within the limited options spelled out in the Selected Alternative. However, these would be site-specific decisions, not applicable to the programmatic

level represented by the Forest Plan. Concerns about opportunities for end-to-end hikers, and evaluating the opportunity for a new backcountry facility between Imp shelter and Osgood Tent site facility, have been noted by recreation program leadership.

**PC 38200-17: The Forest Service should include the Pinkham Notch facilities in the Pinkham Notch Scenic Area rather than in the AT management area.**

**PC 91100-14: The Forest Service should place the Glen Ellis Falls area outside of MA 8.3.**

When mapping the AT management area (MA 8.3) for the DEIS, the protocol followed was that AT management direction would supersede Scenic Area management direction. As a result, the developed areas in the Pinkham Notch Scenic Area along Route 16, the Pinkham Notch Visitor Center, and the Glen Ellis Falls day use area fell within the AT management area. In response to public concern, however, this decision was revised, and where the AT passes through the Pinkham Notch Scenic Area, the Scenic Area MA will take precedence. Additional direction to protect the values of the Appalachian National Scenic Trail in this area has been added (Plan, Chapter 3, MA 8.5).

**PC 38200-21: The Forest Service should rewrite guideline G-1 for motorized use on the AT to prohibit new motorized crossings, since this could cause accidents.**

Because of its configuration, completely crossing New Hampshire from East to West, there will necessarily be some motorized trail crossings of the AT. We believe the management direction provided (Plan, Chapter 3, MA 8.3) is sufficient to allow only those new motorized trail crossings deemed necessary and mutually agreed upon by the Forest Service, the ATC, and local AT clubs. Any new motorized trail crossing would be designed to address potential safety concerns. They would also require analysis under NEPA.

**PC 91100-76: The Forest Service should protect the remoteness of the AT along the north side of the Pemigewasset Wilderness.**

Decisions on management area designation are complex, and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, national designations, and other social concerns all had to be considered to strike the balance reflected in our final Plan. The Forest Service gave the AT its own management area (in this location that is a half-mile from the AT treadway) with specific direction to protect the AT experience. The AT MA and all direction were cooperatively determined with the ATC and the AT Maintainer Clubs (AMC and DOC). (Plan, Chapter 3, MA 8.3) The FEIS analyzes the effects, and we believe the MAs as proposed provide adequate protection to the AT.

**PC 91200-1: The Forest Service should add the Smarts Mountain Forest Legacy Lands to MA 8.3.**

We reviewed the four fee parcels (NH 1000A, NH 1000B, NH 1007, NH 1008) acquired under the authority of the Cooperative Forestry Assistance Act of 1978, located in Lyme, New Hampshire, and have assigned them to MA 8.3. The conservation easements acquired on the remaining parcels will be managed as outlined in standard S-3, Chapter 2 of the Forest Plan, under Lands, Land Status/Adjustments/Acquisition.

#### **Special Areas**

**PC 38300-1: The Forest Service should continue to manage Tuckerman Ravine for non-motorized recreation.**

**PC 38300-2: The Forest Service should limit events in the Cutler River Drainage.**

The revised Plan continues current management of Tuckerman Ravine. “The area will appear much as it does now. Unique recreation activities with high use will remain available, and management actions that spread this use to other locations, and in other seasons, will be minimized.” (Plan, Chapter 3, MA 8.3) Although there is no specific direction for event permits in this management area, Forest-wide standards and guidelines under “Special Use – Recreation Specific” require a careful review of event proposals.

**PC 38400-1: The Forest Service should reclassify the Alpine Garden as a Scenic Area because restricting hikers to the trail is impractical.**

The Alpine Garden was designated a Research Natural Area by the Chief of the Forest Service in 1989 due to its particular scientific interest. It includes an alpine plant community that is distinctive within the alpine community at large. The RNA boundary delineation excluded the historic, high-use Alpine Garden Trail in order to balance historic trail use in a highly popular area with RNA objectives. While off-trail rock hopping can reduce impacts to alpine vegetation, it does not entirely prevent them. While we understand the difficulty in confining hikers to the Alpine Garden Trail, the standard represents a start in preventing off-trail hiking in this sensitive area. Public education efforts on the importance of the area and the need for limiting off-trail hiking will be part of the effort. Because the area is also within the Alpine Zone (MA 8.1), its direction, aimed at protecting alpine communities, also applies (Plan, Chapter 3, MAs 8.1 and 8.4).

**PC 38400-4: The Forest Service should complete the fifteen Conservation Assessments for MA 8.1.**

The Forest Service agrees that rare species in the alpine deserve a high level of attention, which is why the Alpine Community Conservation Assessment has already been completed. This assessment describes the alpine communities in the WMNF and explains how the fifteen Regional Forester’s Sensitive Species (RFSS) in the alpine fit within the alpine communities. It also provides details on the status and threats facing each of the fifteen species, so no additional Conservation Assessments are needed for these species. Information from this Conservation Assessment and the SVE expert

panel for alpine species was used in developing management direction for the Alpine Zone (MA 8.1). Using available information to monitor and improve the Forest Service's approach for protecting species in the alpine zone will continue to be a priority for the Forest.

**PC 38400-5: The Forest Service should increase the Alpine Zone.**

The Alpine Zone MA encompasses all large blocks of alpine and subalpine habitat on the Forest. To clarify the Forest Service's intent to protect even the small patches of alpine and subalpine communities that occur outside the Alpine Zone MA, a goal and Forest-wide guideline were added to the Rare and Unique Features categories in Chapters 1 and 2 of the revised Plan. The Alpine Zone is defined as, and was mapped based on an estimate of, where trees are less than eight feet tall, which includes much of the habitat described in public comments. The glossary definition of the Alpine Zone has been clarified. Scree fields and other open habitats below the elevation where trees are less than eight feet tall are not considered part of the alpine zone in the Plan. These habitats are still of concern, as they may support rare plant species. They are addressed in the FEIS, Rare and Unique Features section, Chapter 3.

**PC 38400-6: The Forest Service should restore the Alpine Zone by replanting impacted areas.**

General standard S-1 for the Alpine Zone MA requires mitigation actions to address declines in alpine communities that result from human use. Because the goal for this MA is for natural processes to predominate, the Forest Service would use management having the least impact that would still conserve the alpine and subalpine communities. Alpine and subalpine communities are complex, often driven by microclimate conditions ecologists do not completely understand, so knowing what species would do well in a given location is difficult if individuals are not still present. Anecdotal information from the Green Mountain National Forest and international studies (Burbank, pers. comm; Whinam and Chilcott, 1999) indicates that alpine communities can recover naturally from the effects of trampling and other human uses if those uses are curtailed. Therefore active revegetation of alpine communities would only be considered if other means of addressing impacts are not effective.

**PC 38400-7: The Forest Service should eliminate any back country structures in the Alpine Zone.**

The special use permit for the AMC Huts was renewed in 1999, following an extensive environmental evaluation which included an alternative to remove huts in the Alpine Zone. The decision to continue to permit them included direction to minimize their inconsistency with the designated ROS Class, and actions to decrease their impact on the Alpine Zone. The Forest Plan provides strong direction to limit changes to the Hut System to meet Forest Recreation Management Approaches and to address recreation use in the Alpine Zone. The Final Plan has been clarified regarding the prohibited construction of additional huts: expanding hut capacity is prohibited and,

except for health, safety, and resource impact concerns, expanding existing huts in physical structure is prohibited. Also see PC 30200-1.

The Forest Plan also prohibits new backcountry facilities (huts, cabins, shelters, tent platforms, and associated structures) on National Forest lands in the Alpine Zone. There is also direction that physical and capacity expansion of existing facilities should not be allowed.

**PC 38400-8: The Forest Service should eliminate all camping in the Alpine Zone.**

Camping in the Alpine Zone is currently allowed in winter when there is two or more feet of snow cover. This is based on input from local botanists and ecologists with detailed knowledge of the plant communities. They have determined that the potential for impacts from snow compaction and related alteration of the local environment are greatest when there is little or no snow on the site. Some believe that one foot of snow would be adequate protection, but the Forest Service chose to be more conservative. In addition, proposed monitoring of impacts from recreational use of all types in the alpine will help the Forest Service ensure that the Alpine Zone standards and guidelines are sufficient. If monitoring indicates a decline in the condition of alpine communities, standards and guidelines can be modified to further reduce impacts.

**PC 38400-9: The Forest Service should continue to emphasize education, interpretation, and stewardship in the Alpine Zone.**

We believe that our approach under the revised Plan accomplishes this.

**PC 38500-1: The Forest Service should reevaluate the rock and mineral collecting section in the Plan.**

The management standards and guidelines for personal use rock and mineral collecting activities in the revised Plan are intended to protect this nonrenewable resource, and are more protective than previously. The need for this increased protection was based on monitoring reports over the last planning cycle and on discussion with law enforcement concerning how best to protect the resource in a way that can be enforced on the ground. The new strategy was proposed in the Notice of Intent (NOI), and provides opportunities for education through a permit system. The permit will include the conditions and locations where rock and mineral collecting is acceptable and will be used to inventory recreational rock and mineral collecting activities. The revised Plan provides for the designation of special collecting areas, if needed, to manage resources at popular or exemplary sites (Deer Hill is an example of the former). The Plan also allows closure of sites for safety and resources reasons. There is not a specific map identifying hazardous recreational mineral collecting sites, nor are there signs to identify these hazards, since the Forest user is expected to be aware of and avoid them.

Based on public comments, wording was added to clarify the standards and guidelines for recreational rock and mineral collecting activities (Plan, Chapter 2, Geologic Resources, Recreational Rock and Mineral Collecting).



The permit will apply only to new excavations begun by the permit holder. After one season, it will be easy to tell what is a new excavation and what is a preexisting site. All new excavations should be restored on the day of use, and should not exceed one cubic yard in size. These conditions will be printed on the permit to educate users in the new policy.

**PC 38500-2: The Forest Service should develop standards and guides to eliminate gold panning in wild trout waters.**

The revised Forest Plan does include standards and guidelines for gold panning activities, including those allowed in documented wild trout waters. Wild trout (brook trout) are present in most fish bearing waters within the White Mountain National Forest. While there is no direction that applies only to documented wild trout waters, several general standards and guidelines for gold panning apply to all surface waters where such activities could occur. These can be found in the Geologic Resources section, Plan, Chapter 2, under Recreational Rock and Mineral Collecting. In addition, some management areas prohibit surface disturbing recreational rock and mineral collecting activities, while others allow this activity only under permit. See the Geological section for each management area in Chapter 3 for details.

In particular, limited gold panning is allowed in certain management areas (MAs 2.1, 6.1, 6.2, and 6.3) with a permit, according to the conditions of Recreational Rock and Mineral Collecting standard S-4 (Plan, Chapter 2, Geologic and Mineral Resources). Protective measures limit users to hand tools only, state that the maximum excavation at any site must not exceed one cubic yard, require that only one site may be disturbed at a time, require that disturbed areas must be restored to as near original condition as possible, prohibit surface disturbance that may unduly affect other resources, permit gold panning within stream channels with small trowels or similar digging tools with due care for protection of water quality and aquatic habitat, and stipulate that sites may be restricted by closure or permit where safety or resource concerns exist. In addition, water resource standards and guidelines require that water quality be maintained protected (Plan, Chapter 2, Water Resources). The number of permits issued will help the Forest Service determine if additional monitoring is needed.

**PC 38600-1: The Forest Service should include the New Hampshire and Maine Division of Historic Resource agencies as partners in the Heritage Resource chapter.**

The partnership between the White Mountain National Forest and the State Historic Preservation Offices (SHPOs) in New Hampshire and Maine, as well as with appropriate Tribal Historic Preservation Offices (THPOs), is covered in the standards and guidelines of the Heritage Resource section (Plan, Chapter 2). This coordination is required by law and regulation, and the requirements form the foundation of our partnership. We also work together on occasion to accomplish projects beneficial to each other, and in a manner supportive of state historic preservation plans and initiatives.

**Recreation Special Use Permits**

**PC 54000-9: The Forest Service should not authorize Recreation permits for off-trail use.**

- **Because Vegetation is often exposed or ice covered and unprotected from trampling.**

**PC 54100-1: The Forest Service should not allow off-trail commercial recreation on the Forest.**

All commercial recreation on the Forest requires a Special Use Permit, and the type of activity is carefully reviewed before the permit is granted. Only a limited number of off-trail activities would be considered (Forest Plan, Chapter 2, Recreation), and these have not been identified as a major concern at this time. We believe there is sufficient direction to manage off-trail recreation events should they become a problem. Any permits granted would require consistency with Forest-wide and management area direction (see the Plan reference above for direction on recreation-specific special uses, and Chapter 3 for direction in specific management areas) as well as any other mitigation measures determined based on the details of the proposal. Also see response to PC 38400-8 for a discussion of camping on two feet or more of snow in the Alpine Zone.

**PC 54100-2: The Forest Service should include outfitters/guides in the special uses section of Land Use Authorizations.**

The Forest Service administers special use permits under two categories; Special Use Permits in general and a subcategory for Recreation Special Use Permits. Special Uses apply to all commercial use on the Forest and must be managed consistent with national direction and policy (including policy that any permit must be consistent with Forest Plan direction). Recreation special uses (including outfitter/guide permits) additionally have specific connection to Forest recreation goals, objectives and direction. They can provide Forest recreation opportunities through commercial entities in a more cost effective way. The Forest Service believes this complementary role of recreation special use permits is most effectively administered and managed through a recreation-specific category of special uses. Forest Plan direction clearly states the connection between special uses and recreation special uses.

**Trails Management**

**PC 61000-1: The Forest Service should maintain recreation trails according to established standards within Wilderness to provide for public safety.**

**PC 61000-2: The Forest Service should construct recreation trails.**

**PC 61000-3: The Forest Service should limit new trail construction.**

The Forest Plan includes direction for construction and maintenance of trails, including references to Service-wide and Region-wide direction, for both

Wilderness and non-Wilderness management areas. The purpose of these is to provide a variety of recreation opportunities while protecting the natural resource. (Plan, Chapter 2, Recreation) There are specific trail construction and maintenance standards for trails in the Alpine Zone, including the prohibition of new trail construction (Plan, Chapter 3, MA 8.3). In Wilderness, trail management direction attempts to balance Wilderness skills with a need for public safety. It allows blazing, but only “when the summer trail tread is not easily discernible, for resource protection, or to mitigate an unusual or extraordinary public safety hazard. Cairns and limited scree walls should be used in preference to blazing.” (Plan, Chapter 3, MA 5.1) Any trail reconstruction and maintenance is undertaken with an underlying objective of resource protection.

It is illegal for anyone to build trails, or any facility, on National Forest land without an authorizing officer’s permission. The Plan includes direction for handling incidental trails. (Plan, Chapter 2, Recreation) Incidental trails are defined in the Glossary.

Alternative 2 limits expansion of the Forest’s recreation infrastructure, including trails. This alternative does not provide for the creation of a summer motorized trail system during this planning period, due to concerns about the effects on the historic recreation niche of the Forest, conflicts with existing uses, potential resource effects, and concerns associated with the management (construction, maintenance, and enforcement) of a new use under existing constrained budgets. The alternative does allow for a net increase of up to 25 miles of new non-motorized trails over the 10-15 year planning period. User impacts will be focused on existing trails where they have become hardened by use.

The Forest Plan is a programmatic document. It does not address site-specific implementation, such as implementation of trail standards and guidelines or where the “25 miles of new non-motorized trails” will be constructed. Comments about applying specific trail standards have been noted by recreation program leadership.

**PC 61000-4: The Forest Service trails should be open unless signed closed to recreation use for ease of law enforcement.**

For the most part, we follow this approach. This helps us minimize the visual impacts of signing and lowers maintenance costs. However, there are a few activities where the use is restricted to some limited trails or areas. In these cases, it is more efficient to close the Forest to these activities except where designated as open. This designation can occur using a variety of techniques, including signing, trail maps, and brochures. In all cases, we strive to make the closures very clear to avoid misunderstandings and to ensure consistent law enforcement.

**PC 61000-5 The Forest Service should not groom the Wildcat River Trail south of Forest Road 233 and Marsh Brook Trail for cross-country skiing.**

The Wildcat Comprehensive River Management Plan, Hiking and Cross-Country Ski Trails Guideline G-1, that appeared in the proposed Forest Plan

is in error. The Wildcat River Trail south of Forest Road 233 is not now, nor to our knowledge has ever been, groomed. The Marsh Brook Trail, identified on a 1989 Jackson Ski Touring Foundation map, is groomed and has been part of the Jackson Special Use Permit for years.

**PC 61000-7: The Forest Service should clarify the definition of “native material” for trail structures.**

**PC 61000-8: The Forest Service should restrict certain recreation uses on trails, and limit off-trail use for certain activities.**

In the preferred alternative foot travel and mountain bike use on the Forest Trail System is open unless closed. Off-trail use by mountain bikes is prohibited and travel corridors will be open unless closed to mountain bikes. Horse use on the WMNF is very limited. Currently there are no restrictions on horse use except on the Appalachian Trail. See also PC 61000-1

**PC 61000-10: The Forest Service should clarify management policy for unofficial trails.**

The Forest Service calls unofficial trails “incidental trails” in the Plan. Incidental trails are not part of the Forest Trail System and are not maintained by the Forest Service, nor are they authorized for maintenance by cooperator groups or Forest visitors. The Plan directs that incidental trails should not merely be left but evaluated for their ultimate disposition (Plan, Chapter 2, Recreation). The decision to include an incidental trail as part of the Forest Trail System requires site-specific analysis under NEPA.

**PC 99100-1ee: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The Plan is not clear in its use of “natural” or “native” materials in the maintenance of backcountry facilities.**

The standards and guidelines where “native material” is used have been clarified to eliminate confusion.

**PC 99100-1pp:**

- **Miles of snowmobile trails on National Forest Land should be clarified.**

The miles cited in the DEIS were identified by determining miles within National Forest land ownership, therefore the miles should reflect miles on NF land not miles on private lands within or adjacent to the Proclamation Boundary. Even though in some cases the map shows snowmobile trails outside NF ownership they would not have been counted in this process. The snowmobile map has been updated to show snowmobile trails within the Proclamation Boundary but not under Forest Service jurisdiction (Class 6 roads, state-owned rail corridors, and roads under other jurisdictions [for example, Jefferson Notch and Mt. Clinton Roads]). In addition we have refined the snowmobile map to include more specific locations ,and have corrected errors.

**PC 99100-1qq:**

- **What are “development trails” which are permitted for mountain bike use? Where are the 20 new miles of snowmobile trails going to be?**

Development trails, or Forest Development Trails are those trails recognized for recreation use and identified within the Forest list of official trails.

The 20 miles of new snowmobile trails are an upper limit objective not a target. There are no specific locations proposed. This objective of limited increases in trail miles (as well as other limits for non-motorized trails, developed campgrounds and backcountry facilities) is an important part of the Forest recreation management approach developed in response to the concern about increasing use on this highly used Forest. It is designed to change what many have perceived as past practice of automatically responding to increasing use by adding more infrastructure

**Administrative Facilities**

**PC 87100-2: The Forest Service should construct new facilities in accordance with standards established in the Leadership in Energy and Environmental Design (LEED) Green Building Rating System.**

We are aware of these guidelines, and are currently pursuing such certification for the White Mountain Administrative Complex. This facility, scheduled for completion in the next 3-5 years in Campton, will house the Supervisor’s Office and the Pemigewasset Ranger District. Additionally, the we will pursue LEED certification where appropriate and feasible for any other proposed facilities during this planning period.

**PC 87300-1: The Forest Service should be consistent with Outstanding National Resource Water (ONRW) criteria, a federal category of special protection provided in federal anti-degradation policy, when working with dams, impoundments, and snowmaking ponds.**

All surface waters on the WMNF are considered Outstanding Resource Waters (ORW) in New Hampshire and Outstanding National Resources (ONR) in Maine. These designations require that water quality and associated uses be maintained and protected during all management activities, including dams, impoundments, and snowmaking ponds.

As with other Forest management activities, there are Forest-wide standards and guidelines that apply to dams, impoundments, and snowmaking ponds within the White Mountain National Forest (see Water Resources, Plan, Chapter 2). In particular, Soil and Water Conservation Practices (SWCPs) and Best Management Practices (BMPs) are used for all activities which could affect water and soil resources. Also, site-specific practices must be documented in terms of effectiveness and implementation, while other standards and guidelines ensure that existing uses are maintained. Other standards, in Chapter 3, are specific to management areas; the Soils section, in MA 7.1, Alpine Ski Areas, mitigates effects related to that Forest use.



A new standard was added to the Plan, another was expanded, and a related definition has been added to the Glossary to clarify ORWs and their existing and designated uses. By ensuring that existing and designated uses are protected under the antidegradation provisions of the Clean Water Act and state regulations, the outstanding resource waters of the WMNF will be maintained and protected.

**PC 87300-2: The Forest Service should consider ecological factors when maintaining impoundments needed for fisheries or wildlife management.**

If major maintenance or reconstruction of an impoundment is required, the Forest Service would determine whether there is still biological, ecological, or social need for maintaining the impoundment in the long term. If the original need for the impoundment is still justified (or if the impoundment serves some new purpose) then a site-specific environmental analysis would be conducted. This process would identify public issues, as well as determine the potential impacts of a range of reconstruction alternatives. An alternative for properly decommissioning an impoundment may also be analyzed. Ultimately, a variety of factors, including ecological, would be considered in the final project-level decision to maintain or decommission any individual impoundment.

**PC 91100-4: The Forest Service should reclassify the areas near HWY. 112 to exclude snowmobiles.**

The Forest Service took a careful look at each of the proposed management allocation changes. The MA designation at this location expresses what the Forest Service believes this particular piece of land is capable of providing, considering its general site capabilities including elevation, and road access. Decisions on management area designations as well as activities allowed in management areas become complex and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions. Although this management area allows snowmobile trails, it does not mandate snowmobile trail construction. Any proposal for a snowmobile trail would require a site-specific environmental analysis. Forest-wide standards and guidelines, as well as constraints on additional snowmobile trail miles Forest-wide, would have to be considered in any proposal.

**PC 91100-41: The Forest Service should consider changing Sawyer Pond to MA 6.2, or perhaps a boundary change, so this trail can be used by mountain bicyclists.**

The Selected Alternative would not affect mountain bike use on Sawyer Pond Trail. Mountain bike use would continue to be allowed. Only Wilderness and the Appalachian Trail prohibit mountain bike use.

## Wilderness

### Wilderness Management

**PC 10000-7: The Forest Service should be stewards of the National Forest.**

**PC 10000-8: The Forest Service should be conservators and stewards of the Forest.**

**PC 10000-11: The Forest Service should preserve the White Mountain National Forest to provide for Wilderness values.**

**PC 10000-12: The Forest Service should protect, preserve, and provide for wild places.**

The Forest Service employs people with a broad range of technical and professional expertise to help manage the Forest and fulfill our responsibilities as stewards and conservators of this important piece of public land. Employees work in concert with other federal, state, and local agencies, as well as many Forest stakeholders and partners, to carry out the mission of the agency in New Hampshire and Maine. The Forest Plan, through the standards and guidelines (Chapters 2 and 3), provides further direction on how this will be accomplished in specific management areas and under specific situations. The Wilderness Management Plan, Appendix E in the Forest Plan, provides direction for these special areas. In addition to the broad, programmatic guidance in the Forest Plan, site-specific analysis and public involvement is mandated for most of the management actions required to carry out the overall goals and objectives of the Plan.

**PC 40160-2: The Forest Service should designate camping areas in the Great Gulf.**

It is possible to have designated sites without removing an area from Wilderness designation. As part of the Great Gulf Wilderness Plan, there are six designated camping sites within the Great Gulf. These are primitive, undeveloped sites with no amenities.

**PC 67000-1: The Forest Service should manage Congressionally-designated Wilderness to protect and enhance Wilderness character.**

- **To protect healthy ecosystems and watersheds.**
- **Consistent with Alternative 3 in the DEIS/LRMP.**
- **To enhance abutting property values.**
- **For future generations.**
- **To provide escape from the pressures of modern life).**
- **To protect historic sites and artifacts.**

The WMNF recognizes the importance of designated Wilderness to many people and for the reasons listed above as well as many others. The preferred alternative seeks a balance between Wilderness and other values of National Forest land, with some lands recommended for proposed Wilderness and other lands being managed for different objectives. The Wilderness

management plan focuses on redeeming our responsibilities for Wilderness stewardship once the land has been designated.

**PC 67000-2: The Forest Service should manage Congressionally-designated Wilderness by implementing the Wilderness Management Plan described in the DEIS/LRMP.**

A number of comments expressed support for the draft's approach. Changes were not made in the approach between the draft and final Plan.

**PC 67000-3: The Forest Service should modify the zone system in the Wilderness Management Plan.**

- **For the Pemigewasset Wilderness, to more accurately reflect current conditions.**

Based on public comments, some changes and adjustments have been made to the Wilderness Zone maps.

**PC 14000-6: The Forest Service should consider the effects of Wilderness designation on the spread of invasive species and include in any Wilderness recommendation a plan to contain any potential outbreak of invasive species.**

Wilderness was evaluated as a special case with regard to non-native invasive species and outbreaks of native insects or disease. Forest Service policy allows treatment of both to protect resource values in Wilderness and on adjacent properties. In the case of non-native invasive species, standards and guidelines in Management Areas 5.1 and 9.1 allow all forms of eradication in order to meet the Wilderness goal of protecting ecological values. Outbreaks of native species, such as spruce budworm, would be allowed to run their course through Wilderness unless resource values on adjacent lands were compromised.

**PC 67000-4: The Forest Service should develop or modify standards and guidelines for Wilderness.**

- **To ensure areas of low-use and restrict development of new structures.**

We believe that the current Desired Condition of the Land, management area standards and guidelines, and the Wilderness Management Plan provide direction to prevent increasing development. In MA 5.1 (Plan, Chapter 3) under Overnight Facilities, standard S-1 expressly prohibits construction of new overnight facilities. The standards go on to require that existing facilities be evaluated to see whether or not they should be retained. These requirements, added to overall direction to minimize development and allow facilities only in Zone D (but not to allow a zone to go from less to more developed) would seem to alleviate concern for unlimited development.

As for trails, the standards and guidelines and zone descriptions clearly state the types of trail standards that must be followed, with the goal of minimizing trail developments.

If the standards and guidelines, zone descriptions, and required monitoring indicate that changes are needed, these can be made through a plan amendment. The intent is to keep the documents current so that they meet the needs and intent of the WMNF's Wilderness stewardship goals.

- **To limit Outfitter/Guide Use.**

Group size is already limited to ten people, as specified in MA 5.1, General standards. This applies to all groups, including outfitters and guides.

At present, the WMNF believes it would be premature to apply stricter limits on outfitters and guides as some public comments have suggested. There is no supporting documentation to justify these limits. Under Recreation Special Uses, Forest Plan Chapter 2, guideline G-3 indicates that, if needed, the Forest Service can and should consider an allocation study for outfitters and guides, and this would include Wilderness recreation. Although such a study may lead to limitations within Wilderness, it would be premature to institute limits without an allocation study and without clearer evidence that the limits would be beneficial.

- **To prohibit wood and charcoal fires.**

One of the items under Desired Condition of the land for Management Area 5.1, Wilderness, is that "Managerial control will be kept to a minimum, and used only as necessary to protect ecological and social values." While the Forest Service agrees that impacts from fires can be unacceptable, we also think this can be addressed through site-specific closure orders rather than blanket prohibitions. For example, wood or charcoal fires are prohibited in the Great Gulf Wilderness where the impacts were too great to continue to allow them. It is possible for hikers and backpackers to practice Leave No Trace skills with fires that would leave little or no lasting impact. As part of preserving Wilderness character, we believe that education is a preferable tool for controlling behavior and the WMNF will institute local prohibitions as needed.

- **To limit helicopter overflights.**

While some public comments expressed support for our standard prohibiting helicopter flights over Wilderness, we have since realized that, as written, the standard was essentially unenforceable. The Federal Aviation Administration (FAA) governs all US airspace, and while they recommend that flights be limited to no lower than 2,000 feet over designated Wilderness, this is a recommendation not a law, and the Forest Service has no jurisdiction to make changes in these flight advisories.

The Forest Service does, however, have the ability to authorize helicopter operation that is part of a special use, or that uses the National Forest for landing or dropping off people or equipment. While the WMNF will not routinely issue Special Use Permits or other authorizations for helicopter operations over or within Wilderness, helicopter use may be allowed in emergency situations such as search and rescue, or if a helicopter is found to be the "minimum tool" needed to meet other Wilderness stewardship objectives (MA 5.1, General standards S-5 and S-6). Based on this, a general guideline, G-1, has been added to the MA 5.1 management area direction.

- **To limit group size to ten, and ensure all cooperator groups comply.**

Many public comments agreed with our limit on group size, and this did not change in the final Plan.

**67000-5: The Forest Service should minimize human activity and intervention in Wilderness to protect Wilderness character.**

Management Area 5.1, Wilderness, prohibits road building, timber management, and habitat improvement projects. While natural fire is recognized as an ecological process that will be managed accordingly, prescribed fire is prohibited.

The Wilderness Act of 1964, as well as individual enabling legislations, guide WMNF Wilderness management and stewardship. There is nothing in the Acts to indicate that all human activity in Wilderness should be discouraged. The WMNF management plan aims to allow for human use and enjoyment of Wilderness while also specifying that it will “Allow natural ecological events to proceed without modification or manipulation where feasible.” This is not always an easy balance to attain, but MA standards and guidelines and the Wilderness Management Plan try to lay out clear direction and goals to protect Wilderness values, including reasonable human use.

**PC 67000-6: The Forest Service should allow public access to Wilderness for enjoyment of the area as Wilderness.**

There is no proposal to close existing trails or limit existing access to Wilderness unless there is a specific resource concern. The WMNF has over 207 miles of trail within Wilderness.

- **By groups greater than ten on a limited basis.**

It is true that Wilderness designation imposes certain limitations on recreation and other uses. Many, if not all, of these are described in the environmental effects section of the Environmental Impact Statement. The Forest Service also understands that these limitations can be an inconvenience and that, moreover, limitation on group size is not a panacea to solve all problems associated with negative behavior. While the exact number can be argued, studies have shown that large groups have a disproportionate impact on fellow hikers and on the natural environment. The group size limitation within WMNF Wilderness has been in place for some time, and we continue to think it is an appropriate and manageable size for a group.

It would be very difficult for WMNF staff to implement a flexible system: how would we determine who gets to have a larger group if we received more than one or two requests per day? How could we justify allowing some groups to have twenty people while others would be allowed only ten? These are only some of the difficulties that come to mind.

The Forest Service agrees that education is key to improving hiker behavior and understanding. The Forest Plan and the Wilderness Management Plan both emphasize the need for increased education, including Leave No Trace. In addition to increased education on the Forest Service’s part, we hope that hikers and others will continue to exert peer pressure by modeling appropriate Wilderness and backcountry behaviors.



**PC 67000-7: The Forest Service should evaluate human impacts in Wilderness and adopt management direction for recreation.**

- **To possibly limit access in Wilderness.**
- **To ensure that impacts do not reach the point where a permit system is required.**

The revised Wilderness standards and guidelines, as well as the Wilderness Management Plan are designed to improve the WMNF's Wilderness stewardship. If evidence suggests that limiting access to Wilderness is the best way to maintain standards then it will be one of the management actions the WMNF will consider. The WMNF does not believe this should be the first course of action but only undertaken if it is clearly the only way to meet the objectives outlined in the Wilderness Management Plan.

In addition to the monitoring requirements described in the Wilderness Management Plan and Monitoring Implementation Guide, all relevant sources of data and appropriate public involvement will be used to inform our Wilderness stewardship. While, to the extent that the information is available, WMNF staff agrees with the potential sources of information described in the comment, the Forest Service does not intend to focus on this for the upcoming season. Rather, the WMNF intends to implement the monitoring schedule outlined in the Wilderness Management Plan and to take actions as needed.

- **To limit access in 9.1 – Recommended Wilderness.**

The purpose of MA 9.1 Recommended Wilderness is to: 1) Recognize the areas currently recommended for Wilderness pending higher-level decisions; and 2) Manage the land to protect Wilderness values to protect eligibility for the Wilderness preservation system. The WMNF does not think that the recommendations in the comment are needed to meet either goal. If these areas do become designated Wilderness then the objectives, standards and guidelines of MA 5.1 and the Wilderness Management Plan will all be used to guide the WMNF's stewardship. Also see responses 67000-5, 67000-6, and 95000-1.

- **To consider alternatives to trail improvements for human safety including seasonal trail closures.**

MA 5.1 purpose, desired condition, standards and guidelines and the Wilderness Management Plan all indicate that improvements should be minimal and in accordance with zone direction. Under 5.1 Trail Management and Operation, G-1 in the draft Plan states "Trails may be added or eliminated to protect Wilderness character". In addition, "Forest Supervisor's Orders or other means may be used to restrict or close activities or uses in order to prevent, mitigate, or correct existing or potential resource impacts, trail development, health and safety issues ... or other management concerns." (All Resources and Management Areas, Closures, G-1)

- **To prohibit certain types of high-risk recreation in order to reduce the possibility of search and rescue incidents.**

What one person considers high risk may seem routine to someone else. There is also no evidence to show that rock or ice climbing, skiing, etc.

necessitate more searches and rescues (in fact SAR data indicates that people who practice these sports tend to have a higher level of training and preparedness when compared to an “average” hiker). Because of these considerations, and the fact that the Wilderness Act specifies that one definition of Wilderness is to provide “... outstanding opportunities ... (for) primitive and unconfined recreation”, the WMNF does not agree that such a prohibition is appropriate.

In order to increase hiker preparedness and responsibility throughout the Forest, as well as to decrease the need for search and rescue, we have cooperated with NH Fish and Game to develop the hikeSafe program. For more information on this effort, see [www.hikeSafe.com](http://www.hikeSafe.com)

Also see PC 95300-1.

**PC 67000-8: The Forest Service should not allow motorized use in Wilderness.**

**PC 67000-9: The Forest Service should allow motorized use in Wilderness.**

- **For trail maintenance.**
- **For bridge and shelter maintenance, and to prevent structural deterioration that requires shelter removal.**

The Wilderness Act prohibits certain uses including “motor vehicles, motorized equipment ... mechanical transport ....” There are exceptions within the Act and within agency policy that allow for administrative motorized use when it can be considered “the minimum tool” necessary to accomplish Wilderness stewardship objectives. Motorized use can also be allowed for emergency response such as search and rescue. In other words, under extreme conditions, if the Forest Service can demonstrate that motorized use is the least harmful or impacting way to complete a given job, or that it will help protect life or limb, then it is possible to receive permission for administrative motorized use from the Forest Supervisor or Regional Forester.

While clearing trails with hand tools can take more time than using a chainsaw, use of primitive tools is part of preserving Wilderness character. After the 1998 ice storm, the WMNF worked with trail partners to clear trails using only non-motorized tools. This was a big decision that took a large commitment on everyone’s part. The trails were largely cleared within that summer’s hiking season, and WMNF trail crews received a Forest Service regional award for use of primitive tools. Maintaining these skills while also providing an area of the National Forest that is fundamentally different is part of the goal of Wilderness. Despite the inconvenience, many people enjoy learning how to use traditional tools.

The Forest Plan does not say that existing shelters within Wilderness must be removed. Instead, it delineates the criteria by which shelters should be considered for removal or retention. It also states that existing shelters or bridges must be maintained and not allowed to deteriorate. See MA 5.1 standards and guidelines for more specific details (Plan, Chapter 3).

**PC 91100-45: The Forest Service should consider using MA 6.2 for areas that are now designated Recommended Wilderness for non-motorized activities such as mountain biking.**

In each alternative, the Forest Service attempted to balance a variety of uses, interests and concerns. While there are many people who favor wilderness designation, there are also many people who favor a different management area designation. Each of these has trade-offs, including effects to recreation opportunities, that were discussed in the environmental analysis. Also see PC 68000-1 and PC 68000-2.

**PC 67000-10: The Forest Service should minimize installation of new structures and facilities or reduce or remove existing structure and facilities within Wilderness to protect Wilderness character.**

The standards and guidelines for MA 5.1 (Forest Plan, Chapter 3) and the Wilderness Management Plan both agree with this comment. The standards and guidelines specifically prohibit construction of new overnight facilities. They also outline criteria for removal or retention of existing overnight facilities, as well as how to minimize the presence and impact of existing shelters on the surrounding area.

- **To reduce the effects of the trail system on natural resources.**

Under MA 5.1 Wilderness, Trail Management and Operation, the Forest Plan states, “Trails may be added or eliminated to protect Wilderness character.” In addition, a Forest-wide guideline for Recreation, Trails, specifies that existing trails should be closed if there are unacceptable resource or social impacts that cannot be mitigated (Plan, Chapter 2).

- **Including trail bridges.**

The Wilderness Management Plan and the standards and guidelines for MA 5.1, Wilderness, all try to minimize structures and facilities within Wilderness. Bridges would be limited to Zones C and D only. After discussion, WMNF Wilderness staff believed the option for a bridge should remain as a tool, especially given that water crossings without a bridge can sometimes lead to resource damage. The Forest Service does agree, however, that bridges in Wilderness are not appropriate as a routine measure.

- **Including roads.**

WMNF Wilderness stewardship is guided by the Wilderness Act, which prohibits road building and other development in Wilderness. This is reflected in the MA 5.1 (Wilderness) standards and guidelines.

- **Including shelters.**

MA 5.1 (Wilderness) standards and guidelines delineate when it is appropriate to retain or remove an existing shelter. New overnight facilities are prohibited. The Forest Service does not agree that there should be a blanket policy of removing shelters, primarily because, at times, they are a better alternative for managing recreation impacts. Although it remains an option, relocating existing shelters poses potential problems with creating new impacts. Also see response above.

- **But allow trail signs to contain safety or resource protection messages.**

After further discussion, we continue to believe the standard restricting verbiage on trail signs in Wilderness is appropriate. While there are trade-offs to any approach, we think that this standard best meets the intent of maintaining Wilderness character, although the standard has been modified to allow for the name of the trail maintaining club or partner, and US Forest Service. Separate from trail signs, in limited cases signs may be used for resource protection and public safety, according to Wilderness Zone direction (see MA 5.1, Recreation, Forest Plan Chapter 3).

**PC 91100-43: The Forest Service should consider the sustainability and suitability of trails in MA 5.1.**

The descriptions of each zone were based on expert opinion, taking into account current use patterns. The actual mapping was based on current condition. The Wilderness management plan also established standards that not only reflect current condition in certain areas, but also set standards that the WMNF believes would help maintain Wilderness character.

The Forest Service agrees that we should work to maintain or even increase the quality of the Wilderness experience over time. To this end, the standards and guides for MA 5.1 specify that management actions “must not result in a change in the Recreation Opportunity Spectrum or Wilderness Management zone scale from less- to more-developed. For example, management actions must not change a zone from A to B, B to C, or C to D.” (MA 5.1 Recreation S-3)

Through monitoring, the WMNF intends to track each zone and whether or not standards are being met. This monitoring will allow us to ensure that standards are effective at maintaining Wilderness character and experiences.

**PC 67000-11: The Forest Service should allow the installation of structures and facilities, as well as increased roads and trails, within Wilderness.**

WMNF Wilderness management is guided by the Wilderness Act, the Eastern Wilderness Act, individual enabling legislations, and agency policy. While trail construction is allowed within Wilderness, roads are not (see MA 5.1, Wilderness, standards and guidelines). For more discussion on the overall issue of Wilderness allocation, see responses to PC 67000 and PC 68000.

The Forest Plan also addresses construction of roads and trails outside of designated Wilderness. See Chapter 2, Forest-Wide Management Direction.

**PC 67000-12: The Forest Service should consider roadless areas with inholdings for Wilderness designation.**

Inholdings are not prohibited under the Wilderness Act. However, because of the many challenges associated with managing a Wilderness that contains inholdings, including potential conflicts over motorized access and uses that are not consistent with Wilderness designation, we prefer to avoid them wherever feasible.

**PC 67000-13: The Forest Service should change the education message for Zone A in the Wilderness Management Plan regarding recommended group size and travel techniques.**

While there may be a difference of opinion on this educational message, the Forest's Wilderness staff has considerable experience with off-trail travel in dense White Mountain spruce-fir. The message is designed to help minimize human impacts in relatively pristine off-trail areas. Hikers who are not comfortable traveling off-trail in small groups should consider staying on trails or outside designated Wilderness.

The trailless area of WMNF Wilderness, (Zone A) begins 500 feet from a trail. WMNF staff experience is that most people actually camp within 500 feet of trails, so we do not think this message would have much effect on Wilderness camping.

**PC 67000-14: The Forest Service should clarify whether Wilderness staffing levels can be maintained for the life of the Plan, especially with added Wilderness.**

It is almost impossible to predict exact budget levels for the life of the Forest Plan. While there may be challenges and trade-offs in terms of how recreation and Wilderness programs are planned, the Forest Service believes the Wilderness Management Plan can be implemented even if staffing levels fluctuate.

**PC 91000-24: The Forest Service should prohibit all development, use or change in Wilderness areas unless occurring naturally.**

Part of the goal in National Forest management is to create a balance of uses so that people can enjoy different activities and so that resources can be managed in a sustainable way. The wilderness management plan tries to find a balance between allowing recreational use where appropriate, maintaining wilderness character and generally minimizing the imprint of man. While it does not prohibit all potential development, such as trails and existing shelters, it does try to provide clear guidance as to when and where these developments may be acceptable. In general, it provides guidance for management that will minimize development and decrease impacts to wilderness values. See the Wilderness Management Plan within the Forest Plan.

Also see PC 67000-5.

**PC 99100-1P: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Change Wilderness guidelines to allow adding or eliminating trails to protect Wilderness character.**

After further review, a new standard has been added, and guideline G-1 has been changed.



**PC 99100-1ii:**

- **The Appalachian Trail should be included in the Wilderness Plan maps**

The maps in the DEIS, of necessity are of a scale to show the overall concepts. Details come from working maps. These maps are available at the District or Supervisors offices. They can also be found using the “GeoBook” disc that was mailed with each of the Forest Plans. Also see response to PC 91700-15.

**PC 99100-1oo:**

- **Standard S-2 under Trail Management and Operation in Wilderness should be clarified**

The Forest Service believes that the current wording, “... used in preference to blazing ...” is clearer than “... prohibited but may be allowed ...” as recommended.

**PC 99100-1rr:**

- **In the MA 5.1 (Wilderness) Desired Condition, paragraph 2, the statement that “natural process will take precedence over recreation objectives” should be moved to the purpose section to emphasize that Wilderness users need to assume responsibility for themselves.**

The cited statement is intended to highlight that natural processes will be allowed to occur without interference as much as possible within Wilderness. Item number four in the Purpose section for MA 5.1 already emphasizes that point, so additional language is not necessary. Forest-wide recreation guidelines (Plan, Chapter 2) emphasize Forest user responsibilities within and outside Wilderness.

**PC 99100-1tt:**

- **Wilderness education messages should reference Leave No Trace guidelines upon which some of them were based.**

We agree and have made the change.

**PC 99100-1uu:**

**The “methods of measure” within the Wilderness Management Plan are arbitrary and statistically questionable or invalid.**

The monitoring methods outlined in the Wilderness Management Plan are the product of an assessment of current practices used in other forests, parks and protected areas, as well as discussion and evaluation of those methods by WMNF wilderness managers. Rather than being arbitrary, the Forest views these methods as reflective of best available information at both the local and national scale.

An important component of the Wilderness monitoring and management processes is the inclusion of managers as active participants. The monitoring methods section of the Wilderness Management Plan lays out the framework for monitoring and management activities, including setting standards,

choosing sites, and identifying management actions. Most of the standards do not depend on statistical validity. Where statistical validity is required, such as for the social monitoring, the Forest Service will work with its own staff and researchers who have expertise in this area.

**PC 99100-1vv:**

- **Management actions are the same in all Wilderness zones, and require rethinking if the zones are different.**

While the potential management actions are the same, the desired conditions and the limits the standards set all differ. A fairly discrete set of management actions are available for meeting the desired conditions of a specific area. What differs are the limits that trigger a management response, the desired conditions of that area, and the monitoring needed to measure whether or not standards are being met.

**PC 99100-1ww:**

- **“Cell-phone fee zones” should be created in Wilderness.**

The Forest Service believes that cell phones are better regulated through peer pressure and education than through legal closures. Legal prohibitions would be extremely difficult, if not impossible, to enforce and would punish responsible cell phone users along with irresponsible users. In addition it would be difficult to define what is “the least disturbing format”. Another person might not even notice what is extremely disturbing to one person. That said, we will continue to work with hikers and partners to protect respect for solitude and the backcountry experience through messages on proper cell phone use in written information, and in relevant talks and presentation on backcountry safety and Leave No Trace ethics.

**PC 99100-3F: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **The Plan is inconsistent in its use of the terms “native” and “on-site” materials within Wilderness.**

The Forest Service does not agree with the comment that there is an inconsistency in how the term “native” is used. In all cases “native materials” are meant to indicate materials that are gathered on-site. The intent of these standards and guidelines is to encourage use of local, or native, materials whenever possible and practical. By emphasizing native materials, we intend to be more in keeping with the surrounding environment to the extent possible. We also recognize that it is not always practical or desirable to use native materials, and that dimensional lumber may be necessary for the upkeep of certain shelters. In any case, all materials should look as natural as possible.

In the case of trails, we agree that in places where bridges are required it will usually be impossible to use only native materials. Therefore, we have revised guideline G-2 under trail construction.

- **The Wilderness zoning map omits spur trails to Owls Head, Davis, and Isolation. Are these to be considered off-trail travel for camping regulations.**

In regard to Wilderness zoning maps and spur trails, areas with unofficial trails are considered “off-trail.” We did, however, modify the zone descriptions to acknowledge areas such as Owls Head that are long-standing exceptions within the trailless zone. Other changes have been made to the Wilderness zone maps to better represent actual trail conditions.

- **The first general standard in MA 9.1 is confusing because we are unaware of any Recommended Wilderness areas that the Appalachian Trail would traverse.**

In regard to overlap of the AT and Recommended Wilderness management areas, there is currently no proposed Recommended Wilderness (MA 9.1) through which the AT traverses. Since final Wilderness boundaries would be determined by Congressional designation, it seemed prudent to include the AT standard stating that where there is a conflict, the stricter standards and guidelines apply.

**PC 91100-15: The Forest Service should clarify how establishing zones in Wilderness is any different from MA 6.1.**

The proposed Wilderness plan does not lay out 4 zones of wilderness but rather identifies 4 zones within designated Wilderness. This distinction is important to remember as all of the zones must meet and maintain the standards for Wilderness designation. The complete difference between MA 6.1 and 5.1 can be found in the standard and guidelines section of the Forest Plan. In summary, the differences include the types of allowable recreation (mountain bikes and snow machines are allowed in MA 6.1 but not in designated Wilderness); development levels, including construction of temporary roads in MA 6.1; allowance of salvage timber harvesting in MA 6.1 but not in Wilderness; and an emphasis on allowing natural ecological events and process to occur within Wilderness.

The Wilderness Act of 1964 defines Wilderness in several ways:

“...A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean ... an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and preserved so as to preserve its conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation....”

While the Wilderness Act of 1964 lays out many difficult and sometimes seemingly conflicting goals and objectives, the WMNF believes the proposed Wilderness Plan, including management actions guided by zones, is consistent with the Wilderness Act.

Also see response to comments 91000-25.

#### **Wilderness Recommendation**

- PC 68000-14:** **The Forest Service should clarify its rationale for Wilderness recommendation, especially regarding recreational use vs. ecological functions.**

Recommended Wildernesses were derived from the existing inventoried roadless areas based on several criteria, discussed in the FEIS (Chapter 3, Wilderness section). Providing opportunities for solitude and unconfined recreation was one of the criteria, although not the only one. The Selected Alternative, including Wilderness recommendations, was based on an attempt to balance a variety of uses, interests, and concerns. Also see responses to PCs 91100-12, 91100-15, and 91100-45.

- PC 68000-1:** **The Forest Service should recommend expansion of the Pemigewasset and Sandwich Range Wilderness and recommend the Dartmouth and Wild River Roadless Areas for Wilderness designation.**

- **Because wilderness designation will provide additional recreation opportunities.**
- **Because there is not enough wilderness in New England.**
- **Because wilderness is an important legacy for future generations.**
- **Because Wilderness designation helps to maintain healthy ecosystems.**
- **Because Wilderness designation will help protect the water quality, particularly in the headwaters of the Saco and Androscoggin rivers.**
- **Because Wilderness designation would be a more appropriate use of the resource than timber harvest and infrastructure support.**
- **Because evidence shows that the size of the undisturbed habitat is a key factor in ecosystem health; the expanded wilderness areas will preserve ecosystem health.**
- **Because pressures from adjacent development and pressure to allow mechanized travel in these areas will continue. Wilderness designation will provide permanent protection.**
- **Because the roadless rule is vulnerable to modification adverse to the goals of additional roadless protection and wilderness designation.**

Alternative 3 of the DEIS includes recommending these areas for Wilderness designation. The affected environment and effects are also documented in the EIS. Each of the areas were evaluated for wilderness suitability. The decision on what to recommend for Wilderness designation is based on evaluating the trade-offs and values of different uses of National Forest land. The Record of Decision states what roadless areas are recommended for Wilderness designation and the rationale for that recommendation. Also see 68000-2.

**PC 68000-2: The Forest Service should recommend designation of additional Wilderness (non-specific).**

- Because areas which retain wilderness characteristics are rare.
- Because these wild areas, which are important state and regional assets, are being lost to development.
- Because increasing population in the northeast are imposing ever-increasing demands for housing and for recreation opportunities.
- Because wilderness is an important legacy for future generations.
- Because wilderness enhances our quality of life through protection of natural resources and by providing important esthetic and spiritual benefits.
- Because wilderness designation offers protection for forest biodiversity.
- Because larger blocks, rather than smaller blocks, of wilderness more effectively protect the integrity of the natural ecosystem.
- Because it is important the wilderness system include representative populations of all forest types.
- Because the public expressed strong support for additional wilderness in the response to the notice of intent.
- Because the long-term implication and efficacy of some resource management practices are not proven; wilderness prevents this management “intervention.”
- Because wilderness provides important baseline information for scientific forest research.
- Because wilderness promotes tourism; additional wilderness designation is important to local economies.

The WMNF recognizes public support for Wilderness designation, as well as the values that have been expressed. These are discussed, along with delineations of elevations and land types, in the Wilderness section of the FEIS. The selected Alternative proposes 10,800 acres of Recommended Wilderness within the existing Sandwich Range Wilderness and a new Wild River Wilderness of 23,700 acres. The overall amount of recommended Wilderness reflects an attempt to balance the various needs, uses and public values of National Forest land.

Boundaries were identified based on several factors. These included if the proposed boundary would: add to the ability of visitors to have a Wilderness experience; make the Wilderness more manageable; supplement Wilderness values such as solitude, and provide recognizable boundaries on the ground. We also carefully considered trade-offs for other uses.

Appendix C of the FEIS contains a discussion of Wilderness needs.

**PC 68000-3: The Forest Service should recommend the Dartmouth Range for Wilderness Designation.**

- Because Dartmouth is among the most remote areas on the Forest.



The WMNF evaluated the suitability of the Dartmouth Range for Wilderness Designation in Appendix C of the FEIS. The overall amount and specific areas of recommended Wilderness reflect an attempt to balance the various needs, uses and public values of National Forest land.

**PC 68000-4: The Forest Service should maintain and protect existing Wilderness.**

The WMNF agrees and is meeting this goal through standards and guidelines for MA 5.1 Wilderness and through the Wilderness Management Plan. Also see PC: 68000-2.

**PC 68000-6: The Forest Service should not recommend any additional areas for Wilderness designation.**

- Because the amount of wilderness considered for designation should be determined not by the size of the WMNF land base but by management objectives and environmental conditions.
- Because the world's growing population continues to increase its demand for wood fiber; our national has an obligation to manage our renewable resources to supply as much of our own wood fiber needs as possible and because wilderness designation removes forest land from the timber base.
- Because of increasing demand for forest products, more imports are coming from forests with limited or no sustainability plans. Wilderness designation removes future management options to response to these evolving global forest products supply conditions.
- Because wilderness allows only limited access to the disabled.
- Because the current level of wilderness is the result of a compromise reached during the preparation of the 1986 plan.
- Because a suitable alternative to wilderness designation would be management area 6.1 or 6.3.
- Because wilderness designation is not responsive to the continued development of private timber land which results in loss of timber production in the private sector.
- Because wilderness designation limits management options for the control of invasive plants and diseases.
- Because wilderness designation attracts more visitor use; this increase in use detracts from the area's wild character.
- Because the intangible human benefits and values found in wilderness can also be found in other management areas.
- Because the Forest Service has an obligation to recover the federal funds that have been invested to improve the quality of timber growing in the areas currently under consideration for wilderness recommendation.

- **Because the Forest Service has effectively demonstrated its ability to restore and protect forest resources, safeguarding resources and recreation experiences outside of Wilderness designation.**
- **Because additional Wilderness is contrary to the Forest Service mission of multiple use; additional Wilderness is exclusionary.**
- **Because Wilderness adversely effects the Forest's ability to support diverse wildlife population.**
- **Because the Forest Service has failed to show adequate scientific rationale for additional Wilderness designation overall or for additional Wilderness designation for specific land type associations.**

Forest Plans require that the Forest Service allocate lands to particular management areas, including analyzing suitability for recommended Wilderness. The WMNF recognizes that recommending National Forest land for Wilderness designation involves numerous trade-offs and effects. These effects, including the amount of WMNF land that is currently suitable for timber harvesting as well as effects to recreation, within the proposed recommended Wilderness is detailed in the DEIS. For some people MAs 6.1, 6.2 or 6.3 serve the same purposes as Wilderness designation, for others there is a notable difference. The objectives for each MA, including standards and guidelines for managing recreation and invasive species, are shown in the Forest Plan.

While Wilderness designation would prohibit most motorized access and mountain bikes, wheelchairs, including motorized wheelchairs, are allowed within designated Wilderness. The Record of Decision will state what roadless areas are recommended for Wilderness designation and the rationale for that recommendation. Appendix C of the FEIS contains a discussion of Wilderness needs.

**PC 68000-7: The Forest Service should recommend the entire Wild River Roadless Area for Wilderness designation.**

- **Because this would offer a unique low-elevation, less rigged wilderness experience.**
- **Because Wild River rates, meets or exceeds the criteria for wilderness consideration.**
- **Because the entire watershed should be designated as wilderness.**

The boundaries of all the recommended Wilderness areas were drawn considering the many trade-offs as well as policy. For example, including the entire drainage would necessitate closing the campground and its access road. We do not believe this is a trade-off worth making.

The proposed boundary adds — acres of low elevation lands to potential WMNF Wilderness while also allowing for some lands with the Wild River Valley to remain available for timber management and other uses. Forest-wide standards and guidelines protect water quality regardless of the MA designation and while many wildlife species will use habitat that occurs in Wilderness, they are selecting areas based on habitat conditions that are not unique to Wilderness, so Wilderness designation is not essential to them

**PC 68000-8: The Forest Service should allocate large “wild” areas to a management area that provides for more management options than formal Wilderness designation.**

- **Because the advantages of wilderness designation are unclear; protection of the wilderness character could be achieved in a less restrictive allocation.**

The WMNF does not have the authority to create new categories of Congressionally-designated lands. This would have to be accomplished outside of the Forest planning process. It would be possible to allocate the land to other management areas such as 6.1, 6.2 or 6.3. These have different objectives and standards and guidelines, as described in the Forest Plan. Our decision balances between the wide range of needs that people expressed. For more discussion, also see response to 68000-6.

**PC 68000-9: The Forest Service should recommend the Sandwich 3 Inventoried Roadless Area for designation as Wilderness.**

The location of the Wilderness boundary in the vicinity of Flat Mountain Pond was drawn to include the Pond itself, but it intentionally excluded the dam itself (and nearby camping shelter and toilet building) from the Wilderness. Thus, the popular site currently provides a primitive camping and fishing experience, although it is in a semi-primitive management area (MA 6.3). Wilderness designation would ultimately require the dam, shelter, and toilet be removed as structures that do not conform with Wilderness objectives. This would likely have an adverse effect on camping and fishing experience and use. (Wilderness is defined as an area “without permanent improvements or human habitation” in the Wilderness Act of 1964. Section 4.c of the Act states that “there shall be ... no structure or installation within any such area.”)

The designation of this area as Wilderness would not likely have a discernible beneficial effect on the values of scenic integrity, current use, resource protection, or accessibility to hikers, particularly in Management Area 6.3. Very little extractive resource management activity has occurred on any MA 6 areas on the Forest during the first Forest Plan period (1986 to present), and we expect that same minimalist approach will dictate management of MA 6 in the next Forest Plan period. Forest management in Management Area 2 land are also subject to standards and guideline designed to protect many of these same values.

**PC 68000-10: The Forest Service should allow mountain bikes in all areas currently being considered for recommendation for Wilderness designation.**

- **Because mountain bikers provide positive economic impacts to local economies.**
- **Because wilderness designation excludes a responsible user and partnership groups.**

Mountain bikes would be allowed in MA 9.1 (Recommended Wilderness) on existing trails. No new trails would be allowed. If an area is eventually

designated as Wilderness, it would become MA 5.1 (Wilderness). Based on the Wilderness Act and Forest Service policy, mountain bikes are prohibited from designated Wilderness. The effects and tradeoffs of Wilderness designation are described in the FEIS, Chapter 3.

**PC 68000-11: The Forest Service should not recommend the Kilkenny Roadless Area for Wilderness Designation.**

The WMNF is not proposing the Kilkenny Roadless Area for Wilderness designation in Selected Alternative 2

**PC 68000-13: The Forest Service should recommend the Pemigewasset extension for Wilderness designation.**

In drawing proposed boundaries for recommended Wilderness, the Forest Service considered trade-offs and values to best meet a variety of sometimes conflicting demands and interests. See FEIS, Appendix C.

**PC 68000-15: The Forest Service should not recommend the entire Wild River Inventoried Roadless Areas as Wilderness.**

The Forest Service is not recommending the entire roadless area for Wilderness designation. Boundaries were selected to provide for a manageable area with high Wilderness values, and considered the trade-offs Wilderness designation would incur.

**PC 91000-16: The Forest Service should make sure all Forest Plan documentation is correct and available in an expeditious manner.**

Concerns were expressed that not all of the planning material was available on the web site until well into the comment period. All written material was, and is still, available on the web site. The entire Administrative Record is available to the public in the Laconia Forest Supervisor's Office. When additional electronic information was requested, such as GIS shape files these were made available on the web site as soon as they could be prepared.

Reviewers noted several factual errors in the DEIS, especially in Appendix C where the individual Sandwich Inventoried Roadless Areas were mis-labeled. The errors have been corrected in the Final EIS. While the correct numbering would have made the description easier to understand, this would not have changed our Selected Alternative.

**PC 91100-72: The Forest Service should allow local management decisions to be made regarding lands in the proposed Wilderness areas.**

The Forest Service does allow for local decision-making, within the parameters of the Wilderness Act and Forest Service policy on Wilderness management. See the Forest Plan, Appendix E, for the WMNF Wilderness Management Plan.

**PC 91700-16: The Forest Service should produce an improved map showing the Great Gulf Wilderness Zone in greater detail.**

The problems noted in this comment were an artifact of the GIS process. Wilderness zones were never intended to extend beyond the Wilderness

boundary. Based on public comment and an internal review, we have changed some of the zone maps.

**PC 95000-1: The Forest Service should consider implementing a permit system in Wilderness.**

- **To limit human activities in Wilderness.**
- **To allow for additional education and the enforcement of personal responsibility .**
- **Because camping should be limited in fragile areas.**
- **To preserve the Wilderness designation and purpose.**
- **Because a permit system will assist in monitoring efforts.**

Providing stewardship for Wilderness, especially in places such as the WMNF where most areas that have been designated as Wilderness have a long history of human use, provides many challenges. In general, it is a constant balancing act to protect natural processes and to provide for solitude or primitive and unconfined recreation. The question of whether permits are appropriate is one that needs to be continually asked and examined. In the past the WMNF did institute permit systems for the Great Gulf and Presidential Range/ Dry River. These were abandoned when it was determined that the overnight capacities were rarely reached.

Permits appear to affect the opportunity for unconfined recreation—at least from the start since visitors have to apply for and receive the permit-although once in an area they may help create more of a sense of solitude and uniqueness.

The WMNF does not think that permits are necessary at this time to protect the values that commenters have cited. Instead, we believe that education efforts, properly applied area restrictions, appropriate monitoring, and adherence to the standards outlined in the Wilderness Management Plan will help us redeem our wilderness stewardship responsibilities while also minimizing unnecessary restrictions or controls on Wilderness access.

The Wilderness Plan outlines specific education objectives that will be critical to maintaining wilderness character. We believe these efforts, combined with other Forest-wide education efforts such as Leave No Trace, will serve the purpose. The Forest Service also has less onerous ways of controlling use, including Forest Supervisor's Orders that implement closure orders for sensitive areas. There are several of these orders currently in effect within WMNF Wilderness. Further, if our assessment of monitoring data as prescribed in the Wilderness Management Plan indicates that numeric limits on use are needed—and that a permit system is the appropriate mechanism—then we would implement such a system. In sum, while we may like the idea of increasing hikers' sense of personal responsibility, we do not think a permit system is the best way to reach this goal.

Finally, there is disagreement in the professional and academic world as to the efficacy of permit systems. Clearly, under the right circumstances permits provide a critical management tool. Permits, however, tend to imply faith in a numeric system, by assuming there is a direct, linear relationship



between use and impact and that we can exactly quantify appropriate numbers of visitors to a given site. Instead, studies have shown that much of the physical impact occurs during the first few times a site is used. Therefore, restricting numbers of people doesn't automatically decrease impact; the type of impacts occurring on a site should be of primary concern. The proposed Wilderness management plan tries to take a more holistic approach, by measuring impacts against desired conditions. The amelioration of these impacts and the restoration of desired conditions then becomes the goal of Wilderness management, rather than simply trusting that impacts will not occur if numbers of visitors are limited.

## **Other Special Areas**

**PC 89100-2:     The Forest Service should increase semi-primitive non-motorized (SPNM) protection to the Elbow Pond Basin to that afforded under Alternative 3.**

This area is one that was evaluated as part of the floodplain terrace forests and wetlands discussed in PC 14000-2. See that response for additional information.

**PC 89300-1:     The Forest Service should conduct research beyond what is done on experimental forests, and should not focus only on short-term goals.**

Research at Hubbard Brook and Bartlett Experimental Forests is administered by the Northeast Research Station. They determine the amount of research within the context of the Research Projects Work Unit Descriptions. The amount of research allowed at any one time depends on a variety of factors, including coordinating activities so they do not affect each other's success.

Research is allowed outside the experimental forests, but within the White Mountain National Forest. This is administered by the National Forest and coordinated with management area goals, objectives, standards, and guidelines.

**PC 89300-2:     The Forest Service should expand the size of the Bartlett Experimental Forest.**

The WMNF supports this expansion. As research needs change, and as natural resource management operates more at the landscape scale, size is a factor in doing quality research.

**PC 89300-3:     The Forest Service should expand the research scope of the Bartlett Experimental Forest.**

Research at experimental forests is determined by a five year Work Unit Description, which sets out the major problem areas and scope of activity. Participation in these reviews, lead by the Northeast Research Station, is the opportunity to affect such programs. This was done recently for research at BEF. The scope of research at the Bartlett Experimental Forest has been expanded recently, especially in the application of remote sensing to estimate

forest productivity and measurement of carbon exchange between forests and the atmosphere.

**PC 89300-4: The Forest Service should increase the number of experimental forests and broaden the scope and purpose of experimental forests.**

Expansion of the Bartlett Experimental Forest is the proposal mutually agreed to for incorporation into this Forest Plan revision. We have forwarded these suggestions to the Forest Service Chief of Lab for consideration.

**PC 89300-5: The Forest Service should continue to facilitate research on experimental forests.**

The WMNF and the Northeastern Research Station work with a wide range of cooperators at universities, institutes, and other public agencies to facilitate research on experimental forests and National Forest System lands.

**PC 89300-6: The wildlife standard for experimental forests should be similar to the guideline for vegetation management.**

The wildlife standard has been modified to make it more consistent with the vegetation guideline in this management area.

**PC 89400-1: The Forest Service should increase the number of Research Natural Areas.**

Comments were made suggesting the Forest actively move forward and designate the candidate Research Natural Areas. Some also suggested adding areas to the candidate list. Once the plan is revised, the Forest will push for designation of the candidate areas. In addition, we will continue to study the need to recommend additional areas. This will be done in close coordination with the Forest Service's Northeast Research Station.

**PC 89400-2: The Forest Service should expand the Welch Dickey RNA.**

There is currently no Welch-Dickey RNA. It has been suggested that the jack pine in this area would be a good addition to the Forest's RNAs, and this suggestion will be forwarded to the Northeastern Research Station for consideration. Identification of candidate RNAs is a joint effort between the Forest Service and the Research Station.

**PC 89400-3: The Forest Service should expand the Bowl RNA and restrict recreational use.**

Expansion of the Bowl RNA was identified in the 1986 Forest Plan as the Bowl Extension Candidate RNA. The designation process that would add this area to the Bowl RNA has been started, but not completed. This area remains a Candidate RNA in the revised Forest Plan.

The Forest Service spent considerable effort trying to coordinate the goals for Research Natural Areas and existing recreation use at the programmatic level of a Forest Plan. In particular, the Bowl RNA, which was established in 1934, overlaps with part of the Sandwich Range Wilderness. This coordination is reflected in the standards and guidelines (Plan, Chapter 3,

MA 5.1 and 8.4). Site-specific issues (e.g., human waste disposal) have been brought to the attention of the Saco Ranger District.

**PC 89400-5: The Forest Service should broaden or clarify the purpose of Research Natural Areas.**

Research Natural Areas (RNAs) are part of a national network. The purpose for these areas is defined in national policy. One of the RNA Management Area purpose statements paraphrases this national policy by stating, “Preserve a wide spectrum of pristine representative forest, alpine, and geologic areas having scientific interest.” A commenter interpreted the use of “representative” to mean that only one RNA could be established for each pristine area type. This is not the intent. Neither national policy nor plan direction is meant to limit RNA’s to one of each type. In fact, for the matrix forest (northern hardwood, spruce-hemlock) there are multiple candidates or designated RNA’s on the White Mountain National Forest, including the recently proposed Shingle Pond candidate area.

**PC 89400-6: The Forest Service should consider quarantine efforts in Research Natural Areas to prevent the development of non-native invasive species.**

Instituting a quarantine for Research Natural Areas is an admirable goal in theory, but because many species such as common reed and purple loosestrife are dispersed primarily through wind, the idea is unrealistic. New standards and guidelines specific to preventing and eradicating non-native invasive species were added in this Forest Plan revision and goals for Non-Native Invasive Species specifically address Research Natural Areas as one of the high priority areas to emphasize management efforts.

**PC 91100-26: The Forest Service should decrease the total number of management areas to a more controllable quantity.**

The identification of management areas is a balance between simplifying management and providing enough detail to protect unique areas or provide different management regimes. Many of the management areas such as Wilderness, Scenic Areas, Research Natural Areas, and the Appalachian Trail have been formally designated through law or policy. Each of these areas has a different set of standards and guidelines designed to achieve desired future conditions that are specific for each management area. Some of the other management areas such as the alpine zone are so sensitive that we believe they need a special focus to ensure their protections. Four of the six “special areas” (MA 8.1) in the current Plan were assigned new 8.x designations merely for greater ease in finding them in the Plan, so they are not in fact “new” management areas. See also response to PC 91100-58

**PC 91100-31: The Forest Service should designate Shingle Pond as a Candidate Research Natural Area.**

Shingle Pond is proposed as a Candidate RNA in Alternatives 2, 3, and 4..

**PC 91100-51: The Forest Service should verify the management area associated with Ethan Pond.**

As a result of changes in defining the Appalachian Trail Management Area, Ethan Pond is in the AT MA (MA 8.3) rather than the Lincoln Woods Scenic Area. References to Ethan Pond have been dropped from the direction in MA 8.5 (Scenic Areas).

**PC 91100-55: The Forest Service should maximize acreage in all new and established scenic areas.**

**PC 91100-81: The Forest Service should designate the area known as “Windy Corner” as MA 8.5.**

- **In order to preserve their natural beauty.**

Maintaining this distinctive beauty is a major goal of the WMNF. (See Goals –Scenery Management). All management activities take place with full consideration for visual quality. In addition, since 1986 the Forest Plan has identified several management areas that provide the same level of “preservation of natural beauty” as designated Scenic Areas (MA 5.1, 6.1, 6.2, 6.3, 8.1, 8.3, 8.4, 8.5, 8.6, 9.1, and 9.3).

The comment on “Windy Corner” expresses concern for the visual attractiveness of the area. The area in question is within MAs 8.3 (Appalachian National Scenic Trail) and MA 6.2 in the revised Plan. Both of these MAs provide significant protection to visual quality.

**PC 91100-58: The Forest Service should assemble all “special use” areas into one category.**

Four of the six “special areas” are in the current Plan. For simplicity, the Forest Service assigned each of these subgroups different 8.x numbers rather than showing them as subgroups within 8.1. The Wild and Scenic River MA resulted from Congressional designation of the Wildcat Wild and Scenic River. The other, the Alpine Zone, was believed to be important enough to have its own MA in order to provide full recognition of this unique environment on the WMNF. Each management area (including each of the “special areas”) has its own specific mix of management activities and standards and guidelines. See also response to PC 91100-26.

**PC 91100-85: The Forest Service should consider special management area designations for old growth.**

Most of the existing old growth on the Forest is in small, isolated patches that would not be appropriate for identification as separate MAs. One exception is the new Shingle Pond candidate RNA, which is proposed through this revision effort to protect areas of old forest. Much of the Forest’s existing old growth is in management areas that do not allow commercial timber harvest and standards and guidelines prohibit timber harvest in old growth, even in MA 2.1. Therefore future management options for this unique habitat should remain open regardless of management area allocation.

**PC 99100-1W: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Suggestions to refine the Desired Future Condition statement for the Alpine Zone.**

MA 8.1 has a series of standards and guidelines which appear to be sufficient for addressing appropriate uses on and off trail in the alpine zone. At this time the Forest Service believes that the recreation activities currently described in the desired condition are sufficiently expressed. Research activities usually come as proposals to the Forest Service. Since all research activities on the Forest require special use permits (see guideline G-3 in the Plan, Chapter 2, Lands section) any research proposals in the alpine zone will have to be reviewed for consistency with the alpine zone management area objectives.

**PC 99100-1aa:**

- **Direction for Research Natural Areas (MA 8.4) and Candidate Research Natural Areas (MA 9.3) should be clarified regarding recreation use.**

The standard has been revised to read, “Management actions likely to introduce new or additional recreation use are prohibited.”

**PC 99100-1dd:**

- **The Desired Condition for the Alpine Zone incorrectly refers to “winter orienteering.”**

The term should have been “winter mountaineering,” and has been corrected.

**PC 89400-7: The Forest Service should ensure that a reasonable amount of RNA land is below 2500 feet.**

The Forest Service specifically examined the opportunities for RNA designation at low elevations during this Plan revision. This included the opportunity to expand existing RNAs or candidate RNAs into lower elevations, and searching for additional candidate RNAs. Opportunities for expansion consistent with the purposes of RNAs were not found, however, an additional candidate RNA, Shingle Pond, was identified and recommended. This includes outstanding examples of red spruce and hemlock old growth at less than 2,500 feet elevation. Overall, roughly half of the acreage in Research Natural Areas and Candidate Research Natural Areas in the revised Forest Plan is below 2,500 feet elevation.

**PC 89400-8: The Forest Service should ensure the public has full access to data collected from RNAs.**

Data collected by the National Forest is available to the public. Research data is typically made available after it is peer reviewed and published in journals or other outlets.

**PC 89400-9: The Forest Service should ensure that research in RNA's is constrained by potential impacts to other natural resources.**

Research permitted in RNAs or candidate RNAs is non-manipulative or minimally manipulative. Standards and guidelines for such resources as



federally-listed threatened and endangered plants and animals, Region 9 sensitive species, or historic resources are still applicable.

**PC 91100-66: The Forest Service should combine candidate Research Natural Areas with Research Natural Areas.**

While the standards and guidelines for the two management areas are almost identical, there are significant differences between the purposes for each management area and in the permanency of the designation. The designation of an area as a Research Natural Area is done by the Regional Forester with the concurrence of the Research Station Director. It is a permanent designation. In contrast, the designation of an area as a Candidate Research Natural Area is a temporary one. In addition, the Purpose sections for each management area described in Chapter 3 of the plan are very different. For example, Research Natural Areas are managed to provide baselines for measuring long-term ecological changes while Candidate areas are managed to protect their eligibility for designation as a Research Natural Area. The permanency of designation and the stated purpose for each management area is taken into account by decision makers when deciding whether to approve proposed activities in the area. For this reason, we decided that the two management area designations should be retained.

## **Wild and Scenic Rivers**

**PC 66000-1: The Forest Service should add more Wild Scenic and Recreational Rivers.**

**PC 91100-63: The Forest Service should include headwaters and tributaries in the Wildcat Wild and Scenic River MA 8.6.**

Congress establishes the boundaries for designated Wild and Scenic rivers, and these are reflected in the management area (MA 8.6) boundaries mapped for all alternatives. Protection within the area is detailed in general Forest-wide direction (Forest Plan, Chapter 2) and in MA 8.6 direction (Plan, Chapter 3). The Plan also presents the Desired Future Condition of the land, including a statement that says, "High altitude areas of the river remain in pristine condition." Protection of the river from activities outside the MA boundaries takes several forms. As the goal in chapter 1 of the Forest Plan points out, we will protect the Wild and Scenic values of this river, as well as all other inventoried potential Wild and Scenic rivers. Forest-wide management direction under the Water Resources section of Chapter 2 outlines standards and guidelines which limit or mitigate impacts from activities in management areas upstream from MA 8.6. This direction is sufficient to protect the Wildcat's Wild and Scenic river values.

The Forest Service has evaluated the eligibility of river segments identified in the National River Inventory, along with eighteen other river segments judged to meet eligibility criteria. Of the 38 rivers evaluated, 36 were considered eligible for inclusion in the National Wild and Scenic Rivers System, and these, along with their highest potential classification are listed in Appendix C of the Forest Plan. Suitability studies are required before a

recommendation can be made to Congress; and, based on current Forest priorities as well as budget concerns; we do not anticipate completing additional suitability studies in the near future. Until these studies can be completed, existing regulations and policies provide protection for the eligible rivers. Both the goal for Wild and Scenic Rivers in Chapter 1, and the standard in Chapter 2, state that potentially eligible rivers will be protected to maintain their eligibility for classification.

**PC 66000-2: The Forest Service should monitor and restrict access and use of Wildcat Wild and Scenic River Corridor.**

**PC 91100-64: The Forest Service should limit human involvement or activity in the Wildcat Wild and Scenic River management area.**

As stated in the FEIS, the Wildcat Wild and Scenic River segments managed by the Forest Service are designated as “scenic” and “recreation.” by the Act. Scenic designations are described by the Act as those “that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.” Recreation segments are those “that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.” Among the provisions of Public Law 100-554 that designated segments of the Wildcat and its tributaries as part of the NWSRS, was the establishment of the Wildcat River Advisory Commission (Commission). The Commission was tasked with assisting the WMNF in preparing a Comprehensive River Management Plan (CRMP). The CRMP, using the Act’s Scenic and Recreation definitions as a framework, evaluates existing recreational uses, access to river and human interactions and identifies standards and guidelines to protect the river. The Commission evaluated the existing situation, developed goals, desired conditions, identified stakeholders’ responsibilities and roles, and developed resource protection standard and guidelines that protect or enhance the rivers’ free-flowing condition and the values for which it was designated. Nothing in the law would limit human activity other than in the Forest Plan standards and guidelines.

## **Roadless**

**PC 40000-1: The Forest Service should protect roadless areas.**

**PC 40000-2: The Forest Service should provide stronger protection of roadless areas.**

**PC 40000-4: The Forest Service should continue to manage roadless areas.**

**PC 40000-9: The Forest Service should prohibit any new permanent road construction in Inventoried Roadless Areas.**

**PC 40000-10: The Forest Service did not provide the same protection for roadless areas in Alternative 3 as it indicated in the March 29, 2003 meeting.**

- PC 40110-2:** The Forest Service should retain the roadless character of the Carr Mountain area.
- PC 40180-2:** The Forest Service should protect more of the Kearsarge Range.
- PC 51100-6:** The Forest Service should preserve all current roadless areas.
- PC 51300-1:** The Forest Service should protect roadless areas and not allow new road construction.
- PC 68000-12:** The Forest Service should reexamine the roadless area inventory and evaluations.
- Because larger areas than indicated meet the criteria for wilderness designation; the largest possible areas were not considered in the assessments.
  - Because it appears that the revised roadless inventory had no impact on the wilderness evaluations.
  - Because the criteria used in the wilderness evaluations was misinterpreted.
- PC 91100-21:** The Forest Service should include the standards written by the Society for New Hampshire Forests into Forest Plan.
- PC 91100-44:** The Forest Service should refrain from building any new roads in Inventoried Roadless Areas.
- PC 91100-59:** The Forest Service should change proposed management area allocation in more of the 100,000 acres added to the roadless inventory since March 2003, including recommending some for Wilderness.
- PC 91100-61:** The Forest Service should designate the MA for roadless areas in the 2005 Plan.
- PC 93000-3:** The Forest Service should preserve natural roadless areas.
- Many public comments related to protecting roadless areas from development, road construction, and timber harvesting.
- In response to comments, the Roadless Area Inventory was reviewed and the planned field verification of Improved Roads was completed during the summer of 2005. As a result, 19,617 acres were added to the Inventory. Approximately 13,000 acres of this came from changes in boundaries to reflect more consistent application of inventory criteria. These occurred in the South Carr, Jobildunk, Pemigewasset, and Waterville roadless areas. The remaining increased acres are from a new Sawyer Pond Roadless Area, which was added when field verification of Improved Roads reduced the road density to a level that would meet criteria for roadless.
- National guidelines for Forest Planning require that National Forests inventory roadless areas whenever Forest Plans are revised. To be included

in the roadless inventory, an area must meet minimum physical criteria for eligibility as Wilderness in the eastern United States. These criteria allow a relatively large amount of existing improved roads, clearcuts, and other limited developments. The roadless inventory covers a large percentage of the White Mountain National Forest because the type and amount of past road construction, and the intensity of timber harvesting, are well within the level allowed for inclusion.

Areas included in the Roadless Area Inventory are then evaluated based on their Wilderness characteristics, trade-offs if the area were to be designated a Wilderness, and the need or demand for additional Wilderness. Recommendations are then made to Congress for Wilderness designation.

National guidance points out that the primary purpose for the inventory is to identify lands with the potential for Wilderness designation. Restricting management activities solely because an area is in the roadless inventory goes beyond the purpose of the inventory. If areas are not recommended for Wilderness, Forest Plan decisions identify appropriate management area designations. These decisions are made considering the various trade-offs between conflicting needs for production of products, access, recreational use, and other resource management needs. Areas not recommended for Wilderness could be designated as semi-primitive recreation management areas, or could be assigned to one of the other management areas, such as General Forest Management. We believe the mix of management area designations identified in the selected alternative does the best job of balancing between competing needs.

We understand that these decisions could impact inventoried roadless values for the next planning period. For this reason, when a site-specific project is subsequently considered, its effects on the roadless character of the area will be evaluated and disclosed for public involvement and comment.

**PC 91100-46: The Forest Service should recommend wilderness protection in current wild roadless areas.**

All roadless areas were evaluated for Wilderness suitability. See FEIS, Appendix C. Also see FEIS, Chapter 2 for a discussion of Alternatives Eliminated from Detailed Study that explains why there was not an alternative that recommended all 27 roadless areas for Wilderness.

**PC 40000-3: The Forest Service should expand roadless areas.**

Comments that raised concerns with specific roadless areas have been reviewed, and in some cases the boundaries have been changed. See the responses to later Public Concern statements dealing with specific boundaries.

**PC 40000-5: The Forest Service should not manage Roadless areas on the Forest.**

**PC 40000-6: The Forest Service should decrease the size of Roadless areas.**

**PC 91100-20: The Forest Service should resolve the roadless issue.**

All National Forests are required to do an inventory of roadless areas during each plan revision and the process that explains this inventory is found in Appendix C of the FEIS. There is national and regional direction that guides the inventory process. Some of the analysis involved has clear direction. Other aspects, such as identifying some boundary lines of roadless areas, require professional judgment.

**PC 40000-7: The Forest Service should study all identified roadless areas for Wilderness.**

**PC 91000-25: The Forest Service should fully explore all roadless area suitability for Wilderness designation.**

The evaluation of all roadless areas can be found in Appendix C. Also, Chapter 2 of the FEIS, Alternatives Eliminated from Detailed Study, discusses why the Forest Service did not recommend all roadless areas for Wilderness designation. Also see the Record of Decision and Chapter 3 of the FEIS.

**PC 40000-8: The Forest Service should explain the boundary criteria used for establishing Roadless Areas.**

The Forest Service followed regional and national direction for delineating roadless area boundaries. The boundary criteria for the Roadless inventory process are explained in Appendix C of the FEIS. The process we followed is further documented in the Administrative Record, and this information is available on request.

**PC 40000-11: The Forest Service should clarify whether the roadless area acres that are recommended for Wilderness designation add to the 59 percent of the Forest that is not part of timber management.**

A commenter asked if all of the inventoried roadless areas were removed from timber management. This is not the case.

All of the land on the Forest was inventoried for its Wilderness potential. Those areas meeting basic criteria were termed inventoried roadless areas and were considered for a Wilderness recommendation. Those areas not recommended for Wilderness designation were then considered for allocation to the full range of management area allocations. Many of the acres not recommended were allocated to semi-primitive recreation and many were allocated to general forest management where timber harvest is allowed. The allocation decisions were made after balancing the various needs people had expressed.

Also, see PC 40000-1.

**PC 99100-1hh: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Will existing snowmobile trails be affected by roadless designation?**

Motorized trails are allowed in inventoried roadless areas. During the roadless inventory process the Forest Service avoided including corridor snowmobile trails within the expanded areas. The roadless area inventory is just that, an inventory, the land is managed according to the assigned



management area direction. If the management area allows snowmobiles then there will be no effect on that use even though the trail is in an inventoried roadless area.

**PC 99100-3H: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **The Forest Service was incorrect in using Recreational Opportunity Spectrum as a means to assess solitude at the roadless area inventory stage.**

Forest Service Handbook direction in 1909.711b #4 states that "... The location of the (roadless) area is conducive to the perpetuation of wilderness values. Consider the relationship of the area to sources of noise..." This direction ties back to Section 2(c)(2) of the Wilderness Act, which states that wilderness "...has outstanding opportunities for solitude or a primitive and unconfined type of recreation." The Regional Forester provided guidance for Eastern Region Forests in 1997 to use the Recreational Opportunity Spectrum system as a means to map areas that would meet the above descriptions of solitude. Areas more than half a mile from sources of motorized use were identified as core areas for experiencing solitude. Based on regional direction, to be included in the roadless inventory these areas had to be approximately 2500 acres or more in size, unless they were adjacent to existing wilderness areas.

**PC 99100-3K:**

- **The DEIS does not adequately address the regional importance of large roadless areas on the White Mountain National Forest. "The greatest concentration of large roadless areas in New England" should be added to the DEIS on page 5 (Executive Summary) in the list of areas of regional and national significance.**

National direction is to only inventory and evaluate National Forests for the presence of roadless areas. We do not have an inventory of areas outside the Forest that would meet the national definition. As such, we have no basis to make a statement similar to that requested.

**PC 99100-3L:**

- **Clarification is needed on whether existing snowmobile trails could be affected by roadless areas. Page A-6 of the draft management plan says "... individual snowmobile trails may be affected by roadless criteria...."**

The wording has been changed in the FEIS. Management area allocations can affect existing snowmobile use but not the mere presence of an inventoried roadless area.

**PC 99100-3M:**

- **The roadless inventory is one of the weakest parts of the DEIS. There is a lack of documentation on the process and criteria for establishing boundaries seem to have been inconsistently applied across the Forest.**

Additional information has been added to the FEIS (Chapter 3, Wilderness) to explain the roadless inventory process. Further, Appendix C of the FEIS includes an explanation that outlines each step taken. Based on public comments, the Forest Service conducted a further review of the inventory process for consistency, with special attention to the boundaries of approximately 34,000 acres that commenters felt had been mis-classified. Approximately 13,000 acres were added to four areas. Due to changes resulting from the improved roads inventory, Sawyer River was added as a roadless area consisting of approximately 6,700 acres. During the review, we recognized that inconsistencies in the classification of improved roads could, in some instances, affect the location of an inventoried roadless area boundary. These roads were field verified to ensure they consistently met the improved road definition and were mapped properly.

Also see PC 99200-3.

**PC 99200-3: The Forest Service should redo the roadless area inventory because an inappropriately broad definition was used for improved roads.**

A number of the comments associated with this concern stated that only roads suitable for travel by 2-wheel drive passenger vehicles should be counted as improved roads. Some went on to say that neither unclassified roads nor maintenance level 1 or 2 roads should have been counted as improved roads for the inventory. Appendix D of the FEIS discusses the Forest's transportation system, including road policy. Table D-01 explains the various maintenance levels, which are illustrated in Figures D-01 through D-06. The roadless area inventory process is described in Chapter 3 of the EIS under Wilderness.

It is important to keep in mind that the primary purpose of the roadless area inventory is to identify areas to consider for Wilderness recommendation. In the eastern United States, the criteria for areas to be counted as roadless allow for limited levels of development. For example, up to a half-mile of improved roads may be present for every 1,000 acres in the area. These relaxed roadless area criteria take into account the heavy settlement, logging, and other historical impacts that have occurred in the East. *Key in this consideration is how visible facilities such as improved roads are and whether they are fading to a natural state.* In order to determine this, the Forest Service had to apply general Regional direction to the specific situation on the White Mountain National Forest.

Regional direction includes the phrase, "An improved road is any constructed or existing feature or facility created on the land for the purpose of travel by passenger vehicles (four wheeled, 2 wheel drive) which are legally allowed to operate on forest roads or public roads ..." It also states that maintenance level 1 and 2 (roads maintained for high clearance vehicles such as pickups, 4X4's, etc) may be improved if they meet the improved road definition.

Since the term "improved road" is used only for the roadless area inventory and does not match with the criteria used for standard Forest road

inventories, we had to determine what roads in and outside the WMNF Forest road inventory should be termed improved roads. Complicating our task was the fact that we did not have an up-to-date road inventory for the Forest. Our first step was updating that inventory to the extent possible. In an initial office exercise, we identified the roads we were aware of that were not on the inventory. We then applied a specific improved road definition, based on the Regional guidance, to help employees sort through this inventory of unclassified roads. The definition included factors for the two overall measures of visibility and if the roads were tending toward a natural state. For visibility, we evaluated factors such as the amount of vegetation present, if there was a definable cross section, and the presence of ditches. To understand if the road would be on a trend to recovery, we evaluated the need to have the road for long term management. Since roads needed for long term management will periodically be maintained, we knew that they would not be on a trend to recovery. A road had to meet all of the criteria in order to be termed an improved road. During 2003, we had numerous personnel field check the roads that were not on our inventory to verify which met the improved road definition. We used the same definition to evaluate our inventoried maintenance level 1 and 2 roads. In 2005, we again field checked the improved roads that could affect the inventoried roadless area boundaries to insure these roads met our definition. In this review, we used a two person crew to assure consistency in the application of the definition. As a result of this field review, we found a few roads that were not consistent with the definition. In most cases this had little effect. However, in the Sawyer River area the changes were enough to enable this area to meet the Inventoried Roadless Area criteria. As a result, the area has been added to the inventory. In addition almost 13,000 acres were added to existing roadless area.

Evaluating both the non-inventory and inventoried roads was not as straightforward as this may sound. In many cases, some sections of a road met the criteria while others did not. In their field checks, evaluators had to determine if the preponderance of the road met the criteria. If it did, the road was considered “improved.” Further complicating the evaluation was the fact that a large number of maintenance level 1 roads are in a “stored” maintenance category. In order to minimize soil impacts and stream sedimentation, and to reduce maintenance costs, the Forest puts many of its infrequently used roads into this category. Typically, drainage structures such as culverts and sometimes bridges are removed from these roads; they are closed to vehicle use; and, they are allowed to revegetate. They often remain in this state for 10-15 years, until they are needed again. The road is then bladed, drainage structures are replaced, and it is put back to use, generally for three to four years, whereupon it is again placed in a “stored” category. While the road is recovering during the short term “stored” period, it is not on a trend to recovery over the long term. This is why, in large part, these and the remaining maintenance level 1 and 2 roads were deemed to be improved roads.

The Forest also had to consider whether a road could be driven by 2-wheel drive vehicles, and this, again, was not a simple question. Stored roads, of

course, cannot be driven at any time during the year. In addition, many roads cannot be driven in winter, when they are not plowed, or in the spring and fall, when the roadbeds are soft and subject to rutting. They are, however, all designed for 2-wheel drive use at some point in their use cycle. All are drivable during the season the road has been maintained for use.

The common thread with all of the improved roads is that they are all designed for 2-wheel drive use, all have drainage features, and all are needed for long term use. They all represent an identifiable impact of man on the landscape, and all will be used periodically in the future so are not fading from the landscape.

Throughout the roadless area inventory process, the Forest has listened carefully to the many comments we received on the process and results. These comments led us to changing the process after the release of the 2003 draft inventory. We again adjusted the inventory after looking at comments concerning specific areas. As a result, we believe we have accurately and consistently identified those areas that can be considered for Wilderness designation.

- PC 40100-1: The Forest Service should designate the Caribou Speckled as Wilderness.**
- PC 40110-1: The Forest Service should designate Carr Mountain as Wilderness.**
- PC 40160-3: The Forest Service should consider an extension to the Great Gulf Wilderness.**
- PC 40190-1: The Forest Service should designate the Kilkenny roadless area as Wilderness.**
- PC 40190-2: The Forest Service should consider impacts that Wilderness designation of the Kilkenny roadless area would have on recreational opportunities in the area.**
- PC 40210-1: The Forest Service should recommend Wilderness designation for the Mt. Wolf/Gordon Pond roadless area.**
- PC 40220-1: The Forest Service should expand the Pemigewasset Wilderness area.**
- Because of its ecological value.
  - In accordance with the recommendation in alternative 3.
- PC 40240-8: The Forest Service should recommend the roadless area between Fool Killer and Greeley Ponds as Wilderness.**
- PC 40250-1: The Forest Service should recommend the Waterville inventoried roadless area for Wilderness designation.**

All inventoried roadless areas were evaluated for Wilderness suitability, and this is reported in Appendix C of the FEIS. The evaluations considered

a range of values, including effects on recreational opportunities. Additional information can be found in Chapter 2 of the FEIS, Alternatives Eliminated from Detailed Study. The overall decision to recommend Wilderness was made on this evaluation, as well as on a need to balance uses, values, and public interest on the WMNF, including both timber management and non-Wilderness recreation. The effects and trade-offs can be found in Chapter 3 of the FEIS under Wilderness.

**PC 40110-3: The Forest Service should clarify why 5,200 acres were excluded from the Carr Mountain Roadless Area.**

The inventory was reevaluated and approximately 5,300 acres were added to be consistent with decisions in other areas. These two areas were avoided earlier because of concerns over the relatively narrow shape of the larger piece and planned or ongoing harvesting activities in the other.

**PC 40150-3: The Forest Service should explain why 1,000 acres in the northeast corner of the Dartmouth Range was excluded from being classified as Roadless.**

**PC 40160-1: The Forest Service should have included approximately 1,000 more acres in the Great Gulf Roadless Area.**

The inventory was reevaluated but no changes were made because the original boundary avoids existing improved roads.

**PC 40170-1: The Forest Service should not have excluded 3,500 acres from the Joblidunk Roadless Area.**

The inventory was reevaluated and approximately 2,200 acres were added to the roadless area to be consistent with decisions in other areas. This area was avoided earlier because of planned or ongoing harvesting activities. The remaining portion of the 3,500 acres was not added because it would create a cherry-stem boundary around the Tunnel Brook Road.

**PC 40180-1: The Forest Service should not have excluded 1,500 acres from the Kearsage Roadless Area.**

The inventory was reevaluated but no changes were made because the original boundary avoids existing improved roads and the proposed shape would add a relatively narrow finger.

**PC 40220-2: The Forest Service should not exclude 4,700 acres from the Pemigewasset Roadless Area.**

The inventory was reevaluated and approximately 3,900 acres were added to the roadless area to be consistent with decisions in other areas. The remaining portion of the 4,700 acres was not added because the original boundary avoided a snowmobile trail, a Nordic ski permit area, and a poor shape.

**PC 40240-16: The Forest Service should include 10,000 additional acres in the Sandwich 4 and Chocorua roadless areas to the Sandwich Roadless Area.**



**PC 91000-20: The Forest Service should state the reason why acreage was not included in the southern end of Sandwich-4 Roadless Area.**

The inventory was reevaluated, but no changes were made because the original boundaries avoided existing improved roads, Nordic ski permit areas, and poor shapes.

**PC 40245-1: The Forest Service should reconsider inclusion of two areas in the Table Mountain Inventoried Roadless Area.**

The inventory was reevaluated but no changes were made because the original boundaries avoided private land, a poor natural boundary shape, and an adjacent condominium complex.

**PC 40260-13: The Forest Service should explain why 3,000 acres were excluded from the Wild River Roadless Area.**

The inventory was reevaluated but no changes were made because the original boundaries avoided a Nordic ski permit area and improved roads.

**PC 40120-1: The Forest Service should not change MA 6.1 designation to MA 2.1 designation for specific areas of the Carr Mountain South Roadless Area.**

A concern was raised about changing the management area designation of some areas in the Carr Mountain Inventoried Roadless area. Under the 1986 Forest Plan, these areas were allocated to Management Area 6.1. The proposed alternative from the draft plan proposed changing these areas to Management Area 2.1. The Forest evaluated the tradeoffs of changing the designations in Chapter 3 of the FEIS. Alternative one did not include these changes while the selected alternative, number two, does make some management area changes including those near Carr Mountain. After reviewing the tradeoffs associated with the alternatives, the Forest decided to continue with the change in management area allocations. These areas will still be protected during timber harvesting through the Forest Plan standards and guidelines. In addition, when a project proposal is considered, its effects on the roadless character of the area will be evaluated and disclosed for public involvement and comment under NEPA.

Also see PC 40000-1.

**PC 40140-1: The Forest Service should recognize that designation of Chocorua as Wilderness would not require they find alternatives to displace current high number of users to non-Wilderness sites.**

One of the criteria for evaluating Wilderness suitability is “manageability” (see FEIS Appendix C for Roadless Area evaluations). Given the very high levels of recreation use on Mt. Chocorua, the Forest Service believes that recommending it for Wilderness designation would lead to inherent conflicts between recreation use and Wilderness stewardship. While some wilderness values are recommended outside of Wilderness, such as the 10-person limit, they become mandated within designated Wilderness. We believe maintaining Chocorua’s designation as a Scenic Area is the best balance of

use, allowing non-Wilderness recreation to continue while still acknowledging its unique natural beauty.

**PC 40150-1: The Forest Service should recommend designation of the Dartmouth Range as Wilderness.**

**PC 40150-2: The Forest Service should not recommend designation of the Dartmouth Range as a Wilderness.**

Although it was considered in Alternative 3, the WMNF is not recommending that the Dartmouth Range be designated Wilderness.

**PC 40190-3: The Forest Service should consider the economic benefits that Wilderness designation of the Kilkenny Roadless Area would bring to northern towns such as Jefferson and Groveton.**

For the alternatives that recommend additional Wilderness, it is likely that any increase in recreation use in these areas would be caused by a redistribution of existing recreation use and not by an overall increase solely from new visitors to the Forest. The economic effect would have the potential to increase the amount of tourism in bordering towns, but the net affect to the region should remain relatively constant. The scope of the economic analysis was established at the programmatic level – looking at the four county area of the Forest to measure impacts to the Forest region collectively. Attempting to move the analysis to the town level of detail would have required detailed data, which was found in many cases to be unavailable or lacking in its consistency. County level data was the lowest level we could look at objectively and have some assurance the data was accurate and consistent. Consequently, while we intuitively can acknowledge there should be some localized effects to the towns bordering Wilderness areas, we do not have sufficient data to perform a reliable economic impact analysis at the town level.

**PC 40190-4: The Forest Service should keep the lower part of the Kilkenny as MA 6.2.**

Currently, the lower portions of the Kilkenny area are in MA 6.1 and MA 2.1. The only alternative that proposes a substantial change in land allocation in this area is Alternative 3, which places the current MA 6.1 land into MA 9.1, Recommended Wilderness. The Forest Service determined that the current allocation is appropriate for meeting Forest goals and objectives in all other alternatives.

**PC 40240-1: The Forest Service should expand the Sandwich Range Wilderness.**

**PC 40240-14: The Forest Service should expand the Sandwich Wilderness to include portions of the Forest that otherwise would be managed for timber.**

Under the Selected Alternative, the Sandwich Range Wilderness would be expanded by 10,800 acres. Also see PCs 68000-5, 68000-1, and 68000-2.

**PC 40240-2: The Forest Service should not expand the Sandwich Range Wilderness.**

The effects on recreation from expanding the Sandwich Range Wilderness are discussed in the FEIS (Chapter 3).

**PC 40240-3: The Forest Service should expand the Sandwich Range Wilderness and consider Wilderness boundary adjustments.**

**PC 40240-4: The Forest Service should establish the Wilderness boundary closer to Sandwich Notch Road, Kiah Pond, and the Guinea Pond Trail.**

**PC 40240-5: The Forest Service should expand the Sandwich Wilderness south of Paugus Pass, include Forest Road 337 and protect Big Rock Cave.**

**PC 40240-6: The Forest Service should expand the Sandwich Range Wilderness especially to the south.**

**PC 40240-9: The Forest Service should expand the Sandwich Wilderness to include more of the Old Mast Road, the Kelley Trail, and the Cabin Trail.**

**PC 40240-10: The Forest Service should expand the Sandwich Wilderness to include Flat Mountain and Scar Ridge.**

**PC 40240-12: The Forest Service should not exclude sections of Algonquin Trail from Wilderness.**

**PC 40240-15: The Forest Service should expand the Sandwich Wilderness in a manner that provides uniform width of the Wilderness area.**

**PC 68000-5: The Forest Service should recommend lands for wilderness designation which will expand the Sandwich Wilderness**

- **Because the extension would provide stronger protection for the third largest roadless area in the eastern United States.**
- **Because surrounding development may encroach upon existing Wilderness.**

The Selected Alternative in the FEIS proposed 10,800 acres of Recommended Wilderness to expand the Sandwich Range Wilderness. Further extensions of the south boundary, at several locations, were proposed in many response letters. There are a variety of reasons why these extensions were not originally included in the alternatives. The reasons are detailed more specifically in the Inventoried Roadless Area Evaluations found in the FEIS, Appendix C. They range from curtailment of established recreation uses in some areas (i.e. snowmobiling, shelter camping at Flat Mountain Pond) to eliminating management options for oak ecological land types (ELTs) to enhance wildlife habitat (i.e. Sandwich 1 extension in the Mt. Mexico area).

The National Forest Management Act that guides the White Mountain planning process (36 CFR 219) states that evaluation criteria for Wilderness consideration “shall include... (t)he anticipated long-term changes in plant and animal species diversity” [219.17 (b) (2) (v)].

Also, in some cases, the roadless area inventory did not extend out to include some of these proposed Wilderness expansion areas, due to certain physical “roadless” characteristics not being present. For example, the presence of greater than ½ mile of road per 1000 acres in some of the proposed expansion areas eliminated them from inclusion in the roadless area inventory, such as for the area northeast of Sandwich Notch Road and the area north of Ferncroft.

Some of the proposals for Wilderness inclusion suggested by respondents offered compromise solutions that could resolve some of the issues described above without adding areas that lack identified roadless characteristics. These proposals would remove some of the gerrymandered appearance of the Wilderness boundaries in a way that avoids roaded areas and retains ecosystem management options in oak ecological land types. Accordingly, the boundary for Recommended Wilderness in the Wonalancet area has been redrawn in the FEIS in two locations: 1) between the Old Mast Road and Mt. Mexico to roughly follow the 1900-foot contour, and 2) east of Big Rock Cave and Mt. Mexico to the Bickford Trail. In the southwest corner, the Recommended Wilderness boundary was moved closer to the Sandwich Notch Road, Kiah Pond, and Guinea Pond Trail.

These changes offer advantages for both Wilderness management and ecosystem management. They will:

1. Provide a greater measure of protection for spruce and hardwood forest areas with mature tree characteristics;
2. Widen the narrow “wasp waist” of the Sandwich Range Wilderness, making it easier to manage for “deep forest” Wilderness values;
3. Maintain a viable and manageable belt of oak hardwood forest for habitat and ecosystem management values on the south margins of the Forest;
4. Preserve “roadless” values for the portion of this area that are absent of roads;
5. Maintain multiple use management flexibility for the portion of this area that is truly roaded;
6. Provide further protection of water quality for the Whittin Brook watershed; and
7. Provide greater protection from disturbance for Big Rock Cave.

The southern boundaries of the Sandwich Range Wilderness are unlikely to be threatened by land development in the foreseeable future. This is evidenced by the rural character of the area, the existing ownership pattern of large acreages and well-kept private properties, and the presence of Hemingway State Forest, conservation easements, and other protected lands to the south in the Wonalancet and Whiteface/Intervale areas.

**PC 40240-7: The Forest Service should not consider the Sandwich 1 area as a land type favoring oak.**

It is true that ecological land type (ELT) classification is not a guarantee of what is on the land, but it provides a reasonable estimate of forest conditions. For the Sandwich-1 area, the ELT classification indicates conditions that are likely to support a component of oak. On November 29, 2004 the Forest soil scientist and wildlife biologist hiked into the Sandwich-1 area to validate that oak is present in this area. Oak was found in the canopy of several stands in this area. Therefore the description in Appendix C is accurate and the rationale for not including this area in the Sandwich Wilderness was confirmed.

**PC 40240-11: The Forest Service should expand the Sandwich Wilderness closer to the Kancamagus Highway.**

Extension of the north boundary of the Sandwich Range Wilderness to reach the Kancamagus Highway was not possible due to road densities in most areas. Heavy recreation use at sites in close proximity to the Kancamagus Scenic Byway (e.g., Sabbaday, Oliverian Brook Trail) in addition to the high vehicle traffic on the Highway itself makes this area less well-suited for Wilderness.

**PC 40240-13: The Forest Service should expand the MA 6.2 area at White Ledge to include oak and pine dominated forest types to the south.**

The Forest Service agrees that maintaining oak and pine dominated forests is an important part of conserving biological diversity on the WMNF. Given the relatively low intensity of timber harvest proposed, the standards and guidelines restricting some activities, and the current recognition of many areas that have been managed through harvest in recent decades and high quality examples of various habitat types across the Forest, the Forest Service does not believe it is necessary or desirable to remove these areas from MA 2.1 to ensure their long-term protection. Oak and pine are not climax forest types on the WMNF (FEIS, Vegetation section), so harvest or fire are necessary to maintain them in the long-term. Conditions are not always favorable for suitable fires so retaining the option of timber harvest is desirable to keep management options.

**PC 40240-17: The Forest Service should exclude the UNH trail and the trail to Jennings Peak from Wilderness designation.**

This comment asks that trails to two popular day-hike destinations, Hedgehog Mountain and Jennings Peak, be removed from Wilderness recommendation. These peaks are both easily hiked via loop trails from accessible trailheads, making them popular with day hiker groups and with outfitter/guides. Hedgehog Mountain is accessible from the Kancamagus Highway via the UNH Trail. Jennings Peak is accessible from Route 49 via the Sandwich Mountain and Drakes Brook trails.

As popular day-hike destinations, large numbers of people often occupy these summits at one time, and one likely effect of the proposed expansion of the Sandwich Range Wilderness boundaries would be to limit or exclude



large groups, since Wilderness standards restrict group size to 10 people or less.

*UNH Trail (Hedgehog Mountain):* The easy access of this trail on the Kancamagus Highway, plus the fact that the trail offers fine views from several viewpoints for a modest effort, makes this trail an ideal destination for dayhikers and many outfitter groups. Designating the summit of Hedgehog as Wilderness would affect this established use. This potential problem was also identified and described in the Inventoried Roadless Area Inventory Evaluation (FEIS, Appendix C): “The heavy day use around Hedgehog Mountain and the conflicting snowmobile use around Flat Mountain Pond could make inclusion of these two areas problematic for Wilderness management. In order to maintain Wilderness attributes, Hedgehog Mountain and Flat Mountain Pond would be most effectively managed outside of Wilderness designation.”

This adverse effect could be mitigated by excluding the summit of Hedgehog Mountain and the upper (southernmost) loop of the UNH Trail from the wilderness boundary. Therefore, it has been decided to adjust the Wilderness boundary at the Hedgehog summit to exclude the UNH Trail (which forms a small loop at the summit), which will result in a net change of approximately 15 acres less Wilderness in the Sandwich Wilderness expansion (“Sandwich-4” extension). This small change seems justified in light of the benefits of encouraging continued day-hike and outfitter use of a popular recreation site.

*Jennings Peak:* A comparable situation exists on Jennings Peak: including it in the Sandwich Range Wilderness will likely adversely affect its use as an established and popular group hike destination. However, the fix for that situation would require that the loop trail formed by the Sandwich Mountain and Drakes Brook trails be removed from Wilderness, which would entail removing approximately 300 acres from Wilderness, and would also require the creation of a significant “cherry stem” in the Wilderness boundary. As a result, this change is less justifiable and has not been included in the FEIS.

**PC 36200-17: The Forest Service should not increase winter motorized use in the Flat Mountain Pond area.**

**PC 40240-18: The Forest Service should close snowmobile use on the Flat Mountain Pond Trail.**

While it is true that travel on the Flat Mountain Pond Trail by snowmobile is difficult and infrequent, it is a long-standing and well-established use, in keeping with Forest goals for recreation. When conditions allow, this trail allows for expert-level riding in a remote, natural setting, providing a relatively uncommon experience at one end of the range of opportunities for winter recreation. Improved signing at the beginning of the trail, the junction with the Guinea Pond Trail, and at the Flat Mountain Pond shelter site, as well as outreach to local snowmobile clubs and riders, may help with the enforcement issue of machines entering the Wilderness.

The WMNF recognizes the continuing operational challenge of preventing snowmobile entry into Wilderness at this location, but it is also important

to understand that there are many locations and situations where Wilderness character is threatened by human recreational impacts. WMNF strategies to manage these impacts must consider and balance the sometimes-competing purpose of maintaining recreational access on the Forest. That said, Forest-wide standards and guidelines do prohibit riding outside the designated trail system – including the surface of Flat Mountain Pond. They also allow for the closure of trails for snowmobile use if social or resource conditions warrant. Were the infrequent entries into Wilderness at this location to become more frequent and unmanageable by other means, removal of this trail from the Forest Snowmobile system could occur as a project-level decision.

**PC 40240-19: The Forest Service should “cherry-stem” the Flat Mountain Pond Trail.**

The Forest Service tries to avoid “cherry stemming” wherever possible in order to avoid creating unmanageable or very difficult areas to manage. In general, having corridors of non-wilderness lands within designated wilderness tends to compromise wilderness values in undesirable ways.

**PC 40240-20: The Forest Service should consider an alternative that provides for both snowmobiling in Sandwich and incorporates some land into Wilderness.**

Each of the alternatives represents a mix of Wilderness, Recommended Wilderness, and other management areas. The current Sandwich Range Wilderness is a Congressional designation that does not allow motorized uses including snowmobiles, however, there are existing snowmobile trails in the Sandwich Range area. None of the alternatives affects the current designated snowmobile trail system. The various combinations of management areas in the alternatives represent different mixes of land in Recommended Wilderness and acres in management areas allowing consideration for snowmobile trail proposals.

Also see PCs 68000-5, 68000-1 and 68000-2 and 40240-1, 40240-2, and 40240-3.

**PC 40240-21: The Forest Service should not allow motorized access to Big Rock Cave.**

Under Alternative 2, motorized recreation access to Big Rock Cave would be prohibited. Even if timber management were to occur in the adjoining 2.1 management area (as suggested under Alternative 2), mitigation measures would limit motorized access and harvest techniques in such a way that would minimize or avoid impacts to Big Rock Cave. As discussed in PCs 40240-5, 40240-9, and 40240-15, there appears to be an option that extends the Wilderness boundary in this area without necessarily compromising other resource concerns.

**PC 40240-22: The Forest Service should expand the Sandwich Wilderness with moderation.**

The Selected Alternative expands the Sandwich Wilderness by 10,800 acres.

Also see responses to PC 68000-1, PC 68000-2, and PC 68000-3.

**PC 40240-23: The Forest Service should study old growth eastern hemlock stands in the Sandwich Wilderness.**

Forest habitat and age class data indicate that the hemlock stand within Sandwich-1 that was mentioned in the comment originated about 1900, so it is not likely to meet the Forest Service's definition of old growth. There are a number of hemlock stands across the WMNF that are substantially older and larger, including some that may truly be old growth. Several of these large, old hemlock stands are in Wilderness, Recommended Wilderness (including the proposed addition to the northeastern corner of the Sandwich Wilderness), or other land allocations that prohibit timber harvest. Thus the Forest Service has several areas in which to study old hemlock forest that are likely better for this purpose than the area in Sandwich-1.

**PC 99100-3I: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **The area between Inventoried Roadless Areas Sandwich-1 and Sandwich-6 should be added to the inventory to connect these two areas or an explanation should be given on why it was excluded**

This area was excluded from the inventory because of the presence of a cluster of improved roads in a relatively small area. In addition, there is private land that comes close to cutting off the potential connection between Sandwich 6 and this area.

**PC 99100-3S:**

- **The DEIS erroneously states that there is oak-pine habitat in the Sandwich-3 roadless area, even though Forest Service personnel found no oak during a field trip**

It is true that Forest Service personnel checked the MA 2.1 land in this roadless area and did not find any oak. Land in MA 6.3 was not examined. In addition, reference to oak-pine habitat for Sandwich-3 in Appendix C where these areas were described in detail could not be located. Oak-pine was appropriately referenced for Sandwich-1. Without more specifics on the location of the erroneous reference, a correction could not be made.

**PC 40250-2: The Forest Service should reconsider inclusion of certain areas in the Waterville Valley Inventoried Roadless Area.**

The inventory was reevaluated and approximately 1,600 acres were added to be consistent with decisions in other areas. This area was avoided earlier because of planned or ongoing harvesting activities.

**PC 40260-1: The Forest Service should designate the Wild River as Wilderness.**

- **To protect water quality.**
- **To benefit wildlife.**
- **Except the campground.**

**PC 40260-5: The Forest Service should protect the Wild River Roadless Area.**

The Wild River is proposed in alternatives 2, 3 and 4 including the preferred alternative. The proposals do not include the campground or the Wild River road. See FEIS, Chapter 2.

**PC 40260-2: The Forest Service should designate the entire Wild River watershed as Wilderness.**

- Due to its low elevation land.
- Due to its unique characteristics.
- To protect it from road construction and logging.
- Because it is a source of clean water.
- Because of threatened and endangered species.
- To prevent spread of invasive plants.

**PC 40260-3: The Forest Service should designate the Wild River Area as Wilderness in accordance with Alternative 3.**

**PC 40260-7: The Forest Service should consider boundary adjustments of the Wild River Wilderness Area.**

See Chapters 2, 3 and 4 of the FEIS for a discussion of what areas are included for recommended Wilderness, how they were chosen, and the environmental effects. In general, recommended boundaries considered the trade-offs of a variety of National Forest uses. The proposed boundaries seek to strike a balance between Wilderness and other values of the National Forest.

**PC 40260-4: The Forest Service should not designate the Wild River as Wilderness.**

- Because it would be too restrictive on recreational opportunities.
- Because it would attract too many people.

The effects of Wilderness designation on recreation use are described in the FEIS, Chapter 3, Recreation section.

See also PC 68000-6, PC 68000-7, PC 40260-1, PC 40260-2.

**PC 40260-6: The Forest Service should consider the potential effects of designating the Wild River as Wilderness, and therefore a Class One airshed, on nearby industries and communities.**

Mandatory Class I areas were established under the Clean Air Act Amendments of 1977, and include certain Wildernesses, National Parks, or wildlife refuges designated before August 7, 1977. Of the five Wildernesses on the WMNF, the Great Gulf and the Presidential Range Dry River are Class I airsheds. All other lands on the Forest are Class II. Nationwide, no additional Wilderness areas have been designated a Class I area since 1977, and it is unlikely that any of the newly proposed Wilderness areas would be designated Class I airsheds. Thus, the lands within the Wild River recommended Wilderness area will most likely remain Class II, whether or not they are designated Wilderness by Congress.

**PC 40260-9:**     **The Forest Service should exclude the Wild River Road and campground from any increase in size from the proposed Wild River Wilderness Area.**

**PC 40260-10:**   **The Forest Service should consider “cherry-stemming” the gravel road in the Wild River Wilderness Area.**

**PC 40260-11:**   **The Forest Service should consider obliterating an access road under the proposed Wild River Wilderness.**

**PC 40260-14:**   **The Forest Service should modify the Wild River Road under the Wilderness designation.**

The WMNF believes that the proposed Recommended Wilderness boundaries provide a balance of Wilderness and non-Wilderness uses.

While not prohibited, Forest Service policy and direction discourage “cherry-stemming” of non-Wilderness lands within designated Wilderness. Cherry stems, or “fingers” of non-Wilderness that protrude into designated Wilderness, sometimes lead to management problems and conflicts that can be difficult to resolve. Examples include allowing motorized trail corridors or non-Wilderness development that in turn affect the goals and objectives of Wilderness designation. In the case of allowing a road, it would create challenges, such as increased noise, to maintaining Wilderness character and values in the adjacent Wilderness lands.

**PC 40260-15:**   **The Forest Service should consider the recreational experiences in the Wild River Roadless Area unique.**

While no place on the Forest is identical to another, we believe that there are many areas that provide recreational experiences similar to Wild River.

**PC 40300-1:**     **The Forest Service should expand the Waterville Roadless Area west to the Mill Brook Valley subdivision.**

The roadless area is bounded by a maintenance level 3 Forest System road that runs parallel and close to the subdivision boundary. We did not include this type of road in our roadless inventory analysis process.

**PC 40400-1:**     **The Forest Service should implement the 2000 Roadless Initiative.**

The commenters making this statement were advocating for protection of inventoried roadless areas. Alternative 3 assigned the areas identified in the 2000 Roadless Conservation Rule to management areas that do not allow road construction or timber harvesting. After evaluating the trade-offs, we determined that Alternative 2 better balanced between the conflicting needs people have expressed. See the response to PC 40000-1 for additional information.

The 2000 rule referred to was amended in May of 2005 and is now termed the “State Petitions for Inventoried Roadless Area Management Rule.” The amended rule gives states the option of requesting local changes in management for inventoried roadless areas. We will follow the rule procedures should the states of Maine or New Hampshire decide to request changes in management.



**PC 91000-5: The Forest Service should not include lands inventoried between Waterville Valley Roadless 2003 and Mill Brook Valley subdivision in the timber or motorized recreation management areas.**

**PC 91100-1: The Forest Service should designate the land east of the Mill Brook Valley subdivision and abutting the Waterville Roadless area as 6.2 lands.**

The land in question, was included as part of Management Area 3.1 in the 1986 Forest Plan and has a long history of timber harvesting into the mid-1980s. Consequently, this land is included in the General Forest Management area (MA 2.1) in the revised Plan. Adjacent landowners would be asked to comment on any proposals during project analysis.

## **Wildland Fire**

**PC 19000-1: The Forest Service should extinguish all fires.**

The FEIS, Chapter 3, Wildland Fire, includes discussion on the role, benefits and objectives of fire use, which encompasses both prescribed fire and wildland fire use. The general purpose of fire use is to help accomplish management objectives. This use of fire under criteria that we set is considered to result in positive benefits to the land.

The revised Forest Plan allows for “wildland fire use,” in which some lightning-ignited fires that meet specific criteria will be monitored rather than extinguished. An example would be a lightning start on a dry ridge top in August. It is in the middle of a remote area, far from private land and improvements. The weather forecast does not include any high winds. The most likely scenario is that the fire would be checked daily and would creep and expand from 30 to 100 acres, then either go out because of lack of fuel or be extinguished by rainfall. These small fires allow natural processes to maintain fire-adapted communities and contribute to biological diversity.

**PC 19000-2: The Forest Service should use a balanced fire management approach for fire-dependent communities, with and without harvest, as well as for fire-dependent communities in which fire is excluded.**

See the FEIS, Chapter 3, Wildland Fire, for a detailed discussion that includes the use of fire as a management tool. Oak, pine, and mixed oak-pine are examples of specific communities in which fire may be an appropriate management tool to reduce competing vegetation, promote natural regeneration, and reduce fuel loading. Fire can be used for ecosystem benefits whether or not an area is harvested.

- **Because these communities can provide important ecological references.**

The FEIS, Chapter 3, Wildland Fire, discusses fire-adapted community types and species on the Forest. Delineating these areas occurs on several levels, including silvicultural examinations as well as community mapping by partners such as New Hampshire Natural Heritage and The Nature

Conservancy. Some of these areas may be managed for fire-adapted communities where harvesting is not allowed, such as in MAs 6.1, 6.2, and 6.3, and in the experimental forests, MA 8.1. Other fire adapted communities not actively managed with fire are those in MAs where prescribed fire is not allowed. See the Forest Plan, Table 1-01.

**PC 19000-3: The Forest Service should recognize the cooperative fire protection provided by the state-operated fire lookouts which surround the White Mountain National Forest.**

The Forest Service appreciates the utility and service of the state-operated fire lookouts. The goal statement in the Forest Plan (Chapter 1, Wildland Fire) mentions that cooperative fire activities will be developed and maintained with other agencies. We also recognize our good working relationship with the states of New Hampshire and Maine in ongoing activities, such as cooperative agreements, sharing of resources, and technical assistance.

**PC 19000-4: The Forest Service should consider the use of small scale wildland fires for the removal of non-native invasive species followed by appropriate revegetation efforts for the creation of wildlife forage and nesting habitat.**

The Forest Plan Goals and Objectives (Chapter 1) have been edited to make it clear that a number of options are available for management of non-native invasive species. Prescribed fire is an available tool (in certain management areas) for eradication of non-native invasive species and to meet other vegetative management objectives, such as managing wildlife openings.

**PC 19000-5: The Forest Service should include prescribed fire as an alternate slope management tool for vegetation control in alpine ski areas.**

We reevaluated the standard that prohibited prescribed fire in Management Areas 7.1 and 9.2, and agree that its use to manage vegetation should be allowed. An example would be to use fire on slopes that are too steep for wheeled or tracked equipment, and where there is no risk to ski lifts or other improvements. Site specific environmental analysis and burn plans would be required for each burn.

**PC 19100-1: The Forest Service should eliminate prescribed fire.**

**PC 19100-2: The Forest Service should continue to use and monitor prescribed fire as an effective management tool.**

The White Mountain National Forest has successfully used prescribed fire for almost twenty years to achieve a variety of objectives, such as those listed in the Forest Plan (Chapter 1, Wildland Fire). While most past burns occurred in brushy openings, prescribed fire can also be applied in fire-adapted communities to promote particular species and reduce fuels. While this may cause some mortality, it is expected and acceptable. Forested stands typically recover quickly from a prescribed fire, with some species reduced while others thrive. The application of prescribed fire to certain pine, oak,

and mixed oak-pine types may help to enhance or maintain unique communities.

Prescribed fires are planned and managed to minimize the impact of smoke on surrounding areas. They are planned when the weather and vegetative conditions meet specific parameters so that there is a quick, safe, and clean burn. Wind direction and transport are considered so as to direct and disperse smoke away from potentially sensitive locations.

Plans for both prescribed fire and wildland fire use will continue to include direction and details for contacting and notifying local area dispatch units, fire departments, and the respective state fire management agencies (NH Division of Forests and Lands and the Maine Forest Service).

**PC 19200-1: The Forest Service should include wildland fire use in all alternatives and management areas to dispose of fuel wood, slash, and non-native invasive species as well as to provide research opportunities.**

**PC 19200-2: The Forest Service should limit interference with natural wildfires.**

The term “wildland fire use” applies only to naturally-ignited fires that meet certain location and prescriptive criteria. The overriding emphasis is on firefighter and public safety. Natural fires that threaten life, property, and resources will continue to be suppressed. Wildland fire use is limited to certain management areas, usually those that are more remote or “primitive,” so as to allow natural processes to maintain fire-adapted communities and contribute to biological diversity. Prescribed fire can be used in most of the other management areas to accomplish the stated objectives. With both these tools, some form of fire use can be used over most of the Forest. See Tables 1-01 and 1-02 in the Forest Plan for lists of MAs where prescribed fire and wildland fire use are allowed.

**PC 19200-3: The Forest Service should use wildfire to direct or redirect species selection in the Alpine Zone MA.**

Management direction for the Alpine Zone MA recognizes the potential benefits and risks associated with wildland fire in alpine areas. Wildland Fire goals (Forest Plan, Chapter 1, Wildland Fire) indicate that “wildland fire use” is permitted in the Alpine Zone MA. This means that lightning-ignited fires would be allowed to burn, functioning as a natural ecosystem process within a specified area and within specified criteria. “Wildfire,” a different term, is an unwanted wildland fire (see the FEIS, Chapter 3, Wildland Fire). Wildfires on the Forest will be suppressed.

Maintaining the long-term health of the alpine system is a top priority with any management activity, including whether and how to use wildland fire. The Forest Service does not believe it is necessary to add additional direction that further emphasizes fire use or alpine protection.

**PC 99100-3U: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Regarding the adoption of the wildland fire use policy and how well it will benefit the maintenance and retention of fire-dependent natural communities.**

Wildland fire use is allowed in management areas that cover approximately 405,100 acres or 51 percent of the total Forest land base. Identifying and mapping all the site-specific fire-adapted communities within this large area is a work in progress. Forest Service efforts, along with partners such as The Nature Conservancy and the State Heritage programs will continue to use existing and ongoing inventories to delineate the extent and range of communities that may benefit from the use of fire.

**PC 19300-1: The Forest Service should evaluate and extinguish only those human-caused fires that threaten private property or alpine communities.**

It is Forest Service policy that appropriate management responses for human-caused fires will not include resource benefits as a consideration, and that all human-caused fires will be suppressed. Human-caused fires, other than prescribed fire, are typically started by accident or are acts of arson. These fires are unplanned and have no relationship to predetermined, accepted Forest management objectives. They will continue to be suppressed.

## Air Resources

**PC 11000-1 The Forest Service should monitor and protect air quality.**

The White Mountain National Forest monitors and protects air quality through its air resource program, stated in the FEIS and Revised Plan. Air resource management includes protection of air quality and related values within the Class I Wilderness areas, and the Forest Service is an active partner with regional groups which address air quality issues, as well as working to reduce emissions from Forest activities.

The Forest Service maintains an air quality monitoring site at Camp Dodge through the Interagency Monitoring of Protected Visual Environments (IMPROVE) program. At this site, additional air quality parameters, such as ozone, are monitored through a cooperative agreement. Forest goals to continue this type of monitoring are noted in Chapter 1 of the Revised Plan. Additional information is published in the Monitoring Guide.

As explained in the FEIS, air quality impacts on the Forest are related to pollutant sources which originate off the Forest, and the Forest Service is an active partner in the Prevention of Significant Deterioration (PSD) process, which addresses this problem. When a major emitting facility is proposed, the Forest Service consults with other agencies to determine whether there will be an adverse impact on air quality related values (AQRVs) such as visibility. The AQRV concept is used on the Forest as well to identify air quality character and effects, and to recommend improvements.

In these ways: monitoring air resources, cooperating with relevant groups and agencies, and reducing emissions from Forest activities, the WMNF does monitor air quality and cooperatively works to improve its condition.

**PC 11000-2: The Forest Service should identify AQRVs in the Forest Plan.**

Air quality related values (AQRVs) have been identified for the Forest specifically in Forest Service publication GTR NE-151 (1991) "Screening Procedures to Evaluate Effects of Air Pollution on Eastern Region Wildernesses Cited as Class I Air Quality Areas." Based on this, the Air Resources section in Chapter 3 of the FEIS lists AQRVs as "air quality, water quality, visibility, human health effects from air quality, vegetative health, soil productivity, and aquatic resources."

As part of its responsibility as a public land steward of Class I Wilderness areas, the Forest Service is a member of the Federal Land Managers Air Quality Related Values Work Group (FLAG), and works with other federal land managers and scientists to develop state-of-the-science critical load indicators to better protect AQRVs from air pollution impacts. The WMNF works with FLAG as these indicators are developed in order that they may be most appropriately implemented. Our participation in this groups ensures that AQRVs are appropriate indicators of the issues of Class I areas on the White Mountain National Forest.

**PC 99200-2: The Forest Service overlooked existing documentation and stated that Forest ecosystems are not adversely affected by air pollution.**

The comment quoted the statement, "Forest ecosystems are not adversely affected by air pollution, and Forest management activities are conducted to protect or maintain air quality," which is located in the Goals and Objectives (Plan, Chapter 1), and misunderstood that this is a goal, not a statement of existing condition. As explained in the Plan Preface, "Goals are broad statements that describe the conditions the Forest Service will strive to achieve through implementation of the Forest Plan. They are generally timeless and not measurable and their achievement is not required."

The FEIS discusses the condition of air quality on the Forest, including the effects of atmospheric deposition on water and soil resources.

**PC 11000-3: The Forest Service should monitor air pollution sources operating within the National Forest.**

The Forest Service does monitor the effects of air pollution sources that operate within the National Forest. Several sites are located on the White Mountain National Forest to monitor air pollution and its effects to soils, water, vegetation, and visibility. These sites are operated by the Forest Service either alone or in conjunction with partners such as Appalachian Mountain Club, NH Department of Environmental Services, and the University of New Hampshire. The Forest Service also requires that any of its activities, or activities which it permits, must comply with all ambient air quality standards and other state and federal regulations. The Forest Service does not have the authority, however, to monitor compliance with emission controls or require stricter emission controls than those required by the state or county. Specific air monitoring guidelines are set forth in the Monitoring Guide.



**PC 11000-4: The Forest Service should consider the effects of pollution by the Cog Railroad in determining air quality in the Great Gulf.**

The Cog Railway is located on private land and is not regulated by the White Mountain National Forest. It is correct that the Cog Railway continues to use coal as a source of fuel, and as a result produces emissions to the air during its use. It is possible that, in the future, the Cog Railway will convert to other forms of fuel, thereby reducing the emission related to coal burning. Should specific effects to resources related to the Cog Railway emissions arise, a cooperative approach would be used. It is likely this would include involvement with the State of New Hampshire, as they are the regulating agency for private lands.

The effect of emissions from the Cog Railway engines has not been specifically studied. However, the White Mountain National Forest does monitor air quality and air quality related values (AQRVs) in the Great Gulf-Dry River Class I areas as described in the Monitoring Guide. The Forest Service also works cooperatively with the states of New Hampshire and Maine, regional air quality groups, and the Appalachian Mountain Club (AMC) to monitor air quality and assess impacts from emission sources.

**PC 91700-10: The Forest Service should include airshed conditions and quality standards in the Desired Future Condition component in order to maintain their natural range of variation.**

This was a good suggestion, and air quality has been added to the Desired Future Condition (DFC) in the FEIS, Chapter 1. There are also goals for air quality that provide information about desired conditions (Plan, Chapter 1). Goals provide additional information about the desired condition for each resource, and are considered when planning projects and activities so that management actions move the Forest toward the desired condition. Information on existing air quality and emissions related to Forest management activities is found in the Air Resources section (FEIS, Chapter 3). Information on the effects of atmospheric deposition can be found in the Water Resources section (FEIS, Chapter 3).

## **Scenic Resources**

**PC 52000-1: The Forest Service should consider visual quality equal with other resource values.**

The intent of establishing Scenic Integrity Objectives and related guidelines is to provide a framework, based on inventoried attributes, for addressing scenic resources and achieving positive results in management of other resource areas. There is no intention in the development of scenery management guidelines under the Scenery Management System (SMS) to weigh this resource area as more important than other significant resources on the White Mountain National Forest. While there may be some areas where scenic resources should take a higher priority over other management considerations, due to their significance and sensitivity, SMS is designed to be an integrated ecosystem based process.

During the SMS inventory, analysis, and planning stages, several resource areas were closely involved in the assignment of Scenic Integrity Objectives and related guidelines. This included vegetation and wildlife resource areas. Review and evaluation of the guidelines as they were developed included their effects on other management goals and output targets. Goals and outputs for vegetation management were closely evaluated and it was determined that vegetation management goals can be achieved for all but Alternative 1 under the proposed scenery management standards and guidelines.

For the majority of the management areas, Scenic Integrity Levels were established to correspond with the stated management objectives for the MA. For MA 2.1, a more integrated approach involving several resource areas resulted in objectives that recognized that this MA would be a more actively managed area. For this MA a range of Scenic Integrity Objectives is provided recognizing the range of visual quality and user concern that exist. Frequently, local issues become more of a factor in how scenic resources are treated. In these cases, the land manager may implement more stringent scenic resource management controls than what SMS calls for.

**PC 52100-1:      The Forest Service should not manage large forest openings in low elevation bottomlands.**

The Scenic Resource Management guidelines recognize that vegetation management activity may occur throughout MA 2.1, and within a range of different slope conditions and landscape character. For vegetation management, where openings may occur is a function of the existing stand structure, opportunities for management, and habitat goals. Scenic resource management in itself does not dictate what stands will be managed in a way that will result in openings.

When the ecological and biological factors favor prescriptions that result in openings, then additional factors involving the actual design of the units or openings become important. No matter the position of openings on slopes, good scenic resource management guidelines are called for and openings should be designed to draw from existing elements in the affected landscape. It is in this context that the guideline concerning position on slopes is offered. Generally, larger openings will appear more natural and fit better lower on the slopes or flat terrain. The higher in elevation the opening may occur, the more difficult it is to blend it in with the surrounding character and to achieve Scenic Integrity Objectives.

**PC 52100-2:      The Forest Service should coordinate Scenic Integrity Objectives with vegetation composition goals and wildlife habitat needs.**

Coordinating Scenic Integrity Objectives with other Forest goals and objectives is an important consideration in the implementation of the Scenery Management System. Results of the modeling indicate that, based on application of the Scenery Management System, vegetation management goals can be achieved for all but Alternative 1. Alternative 1 allows for a harvest level and an intensity of even-aged regeneration harvest that would not meet Scenic Integrity Objectives in all areas. During the SMS inventory,

analysis, and planning stages, several resource areas were closely involved in the assignment of Scenic Integrity Objectives and related guidelines. This included vegetation and wildlife resource areas.

Also see response to PC 52000-1.

**PC 52100-3: The Forest Service should conduct further analysis to determine if the Visual Management System (Scenery Management System) affects commercial timber production.**

Scenery Resource management guidelines were a factor used in the modeling for vegetation management goals for the alternatives presented in the plan. Results of the modeling indicated that vegetation management goals can be achieved for all but Alternative 1.

Also see response to PC 52000-1 and PC 52100-2.

**PC 52200-1: The Forest Service should manage for scenic vistas.**

The Forest Service is evaluating guidelines to address vista opportunities within certain management areas and where appropriate. Historically, opportunities for creating or improving vistas have been on a project-by-project bases. In some cases, opportunities for vista improvement has been identified in management plans drafted for specific projects. There is nothing in the Forest Plan that would preclude managing for scenic vistas.

**PC 91700-18: The Forest Service should include information on viewshed standards and opportunities in the Desired Future Condition section of the Forest Plan (DEIS).**

The Desired Future Condition section of the FEIS has been expanded to include additional descriptive information concerning the expected condition of the landscape character. This is also noted in the Affected Environment section for Scenic Resources, where mention is made of the existing, predominantly natural-appearing landscape, forested mountain slopes, variety in vegetation, etc.

It is anticipated that monitoring of Scenic Resources will be an ongoing function of the plan.

## **Geologic and Mineral Resources**

**PC 14200-1: The Forest Plan Revision should prohibit mineral collecting in the Alpine Zone in order to discourage off-trail travel in these sensitive areas.**

The revised Forest Plan includes a standard that prohibits rock and mineral collecting activity in the Alpine Zone (Chapter 3, MA 8.1), and this standard has been rewritten to clarify the fact that all types of rock and mineral collecting are affected. Rocks within the Alpine Zone can have cultural and historical significance, as well as providing habitat for plants and animals. All of these values are protected by the standard. In addition, these lands are not currently open to activity related to leasable and common variety mineral materials. Other standards and guidelines in Chapter 3 encourage

hikers to stay on the trails and provide for closure and use limitations if resources are threatened.

**PC 17000-1: The Forest Service should not allow commercial mining or oil drilling because these resources are available on private lands.**

The overall policy of the Forest Service towards mineral resources supports the federal government's policy for minerals resource management: to "foster and encourage private enterprise in the development of economically sound and stable industries and in the orderly and economic development of domestic resources to help assure satisfaction of industrial, security, and environmental needs." Within this context, National Forests have an important role in contributing to an adequate and stable supply of mineral and energy resources, while continuing to sustain the land's productivity for other uses and its capability to support biodiversity goals (Forest Service Minerals Program Policy, 1995). While the White Mountain National Forest does not have high potential for mineral and energy resource development, moderate to low moderate resources are present. The Forest Service prescribes mitigation and restrictions to minimize the effects of mineral exploration and development.

**PC 99100-10: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The Geological Resources section should include language limiting expansion of mining to specific management areas with specific restrictions proposed at that level.**

The Forest Plan does include standards and guidelines for mining activities by management area that specifically address leasable mining activity, prospecting activities, mining of reserved mineral rights, mineral materials development (such as gravel pits), and recreational mineral and rock collecting. This MA-specific direction is found in Chapter 3 of the Plan for leasable minerals and materials, and recreational mineral/rock collecting activities. Tables in the FEIS show the management area direction for leasable mineral activity and recreational mineral/rock collecting activities.

Additional Forest-wide direction provides standards and guidelines restricting leasable mining activities in public water supply watersheds, riparian, floodplain, and wetland areas (Plan, Chapter 2). Other standards include requiring adequate reclamation and environmental protection measures in operating plans and surface use plans, and the use of all practical means to minimize resource impacts when surface disturbance is allowed. New mineral materials activity, such as gravel pits, is not allowed in public water supply watersheds; existing sites must be stabilized between periods of use and allowed to revegetate if closed. In general, new development of mineral materials is only allowed for administrative uses. Recreational rock/mineral collecting has several standards for management of this use across the Forest. These standards and guidelines were developed to support Forest goals as described in the Plan (Chapter 1).

## Heritage Resources

**PC 20000-1: The Forest Service should address all heritage sites for evaluation under the National Historic Preservation Act.**

**PC 32600-10: The Forest Service should evaluate and nominate eligible facilities for The National Register of Historic Places.**

Our goal is to evaluate all sites discovered on the Forest to determine if they are eligible for The National Register of Historic Places. However, because of budget constraints, and the potential for impacts to certain sites more than to others, we must prioritize. We consult with appropriate State Historic Preservation Offices (NH & ME SHPOs) and evaluate when necessary for Forest undertakings, or when nature or human events disturb a site. In addition, the Forest Service works at reducing the backlog of Un-evaluated Sites which, until they are evaluated, must by law be treated as being eligible for listing on The National Register.

**PC 20000-2: The Forest Service should retain a minimum 10 foot buffer area around each cultural or historic feature.**

The use of buffers varies, depending on the situation and the Forest Service's assessment of the best approach for management of a site over the long term. Standing trees might be used where appropriate, and where they are not likely to blow down and disturb the site. In other cases, we cut the vegetation around, and even within, a site such as a stone lined cellar hole if blow down is probable or if an individual tree or vegetation is causing movement or other impact to the site or feature.

The Forest-wide Heritage Resources standards and guidelines (Forest Plan, Chapter 2) were written to respond to federal and state laws regarding cultural resource management. The consultation process we are required to complete serves to protect and preserve cultural values associated with sites on the Forest, as well as sites off-Forest which are subject to undertakings we are a part of.

**PC 99100-1bb: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **Non-conforming heritage sites in Wilderness should be removed where possible.**

Wilderness guideline G-1, under Heritage, requires these sites be left undisturbed unless they threaten public safety or resource protection. While this leaves some room for removing structures, the action must still meet our legal requirements under the National Historic Preservation Act. Forest Plan Chapter 2, Heritage standards and guidelines, summarizes these requirements. In all cases, evaluations are necessary to determine documentation required and conditions to be met if removal of an historical resource is to be pursued. Consultation with the State Historic Preservation Office is also required.



**PC 99100-6A: The Forest Service should address and follow all applicable state and federal laws.**

- **In the EIS Executive Summary, the statement pertaining to disposition of existing shelters in Wilderness is incorrectly worded.**

We have changed the wording to better reflect our intent and the requirements of law. As the preface to the Forest Plan points out, we will meet all applicable laws which include the National Historic Preservation Act of 1966. This is reinforced by the Forest Wide Standards and Guidelines for Heritage Resources in chapter 2 of the Forest Plan. These Standards require that we coordinate undertakings with State Historic Preservation Offices and consider the effects of actions on historic values.

See PC 99100-1bb.

**PC 99100-6B:**

- **Section 106 consultation should be completed prior to designation of Wilderness areas.**

A comment was made that we should complete consultation with State Historic Preservation Offices prior to the designation of Wilderness areas.

Forest planning only makes recommendations for Wilderness designation. Designation of Wilderness is an authority reserved to Congress and therefore that action is outside of and usually follows the planning effort.

The Forest Service will consult with the proper State Historic Preservation Office on any undertakings proposed in these areas whether or not Congress has designated that particular location as Wilderness. This is required by the Forest wide standards and guidelines under Heritage in Chapter 2 of the Forest Plan.

See Appendix C of the FEIS for a description of the Inventoried Roadless Areas and the attributes that could be affected by designation.

**PC 99100-6C:**

- **The Glossary definition of an “undertaking” as it relates to the National Historic Preservation Act of 1995 is incorrect.**

Suggestions were made to improve the glossary definitions of undertaking and other archaeological terms. In response to these concerns, we’ve included the complete definition of “Undertaking” as it appears in the regulations and added the term “National Register of Historic Places” to the glossary. The National Historic Preservation Act (NHPA) was already referenced in the Forest wide Standards and Guidelines so was not added to the glossary.

**PC 99100-6D:**

- **The EIS Executive Summary and Appendix D should further describe heritage resources that may be found on the WMNF.**

The range of Heritage sites discussed on the Forest is discussed in the FEIS (Chapter 3, Heritage).

Roads and trails are part of this Heritage discussion. Trail and road work are undertakings that must meet the Forest wide Heritage Resource standards and guidelines described in the Heritage section of Chapter 2 of the Forest Plan. These standards and guidelines will adequately protect historic values associated with these features so it is not necessary to include more discussion in Appendix D of the FEIS.

**PC 99100-6E:**

- **A “Heritage Resource Identification” section should be added to the EIS.**

A suggestion was made to include a summary of heritage identification required by Section 106 of the National Historic Preservation Act in the EIS.

Direction for management actions such as this is spelled out in the Forest Plan versus the EIS where the effects of proposed actions are described. Forest wide Heritage guidelines G-2, G-3, and standard S-2 in Chapter 2 of the Forest Plan require that we follow a survey strategy and describe the criteria to be met. The Heritage Resource Survey Strategy referenced in G-2 outlines the type of inventory that should be conducted depending on the management action and location. S-1 requires that we coordinate these efforts and consult with the State Historic Preservation Offices on the results.

**PC 99100-6F:**

- **The Heritage section direct and indirect effects are not consistent with Heritage goals. The approach does not meet legal requirements.**

A comment was made that the description of effects on heritage resources assume that negative effects will take place and that assumption is inconsistent with the Plan goals for Heritage resources. The comment quotes regulations that say mitigation should be a last resort.

The intent of the effects discussion is to display the potential effects that could occur. This does not mean that they will occur. By applying the Forest Plan standards and guidelines listed in Chapter 2 of the Forest Plan, negative effects from these actions can be avoided. Consultation with the State Historic Preservation Office is a key requirement in the standards that insures historic values are properly protected or at least considered.

Mitigation, as used in the Forest Plan, refers to actions that can be taken to avoid or minimize impacts. This is very different than the way the term is used in the regulations. In the regulations, mitigation refers to actions taken when adverse effects cannot be minimized or avoided.

**PC 99100-6G:**

- **The EIS should contain a statement stating other site-specific direct and indirect effects can take place on cultural resources, such as the effects of constructing telecommunication towers and wind turbines.**

This concern pointed out that the EIS effects section does not disclose all the potential effects that could occur on heritage resources.

As the preface in the Forest Plan points out, the Plan is programmatic in nature and does not make project-level decisions. The Plan sets broader goals and objectives for the Forest; and, allocates land to different management regimes. It also lists measures to mitigate adverse effects through standards and guidelines. The accompanying EIS describes the broad effects that could occur. Since, we do not know all the locations or projects that may be proposed over the life of the plan, it would be impossible to list all the potential impacts that could occur in the EIS. For this reason, we conduct site specific project level analysis, building on the Forest Plan EIS analysis, to determine the effects that project could have. We can then decide if mitigation beyond that required by the Forest Plan standards and guidelines is needed. In the case of heritage resources, this would be completed in close cooperation with the State Historic Preservation Offices as required by Forest wide standards and guidelines.

**PC 99100-6H:**

- **Heritage standard S-2 should be shortened and clarified while standard S-3 should be expanded with a reference to Section 106 of the National Historic Preservation Act.**

The reviewer pointed out that much of the language in the Forest wide heritage standard S-2 is required by law and therefore not needed.

The preface of the Forest Plan also states that for the most part higher level direction is only occasionally repeated in the plan. However, since the Plan will be used as a field guide for Forest employees, we felt we should reinforce a few requirements by listing them again in the standards. The heritage standard S-2 is one of those. We do not believe the reference to Section 106 needs to be again repeated in S-3.

In addition, S-3 refers to a standard set of contract and permit clauses that are available during contract and permit preparation. For example, one of the clauses we often use covers actions that could occur after the permit or contract is issued. It puts the contractor or permittee on notice that further heritage resource consultation may be required for some actions. The clauses are often the means to meet heritage protection requirements spelled out in the Forest Plan or through consultation with State Historic Preservation Offices. S-3 simply requires that we consider protection of heritage resources and include the appropriate clause to provide that protection when we are preparing the contract or permit.

**PC 99100-6I:**

- **Specific changes are recommended for Forest Plan Appendix A (Summary Analysis of the Management Situation).**

The Analysis of the Management Situation was an effort the Forest went through several years ago while preparing to revise the Forest Plan. The document consists of a series of specialist papers for each resource area that outlined the current condition of different resources, concerns with current plan direction, need to change management direction, and an assessment of the Forest's capability for that resource. It was a shopping list of potential

changes that could be made through and outside of the plan. This shopping list and needs identified through public meetings was eventually boiled down to the 3 issues that were the basis of the alternatives.

Appendix A of the Forest Plan is therefore a historic compilation of that initial planning step. While we agree that the language used in that earlier document could have been much clearer, it would not be appropriate to rewrite that at this time. The document has served its purpose and has little value in guiding future actions since most of the concerns have had much more detailed analysis and public involvement since it was written. Because of this, we have decided to briefly summarize the effort in Appendix A of the final Plan and put the full Analysis in the planning record.

**PC 20100-1: The Forest Service should provide protection for the full range of historic artifacts of human use, including cellar holes, old mills, stone walls, bridle paths, etc.**

Within the Forest's boundaries are what remains of the evidence of past human land use history/environmental history. Our goal is to locate and manage the significant sites which tell these stories. We are obligated to protect sites determined Eligible for listing on The National Register of Historic Places (NRHP) as well as those yet Un-evaluated, and we consult with State Historic Preservation Offices to accomplish this activity. If a site is determined to be insignificant, it is still recorded and information is archived for future referral.

**PC 20100-2: The Forest Service should restore and relocate the Black Brook railroad trestle, and its interpretive signing, to a location outside of a designated Wilderness.**

We have documented the Black Brook trestle (or J.E. Henry Railroad Trestle) with Historic American Engineering Record (HAER) style line drawings and scaled photographs, and coordination has been accomplished, as required, with the NH State Historic Preservation Officer and The Advisory Council of Historic Places (ACHP). The documentation on file on the Forest and with the SHPO in Concord fulfills what is required to "mitigate for the loss" of this significant historic structure. The Forest Service is faced with making choices in applying limited historic resource funds, and our three standing nineteenth century buildings and numerous early twentieth century buildings are considered higher priorities. No decision has been made at this time on the disposition of the trestle; the Forest Service has no current plans to restore, move, or reconstruct it in a different location.

Also see *Historical New Hampshire*, Vol. 48, No. 4, Winter 1993, pages 187-213, "Railroad in the Wilderness: The East Branch & Lincoln Railroad, 1892-1948," by William L. Taylor. Published by the New Hampshire Historical Society, Concord.

## **Social and Economic**

**PC 16000-1: The Forest Service should reevaluate its analysis of Annual Labor Income and jobs generated by each alternative.**

This concern takes exception with a portion of the summary of the economic effects analysis found in the Executive Summary. Alternative 3 is estimated to produce 5 percent less in labor income than Alternative 2, and 7.5 percent less labor income than Alternative 4. Whether this difference should be characterized as “producing far fewer jobs and income” as is mentioned in the Executive Summary is subjective. In an effort to make this more objective, the wording has been changed in the FEIS.

**PC 16100-1: The Forest Service should request increased funding for research, timber, wildlife, recreation, and water quality.**

While the Forest Plan does not include budget considerations, funding requests for specific purposes such as research, timber, wildlife, recreation, and water quality are submitted based on the management needs identified in the Plan and associated documents like the monitoring guide. The final decisions for overall funding levels are then made by the Congress and the President, taking into account national priorities to determine the actual share received by the Forest Service. The WMNF will then strive to match the actual funds received with the actions called for in the Forest Plan.

**PC 16100-3: The Forest Service should phase out commercial timber sales and use the savings to fund management that emphasizes recreation and environmental purposes.**

Phasing out commercial timber sales on the WMNF is one of the Alternatives Eliminated from Detailed Study in the FEIS (Chapter 2), and the rationale is included in that section. The alternatives evaluated by the decision maker spanned a range of projected harvest levels from 18 MMBF (million board feet) per year to 35 MMBF per year. Alternative 2 is the Selected Alternative because it represents the most balanced approach to managing the Forest for the variety of resource demands that are made upon the land. Forest activities are funded in part based on outputs, services, and experiences provided. If timber is not harvested, funds would not be available to other resources.

**PC 16100-4: The Forest Service should reevaluate projected accomplishments to accommodate likely budget reductions.**

The planning process is designed to identify needed management over the next 15 years. Plans developed in this manner then serve as a basis for budget requests to Congress. Appendix B of the Plan explains that the expected outputs and practices are subject to annual funding levels. Chapter 4 of the Plan shows how monitoring and evaluation activities may also be affected by annual funding constraints. The Forest reviewed historical levels of accomplishments to determine if outputs were realistic given past and expected funding levels.



**PC 16200-1: The Forest Service should clearly disclose how non-priced benefits were specified in the analysis because without this information, the affected environment cannot be adequately described nor can effects be adequately assessed in order to determine significance under NEPA.**

Net public benefits were evaluated through analysis completed by Forest Service specialists, in combination with public involvement and participation, throughout the planning process. The public involvement for the White Mountain National Forest was extensive and provided the context to establish a range of alternatives that would best reflect and ultimately maximize net public benefit. The Forest Service engaged the public in a lengthy scoping process to identify many of the non-priced concerns and possible benefits over a period of several years leading up to the rollout of the conceptual alternatives in March, 2003. Public concerns were developed into issue statements and indicators were developed to provide a basis of comparison between the alternatives. These non-priced benefits were, therefore, used in the design of our alternatives, the selection of the preferred alternative, and ultimately in the Record of Decision. Tables in Chapter 2 of the FEIS display these criteria and an evaluation of their associated indicators that were used as part of the decision making process to select the Selected Alternative.

The Forest Service also estimates the value of some non-priced benefits. The value of several of the recreation experiences on the Forest is estimated using the Resource Pricing and Valuation Procedures recommended for the 1990 Resources Planning Act program. This technique assigns research-based “market-clearing prices” to various recreation experiences on the Forest and is described in the FEIS, Chapter 3, Social and Economic section. This approach estimates what these recreation experiences would cost if they were for sale on the open market. By applying these market-clearing price estimates to the number of visitors forecasted, by activity, for the next decade, it is possible to estimate a value for these non-priced recreational experiences provided to the public for an alternative. These results become another indicator for decision-makers to consider as part of their overall evaluation of the net public benefit of an alternative.

Other non-priced benefits are discussed in Chapter 3 of the FEIS in several resource sections. Many of these do not have widely accepted techniques to estimate their value to society, although some are currently the subject of much research and discussion. Non-priced benefits include the Forest’s healthy ecological systems, biodiversity, scenic value, production of safe drinking water, protection of wildlife, lands preserved for Wilderness or potential Wilderness designation, and natural and cultural heritage resources. The effects analysis in the FEIS evaluates each of these areas and makes judgments concerning the effects each alternative will have on the resources concerned. Also, “A Socio-Economic Assessment to Provide a Context for the White Mountain National Forest Plan Revision” (High et al., 2004) helped describe the overall context within which the public is impacted by the Forest, as well as their expectations for how it should be

managed. By combining these assessments with the information gained through the public participation process, the Forest Service has a framework to evaluate these non-priced benefits in their proper context in order to make conclusions about which alternative will best maximize net public benefit.

Information on non-priced benefits has been added to the FEIS, and the decision maker considered these — both in determining the Selected Alternative and in the Record of Decision.

**PC 16200-2: The Forest Service should more clearly allocate program costs to accurately reflect the benefits to other programs.**

In general, the Forest Service allocates costs for projects to their primary purpose. There is no method to track values associated with secondary or cross-benefits to another resource from an accounting standpoint. Project costs are normally charged to the resource management area that has responsibility for the project's primary purpose. The Forest Service well understands and appreciates these cross-benefit relationships and provides management of the resource for all intended uses. One example is the secondary uses of many of the access roads created or reopened as a result of a timber sale. Some of these roads are designed to remain open after their primary purpose has been fulfilled to facilitate non-motorized recreation and, occasionally, winter motorized recreation if it is part of a designated snowmobile trail. The maintenance of these roads after their primary purpose has been fulfilled is generally accounted for as part of the general Forest maintenance account. While these resources are often shared in practice, the Forest Service does not believe it would be worthwhile to parse the costs for maintaining and managing them between the various resource management areas.

**PC 16200-3: The Forest Service should stop offering timber sales that are not profitable.**

Timber sales are conducted on the WMNF for a variety of reasons, not simply for deriving a profit from a specific sale. Sales may be sold to accomplish wildlife habitat treatments, for research purposes, or to improve stand quality, thereby increasing the value of future harvests. Individual timber sales may or may not return a profit.

In addition, overall market trends have increased stumpage values over time.

**PC 16200-4: The Forest Service should recognize that commercial thinning may not represent an investment if all costs are covered and habitat quality is improved. Commercial thinning should not, independently, justify future timber sales of then-improved high quality timber.**

The harvesting program on the WMNF is conducted for the purpose of achieving integrated resource objectives. Thinnings are prescribed to accomplish a variety of objectives, such as improvement of structural habitat for wildlife, reduction of fuel loadings, addressing insect and disease conditions, and improvement of stand quality to create conditions that will

lead to the production of higher quality timber products in the future. The production of high quality forest products involves a long-term commitment to applying sound silvicultural practices. When thinnings are prescribed and implemented, it is with the long term expectation that the resulting high quality timber will be harvested in the future.

**PC 16300-1: The Forest Service should clarify its accounting methods, particularly in regard to its calculation of cost-benefit analysis.**

**PC 91800-4: The Forest Service should use the correct standard RPA guidance in the Forest Plan.**

The title of Table B-28 “Market Clearing Prices” describes the Forest Service’s accounting approach. The Forest Service is looking at this using contingent valuation based on the entire market output, not just the National Forest. In accordance with FSH 2409.18, FSM 1971, and 19707.17 our financial efficiency analysis looks at benefits from the government/WMNF perspective. Multipliers were not used in the financial efficiency analysis, and benefits were captured strictly as a result of cash flows to or from the Forest. While the net total result of the Forest’s financial efficiency analysis is negative across the alternatives, there are other benefits, some that are not easily quantified, which the WMNF provides and are developed as part of the economic efficiency analysis. The economic efficiency analysis adds benefits in excess of cash flows, and extended this perspective to include the community at large which actually uses the Forest.

Another point made under this concern takes exception with the Forest Service’s use of market-clearing price versus willingness to pay as part of its economic efficiency analysis. The Forest Service has no evidence to support the contention that using market-clearing price is technically wrong.

In response to this and other comments, the FEIS (Chapter 3, Social and Economic) includes more complete corrections in terminology as well as a more detailed explanation of the financial and economic analysis.

**PC 88100-1: The Forest Service should consider land management strategies which would provide more economic opportunity in northern New Hampshire.**

As described in the “Economic Impact of Forest Related Activities on the Economy of the Forest Region” section of the FEIS (Chapter 3, Social and Economic) and subsequent sections, the Selected Alternative incorporates strategies that have the potential to improve the economic opportunities not only of the two northern counties of the Forest but the rest of the Forest as well. The increased levels of timber harvesting in the Selected Alternative compared to recent history is estimated to generate a 16.6 percent increase in jobs and a 20.8 percent increase in income compared to current levels. These increases will be due in part to increased levels of timber management compared to recent levels, and in response to increased levels of recreation use on the Forest. The revised Plan will allow for improvements at some of the developed recreation facilities on the Forest in response to the changing needs of the public. Additionally, the Forest Service will continue to provide

both semi-primitive and primitive recreation experiences to those visitors who desire such an experience, as has been its tradition over the decades to several generations of visitors. The positive trends in visitation for most of the recreation activities on the Forest are expected to continue. These increases in visitation will contribute positively to the local economies of the communities surrounding the Forest. Comments received regarding the development of more manufacturing and a high tech corridor for the North Country are beyond the scope of this Plan revision.

**PC 88100-2: The Forest Service should consider an economic analysis of the non-market values associated with the Forest.**

The non-market values associated with the Forest were considered in the economic efficiency analysis described starting on page 3-448 of the DEIS. Supplementary information concerning these non-market values, termed market clearing prices, can be found in Appendix B.

**PC 88100-3: The Forest Service should summarize the direct costs and direct returns for timber harvesting, developed recreation, dispersed recreation, ski areas, and special use permits.**

Table B-20 of Appendix B in the DEIS summarizes the direct costs and direct returns for the current situation and for each alternative in each of these program areas. A discussion of the methodology used and the results can also be found in Appendix B.

**PC 88200-1: The Forest Service should reconsider the economic impacts of the Forest on local economies.**

The economic impact analysis of the alternatives using the IMPLAN model captures only part of the economic benefits that the Forest brings to the region (FEIS, Chapter 3, Social and Economic). It is important to understand the only jobs and income that are attributed to the Forest in this analysis are those that result from the expenditures from visitors who actually visit or recreate on the Forest or from the sale of a resource extracted from the Forest, such as timber. Similarly, it is important to understand what economic activity is not attributed to the Forest in these calculations. For example, the economic activity generated from the sale and purchase of secondary homes in the region is not attributed to the Forest. Although it can be argued much of these homes' market value is derived from their proximity to the WMNF, their sale activity is not attributed to the Forest because it does not occur on the Forest. Likewise, it does not include the economic activity associated with visitors to the region who may shop, dine and rent overnight accommodations in the region because of area's scenic attractiveness but never actually visit the Forest in the course of their stay. This narrow definition of the Forest's economic impact was intentionally limited in order to provide a better assessment of the economic impact of various management strategies embodied in the alternatives. This assumes that within the range of the alternatives presented, protection of the resources such as water and air quality, ecosystem diversity and scenic attractiveness are within a range that will continue to enhance the desirability and

attractiveness of the area from an economic standpoint. The real economic differences between the alternatives are captured within various levels of goods and services detailed within the alternatives.

The economic impact analysis of the Forest on the region was limited to the analysis area described in the FEIS (Chapter 3, Social and Economic section) and discussed in more detail in the Socio-economic Assessment. The definition of the analysis area also directly impacts the evaluations of the overall impact of the Forest in the region (0.8 percent in terms of income and about 1.5 percent in terms of jobs). For example, the four county analysis area extends down to Hanover in the southwest part of the analysis area and therefore includes an area that is not commonly associated with the White Mountain region. The addition of the jobs and income from this and other outlying areas, adds jobs and income to the denominator of the percentage calculation when evaluating the impact of the Forest on the region. The limitations of this analysis area in terms of adequately capturing the Forest's economic impact were weighed against the availability of more geographically precise data to support the analysis. The four county analysis area was deemed to be suitable for what would ultimately be more of a comparative analysis between the alternatives.

Another area embodied in this concern relates to whether the Forest adequately recognized the economic impact of snowmobilers and alpine skiers. Both of these recreational activities were captured within the economic impact analysis as shown on Table B-20 and discussed in Appendix B of the FEIS.

**PC 88200-2: The Forest Service should not conduct commercial timber sales.**

This comment is based on the concept that there is no shortage of lumber on private lands and that the selling of timber from National Forest lands depresses stumpage prices. Furthermore, there is a feeling that New Hampshire's economic future is best served by a WMNF based on recreation, not logging.

The Forest Service has a legal mandate established by Congress to provide commercial timber for the nation on a sustainable basis. There is little or no evidence that the quantity of timber provided by the WMNF has a depressing effect upon stumpage prices. While the WMNF provides a wide range of timber products, the focus of management is to provide high quality sawlogs, and current market trends indicate that there is extremely strong demand for high quality timber. There is not an inherent conflict between the recreational use and timber harvesting on the WMNF. Indeed, one of the great benefits of a well implemented "integrated resource management" program on the WMNF is to serve as an example of how high quality forest products can be provided to society in a manner that is compatible with heavy recreation use.

**PC 90100-7: The Forest Service should include costs associated with managing the Forest to the public.**



- **In order to make informed decisions.**

Table B-20 of the FEIS (Appendix B) displays the costs associated with managing the Forest by program.

**PC 99100-1F: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **The towns which contain Appalachian Trail corridor transfer lands should be included in the Payments in Lieu of Taxes (PILT) table.**

Table 3-100a in the FEIS (Chapter 3) has been expanded to include PILT made to towns that have acreage of the Appalachian Trail Corridor in New Hampshire. These lands are managed by the USDA Forest Service under an agreement with the National Park Service.

**PC 99100-3X: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **RVD inputs for the current situation shown in table B-20 are rounded to thousands.**

Table B-20 in the FEIS has been corrected to not use rounding for the RVDs displayed under “Current” and makes the table more consistent.

**PC 99100-3Y:**

- **In the Spectrum model, no explanation was given for how the management prescriptions were mapped under each alternative.**

By design, the SPECTRUM model was not intended to be site-specific in terms of providing an exact, spatially specific solution of prescriptions that could be executed on the ground. The modeling was done at a programmatic scale, not a site-specific scale, and therefore was not designed to provide site-specific management prescriptions. This is discussed further in Chapter 3 of the FEIS, Vegetation section. There were some controls on management prescriptions in the modeling by tying them to some characteristic of the analysis unit. These are identified in the FEIS in the tables of constraints listed in Tables B-13 through B-17. One example is limiting the spruce-fir ELC management prescription to at least 90 percent of the acres treated using uneven age management techniques in order to preserve the softwood component and reflect habitat objectives. Another example is only allowing the aspen-paper birch ELCs to be harvested using regeneration harvests consistent with promoting their regrowth for wildlife habitat purposes. In practice, the selection of a management prescription is done by qualified foresters in consultation with an interdisciplinary team to satisfy multiple resource objectives. This process is very site-specific, and is dependent on a multitude of factors that go beyond the scope of the programmatic modeling done as part of Plan revision. Therefore, any attempt to apply the model results to draw site-specific conclusions about management prescriptions would be inappropriate.

**PC 99100-3Z:**

- **It is unclear what is included in the category of assigned values and what dollar amounts are attributable to each subcategory.**

The assigned values used in the DEIS are identified in Table B-28 of the DEIS. This table lists the activities which were cross-walked back to the recreation activities found in Table B-20. Most of the crosswalk was straightforward. The only categories that require some explanation are:

“OHRVs” were included with “Driving and Viewing” in an assigned value category of “mechanized travel and viewing scenery.”

“Snowmobiling” was included with “Alpine and Nordic Skiing” in an assigned value category of “winter sports.”

The assigned values were multiplied by the number of RVDs using the same forecasts of RVDs used in determining the recreation visitor spending described in Appendix B. The NPV of these assigned values were calculated over a 100 year period. This “Assigned Value NPV” is displayed in Table B-29 of the FEIS. By adding the Assigned value NPV to the financial efficiency NPV, which considers direct costs and revenues anticipated over the same 100 year period, an “Economic Net Present Value” was estimated, which is also displayed in Table B-29.

**PC 99100-3bb:**

- **Information should be provided on how multipliers/data are determined in FEAST, and technical description of FEAST provided.**

The multipliers that were used in FEAST were obtained from the IMPLAN model, which was run for the economic analysis area defined in the economic impact analysis. They are area-specific to the four county analysis area of the Forest. It is worth noting that FEAST is not a model; rather, it is a spreadsheet tool (Forest Economic Analysis Spreadsheet Tool) that was developed to apply the IMPLAN impact results (response coefficients) to each alternative. By multiplying expected resource outputs by the IMPLAN response coefficients, it is possible to calculate the economic impacts in terms of employment and income for each resource or activity. These results are subsequently displayed in the economic impact analysis results. A DRAFT technical guide for FEAST is available at: [www.fs.fed.us/r9/white/3\\_WM\\_fpr\\_Web/forest\\_plan/revision/FEAST\\_Tech%20Guide\\_VII.pdf](http://www.fs.fed.us/r9/white/3_WM_fpr_Web/forest_plan/revision/FEAST_Tech%20Guide_VII.pdf)

**PC 99200-1: The Forest Service should supply requested information.**

This concern relates to a specific request for information regarding inputs used in the SPECTRUM modeling process. The Forest Service responded to this request in writing, and provided the requested information (Administrative Record memo dated 19 November 2004 and subsequent email correspondence). This response included an offer to meet personally with the party concerned to make certain all requests for information were satisfied and the information provided was understood.

## **Lands and Special Uses**

**PC 21000-1: The Forest Service should actively pursue land purchases and conservation easements both within and beyond the Forest proclamation boundary.**

- **Because pressure on Forest resources, including demands for recreation and other resources, continue to grow.**
- **Because rapidly increasing demands are creating extreme use levels even during what were previously considered “shoulder seasons”. This increased use, concentrated on a fixed land base, has resulted in a decline in the quality.**

**PC 21000-3: The Forest Service should focus land acquisition priorities on snowmobile access, snowmobile corridors, and trailhead access and protection, because specific parcels are important connections to the statewide snowmobile network of trails, enhance local economies, and improve the safety of these sections of snowmobile trails.**

Land acquisition in the Eastern Region has always been an important tool to achieve a contiguous landscape among the fragmented ownership patterns that characterize the urbanized East. Desired goals have been to achieve continuity in the mixed ownership pattern, address resource objectives — which include trail and trailhead access, and improve management efficiency.

The Forest Service pursues land purchases and other interests (conservation easements, rights-of-way easements, and land exchanges) as outlined under Chapter 2, Lands. We apply a proactive approach for all proposed acquisitions, with the knowledge that Congressionally appropriated dollars are necessary to complete any purchase of land, interest in land, or land adjustment activity. Each request received from a willing seller is screened to comply with land adjustment criteria as outlined in Forest Service Manual 5400.

Our objective for all future land adjustment or acquisition proposals is they will be accomplished by working with willing sellers, and guided by the Forest-wide or management area-specific direction for land management in the Forest Plan and the Forest Land Adjustment Plan. There are numerous other requirements in all land acquisitions and land adjustments proposals that affect each action, including New Hampshire and Maine state consent laws for federal land acquisition, federal appraisal regulations, Department of Justice title standards, and specific regulations and policies outlined in Forest Service Manuals and Handbooks. As outlined in current Forest Service policy, acquisition of lands or interest in lands (conservation easements) outside the Forest proclamation boundary require town, state, and Congressional approval, and must be contiguous to our existing boundary.

For forest land beyond the WMNF proclamation boundary, the Forest Legacy Program is an important means of conserving environmentally significant forests from conversion to non-forest uses. Forest Legacy is a successful

partnership between the private land owner, state and local government, and the Forest Service's State and Private Forestry. For more information on the Forest Legacy Program, contact the State Forester in New Hampshire or Maine.

**PC 10000-19: The Forest Service should create a better boundary maintenance program.**

A commenter pointed out that not all Forest boundaries are marked and many are fading. The Forest's budget is allocated by Congress in specific budget line items. These line items have strict rules on what the money can be used for. Unfortunately, the budget line item that can be used to accomplish boundary line maintenance and establishment has been insufficient to meet the needs. We will continue to pursue the funding needed to identify and maintain all National Forest property lines.

**PC 21000-2: The Forest Service should expand the carrying capacity of the Forest through land acquisition.**

- **In order to increase timber outputs and reduce access restrictions.**

The Forest has increased in size by approximately 15,000 acres over the last planning period. The acres acquired by land adjustment activities are designated as National Forest System lands within the White Mountain National Forest and are included in the overall study of the carrying capacity of the Forest. Management of these acquired acres is in compliance with the laws set by Congress to encourage the foresight in the use on the Nation's forest resources and establish a long-range planning process for the management of the National Forest System. These regulations, policies and goals are articulated in the following statutes as referenced in The Principal Laws Relating to Forest Service Activities (1993) (ISBN 0-16-041927-1).

Also see PC 21000-1.

**PC 21000-4: The Forest Service should explore alternative acquisition options to full fee acquisitions, including conservation easements, to achieve conservation objectives.**

**PC 21100-3: The Forest Service should explore non-fee ownership opportunities, including easements and deed restrictions.**

- **Because the private land tax base is important to local areas and towns.**

When a proposal is submitted the determination of fee ownership or acquisition of a partial interest (conservation easement) depends on whether fee or partial interest is required to satisfy a particular goal the Forest Service sets to achieve. In most cases fee ownership is the preferred option. The Forest Service does consider less-than-fee interests, as well as reservations for life or a term of years, when a property contains substantial improvement value and the continued use of the property will not adversely affect the management objectives for the area. The fact that a property remains on the tax rolls is also considered during the decision process.

Experience has taught us that partial interest acquisitions are often complex, the appraisals are expensive, negotiations are usually complicated, the value is often close to the fee value — regardless of the interest sold, and they can be expensive to monitor, manage and enforce.

The Forest Service will continue to evaluate if fee ownership or acquisition of a partial interest best serves the public for each land adjustment proposal received based on criteria outlined in the Plan, Chapter 2, Lands.

**PC 21100-2: The Forest Service should modify Lands Status/Adjustments/Acquisition guideline G-1-c to increase acquisition of lands that access popular recreation areas, because trailheads and parking areas not located on WMNF lands are subject to closure and modification.**

The Forest Service believes continued recreation access is extremely important and that this issue is adequately addressed in Lands section of the Plan (Chapter 2) under Land Status/Adjustments/Acquisition, guideline G-1, d. and f. We also adhere to Forest Service Manual 5400 objectives to optimize National Forest System land ownership patterns, to further resource protection and use, and to meet the present and future needs of the American people.

**PC 21000-5: The Forest Service should honor the intentions, at the time of transaction, of the people and organizations who have sold or gifted lands to the White Mountain National Forest.**

To the best of our knowledge we have honored the intentions, at the time of transaction, of properties acquired by sale or donation. The Constitution provides the fundamental basis for the control, acquisition, disposition, use, and management of all federally-owned lands. Article IV, Section 3, paragraph 2 of the Constitution states: The Congress shall have power to dispose of and make all needful rules and regulations respecting the Territory or other property belonging to the United States.

We strive to comply with the multitude of laws that govern how we, as a land management agency, manage National Forest System lands that were acquired over the years. It should also be understood that Congress has enacted many new laws and amended existing laws that govern how we manage lands acquired for public use. It is the goal of every Forest Service employee in the performance of their day-to-day duties to adhere to these laws, regulations, and policies as outlined in Forest Service Manuals and Handbooks. The primary laws relating to Forest Service activities can be referenced in *The Principal Laws Relating to Forest Service Activities* (1993) (ISBN 0-16-041927-1). Forest Service Manuals and Handbooks can be accessed at any Forest Service office or online at [www.fs.fed.us/im/directives](http://www.fs.fed.us/im/directives).

**PC 99100-4: The Forest Service should work with outside agencies and groups to clear up discrepancies in land ownership and management requirements.**

We concur, and through this planning process we have constructively worked with outside agencies (State, Federal, and Local) and the public as



we move towards completion of the planning process. The Forest Plan is a strategic, programmatic document that does not make project-level decisions. Site-level project planning would address land ownership concerns and management requirements and strive to meet the Forest-wide goals and objectives along with the purpose and desired conditions of the management area within which the project is proposed.

**PC 21100-1: The Forest Service should clearly delineate in the EIS those lands which were acquired through the 1911 Weeks Law and those lands that were acquired through the 1924 Clarke-McNary Act. The EIS should show how other laws have altered the status of that lands purchased under the Weeks Law.**

**PC 99100-6K: The Forest Service should address and follow all applicable state and federal laws.**

- **The EIS should delineate areas purchased by authority of the Weeks Law, and must specify how other applicable laws altered the status of the lands purchased under the Weeks Law to allow other uses.**

Forest management is not based on how land was acquired (e.g., through the Weeks Law), but on land allocation in the Forest Plan. The Forest Plan and FEIS address all White Mountain National Forest lands, regardless of when or how they were acquired. Therefore, a delineation of which lands were acquired through the Weeks Law or other legislation was not done for this analysis. The requirements of all applicable laws, including the Multiple Use and Sustained Yield Act, Wilderness Act, Wild and Scenic Rivers Act, Endangered Species Act, Clean Water Act, National Historic Preservation Act, National Environmental Policy Act, and the National Forest Management Act, are incorporated into the revised Forest Plan.

**PC 54000-1: The Forest Service should consider a moratorium on mountain bike races on WMNF land.**

We have not received a proposal for an organized mountain bike race on the National Forest. Such an event would require a Special Use Permit, and, if granted, would require consistency with Forest-wide and management area direction (see Forest Plan, Chapter 2, Recreation, for direction on recreation-specific special uses, and Chapter 3, Special Uses — Recreation Specific for direction in specific management areas) as well as any other mitigation measures determined based on the specifics of the proposal. Further, we have no indication that impromptu mountain bike races are a concern at this time. The Forest Service believes there is sufficient direction to manage recreation events, including competitive events, should they become a problem.

**PC 54000-2: The Forest Service should ban grazing.**

Currently there are no grazing permits or proposals on the White Mountain National Forest. Any new proposal for use or occupancy of National Forest Systems lands would have to go through a two- stage, fourteen item screening process.

**PC 54000-3: The Forest Service should develop guidelines for aerial flight frequency and duration.**

**PC 54000-4: The Forest Service should reduce low-level private planes / gliders.**

Airspace over the White Mountain National Forest is under the jurisdiction of the Federal Aviation Administration and not the Forest Service. The FAA requests that pilots fly in excess of 2000 feet above ground level in Wilderness areas.

**PC 54000-5: The Forest Service should list dog training field trials as an exception listed in Section S-3 Special Uses.**

Sporting dog field trials have been allowed under special use permit authority in the Kilkenny area for some time. We have added these specific dog trial permits to the exceptions under the direction for “permits for recreation events and services with off-trail use”.

**PC 54000-8: The Forest Service should administer Alpine Zone special use research permits at Ranger Stations.**

- **Because they should not be available at huts or summit buildings.**

Requests for research permits on National Forest land are processed through the Forest Supervisor’s Office. Depending on the details of any research permit, administration falls to the district in which it occurs or, in some cases, to a resource specialist (e.g., wildlife biologist, soil scientist) as appropriate. Permits for research on National Forest land are not available at huts or summit buildings. Lonesome Lake Hut, the Mt. Washington summit buildings, the Auto Road and the Cog Railway are not on National Forest land.

**PC 91100-77: The Forest Service should not make any management decisions without first examining all legal titles to lands adjacent to National Forest lands.**

Department of Justice – 2001 Title Standards serve as a guide for the preparation of evidence of title for all acquisitions by the United States of land or interests in land, including acquisitions by direct purchase, exchange, donation, and condemnation. Normally title on abutting land is not examined other than to the extent it affects title to the land being proposed for acquisition.

As stated in the DOJ – 2001 Title Standards, - Title or ownership of land or interests in land is determined by an examination of documents in the public land records, by a physical inspection of the property, and by a review of other supplemental or supporting documents. Such title evidence is prepared and reviewed when land is purchased to determine that there are no adverse or unacceptable encumbrances or “clouds” on the title. The United States government, acting through its various departments and agencies, follows the same practice when it acquires land or interests in land, for the same reason, but also because it is required to do so by a statute originally enacted

in 1841, now codified at 40 USC §255. This statute conditions an agency's authority to acquire land on the prior approval of the sufficiency of the title by the Attorney General or her/his delegate (Office of General Counsel). It applies broadly to all federal land acquisitions unless Congress has specifically provided otherwise. The regulations promulgated under this statute provide that the Title Standards must be followed unless exception is made in unusual circumstances.

#### **Communications Sites**

- PC 54200-1: The Forest Service should prohibit cell phone towers and communication sites from National Forest Lands.**
- PC 54200-2: The Forest Service should continue to limit the development of new communication sites at alpine ski areas.**
- PC 54200-3: The Forest Service should oppose construction of wind turbines and communication sites at Wildcat Mountain and ski areas.**
- PC 54200-4: The Forest Service should consider small camouflaged wireless facilities along the Kancamagus Highway.**
- PC 54200-5: The Forest Service should prohibit aerial communication services in the backcountry.**
- PC 54400-1: The Forest Service should consider the environmental impact of communication towers or wind turbines sited on White Mountain ridges.**
- PC 54400-2: The Forest Service should consider wind energy proposals with robust NEPA analyses and scrutiny.**
- PC 54400-4: The Forest Service should place a moratorium on Special Use permits for wind power facilities during this planning period.**

The Telecommunications Act of February 8, 1996 (Pub. L. 104-104; 47 USC 332), Section 704(c) requires federal agencies to facilitate the development and placement of telecommunications equipment on buildings and land they manage. The National Energy Policy (Executive Order 13212) directs federal agencies to make agency land and energy resources available and to expedite permits and other federal actions necessary for energy related project approvals on a national basis.

The Forest Plan limits communication facilities to four designated sites in Management Area 7.1, Alpine Ski Areas. Ski areas were selected because they already have high levels of development, so impacts can be concentrated in a small area. A communication site plan that outlines the lease area and the improvements authorized on the site is required for all communication sites. Currently there is very little public and industry interest in developing communication facilities along the Kancamagus Highway, a National Scenic Byway. The Forest to minimize effects and to meet assigned Scenic Integrity Objectives, has designated sites only in areas of identified need.

Wind towers are only considered in a few select management areas to minimize effects (see FEIS Chapter 2, Elements Common to All Alternatives). Further, these projects must be consistent with the Plan's goals and objectives. Any new proposal for use or occupancy of National Forest System lands would have to go through a two-stage, fourteen item screening process. If such a proposal were accepted as an application, the public would be scoped for issues and concerns, and the appropriate National Environmental Policy Act environmental analysis would be conducted before the issuing of a permit was considered. The analysis would study potential impacts on resources, including, but not limited to, public safety, noise, visuals, wildlife, etc. (36CFR 251.54 (e)).

**PC 54400-3: The Forest Service should consider revising Chapter 2, under Standards and Guidelines for Wildlife, Guideline G-9 from a Guideline to a Standard.**

- **Because prospective wind project applicants should know that aerial wildlife surveys are required surveys.**

Wind energy technology is a rapidly changing field. All applications for special use permit to site wind towers on the WMNF will need to consider the potential effects of structures and their operations on flying wildlife. The reason the direction is a guideline and not a standard is because there may be times when additional survey information is not needed. Research is rapidly increasing on migration patterns of birds and bats and what leads to high mortality rates at some wind farms but not at others. It is possible that in the near future, landscape mapping or other techniques will be adequate to identify risk areas or effective collision avoidance devices will be developed to make surveys unnecessary. In the meantime, surveys will be required unless some other information is available to determine that wildlife will not be impacted by a proposed structure.

## **Transportation System**

**PC 51000-1: The Forest Service should prohibit new roads within the National Forest.**

The laws and regulations which govern National Forests require that they be managed according to multiple use principles. The Forest Plan establishes a balance of uses and, using Forest-wide and management area standards and guidelines, directs how the White Mountain National Forest will be managed over the next fifteen to twenty years. Most, if not all, of the multiple uses on the Forest require some level of road access and transportation network. The primary projected need for new roads and road reconstruction during this planning period and beyond will be directly related to vegetative management activities. The exception to this would be for the reconstruction that may occur as a result of the PFSR (Public Forest System Road) program. Any new roads for vegetative management purposes would be closed to public motorized use once they have served their intended purpose. Table B-04 of the Forest Plan outlines the amount of new road construction and road reconstruction planned for the first decade, and the effects of this are

addressed in the resource areas affected (Chapter 3, FEIS). As project-level environmental analyses are conducted, the transportation system will be analyzed to ensure long-term requirements are met. It is anticipated that minor modifications may be made to the overall system through decommissioning or the addition of unclassified roads to the system. The remainder of the transportation system on the Forest will be managed and maintained to support planned activities.

**PC 51000-2: The Forest Service should enhance beauty along Forest roads and highways.**

Recent improvements to numerous sites along the Kancamagus Highway were part of a multi-year capital improvement project to upgrade those locations to meet the demands of today's traffic levels and vehicles. No similar projects are currently planned on other highways on the Forest, though we will continue to maintain existing facilities to meet public needs. We will also continue to work with the New Hampshire and Maine DOTs on their 10-year Transportation Improvement Plans to ensure highways within the Forest meet safety and user needs. Some of these improvements may include efforts to enhance scenic viewing. The Forest Plan also allows for us to work closely with the states in maintaining the beauty of the WMNF along roadways.

**PC 51000-4: The Forest Service should leave existing roads open for people who are less mobile.**

All roads on the Forest that are planned and managed for a variety of open, public, motorized vehicular uses are, and will continue to remain, open for such use except for seasonal closures to protect the investment and surrounding resources. Roads planned for specific management purposes will remain closed to public motorized use following completion of those activities. Roads not planned for public motorized use will remain closed for several reasons, including resource protection and to avoid establishing new use patterns. Most Forest roads are open to non-motorized travel.

**PC 51100-1: The Forest Service should permit more road construction in the White Mountains National Forest to provide access for elderly and handicapped individuals.**

**PC 51100-4: The Forest Service should not build additional roads in the Forest.**

Roads on the Forest, which are open to public motorized vehicular use, are planned and maintained for the use and enjoyment of all users. All new construction planned for this planning period is related to vegetative management only and roads will not remain open for public motorized use following primary use. In doing this, we have stayed with a balance of motorized and non-motorized access that has had good support over the last planning period.

**PC 51100-2: The Forest Service should allow for natural revegetation of roads.**

Classified roads, which are not needed for continuing use and which are not open to public motorized vehicular travel, are normally allowed to



revegetate naturally to protect resources and monitored accordingly. These roads are considered to be in long-term storage awaiting future use periods.

**PC 51100-3: The Forest Service should implement innovative or traditional best management practices in parking lot design for storm water management.**

The Forest Service has used, and will continue to use, Best Management Practices for all road and parking lot construction and reconstruction on the Forest in accordance with State and Federal requirements. We will also continue to work with State and Local jurisdictions to accomplish these requirements on roads under their management within the Forest.

**PC 51100-5: The Forest Service should provide a definition of improved roads consistent to Chapter 7 of the Roadless Inventory document**

Direction and guidance for completion of the roadless area inventory is found in the Forest Service Handbook and a letter from the Regional Forester. (This can also be found in the Administrative Record.) We again reviewed this guidance against our procedures. The concerns raised focus on whether or not the roads are maintained for travel by passenger vehicles and were designed for passenger vehicles. All of the roads in our improved road inventory were designed for passenger vehicle use. Maintenance on many of the lower level roads is not conducted annually. This is because many of these roads are put to rest to minimize resource impacts. They are closed to use for periods that can last 10 years before they are brushed for use again. Inventoried roadless areas according to our handbook direction are supposed to be regaining a natural, untrammelled appearance. Since these roads are being used and maintained on a periodic basis, we concluded they were not regaining a natural, untrammelled appearance.

**PC 51300-2: The Forest Service should obliterate and reduce roads.**

**PC 51300-3: The Forest Service should place greater emphasis on road decommissioning.**

As a part of the Forest Plan revision process, we have conducted an extensive, multi-year inventory of the WMNF transportation system. The current classified transportation system is deemed necessary for the use and management of the Forest. The current inventory of unclassified roads on the Forest will be reviewed during project-level environmental analysis for inclusion in the classified network, conversion to trails, or decommissioning. Table B-04 of the Forest Plan shows that we anticipate decommissioning up to 40 miles of road over the first decade.

**PC 51300-4: The Forest Service should not allow new logging roads.**

Implementation of Alternative 2 is projected to result in the construction of approximately 1 mile of road per year. These are planned to have intermittent use for transporting forest products and when not in use will be gated or otherwise blocked to motor vehicle thus providing access for walkers or bicyclists. In a typical situation, trucking might take place for 3 to 4 years

out of a twenty year period with the road being available for recreational use the remainder of the time.

The decision strikes a balance between motorized and non-motorized access.

**PC 99100-3T: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Clarification of road decommissioning and road management objectives should be clarified.**

Decisions to decommission both classified and unclassified roads will be made during individual project-level environmental analysis. When decisions are made to decommission roads, funds will be requested to accomplish this. Some decommissioning techniques, such as natural revegetation, require little to no funding while other techniques require significant funding. The majority of current road funding is dedicated to the maintenance and management of the existing road system.

The DEIS, Forest Plan, and Appendix D (Roads) clearly indicates that the objectives for road management on the Forest are towards the maintenance and reconstruction (when funding is available) of the existing road system and decommissioning of unneeded roads. Planned new construction is minimal (1 mile per year), will only be associated with vegetative management, and any new roads constructed will not remain open to long term public motorized use.

**PC 51400-2: The Forest Service should consider road closure guidelines that include access for hunting and fishing.**

We do consider hunting and fishing access, as well as maintenance and protection of the investment, when managing the transportation network and developing closure guidelines. All travelways that are open to public motorized vehicle travel are available for hunting and fishing access when open. The Forest Service works closely with the Fish and Game departments of Maine and New Hampshire to authorize the retrieval of legally taken game on roads closed to public motorized vehicle travel, using highway legal vehicles, when conditions will not damage the roadway. Additionally, guideline G-8 in the Wildlife section of Chapter 2 of the Forest Plan allows for opening roads normally closed to public motorized travel for access to hunting and fishing areas when resource concerns permit and to accomplish state wildlife management goals.

## **Monitoring**

**PC 22000-1: The Forest Service should continue Forest-wide monitoring.**

**PC 22000-2: The Forest Service should expand Forest-wide monitoring programs.**

**PC 22000-3: The Forest Service should work closely with partners to address Alpine Zone monitoring efforts.**

**PC 91700-9: The Forest Service should change the monitoring and evaluation process used in small area classifications.**

**PC 99100-2: The Forest Service should define and include efforts to monitor adverse ecological developments.**

The Forest Service approach is described in Chapter 4 of the Forest Plan. This describes how the plan takes a strategic approach describing the broad topics that will be monitored and the questions that need to be answered. The Forest Service received a number of comments suggesting specific monitoring that should be completed. For example, responses not only stated that monitoring should go beyond standard regulatory requirements but specifically said it should include monitoring ecological indicators as well as rare and unique features. A separate document, the “Monitoring Implementation Guide,” will consider this information and describe the specific items to be monitored. These items cover the categories described in Chapter 4 of the Forest Plan. While the Implementation Guide is not part of the Plan, it is closely tied to it. It is here that specific monitoring for items such as brook trout populations, water quality, recreation use, alpine, climate change, invasive species, project effectiveness, ecological indicators, and Wilderness monitoring will be considered. Recreation use and wildlife monitoring will be a large part of the Implementation Guide. Monitoring will go well beyond the minimum required by law, and will include items to meet the questions raised in the Forest Plan, Table 4-06. It will include a range of methods to answer these questions. For example, in some cases, the Implementation Guide will include protocol to monitor a specie’s population trend, while in other situations habitat will be monitored instead. These protocols could change over time as we learn through our management of the land, and as we evaluate monitoring results and new scientific information. Chapter 4 of the Forest Plan describes this adaptive approach to management.

The Implementation Guide will prioritize monitoring items so limited funding can be distributed to meet the highest priority needs. When funds are limited, these are often not easy decisions. For example, the Forest Service may have to decide whether to put specific recreation funding into trail maintenance, estimating the amount of recreation use, monitoring recreation use impacts on wildlife, and inventorying for invasive plants brought in by recreational traffic. In other words a balance must be struck between monitoring, inventory, and project work.

Forest management will be done in cooperation with partners. As the Desired Future Condition outlines in the EIS, partnerships will continue to play a large role in the stewardship of the Forest Service. This has and will continue to include monitoring. One example of monitoring partnerships is the cooperative effort with researchers to establish long term soil monitoring plots on the Forest. This monitoring is an example of monitoring items aimed at determining if we are achieving our goal of managing for ecosystem health. It is also an example of a monitoring task that is included in the monitoring guide.

This Forest Plan recognizes ecosystem health monitoring importance by citing it as a Forest objective (Plan, Chapter 4). Beyond this, the importance of general Forest monitoring is demonstrated several times through citations in the Goals and Objectives (Plan, Chapter 1).

**PC 22000-4: The Forest Service should explain what actions will be taken if monitoring results pertaining to Management Indicator Species are not consistent with predictions set forth in the Environmental Impact Statement.**

Chapter 4 of the Plan explains the concept of “Adaptive Management.” The section describes how monitoring information and new research is evaluated and incorporated into the Plan. If monitoring results for management indicator species show that the assumptions we used in the analysis are incorrect, then the Forest Service will evaluate whether Plan allocations or direction needs to be updated through amendment or revision. This evaluation, and the decisions flowing from it, will depend on the specific situation, and will follow the general adaptive management approach outlined in the Plan.

**PC 22000-5: The Forest Service should ensure that controlled studies occur when monitoring work is contracted to the public.**

We agree that proper controls need to be placed on any contracted studies. Contract objectives must be clearly stated and the protocols used must be designed to answer key resource questions. No changes are needed in the plan to implement this suggestion.

**PC 22000-6: The Forest Service should ensure that a draft of the Monitoring and Evaluation criteria used for roads monitoring is available for public comment.**

As the Plan states Chapter 4, the Monitoring Implementation Guide will be released concurrently with the final Plan. This guide will be available to the public.

**PC 22000-7: The Forest Service should qualify the establishment of Monitoring and Evaluation objectives as a function of available funding.**

Chapter 4 of the Plan briefly discusses how budgets can affect the annual monitoring program. However, the draft document could have been clearer on how the monitoring guide should also prioritize the competing needs and identify how limited funding can limit monitoring. The final document contains some additional clarification.

**PC 22000-8: The Forest Service should consider whether it has statutory authority to remove Monitoring and Evaluation activities from the Forest Plan and place them in an implementation guide outside the requirements of NEPA.**

We have taken a careful look at the National Forest Management Act. Our monitoring approach, as outlined in Chapter 4, not only meets the regulations – it goes beyond the minimum requirements and will result in a

more effective program than that in the 1986 Plan. For example, the revised Plan allows for monitoring protocols to be updated as new technology or scientific information becomes available; it allows managers to drop or add monitoring components to be more responsive to emerging issues; and it allows for rapid adjustments based on past monitoring or changes in budget. The specific protocols and schedules for monitoring are identified in the Monitoring Guide, which is available to those interested.

A comment suggested that we add a standard requiring the completion of an annual monitoring report. Since National Forest Management Act regulations already require this, no standard is needed. The Preface to the Plan points out that higher level direction such as this must always be followed, and only in certain cases do we repeat such direction in the Plan.

**PC 91700-7:      The Forest Service should include the Monitoring Implementation Guide in the Forest Plan.**

Some reviewers felt this was important in order to correctly assess benefits and risks of all proposed actions. The three basic types of monitoring are outlined in Chapter 4 of the Forest Plan. These include monitoring for how well we implement the plan, if the standards and guidelines are effective, and if the assumptions along with predicted effects are accurate. Monitoring is, therefore, a means of testing the accuracy of the benefits and risks that were described in the plan. It is a chance to use hindsight to see if our decisions are sound or if we need to adjust based on experience. Including the Monitoring Guide in the Forest Plan will not make our assessments any better, since we are using the information available at this time. As Chapter 4 of the Plan points out, a separate monitoring guide can be quickly updated to better incorporate improved protocol, policy changes, monitoring information, and other changing conditions without amending the Plan and issuing a NEPA decision. It is for these reasons that we believe the Plan monitoring chapter needs to be strategic in nature with the details flowing out of the Monitoring Guide.

## **Public Involvement / Communications**

**PC 90000-1:      The Forest Service should require cooperators to acknowledge all their activities on National Forest lands.**

Partner and cooperator relations are established under a variety of authorities instituted by law. Subsequently, these relationships are documented in numerous ways including special use permits and a host of formal agreements such as participating, challenge cost share and volunteer agreements. Many of these existing official arrangements do require the cooperators to acknowledge that they are operating on National Forest System lands.

**PC 90100-2:      The Forest Service should seek comments from individuals or groups not usually heard from during the planning process.**

**PC 90100-4:      The Forest Service should improve its public involvement process.**



Non-traditional public involvement concepts were incorporated into the pre-revision outreach in 1997 and followed throughout the planning process. The Forest Service worked openly with communities of interest throughout the process – knowing that it can be lengthy, but that there is a greater sense of ownership in the final decision if that decision is reached in an open manner.

This was done by inviting special interest groups, town governments, general public, local planning groups, and public planning groups to be involved. Listening sessions and open houses were held, items in the Plan that needed change were documented, interested users reviewed and commented on information assessments and resource reports. Planning criteria was used to evaluate alternatives. Again, comments on the purpose and need, issues, planning criteria and areas proposed for change were available to the public. Alternatives were developed over a long period of working with groups and individuals and finally comments were sought on the Notice of Intent and the Draft Environmental Impact Statement and Draft Plan.

The Forest website contained all of the information developed throughout the process, mass mailings were done at key points, and public meetings were advertised and held in a variety of locations.

More than 6,000 people or groups responded within the comment time period.

Although the documents were lengthy, the background information used to develop the alternatives was freely discussed as it was developed.

Roadless areas and other management area designations were discussed throughout the process and comments and concerns were evaluated as the preferred alternative was developed.

**PC 90100-5: The Forest Service should include in the Forest Plan revision comments respectively made by the residents of Mill Brook Valley.**

Comments received from the residents of Mill Brook Valley were considered along with all the comments received during the comment period. To reach the preferred alternative we had to look at trade-offs from resource to resource and look at the best balance to achieve our desired condition.

As addressed in PC 90100-2, the interest and involvement of the many groups and individuals throughout the process enabled the White Mountain National Forest planning team to draft a balanced plan.

**PC 90200-1: The Forest Service should work in partnership with local wilderness organizations to develop a comprehensive wilderness program.**

The White Mountain National Forest has a long history of working with local wilderness groups on a full spectrum of issues and management needs, ranging from trail maintenance and nonconforming uses to Wilderness expansion. The local wilderness organizations and advocacy groups were very involved in this Forest Plan revision process, and have played an important role in helping us create a balance of uses across the Forest.

- PC 90200-3: The Forest Service should maintain a professional relationship with the New Hampshire Natural Heritage Bureau and the Maine Natural Areas program in regard to fire management.**

The Forest Service does have a professional relationship with both State programs and has specifically met with them in regards to fire management. The survey work done by both State programs is utilized in the identification of fire-adapted communities and to help evaluate the effects of fire management on particular species. Both programs are regularly scoped during the preparation of NEPA documents related to fire.

- PC 91700-17: The Forest Service should remove wording that may illustrate values or opinions that should not be a consideration in the Forest Plan.**

- **Because “management that limits ... opportunities” is a subjective thing.**

In this case “limit” was used simply to show a difference across the alternatives. It is not meant to be a final statement or judgment of values related to Wilderness designation.

- **Because excluding land for Wilderness recommendation because it is “in close proximity to” or “abuts” developed areas and highways.**
- **Because it should be up to Congress, not the Forest Service, to determine if “non-conforming uses” eliminate an area from Wilderness consideration.**
- **Because judging public interest is the job of Congress, not the Forest Service.**

It is true that recommended and designated Wilderness has included non-conforming uses. While Congress makes the ultimate decision as to whether or not an area should be designated Wilderness, the Forest Service and other federal agencies are charged with recommending areas for designation. Part of this process includes evaluating roadless areas based on given criteria, including evaluation of public interest.

## **Planning Process**

- PC 40300-2: The Forest Service should provide a management plan for the Lake Tarleton Area.**

- PC 91100-11: The Forest Service should open National Forest land in the Piermont area for recreational activities.**

The White Mountain Forest Plan revision does not include a level of detail that specifies separate management plans for local areas such as Lake Tarleton. The Forest Plan identifies the general purpose and desired land conditions for each management area, and allows projects and activities to be planned on a case-by-case basis. Forest wide standards and guidelines in Chapter 2 of the Plan include consideration for important wildlife species

and their habitat. Likewise, Forest Service direction for use and protection of watersheds is contained in standards and guidelines identified in Chapter 2 and 3 of the Forest Plan.

All National Forest land in the Town of Piermont is currently open to the public. The New Hampshire Bureau of Parks, who controls the swimming beach, and the Department of Fish and Game, who maintains a boat launch at the south end of the lake, currently provide access to the shoreline of Lake Tarleton. At the time of acquisition, there was some public support for higher levels of recreation development and access on the State-owned lake-front properties, and a relatively low level of development on the surrounding National Forest lands. Specific project proposals relative to recreation facilities and trails on National Forest land would be considered on completion of Forest Plan revision. Public participation will be an important part of the process we use for making site-specific management decisions.

**PC 91000-1b: The Forest Service should ensure the Forest Plan meets all NEPA requirements because Alternative 1 is not a “no action” alternative**

This concern is based on the misconception that “no action” means that no management activity would take place. NEPA (the National Environmental Protection Act) requires that for any proposed project a purpose and need must be stated. For this Forest Planning effort, our purpose is to revise the 1986 Forest Plan (see Chapter 1 of the FEIS for a complete discussion). NEPA further requires that a range of reasonable alternatives be developed to accomplish this, and that Alternative 1 be the existing situation. Again, in our case, continuing the existing situation means that we would take no action on revising the 1986 Forest Plan (see Chapter 2 of the FEIS for a description of this alternative). The effects of each of the alternatives, including the “no action” alternative, on the natural and human environments are analyzed and described (Chapter 3), and from this, a decision is made.

Because nearly twenty years have elapsed since the current Plan was put into effect, a number of changes, for example the addition of the Caribou-Speckled Wilderness, have occurred, and Alternative 1 was updated from the 1986 Plan to reflect the current condition.

**PC 91000-2: The Forest Service should strengthen the Forest Plan standards and guides and eliminate “unless approved by managers.”**

The phrase “unless approved by managers” appeared in six standards specific to management areas 8.2 (Experimental Forests), 8.4 (Research Natural Areas), and 9.3 (Candidate Research Natural Areas). Within those management areas the standards only applied to riparian/aquatic and wildlife activities. The intent was to give managers flexibility to meet the purpose of the Experimental Forest or Research natural areas. After considering the comment and again reviewing the language of the six standards, we decided to eliminate the “unless approved by managers” wording from two of the standards and slightly modify three of the others

to make it clearer that the exception was to be used to meet the purpose of the management area.

**PC 91000-7: The Forest Service should keep Wilderness a priority.**

Within the context of meeting the Forest Service mission of providing a range of goods and services, the WMNF recognizes both the importance of undeveloped lands on which people can recreate and the need to meet our responsibilities for stewardship of designated Wilderness. The land allocation described in all alternatives seeks to find a balance between uses and interests, including designated Wilderness. The proposed Wilderness Plan helps us meet our responsibilities for Wilderness stewardship.

**PC 91000-8: The Forest Service should wait for problems to arise before trying to solve issues instead of anticipating user conflicts or trail damage.**

We work with user groups to minimize the impacts — and to minimize restrictions — on uses that are compatible with management goals. In some cases, such as mountain biking, users have created trails on their own. This illegal trail construction can create unacceptable erosion, other resource impacts, and can spoil the enjoyment of other users. Forest managers must determine if they can deal with these problems on a case-by-case basis or develop Forest-wide restrictions. In some situations, waiting until the problem becomes a significant issue results in managers trying to catch up with the impacts. It is often more efficient to deal with such a situation before it becomes a large problem.

**PC 91000-14: The Forest Service should be held accountable for making sure all interested associations are included in the Forest Plan revision process and stay accountable to these associations throughout the planning process.**

The New Hampshire Off Highway Vehicle Association (NHOHVA) was inadvertently left out of the list of interested organizations in the DEIS. We apologize, and have included them in the final EIS.

**PC 91000-18: The Forest Service should include management objectives to prevent trailhead break-ins in the Forest Plan.**

This concern addressed the fact that the Forest Plan includes goals for patrolling and education/enforcement of Wilderness ethics, yet does not mention such problems as theft and vandalism of automobiles at trailheads. The Wilderness goals mentioned are actually part of the Wilderness Management Plan, Appendix E of the Forest Plan. This is intended to be more detailed than the Plan itself, which is a broader, programmatic document. While the Plan does not address site-specific situations like vandalism and robbery, each Ranger District on the Forest has a program for preventing (through education and regular patrols by law enforcement personnel) and investigating crimes committed at trailheads and other locations.

**PC 91000-19: The Forest Service should expand their views on timber harvesting objectives.**

Under the preferred alternative only 45 percent of the WMNF is allocated to the General Forest Management Area (MA 2.1), where planned timber harvest activities take place. Even within this management area, lands are set aside where harvesting is not scheduled. As a result, more than 60 percent of the WMNF will be managed in such a way that planned timber harvest does not take place. Consequently, a large amount of the Forest will develop into mature type forest.

**PC 91000-21: The Forest Service should incorporate the information in Appendix D (Transportation Analysis) into the EIS and the management direction of the Forest Plan.**

While roads and road management continue to be a significant aspect of National Forest management, comments received during the Notice of Intent period did not elevate this concern to a level that warranted special consideration. Therefore, it was determined that roads would be best addressed by way of an appendix. The regulatory and policy information included in Appendix D is included for explanation and clarification of the overall road policy.

**PC 91000- 22: The Forest Service should consider a 100 year plan.**

As we found in the last planning period, new research, monitoring information, changing public uses and desires, and new regulations are just a part of the changing conditions we face in managing the National Forest. Any one of these can necessitate changes in the Forest Plan. In fact, as Chapter 4 of the Plan points out, the Plan must be updated frequently if it is to be useful. In addition, the National Forest Management Act requires Forests revise their plans every 10-15 years.

While the initial planning period is 10-15 years, the Forest considered long-term conditions and needs in developing alternatives, goals, objectives, and management direction. We also used computer models to predict long term outcomes of management. Some of this modeling exceeded 100 years.

**PC 91000-26: The Forest Service should allow additional public comment and consideration if the preferred alternative (Alternative 2) is not chosen.**

Concern was expressed that the public would not have a chance to comment on the FEIS and Final Plan if the Regional Forester picks an alternative different than the preferred alternative. The intent behind making the draft documents available for review is to give the public a chance to tell the Regional Forester if the Forest Service missed important information, if there were errors in the analysis, and to share their thoughts on the range of alternatives. This is the public's opportunity to tell the Regional Forester the reasons behind what they like and dislike in the alternatives. The preferred alternative is provided so that the public can see where the deciding officer is leaning after looking over all the analysis completed to



date. For the 2005 Plan, the Regional Forester decided to select the preferred alternative with some minor modifications.

**PC 91000-27: The Forest Service should continually look to the future for resource sustainability.**

Chapter 4 of the Plan (Monitoring and Evaluation) paints a picture of having an adaptable plan that can quickly respond to changing conditions. The starting point in doing this is a Forest Plan that is based on the best available science. Part of this science is a careful look at the sustainability of the Forest under the decisions proposed. For example, computer modeling projects the composition of the Forest and related outputs decades and sometimes over a century into the future. While the Forest Service is confident the decisions proposed in the draft documents will provide for resource sustainability, monitoring is also proposed to verify our expectations. This monitoring is described in Chapter 4 of the plan. More specifically, Tables 4-02 through 4-06 describe the monitoring that will be completed to insure sustainability.

**PC 91000-28: The Forest Service should choose the No Action alternative.**

In one specific comment supporting Alternative 1 (no action), a concern was raised that the Forest Service did not have an adequate range of alternatives. Specifically mentioned was a concern that only alternative 1 proposed no recommendations for Wilderness. The reviewer also suggested that the Forest Service should have considered a scenic highway through the Wild River area and/or allowed ATV trails.

Forest Plans cannot possibly analyze every possible combination of activities. For that reason, different management area allocations and decisions are proposed in a range of alternatives. Alternative 1 could have recommended an ATV area on a case-by-case situation. In addition, as the reviewer points out, Alternative 1 would not recommend any additional Wilderness designations. Alternative 3 would propose almost doubling the amount of current Wilderness. The range of alternatives proposed, therefore, does provide a range of reasonable alternatives.

**PC 91000-30: The Forest Service should address cumulative impacts of all activities across the Forest, not just specific activities.**

The commenter has asked the Forest Service to develop a process for a comprehensive assessment that is above and beyond Council on Environmental Quality (CEQ) and Forest Service requirements. CEQ's "Guidance on the Consideration of Past Actions in Cumulative Effects Analysis" (June 2005) indicates cumulative effects can only be considered for resources with direct and indirect effects. Further, when considering direct and indirect effects there must be a "cause and effect" relationship between an effect and its cause (40 CFR 1508.0), most often a specific proposed activity. The FEIS follows a systematic procedure of analyzing cumulative effects consistent with this by focusing on individual resources with direct and indirect effects as a result of specific Forest Service activities.

The decision-maker in turn takes these pieces and considers them in relation to each other and for each alternative. The result is that the comprehensive assessment the commenter requests is really the sum of these parts that is considered during decision-making and essentially presented in the Record of Decision as rationale for the selected alternative.

**PC 99100-3N: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Modifications were proposed to the Forest Desired Future Condition (DFC).**

The DFC was edited slightly to include additional ecological aspects of the Forest and the value of Wilderness.

**PC 99100-3W:**

- **Benchmark analyses should have been broader**

The goal in designing the benchmarks was to make them realistic. The assumptions for each of the benchmarks were intended to reflect reasonable, albeit extreme in terms of shifts in management approach, bounds to assist in the development and validation of alternatives. It is important to recognize these benchmarks were also constructed within the bounds established in the Notice of Intent. For example, the creation of new alpine ski areas is beyond the scope of this revision as defined in the NOI. Therefore, the assumptions were designed to be realistic and needed to stay within the scope expressed in the NOI. Notwithstanding, a review of the benchmarks did reveal that the Maximum NPV benchmark assumptions needed some adjustments to better maximize some non-timber related values. This was done in the FEIS and can be found in Appendix B.

This concern statement also includes comments regarding the design of the assumptions in the Minimum Management Benchmark. The staffing levels specified in this benchmark hinge on the assumption most of the field work would be satisfied through contract, partnerships, and volunteers. The supervisory/management level staffing favored in this design would have management and contractual responsibilities to oversee these arrangements. The assumption that all hiking trails would have to be eventually closed is a result of a lack of resources available to perform major trail maintenance. The potential for resource damage resulting from this lack of maintenance after 10 years would rise to levels that would necessitate closing the trails. Raising the management levels to overcome these issues would be discretionary, and therefore contrary to the stated intent of the benchmark.

**PC 91100-7: The Forest Service should support Alternative 3.**

**PC 91100-8: The Forest Service should support Alternative 2.**

**PC 91100-13: The Forest Service should support Alternative 2 with the allocation of 2.1A and 9.4 lands from the 1986 plan.**

**PC 93100-1: The Forest Service should implement Alternative 1.**

- PC 93100-2:** The Forest Service should implement the land allocation approach in Alternative 1.
- PC 93200-1:** The Forest Service should implement the proposed alternative.
- PC 93200-2:** The Forest Service should implement Alternative 2 with modifications.
- PC 93200-3:** The Forest Service should implement Alternative 2 with additional roadless and wilderness areas.
- PC 93200-4:** The Forest Service should implement Alternative 2 with fewer roadless and wilderness areas.
- PC 93300-1:** The Forest Service should implement Alternative 3.
- PC 93300-3:** The Forest Service should not implement Alternative 3.
- PC 93400-1:** The Forest Service should remove Alternative 4.
- PC 93400-2:** The Forest Service should implement Alternative 4.

The EIS analyzed four alternatives with different levels of outputs and services, management area allocations, and ways of addressing the identified issues. Each alternative meets the intent of relevant laws under which National Forests are managed and would move the Forest toward our Desired Future Condition (FEIS, Chapter 1) and Forest goals (Plan, Chapter 1). The Regional Forester considered all of the alternatives, and the Record of Decision (ROD) describes his rationale for the Selected Alternative. In his decision, the Regional Forester considered the trade-offs among alternatives and weighed ecological, economic, and social concerns. The Forest Service believes that the Selected Alternative provides the best balance of outcomes and services that will maintain sustainable ecosystems, meet the intent of relevant laws, and address issues and concerns specific to the White Mountain National Forest

- PC 91100-10:** The Forest Service should make the following changes. In **Appendix A Summary Analysis of the Management Situation.**

The Analysis of the Management Situation (AMS), which is summarized in Appendix A of the Plan, was prepared to help define the need for change in the Notice of Intent. The purpose of the AMS has been accomplished; therefore changes to this document would not be appropriate.

- PC 91100-12:** The Forest Service should allocate Wilderness expansion areas shown in Alternative 2 to MA 6.1 lands.

The concept of not recommending any lands for consideration as Wilderness is included as part of Alternative 1. One of the essential components of Alternative 2 was to provide some specific lands to be recommended for wilderness study. These alternatives were presented to the public, and, public comment was received with this distinction being clearly part of the decision

making process. Maintaining the integrity of the Selected Alternative requires that these lands remain allocated to MA 6.1.

**PC 91100-19: The Forest Service should insure that the Wildcat Ski Area, Alpine Zones, and Wilderness not overlap onto the AT Management area.**

Direction has been added to the Wildcat Ski Area, Wilderness and the Alpine zone management areas to clarify that they do not overlap with the Appalachian Trail Management Area. In addition there is a standard strengthening direction that management actions at Wildcat Ski Area do not create adverse impacts to the Appalachian National Scenic Trail. There are places where the AT passes through the Wildcat Ski Area permit boundary. We are working with AT and Wildcat Ski Area to resolve these situations. See also the response to PC 38200-17 for changes to the overlap protocol for the AT and Pinkham Notch Scenic Area Management Areas.

**PC 91100-16: The Forest Service should make the following changes in management area allocations.**

**PC 91100-17: The Forest Service should classify a management area somewhere between severe wilderness and classical silvicultural practices with the following characteristics.**

The Forest Plan revision process included the assessment of a wide range of silvicultural treatments. Alternative 1 is based on heavy use of even-aged regeneration harvesting while Alternative 3 relies primarily on uneven-aged management. Alternatives 2 and 4 both provide moderate amounts of even-aged regeneration harvesting. The types of silvicultural treatments recommended in this concern statement are very similar to those already analyzed in Alternative 3.

**PC 91100-18: The Forest Service should make the following changes in activities allowed for each management area.**

The Forest Service took a careful look at each of the proposed management allocation changes made by the working groups. We also looked at the activities in each MA. The final plan reflects the results of this review. Decisions on management area designations as well as activities allowed in management areas become complex and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions.

**PC 91100-23: The Forest Service should assign all areas unsuitable for timber but acceptable for snowmobiling into MA 6.2, and all areas suitable for timber salvage, but sought for backcountry, be assigned MA 2.1 and managed with the appropriate timber management regime.**

By definition, snowmobile trail construction is not permitted in MA 6.2. Shifting any of the land now in MA 6.1 to MA 6.2 would eliminate the potential for future snowmobile trail construction. The purpose of MA 6.1

is to provide semi primitive recreation, without planned timber harvest. Salvage harvesting is permitted, but it would be done in accordance with the standards and guidelines for this MA which allow for resource protection.

- PC 91100-25: The Forest Service should designate the region in Waterville Valley containing a series of WVAIA (Waterville Valley Athletic and Improvement Association) trails as a SPNM area and not a “General Forest Management Area.”**

The Forest Service took a careful look at each of the proposed management allocations. The MA designation at this location expresses what the Forest Service believes this particular piece of land is capable of providing considering its general site capabilities including suitability for timber, elevation, and road access. Decisions on management area designations as well as activities allowed in management areas reflect a range of tradeoffs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions. Several of the WVAIA trails are in Wilderness or in management areas other than the “General Forest Management” area (MA 6.1, 6.2 etc.). The Forest Service considers impacts of all management activities on the “natural integrity” including recreation activities as well as natural and cultural resources. Important geologic features, outstanding natural resource features and trail opportunities will be considered and impacts mitigated by Forest management activities in any management area.

- PC 91100-29: The Forest Service should designate the AT corridor and the Alpine Zone as separate management areas.**

- PC 91100-30: The Forest Service should designate Research Natural Areas, Scenic Areas, and Wild and Scenic River Areas as separate management areas.**

This is a provision of the Selected Alternative.

- PC 91100-32: The Forest Service should combine MA 6.3 and MA 2.1.**

- PC 91100-67: The Forest Service should eliminate MA 6.3.**

Forest Plan Goals are threefold: 1) sustain a healthy forest, 2) provide recreation and other opportunities, experiences and benefits, some of which are not readily available elsewhere, and 3) recognize the Forest’s support to local economies while realizing the importance to society of a natural appearing landscape. All lands, no matter what management area designation are managed under these goals. The alternatives considered explored different mixes of management area allocations in meeting the goals.

None of the Forest Management Areas are single use, although some, such as the Wilderness, AT, or Ski Areas have strong emphasis on one or another type of recreation. Some of the Management Areas such as 2.1 allow for more intensive management of a wide range of resources while others such as the Management Area 6’s focus on providing an environment dominated by natural processes and aimed at meeting the needs of people for



backcountry recreation opportunities. The balance between the amount of land available for various activities was carefully considered in the final decision and is discussed in the FEIS chapter 3 and the Record of Decision.

In making the final decision, we recognized that some of the Management Areas limit different activities such as timber harvest, snowmobiling, salvage logging, and roads. For example: Management Area 6.3 does not allow any form of timber harvest or roads; Management Area 6.1 allows temporary roads, salvage harvesting, and snowmobiling; and, Management Area 2.1 allows commercial and salvage timber harvesting, permanent and temporary roads, and snowmobiling. This Management area designation process is similar to what local governments do through zoning. The allocation is done based on factors such as land capability and public desire.

As pointed out above, there are large differences in Management Areas 2.1 and 6.3 that would be lost if they are combined. There are more subtle differences between Management Areas 6.1 and 6.3 that would also be lost if these were combined. In the end, the Forest decided it was important to retain these distinctions in order to better meet peoples' desires.

**PC 91100-37: The Forest Service should remove low elevation lands from the General Forest Management Area only if there will not be a significant acreage loss from the timber base.**

The Forest Service does not propose to change the allocation of any large blocks of land from what is stated in the FEIS. During the alternative development phase of Forest Plan revision, Forest Service employees compared existing land allocations and current Forest conditions to determine if land allocations should change. Based on better data and 15 years of experience, some changes were made, removing land from or adding it to MA 2.1. Another review, based on public comments on the DEIS, indicated that no additional changes were necessary to meet the desired future condition and goals of the Forest.

**PC 91100-49 The Forest Service should continue allowing snowmobiles in lands allocated to MA 2.1 by placing these lands in 6.1 or 6.3.**

The MA designation at this location expresses what the Forest Service believes this particular piece of land is capable of providing considering its general site capabilities including elevation, and road access. Decisions on management area designations as well as activities allowed in management areas become complex and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions.

**PC 91100-53: The Forest Service should change the confusing acronyms and initials of management area categories into a meaningful and logical list.**

The Forest Service reviewed the acronyms used to reference the 6.1, 6.2, and 6.3 management areas and we agree that there are inconsistencies between the acronyms and management area definitions. The acronyms

used in Chapter 2 of the EIS were changed to better represent the management areas.

**PC 91100-54: The Forest Service should change the management area of Sable Mountain and Chandler Mountain from 6.1 to 6.2.**

Decisions on management area designations, as well as activities allowed in management areas, are complex and reflect a range of trade-offs. Wildlife habitat, biodiversity concerns, recreation uses, product outputs, and other social concerns all had to be considered to strike the balance reflected in our final decisions. The MA 6.1 area encompassing Sable and Chandler Mountain is almost entirely surrounded by MA 2.1 (which also allows snowmobile trails) although there is a short segment of its northeast side adjacent to MA 6.2. The intent of this management area allocation is to keep the option open for snowmobile trails between Slippery Brook and the East Branch of the Saco River. Any specific trail proposal would require site-specific environmental analysis and public involvement.

**PC 91100-60: The Forest Service should continue to allow changes in the Plan if errors are found and need modification.**

The National Forest Management Act provides an amendment process to allow for changes and corrections to be made to Forest Plans as needed.

**PC 91100-62: The Forest Service should use tree height as the boundary for alpine zone designation.**

The WMNF defines the alpine zone as any high elevation locale where trees are less than eight feet tall. The glossary definition of the alpine zone was edited to reflect this fact.

**PC 91100-65: The Forest Service should explain how management prescriptions were mapped under each alternative in order to replicate the process.**

The range of possible management prescriptions along with the timing for initial and subsequent entries is shown in Appendix B of the FEIS, Table B-08, and in the accompanying discussion. These management prescriptions, subject to the constraints identified in Tables B-13 through B-17, were available within the SPECTRUM model as inputs. The outputs from the model runs included data showing the management prescriptions and the acres allocated to that prescription by period, and by analysis unit. Mapping these prescriptions requires moving this data from the SPECTRUM output files into the GIS environment and matching the outputs to the known analysis units that had been established for each alternative. Displays were then created for the preferred alternative to reveal the potential spatial distribution of the solution's management prescriptions. While this process was used for display purposes, it is important to recognize the model outputs were not intended to be spatially specific. Consequently, there is no display that can portray exactly where specific management must be applied. This condition serves to point out the difference between models designed for the programmatic level versus the project level.

**PC 91100-82: The Forest Service should change the management area around Bennett Street Loop to ensure timber harvesting does not take place around existing conservation easements.**

The lands in question are suitable for timber harvesting. They were included as MA 2.1 or 3.1 lands in the 1986 Plan and are appropriate for inclusion in the General Forest Management Area (MA 2.1) in the revised Plan. In the event that harvesting is planned on this ground, the potential impacts to the scenery and impacts to abutting landowners will be considered.

**PC 91100-83: The Forest Service should modify MA 2.1.**

- **To recognize wildlife as well as scenic objectives in forest openings.**

The guidelines for scenery management and vegetative composition are not intended to be in competition. They work together to guide managers toward well-balanced decisions as to how vegetative treatments are applied on the landscape. Openings for wildlife objectives are described in Chapter 2 of the Forest Plan.

- **To include hunting and fishing in the list of recreational activities in the Desired Condition.**

This is a valid point, and we have added hunting and fishing to the list.

**PC 91100-84: The Forest Service should consider changes in management area designations for specific roadless and Wilderness areas.**

The comments encompassed in these two statements recommend shifting areas of the Forest from Management Area 2.1 (and MA 3.1 in the 1986 Plan), General Forest Management, to management areas where no vegetative management would occur. A variety of reasons are offered for these changes including protection of under-represented forest types, preservation of “North Country” character, protection of undisturbed character, and high recreation use.

These factors and many others were considered and analyzed in the allocation of management areas among four Plan revision alternatives. In trying to strike a balance between all the products, services, and experiences the public is seeking from the White Mountain National Forest, it was not possible to satisfy everyone’s preferences for areas that would remain undisturbed, or preferences for areas where timber management could occur. An argument could be made for either type of management on a large percentage of the Forest. Ultimately, we had to consider all the science and all the public input to come up with the mix and distribution of MAs that represents the best balance for this planning period.

This is a Forest Plan *revision*, not a new Forest Plan. For the last 15 years, timber management has been carried out carefully and sustainably on many areas of the Forest, including those with high recreation use, sensitive watersheds, under-represented forest types, and scenic values. With proper management, protection of these attributes and timber management are not mutually exclusive. As a result, many areas that were managed as 2.1 and 3.1 under the last Plan have remained in the General Forest Management Area in the revision.

As in the previous Forest Plan, a percentage of the General Forest Management area where timber harvesting may be considered will be protected from disturbance as a result of applying standards and guidelines to any proposed projects. The presence of special plant communities, riparian zones, important wildlife habitat, or high scenic values may trigger protective measures that will restrict timber management from portions of this management area.

**PC 91100-86: The Forest Service should review additional science relevant to social and wildlife conditions when determining the Forest management area designation near Mill Brook Valley.**

The comments received from the residents of Mill Brook Valley were included as part of the deliberative process when the Forest Service reviewed management area assignments. The desires and concerns of local residents are important considerations in our management. However they must be balanced with the contribution of the area to Forest goals and objectives. In this instance, the Forest Service determined that it is important to retain existing MA 3.1 lands in an allocation that allows timber harvest to contribute to wildlife habitat and other objectives that were developed based on available social and ecological data, including information provided by local towns and communities.

Another aspect of this concern statement relates to the presence of deer wintering yards around Mill Brook Valley in lands that are currently assigned to management area 3.1 which the local residents seek to have changed to management area 6.2. The softwood stands that provide winter shelter for deer populations can be maintained or improved as winter habitat through uneven-aged timber harvest that perpetuates the mature softwood overstory and creates small patches of browse (Boer, 1992, Morrison, 2003). In the absence of natural disturbance, it can also be beneficial to provide early successional habitat in close proximity to the softwood shelter as a fall-winter food source (Morrison et al., 2002, 2003). Retaining these deer yards in Management Area 2.1 (replacing 3.1) will allow vegetation management to maintain shelter and forage in the deer wintering yards when necessary. Forest-wide Wildlife guidelines would help ensure known deer yards are managed properly. If the areas in question were assigned to management area 6.2, vegetation management would not be permitted and these areas would be left to natural processes, which may or may not serve the objective of preserving deer wintering yards.

**PC 91100-87: The Forest Service should extend the SPMN allocation south and southeast of the Caribou-Speckled Mountain Wilderness area to protect under-represented forest types and high quality streams.**

The Great Brook and Cold Brook areas of the Forest do have a unique character. This is partly due to the fact that much of the land was heavily farmed, pastured, or logged prior to acquisition. Although the highest elevation land was acquired in 1918, nearly 2000 acres in the lower elevations were acquired in the 1970s and 1980s. The first generation forest that now dominates the Forest is characterized by a uniform young even-aged

hardwood forest, with a significant oak component. The landscape was heavily manipulated in the past, and signs of that manipulation and human occupancy are still very evident. The pole-sized stands have not been managed in recent years, and their young age makes them unlikely candidates for timber harvest in the next decade. Some wildlife habitat and ecosystem objectives in this area may be best met by prescribed fire, and road access aids in accomplishing these. Great Brook and Cold Brook are high quality streams with healthy fish populations, and recent stream restoration efforts in Great Brook are further enhancing this. Dispersed recreation use of this area consists of hunting, fishing, and snowmobiling. Whether tighter management restrictions are appropriate or necessary is a matter of debate. Many local residents who currently use this area for recreation would probably not agree. The option of restricting management still remains in future Forest Plan revisions, but it would appear that the existing values of this area will continue to be protected by retaining the current management area designations.

**PC 99100-1H: The Forest Service should use stronger or additional wording in the proposed alternative.**

- **DEIS page 2-24: Please elevate paragraph 5 to paragraph 1 and provide the percentage information necessary to understand that vegetation management will occur on x percent of the Forest and that vegetation management is used to develop multi-disciplinary objectives.**

The arrangement of the paragraphs in this section is not intended to be a relative ranking of resources. It is simply intended to provide a brief summary of how management areas are allocated under Alternative 2.

The information regarding multi-disciplinary objectives and percentages of the Forest being treated is contained in Chapters 2 and 3 of the FEIS.

**PC 99100-3G:**

- **MA 8.3 is incorrectly cited as MA 8.1.**

We have made the correction.

**PC 99100-1aa:**

- **The application of Forest-wide standards and guidelines is unclear in the Plan.**

The Preface to the Forest Plan makes this point. In addition, at the start of the standards and guides for each management area we include a statement that, in addition to MA-specific direction, Forest-wide direction must also be considered. This is repeated under a particular resource if it does not have MA-specific direction. This may be redundant, but we wanted to list all resource area in every management area section, regardless of whether or not they had specific direction.

**PC 99100-1cc:**

- **The Forest Service should provide a map that identifies unsuitable land within management area 2.1.**



A GIS layer is available on the Forest's website that identifies unsuitable land using a land suitability code (LSC) which is an attribute table that can be joined to the GIS layer. This layer and accompanying tables can be downloaded under the "Download Stand Boundaries Shape File" at: [www.fs.fed.us/r9/white/3\\_WM\\_fpr\\_Web/forest\\_plan/revision/proposed\\_plan/maps\\_data.html](http://www.fs.fed.us/r9/white/3_WM_fpr_Web/forest_plan/revision/proposed_plan/maps_data.html)

**PC 91300-1: The Forest Service should increase its full time rangers.**

While we appreciate the support, the number of full time employees is based on our long and short term budgets and is outside the scope of the Forest Plan revision.

**PC 91300-2: The Forest Service should include wilderness personnel on the interdisciplinary team.**

Wilderness specialists are included on the interdisciplinary team. We will be sure that this is reflected in the team's description.

**PC 91300-4: The Forest Service should add a position of Forest Health Specialist.**

The Forest Service currently employs a number of biologists and specialists in such fields as fisheries, wildlife, soils, air and water, biodiversity, geology, recreation, Wilderness, and statistical analysis. Together they form an interdisciplinary team to consider all aspects of forest and resource health and the effects of management actions on it.

**PC 91400-2: The Forest Service should include a reference to "Good Forestry in the Granite State: Recommended Voluntary Forest Management Practices" in the Forest Plan.**

The publication "Good Forestry in the Granite State: Recommended Voluntary Forest Management Practices" was used heavily in the development of Standards and Guidelines in various sections of the Forest Plan.

**PC 91500-1: The Forest Service should not develop the Forest Plan based on forceful vocal groups with a strong litigation history.**

Over several years of public involvement, the Forest Service has met with and considered comments from numerous individuals and organizations expressing a broad range of viewpoints. The revised Plan is based on this, and care was taken in making final determinations.

**PC 91500-2: The Forest Service should base the legal background of the Forest Plan on the Organic Act.**

The Organic Act is one of many laws upon which the Forest Plan is based.

**PC 91700-4: The Forest Service should develop an overview of the draft plan, with a simplified comparison of Alternative 1 and Alternative 2.**

The Regional Forester explains and highlights the changes made from the 1986 plan in the Record of Decision.

**PC 91700-5: The Forest Service should include a Forest wide “Desired Future Condition” to the Forest Plan.**

**PC 91700-6: The Forest Service should succinctly describe the goals and objectives of the Forest Service in the Forest Plan.**

The Desired Future Condition and goals in Chapter 1 of the Plan have been revised and clarified.

**PC 91700-8: The Forest Service should include more information in the glossary, and include the glossary in the Final Plan.**

The Glossary has been updated and included in the Plan.

**PC 91700-12: The Forest Service should address the history of an area if talking about facilities that were “formally” in use to give a broader understanding of past management.**

**PC 91700-14: The Forest Service should modify details regarding visitor contacts when recreating in valley bottoms, as examples specified in the plan are deceiving.**

The referenced statements in Appendix C describe the fact that the attraction of the Wild River and its associated development lessen the opportunities for solitude compared to areas “that are away from the valley floor ....” That is not to say there are no opportunities for solitude on the valley floor away from the immediate vicinity of the road or the river.

Also see PC 40260-15.

**PC 99100-3E: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **A reference cited in Appendix G relative to roadless areas was used incorrectly.**

The Forest Service apologizes if the referenced use of this paper was incorrect. To avoid confusion, it has been removed from the references used in the Biological Evaluation.

**PC 93000-1: The Forest Service should offer an alternative that is a combination of one or more alternatives.**

**PC 93700-1: The Forest Service should develop an additional alternative.**

The EIS analyzed four alternatives with different levels of outputs and services, management area allocations, and ways of addressing the identified issues. During the alternative development process, various ways of addressing each of the three issues were considered. Alternatives were built by combining components that would address each issue so that the resulting alternative is feasible, meets Forest goals and objectives, makes sense to the public and employees who would need to implement it, and is different from the other alternatives being evaluated. The Regional Forester has determined that the range of alternatives analyzed in the EIS provides a reasonable number of approaches addressing the three issues. Therefore it

is not necessary to develop an additional alternative. If the analysis or public comment indicate that an alternate combination of components would better meet the goals of the Forest, the Regional Forester can modify the alternative he selects in his decision, adding one or more components from other alternatives.

**PC 93300-2: The Forest Service should include additional wilderness areas.**

- **Because additional roadless areas need protection.**

The decision to recommend additional Wilderness, and in what areas, is based on trying to balance a range of goods, services and expectations for use of the National Forest. While some people believe that more Wilderness is the highest use for the WMNF, others believe that no additional Wilderness should be recommended. The alternatives tried to present a range of recommended Wilderness with the trade-offs and effects discussed in the EIS.

Also see PCs 91100-25, 91100-46, 68000-1 and 68000-2.

**PC 93500-1: The Forest Service should combine the land allocation of Alternative 3 with the timber and wildlife management approach of Alternative 2.**

The intensity of harvest planned for alternative 2 is intended to be conducted on a working landbase of the size contained in the MA 2.1 for that Alternative. Substantially reducing the land in MA 2.1 to the level that is in Alternative 3 and trying to harvest at the rate planned for Alternative 2 would create impacts that have not been analyzed in the DEIS.

**PC 93500-2: The Forest Service should consider a wider range of alternatives.**

The National Environmental Policy Act (NEPA) requires the Forest Service to analyze a range of reasonable alternatives. Consistent with NEPA, the range of alternatives is set by the purpose and need identified in the EIS. The range should be sufficient to allow the public and the decision maker to assess the environmental costs and benefits of different approaches for meeting the purpose and need. Alternatives do not need to address every topic of interest to the public, but must speak to the issues identified in the analysis document. Issues and alternatives for the Forest Plan revision EIS were developed based on consideration of all input gathered through an extensive public involvement effort (see Appendix A for details of the process). The Regional Forester has determined that the range of alternatives analyzed in the EIS is adequate to meet the purpose and need and to address the identified issues.

Benchmarks were used to evaluate several variables in the alternatives in terms of the relative difference between the benchmark results and the alternatives. These comparisons helped to evaluate whether the results of modeling the alternatives conformed to the ranges identified in the benchmarks and how closely they approach the objectives of the benchmarks. Allowable sale quantity (ASQ), acres treated, mix of management prescriptions, and present net value (PNV) are some of the variables that

were considered in these comparisons. The Process Overview section (FEIS, Appendix B) includes additional discussion concerning the benchmarks.

**PC 95000-2: The Forest Service should monitor and review the necessity of overflights.**

A commenter raised concerns about the presence of military overflights and encouraged us to work with the military on a regular basis and limit these flights to the extent possible. Federal law and congressional policy mandate that the authority over the airspace reside in one agency, the Federal Aviation Administration. Any restrictions or alterations of aircraft procedures or airspace use cannot not be considered without the consent of thies agency. While we do not have the authority to restrict any type of overflights, we do have a cooperative agreement with the military to coordinate in our management needs. We will consider our planning decisions as we work through the provisions of the cooperative agreement.

See PC 67000-4

**PC 95100-1: The Forest Service should work more closely with partners.**

- **To encourage participation by partnerships.**
- **So the Forest can provide a wider range of recreation opportunities.**

The Forest Service greatly appreciates all past and current partnerships, and we agree that there is always room to work more closely with our partners. We also recognize that there is great potential for additional or new partnerships in a variety of program areas. We believe our doors are open to potential new partnership, and will actively pursue those to the extent practical. To affirm this, we have added a Forest-wide goal statement to the Plan. It is however, not appropriate to include a list of partners in the Plan as this list is ever changing.

**PC 95100-2: The Forest Service should do all it can to increase opportunities for its partners.**

- **Because partners need adequate training.**

We concur that the WMNF should do all that it can to increase opportunities for partners. Partnerships add tremendously to the capacity and accomplishments of the Forest. Forest managers realize that these collaborative efforts require considerable time and energy on the part of all parties including training of the partners in the various aspects of the work.

**PC 95100-3: The Forest Service should not allow themselves to be overly influenced by different philosophies of partners.**

- **Because policy developed may not be objective.**

During the course of revising the Forest Plan, we have listened to many concerns and interests about how the Forest was managed in the past and how it should be managed in the future. We have engaged people with differing values and philosophies, including our partners, on the compromises and balancing necessary to manage a finite resource in the

face of expanding demands. We agree that we should not be overly influenced by any particular group or individual, and we strive for land management policy that provides for the greatest good.

Suggested new plan level goal statement addressing social setting: Management will build on the Forest's rich history of successful collaboration by continuing to engage the public, current and future partners, communities, and outside agencies and organizations in managing the Forest over time. The focus will be on enhancing and developing long term relationships.

**PC 95500-1: The Forest Service should develop a plan for enforcement of policies regarding motorized use.**

Enforcement of policies applies to a whole range of recreation activities, not just motorized trail use. The Forest Service has a law enforcement organization that assists in this work. But this is an implementation concern and the Forest Plan, as a programmatic document does not address the specifics of implementation. The states have responsibility for law enforcement on snowmobile trails. Forest Law Enforcement Officers (LEOs) and State officers routinely patrol to enforce rules and regulations.

**PC 95500-2 The Forest Service should not allow activities that they cannot monitor or enforce.**

The Forest Service works hard to ensure that all activities conducted by or on the National Forest meet all laws, standards, and guidelines. Project activities, including contracted work, are monitored during and after implementation to make certain that management direction was applied properly and that it produced the desired results. Working with the public to make sure that they abide by all laws and Forest rules is an on-going challenge that can actually increase as activities are restricted. Many Forest Service employees, including law enforcement officers, spend significant amounts of time in the field talking with visitors to increase their understanding of what is allowed and why, and to help prevent illegal activities.

**PC 99100-3J: The Forest Service should correct errors, conflicts, omissions, and inconsistencies, and clarify statements that are unclear.**

- **Several trails or roads in the Flat Mountain Pond area were incorrectly shown as improved roads.**

The results of a field review of the condition of the roads in this area determined the following:

- Road 5204.1 (shares use with a southern section of Flat Mountain Pond Trail) meets the criteria for improved road classification.
- Road 5204.2 (shares use with a northern section of Flat Mountain Pond Trail) does not meet the criteria for improved road classification.
- Road 5205A (referred to as an old logging road and is east of Flat Mountain Pond Trail) does not meet the criteria for improved road classification.



Roads not meeting the improved road classification criteria were removed from the improved roads inventory that was used in the final evaluation of the Roadless area inventory.

**PC 99100-9:      The Forest Service should clarify language in the DEIS concerning non-conforming uses.**

See responses to PC 40260-1, PC 40260-2, PC 40260-3, PC 40260-7, PC 68000-1, PC 68000-2, and PC 68000-7.

## **Selected Responses**

Due to the large volume of standard and electronic mail received during the public comment period between the DEIS and FEIS (over 6,000 letters), it is impractical to publish each letter in this appendix. However, Forest Service Handbook 1909.15 — Environmental Policy and Procedures Handbook, Chapter 24.1.3, requires that this appendix to the FEIS include, at a minimum, copies of all comments received on the DEIS from federal, state, and local agencies and elected officials. The following pages include these comments. All other public comments received between the DEIS and FEIS are available for review at the White Mountain National Forest Supervisor's Office in Laconia, New Hampshire.



City Hall — Main Street

City of Berlin

PR-5913

Pg. 1 of 2



Office of the City Manager

December 14, 2004

RECEIVED DEC 20 2004

Forest Planner  
WMNF  
719 N. Main Street  
Laconia, NH 03246

RE: Comments to Proposed White Mountain National Forest Plan

Dear Forest Planner:

Kate Stewart and Frank Hagen of the Forest Service attended last evening's Berlin City Council meeting to answer questions regarding the proposed revision to the White Mountain National Forest Plan. The City Council unanimously voted to support Alternative II with the amendments proposed by the North Country Council. They join the Society for the Protection of NH Forests, NH Timberland Owner's Association, NH Audubon, NH Wildlife Federation, NH Fish and Game, and the NH Division of Forests and Lands in a coalition of support for Alternative II with certain modifications.

Although the Berlin City Council placed its support behind an amended Alternative II as proposed by North Country Council, it wishes to advocate the following:

- Generally, the City Council is happy with the management practices that currently exist for the WMNF and feels these should be continued. The WMNF occupies nearly half the land area of the City. The City recognizes that the WMNF is a federal resource visited by residents from across the country. However, the residents of the City of Berlin live with the WMNF and its attributes 365 days a year. Because of this, the impacts of any new Forest Plan will impact Berlin residents in a greater, more direct and permanent way than it will affect people from other areas who spend a day or a few days a year visiting the WMNF.
- *An annual timber harvest of 35 million board feet using forestry practices that meet high environmental standards.* The City Council felt strongly that limits placed on cutting in the WMNF is forcing an increase in cutting on private lands surrounding Berlin. The increase to 35 million board feet would provide a better balance of cutting between private and public lands.
- *Supporting the current practice of reviewing summer motorized recreation opportunities (e.g., ATV's) on a case by case basis.* As an economically

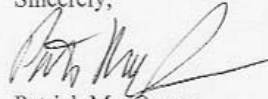
Berlin, New Hampshire 03570-2404

PR-5913 pg. 2 of 2

challenged area, Berlin and the surrounding areas need to be able to utilize the considerable forest within its borders in a way which maintains its integrity and

The City of Berlin greatly appreciates the ability to comment on the Plan because of the great impact that the WMNF located within our jurisdiction has on our daily lives.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick MacQueen", written over a horizontal line.

Patrick MacQueen  
City Manager

cc: Mayor and Council



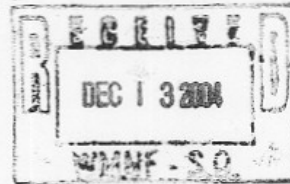
## TOWN OF CONWAY

1634 EAST MAIN ST. • CTR. CONWAY, NEW HAMPSHIRE 03813

PR-4224

Page 1 of 2

(603) 447-3811  
FAX (603) 447-1348  
WWW.CONWAYNH.ORG



December 9, 2004

Thomas G. Wagner, Forest Supervisor  
White Mountain National Forest  
719 Main Street  
Laconia, NH 03246

Re: WMNF Plan

Dear Mr. Wagner:

The Conway Board of Selectmen is pleased to offer the following comments on the final Draft of the White Mountain National Forest (WMNF) Management Plan.

First, we would like to confirm our support and appreciation for the efforts of the North Country Council's Forest Plan Committee in working to create a collective position supported by towns within and adjacent to the WMNF. We agree with the committee's position and would like to reiterate that Alternative 2 should be modified to include the following:

- An annual timber harvest of 35 million board feet using forestry practices that meet high environmental standards;
- Managing a diversity of forest stand ages, including young and mature forest habitat;
- Moderately increasing recommended Wilderness management areas, but only after careful consideration of the economic and social impacts to timber harvesting and recreation areas;
- Supporting the current practice of reviewing summer motorized recreation opportunities (e.g., ATV's) on a case by case basis;
- Supporting the NH Fish and Game Department's recommendations to develop alternatives that put more emphasis on wildlife habitat and timber management.



PR - 4224 pg 2 of 2

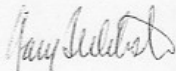
Thomas G. Wagner, WMNF Supervisor  
12/10/2004  
Page 2

Further we would like to add the following specific comments:

- Change the plan language so that travel corridors are open to mountain biking unless specifically closed
- Make provisions to enable the continued use of existing legal OHV trails that pass through portions of the forest

We hope you will give serious consideration to our comments and look forward to continuing the positive working relationship between the Town of Conway and the USFS.

Sincerely,



Gary Webster  
Chair, Conway Board of Selectmen

cc: Jeffrey Hayes, NCC  
Earl Sires, Conway, Town Manager  
Rob Adair, Conway Recreational Trail Advisory Committee

JEFFERSON CONSERVATION COMMISSION  
TOWN HALL  
JEFFERSON, NEW HAMPSHIRE 03583

PR-5904

Pg 1 of 2

Forest Supervisor  
White Mountain National Forest  
719 N. Main Street  
Laconia, NH 03246

16 December 2004

RECEIVED DEC 20 2004

Subject: Comments on Forest Plan Alternatives from the Jefferson Conservation Commission

The Jefferson Conservation Commission reviewed the four WMNF Forest Plan Alternatives and congratulates your staff on producing such a comprehensive document.

The Jefferson Conservation Commission supports Alternative 2 with the following additional comments:

1. We support forest management activities that provide a diversity of wildlife habitat, protect watersheds, and provide a sustainable harvest of forest products. The 24 million board feet under Alternative 2 is a reasonable and prudent amount and suggest that this should be the average annual harvest over a 10 or 15 year period. We realize that there may be circumstances for more or less than 24 million board feet in a given year.
2. We favor resolution of the Roadless Area issue. We recommend that the 383,500 acres of roadless should be placed into appropriate management areas such as MA 2.1 lands. The lack of timber revenue and jobs from not harvesting forest products in the Cherry Mountain and Dartmouth Range Roadless areas, for instance, hurts our community financially.
3. We support recommending to the Congressional Delegation the designation of the Wild River and Sandwich Range Extension as Wilderness as proposed in Alternative 2.
4. We support combining Management Areas 2.1 and 3.1 into MA 2.1 as proposed.
5. We continue to oppose allowing All Terrain Vehicles or similar motorized vehicles summer recreational access to the forest.
6. We support snowmobiling on approved WMNF trails. We feel it provides important recreational and economic benefits to local communities.
7. We would like to see more wheelchair accessible trails built on the WMNF. We ask that a new category for such trails be placed on Table 3-65, page 3-305 with a goal of 10 new miles of wheelchair accessible trail built in the planning period and not to come out of the goals for non-motorized trails.
8. We are opposed to allowing Personal Watercraft (Jet Skis) on WMNF lakes.
9. We urge the WMNF to increase its efforts on locating and eradicating exotic invasive plants, insects, and diseases. On page 3-129 paragraph 3, a statement is made that there are "no known invasive vertebrate species are known to exist on the Forest". European starlings, house sparrows, mute swans are examples of vertebrate exotic invasive species, for the record.
10. We ask the WMNF consider adding a position of Forest Health Specialist to coordinate efforts on detecting forest health threats such as the Hemlock and Balsam Woolly Adelgids, Emerald Ash Borer, Asian Long-horned Beetle and other emerging threats to our forest. We feel that low level ozone and other air pollutant monitoring would be a part of this position description.
11. We support efforts to enhance scenic beauty along forest roads and highways as has been done along the Kancamagus Scenic Highway.
12. We applaud your support of the North American Bird Conservation Initiative and the Partners in Flight Program (page 3-173 paragraph 3). We would like to have you consider adding a bird conservation specialist to your staff if funding could be found.

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Pg 2 of 2

Sincerely,

*Marjorie Doan*

Marjorie Doan, Secretary

Bob Ball

Jean Cargill

Bill Fischang

David Govatski, Chairman

Charles Muller

Winnie Ward



PR-6159



# Town of Lincoln Pg 1 of 4

LINCOLN, N.H. 03251

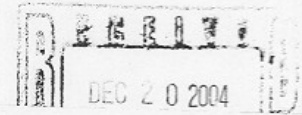
603-745-2757

FAX 745-6743

TOWN MANAGER  
Ted Sutton

suttoninlincoln@eagle1st.com

December 14, 2004



Mr. Thomas G. Wagner  
Forest Supervisor  
White Mountain National Forest  
719 North Main Street  
Laconia, NH 03246

PLEASE NOTE,  
THIS LETTER IS A  
CORRECTED VERSION  
OF ONE SENT EARLIER  
TODAY

Dear Tom:

Some time ago our North Country Council Steering Committee wrote to town officials throughout the North Country asking that they participate in a Host Communities organization to work together in reviewing and commenting on the Land and Resource Management Plan revision.

Our primary goal was to make the collective voice of the North Country as compelling and powerful as possible. The idea was to seek unified input from local selectmen and planning boards to help in the development of a Forest Plan that works for local communities.

The 51 rural communities immediately adjacent to the White Mountain National Forest have a tremendous stake in the management decisions made regarding these public lands. However, they have been largely left out of the planning process. Many in this region recognize how critical it is to express the common concerns of towns within and around the national forest.

There are many well-funded, well-organized interest groups from outside our region that rightfully have a say in how the Forest is managed. These groups have their own vision for the Forest, but it is a vision that often does not mesh with the interests of the towns that are most impacted by the Plan. To be sure, these parties value the Forest and want to protect it, just as we do. But many come from urban areas and visit here only occasionally. They don't have the benefit of living here and seeing firsthand the finely woven interconnections that exist between the White Mountain National Forest and local communities; nor do they understand that the Forest is managed effectively by an educated and dedicated team of WMNF personnel. If we don't continue to manage this natural resource as it has been managed for the past 15 years, the consequences to this region and the people — many of whom rely on the Forest for their economic survival and quality of life — could be devastating.

The response to our proposal was heartening, as 33 boards of selectmen agreed to come together on this project. We sought to strengthen this base of support by coming together with "multi-use

Mr. Tom Wagner

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December 14, 2004

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pg 2 of 4

partners” to build a consensus that would focus on the best interests of North Country towns. These partners are: the Society for the Protection of New Hampshire Forests, NH Timberland Owners Association, NH Audubon, White Mountain Attractions, Wilderness Federation, NH Fish and Game, and the NH Division of Forests and Lands. This was an exciting and historically significant development, as never before has such a broad-based coalition of municipal, state, and non-governmental agencies come together to address the future management of our public lands.

After careful review of the Alternatives, our coalition elected to support *the key elements* of Alternative 2. It is important to note that a significant degree of compromise was necessary in order for these diverse groups to reach this consensus. In recent correspondence to the Host Communities, our committee asked town officials to endorse the provisions of Alternative 2. So far 25 boards of selectmen have agreed to do so, with the understanding that the endorsement includes specific recommendations for modifications, additions, and changes.

In your letter of September 10, 2004, you said that Alternative 2 “provides the best balance of products, services, and experiences, while maintaining the core ecological processes of the Forest for the future.” We concur with this statement.

Your letter also asked for comments that might provide “additional information, correct any mistakes and further clarify the tradeoffs” so that your agency can arrive at an informed decision regarding the sound management of National Forest land. The purpose of this letter is to do exactly that. Our Steering Committee represents a large group of stakeholders in this process, as described above. The following is a summary of the recommendations that accompany our endorsement of the provisions of Alternative 2.

- We agree with the NH Timberland Owners Association, NH Fish and Game Department, NH Division of Forest and Lands, NH Wildlife Federation, North Country Council, and other groups that believe the WMNF can support an Allowable Sale Quantity (ASQ) higher than the 24 MMBF per year as proposed in Alternative 2. The NH Timberland Owners Association proposes that there be a gradual increase in the ASQ by increments of 2MMBF every five years, to 32 – 35 MMBF within 20 years after adoption of the plan. We believe this level of harvest is biologically, ecologically and socially sustainable, and it will maintain the output of forest products at a level that will sustain the forest industries of northern New England.

We support a sustainable and strong timber management program, as we believe it is consistent with the multiple use concept and the original intent of the National Forest System. We believe 32-35 MMBF represents a modest amount, given the amount of land within the WMNF that is available for harvesting. The emphasis should be on improving the quality of timber on the residual forest, with the overall objective of producing high-value, solid wood forest products. This, as you know is a commodity of increasing value and scarcity in northern New England.

We recommend that there be an emphasis in Alternative 2 on the quality of excellent hardwood timber available in the WMNF. The high quality timber is the direct result of a



Mr. Tom Wagner

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December 14, 2004

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well run forest management program that the Forest Service has carried out through the years.

Towns gain in two methods from timber harvesting in the WMNF, first from the direct revenues derived from the sale of timber and second, from the timber yield tax derived from the forest products removed from the sale.

- We would like to see more emphasis in Alternative 2 on the socio-economic impact of the Forest. An active forest management program improves the health of the Forest, and provides a crucial stimulus to local economic activity. Local manufacturers (sawmills, pulp mills, and wood fired electrical plants) are vital to the economic survival of this region. Most modern mills have investments in excess of one million dollars in computers, scanners, and labor saving equipment. The sale of timber – particularly quality northern hardwoods - has a true and beneficial impact to this region. It is critical that we harvest this local resource with proper guidelines, rather than relying on the resources of other countries where little or no management exists.

We disagree with the results of the Economic Impacts Analysis that indicate that the economic impact of the Forest on the region is relatively small (about 0.8 percent in terms of income and about 1.5 percent in terms of jobs.) We would like to see these numbers revisited.

Another concern is the loss of available timber caused by the Visual Management System, along with the loss of land dedicated to producing commercial timber. This has had direct, indirect, and cumulative effects on the economy of the forest production industry, and we would like to see further analysis done on these impacts.

We suggest that the socio-economic impact of the recreational industry that exists because of the Forest should also be given additional emphasis. Snowmobiles, for example, generate considerable revenues throughout the region by way of sales, repairs, registrations, and use of area lodging and restaurant facilities by snowmobilers.

Similarly, alpine skiing contributes significantly to the vitality of the regional economy, since most of the premiere skiing areas are located in or adjacent to the White Mountain National Forest. Many out-of-state residents and the majority of local residents buy their equipment within this area, supporting businesses which can then sustain year-round employment.

- We support the New Hampshire Fish and Game Department's recommendations to develop alternatives that put more emphasis on wildlife habitat and timber management. We support all efforts to produce and maintain early successional habitat and wildlife openings. Many of the wildlife species in the Forest require early successional habitat as a principal component of their home range. We would like to see Alternative 2 continue the direction that was established in the previous Plan.

Mr. Tom Wagner

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December 14, 2004

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- We support a modest increase in Wilderness designation in the Sandwich Range. We feel that further studies should be done for other expansion of wilderness areas in the WMNF. Also, we do support preservation of some areas that are considered "roadless" by Forest Service definition; however, in other roadless areas, we advocate that they continue to be available for sensitive forestry and wildlife habitat management.
- We support the current practice of reviewing summer motorized recreation opportunities (e.g., ATV's and dirt bikes,) on a case by case basis. The North Country Council Board of Directors is concerned that Alternative 2 allows for only 20 miles of new snowmobile trail within the life of the plan. Due to changes in private landowners, logging activities, and other development pressures, it is feasible to presume that more than 20 miles of new trail would be needed within the next 10 years to address trail mileage that might be closed. We would like to see the potential mileage increase to that allowed in Alternative One (30 miles) or Alternative 4 (60 miles.) For generations, the Forest has successfully built and maintained logging roads that support heavy equipment, so it seems logical that there should be a way to develop ATV trails in an environmentally sensitive manner. We believe that those who pursue ATV activities have the same rights as other multiple users of the Forest, and there should be more consideration given to allowing these individuals greater access to the Forest. ATV users are not going to go away; they are here, and we should recognize them as we do other people who use the Forest for recreational pursuits.
- We support the management of a diversity of forest stand ages, including young and mature forest habitat.

To summarize, many North Country agencies and organizations have supported a general mix of uses and land area allocation, and we believe Alternative 2 best reflects this stance. The White Mountain National Forest is nationally recognized for maintaining a reasonable balance of sustainable resource management and use, backcountry and developed recreation, protection of biodiversity, and wilderness preservation. Alternative 2 will allow this balance to continue into the future.

We believe that if you incorporate the recommendations summarized above, Alternative 2 will help to ensure that the diverse socio-economic, cultural, and recreational needs of the communities that surround the WMNF will be met. Based on the unprecedented level of agreement described in this letter, we urge you once again to embody these recommendations in the final WMNF Management Plan. If you would like any clarification of our stated position, please contact me at 745-2757, or North Country Council Assistant Director Jeffrey Hayes at 444-6303.

Thank you for your consideration.

Ted Sutton

Chairman,

North Country Council Host Communities





JOHN ELIAS BALDACCIO  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF CONSERVATION  
22 STATE HOUSE STATION  
AUGUSTA, MAINE  
04333-0022

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Pg 1 of 4

PATRICK K. MCGOWAN  
COMMISSIONER

December 15, 2004

RECEIVED DEC 20 2004

White Mountain National Forest  
Forest Supervisor  
Thomas G. Wagner  
719 North Main Street  
Laconia, NH 03246

Dear Thomas,

We appreciate once again having the opportunity to provide information and feedback to you on your draft Proposed Land and Resource Management Plan. Over the last few years, we have presented information that addressed snowmobile and ATV management issues to your staff in writing and in person at numerous meetings. As you know, in Maine, the ORV Division of the Department of Conservation is responsible for the administration of trail programs for snowmobiles and ATVs, and also provides some law enforcement efforts through the Bureau of Parks and Lands and the Maine Forest Service. The following comments present the views of the ORV Division of the Bureau of Parks and Lands. They focus on motorized uses, and the areas of immediate interest to the ORV Division. They do not represent a comprehensive presentation by the Bureau or the Department.

It is apparent to us that your preferred alternative 2 does not adequately address several of our concerns. In fact, alternative 2 could have significant long-term negative effects on the existing snowmobile trail system we have maintained since the late 1970s. Also, the plan does not make available any opportunities for the current or future management of ATV trails in Maine.

The following information will identify our ongoing concerns with the draft language in the plan as it pertains to proposed land allocations and actions that will affect snowmobile and ATV trail management. This information will, we hope, leave the door open for future discussion about ATV opportunities, as your 1986 plan provided. We have four basic areas of concern that we respectfully request you consider and address for us.

1. One of the major concerns we have is the proposed management of the so-called Wild River Watershed. As you know, this watershed starts in the high elevation of NH and ends in Maine, with the river flowing into the Androscoggin River in Gilead. We recognize this is an outstanding watershed that must be very carefully managed. However, in the old plan the allocation for that area allowed for one snowmobile trail to travel along the old rail bed and through the valley connecting Shelbourne, Gilead and Chatham, together creating a North-South trail corridor primarily in NH. Our trail (ITS 80) travels through Evans Notch connecting

BUREAU OF PARKS AND LANDS



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FAX: (207) 287-8111

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Fryeburg, Lovell, Stoneham to Gilead and the NH corridor trail from Chatham and Conway to Gorham, NH. Several years ago the Forest Service decided to close the NH corridor through the Wildriver Valley trail to Gorham and combine both trails into one corridor that now goes through Evans Notch on State Highway 113 that is currently not maintained for vehicle use. You may recall Maine DOT has never been willing to guarantee that this highway will never be plowed. Maine DOT has stated repeatedly that it is very unlikely to be maintained for winter travel, however two notches in NH that were not maintained many years ago are now maintained and those trails were lost or rerouted. Therefore, we continue to have a serious concern that someday economic or social pressures may force Maine to maintain highway 113 for vehicular traffic. We do not support the Wild River Watershed classification as wilderness or even roadless unless there is an allocation adopted that would provide for a north/south 12'-14' wide snowmobile trail connector, to be developed only if the following conditions are met:

- A) Highway 113 is plowed for vehicular traffic;
- B) No alternative corridor is provided adjacent to or parallel with the highway (similar to the snowmobile/bike path along the Franconia Notch Highway in NH);
- C) Such a Wild River Snowmobile Trail would be considered temporary until a suitable, safe, and economical trail is developed;
- D) All agencies involved, including the USFS, MDOT, DOC, and NH Trails Bureau have exhausted all alternatives to providing a N/S corridor trail in Maine or parallel to and in close proximity to the NH state line.

Your alternative #1 designates the entire watershed as roadless, but that still does not allow for a "new" trail to be constructed. Alternatives 2-4 all have the area designated as wilderness. Therefore, we recommend a 5<sup>th</sup> alternative to allocate one strip through the watershed as a potential route if the criteria spelled out above are met. You might also consider a corridor that allows existing trails or new trails that meet three criteria: 1) No safe, cost effective alternative exists; 2) the impact on the protected natural resources values or remote recreation values is minimal; and 3) the designated trail will provide a crucial link in a significant trail system. The current N-S trail is crucial to the local economies of several towns. Loss of this trail would be economically devastating.

2. We are concerned about designated "roadless" areas and the potential impact on existing trails. We are perceiving mixed messages concerning the roadless designation, when comparing several documents and conversations with your staff. The definition of "roadless" seems to be a moving target as it relates to allowed recreation over the last few years. It is our understanding "roadless" is defined in the document "Roadless Area Conservation Final Rule; Questions and Answers" as provided to our staff at the open house in Bethel. That document states "The final rule will not affect existing access to National Forests or grasslands for hunting, fishing and other dispersed recreation activities. Nor will it affect off road vehicle use on existing designated motorized trails in inventoried



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Pg 3 of 4

roadless areas (page 9). Yet the proposed Land and Resource Management Plan, August 2004, states on page A-6 "the forest will strive to maintain the integrity of the current snowmobile trail system. Individual snowmobile trails may be affected by roadless criteria and wildlife concerns. The Forest will analyze the impacts of the alternatives on the current system and use of snowmobile trails including the North-South Trail. There may be closures because of social or ecological concerns." These statements seem to contradict each other. Therefore, we need clarity on this issue, and would like to know which existing trails fall into the proposed "roadless" designation and could be affected, or is it true that existing trails will not be affected? Reviewing the broad allocation maps, there is very little area where a trail could be relocated to get around existing wilderness and proposed roadless areas without moving out of the forest onto private land. Perhaps existing corridors for snowmobile trails should be classified as something other than roadless. It is our understanding the roadless definition is currently being challenged in court, which further elevates our concern, because areas could be allocated in the roadless category prior to a final legal definition being adopted through the court system.

We suggest the final plan address the numbered corridor trails (not just the ITS Trails) in Maine. The current language references ITS 80 only, but doesn't address the significance of other trails that are, in fact, major regional trails, such as trail 14 from Gilead to Bethel or trail 12 from ITS 80 east to Greenwood or the upgraded trail from Stoneham to Lovel. Each of these trails is a significant trail, but is not recognized as an "ITS" trail at this time (section 2-20, G-4 should be modified)

3. The plan speaks to acquiring land to protect trail corridors or trail heads. To the best of my knowledge, no property in Maine has been acquired that includes any snowmobile trail in spite of land being available that includes critical sections of trail. Three pieces of land that have been available for sale or have already changed hands once, include;
  - A) Bayrout LLC (Wagner) land South of route 2 and west of Wild .. Bayrout also has land east of Wild River and 113 in the same area that may also be available.
  - B) The entire Evergreen Valley Resort owned by Bob Bahre is for sale. We respect the fact that the USFS is unlikely to acquire a resort, but have you considered negotiating an easement for public recreation, including motorized trails?. If this opportunity is lost we could loose our entire operation and trail head and the site where our groomer is housed. On the south end of Evans Notch the trail is on private land for a mile or so on the west side of 113 in NH. For at least ten years, we have asked the USFS to provide a snowmobile corridor on WNMF land east of 113 to avoid crossing the road twice and the crossing the state line. Has the WNMF considered buying the private land or an easement to cross the private land if the trail is not going to be moved to public land? Or will you commit to moving the trail to the east side of Highway 113 on Forest



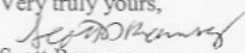
PR-5935  
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Service ownership? Again, this is a critical piece of property that includes both ITS 80 and NH 19.. Closure of the land would be devastating to the entire region. These approaches may require a bit of creativity, but they will effectively address major issues.

4. You propose a complete closure of WMNF in Maine for the use of ATVs with no provisions for an area or trail that could even be discussed. We urge you to reconsider this action. The 1986 plan at least allowed a proposal to be considered. At that time our program and the sport was in its infancy. Since then, we have developed 3000 miles of trail and over 100 clubs have formed. At least one club is very near the forest in Norway and has a trail toward Bethel. In 1986, the only existing trail in Maine was on Caribou Mt., until it was closed when that area was designated as wilderness in 1990. The forest made a commitment to provide an alternative trail as part of the wilderness designation. A trail was created for the snowmobile community to replace the Caribou Mt. Top Trail, but it remains closed to ATVs, and now USFS apparently doesn't plan to provide even the possibility for a trail for at least the life of the new plan. It would seem that is not fair to the ATV community. We would be happy to work with you to amend the current language to keep the door open for that discussion.. In some circles, it is politically fashionable to "disrespect" ATV use. But the sport will mature in the coming years, and it will become a major recreation activity for many different kinds of people — especially people with physical limitations and disabilities. While it may be premature to actively plan for this potential use now, you should not close the door on this important user group.

Thank you for the opportunity to comment on your proposed management plan. We look forward to working with you as the plan works its way to adoption. If you have any questions please don't hesitate to contact us. We have been pleased to work with your staff for managing trails over the last 28 years.

Very truly yours,

  
Scott Ramsay  
ORV Division Director  
Maine Bureau of Parks and Lands

Cc David Soucy; Director, Bureau of Parks and Lands  
Forest Planner, White Mountain National Forest

"Burns, Susan" <Susan.Burns@maine.gov>  
12/15/2004 04:11 PM  
To: "WMNF (E-mail)" <wmnfplan@fs.fed.us>, "Barbara Levesque (E-mail)" <blevesque@fs.fed.us>, "Fred Kacprzyński (E-mail)" <fkacprzyński@fs.fed.us>  
cc: "Carroll, Catherine M." <Catherine.M.Carroll@maine.gov>, "Todd, Fred" <Fred.Todd@maine.gov>  
Subject: Proposed WMNF Management Plan

Barbara and Fred - I am submitting LURC comments to the address given in the plan, as well as to you, because several of these items involve points of clarification as much as comments on the proposed management plan. I appreciate the timeliness with which you answered my earlier questions and sent the requested maps.

- 1) WMNF Boundaries: The boundaries for the Resource Plan Protection (P-RP) Subdistrict on our current land use guidance maps do not correspond exactly with those indicated on the maps you sent. These appear to be fairly minor differences. We would like to arrange to have our GIS staff person, Ellen Jackson, work directly with yours, if possible, in order to make the zone's delineation more accurate on LURC maps as part of the next plan renewal. Ellen can be reached at [ellen.jackson@maine.gov](mailto:ellen.jackson@maine.gov) <<mailto:ellen.jackson@maine.gov>> if you would please pass along her address to the appropriate person.
- 2) Roads near Remote Ponds: When comparing the LURC zoning and WMNF MA maps as well as past actions by the Commission on the P-RP zoning petitions, it became apparent that an area of the WMNF in Mason Township may have been inadvertently left out of the 1979 approval and then added to the zoning designation in the 1992 renewal. That area involves land which lies near Trout Pond, a 17 acre Management Class 1/6 pond, which requires a ½ mile Recreation Protection (P-RR) Subdistrict around it. One of the requirements of that zoning is that land management roads (for timber harvesting/management activities) be located no closer than 1,000 feet of the normal high water mark and be discontinued, gated, obstructed, or otherwise made impassable to 2WD vehicles within three years of construction. It appears there is an unimproved road (gated where it turns into a trail?) and trail that go to that pond from the Flat Road south of West Bethel, according to "The Maine Atlas and Gazetteer," although it doesn't show up on the maps which you sent. You may be able to provide more information regarding the nature of the access, and whether it is limited, into Trout Pond. This is definitely an issue of import to the Commission, probably deserving of some discussion with regard to motorized vehicular access limitations.
- 3) Wetlands and Road Construction: Since the 1992 plan renewal, the Commission has revised its rules to cover additional areas of wetlands and to apply stricter construction standards to land management roads passing

## *White Mountain National Forest — Final Environmental Impact Statement*

through them. Portions of the standards were based upon information received from the WMNF, I believe, yet I didn't find such standards in the plan. I suspect they're contained in items/references such as those covered in #4 below.

4) Additional Reference Materials: There are a number of instances where the proposed plan refers to various classification schemes (for example, Recreation Opportunity Spectrum) or activity standards (again, for example, Scenic Integrity Objectives in "Agriculture Handbook 701, Landscape Aesthetics." Fred K, in your first response, you said you were compiling additional requirements to address my request regarding the extent of WMNF timber harvesting and road construction requirements. I'm sure that the USDA Forest Service has extensive management documents/requirements that far exceed in length LURC's requirements. Perhaps if I make a more specific list of references and questions, we can speak by phone, or in person, if necessary, to make the appropriate comparison of standards and requirements for various activities and uses.

5) Application of Forest-Wide Standards: I just want to be sure that I understand the application of the Forest-Wide Management Direction standards compared with the MA standards. Even though the statement "Forest-wide standards and guidelines apply" isn't repeated for each activity with specific additional standards in the various management areas, I assume the forest-wide standards apply, plus those additional ones listed. Please correct me, if wrong.

6) Vegetation Management: As was discussed at one of our meetings and repeated in Barbara's email to my supervisor, Fred Todd, the Maine Forest Service is developing new standards to cover clearing/timber harvesting in selected shoreland areas in Maine. Those standards and the MFS may replace LURC as the regulatory requirements and agency by 2006. I believe Barbara indicated that WMNF staff is reviewing a draft of the standards.

7) Commission Approval of Selected Activities/Uses: There are a number of uses listed in the proposed WMNF plan which may involve structural development for which the Commission will want to retain review and approval authority, in addition to the WMNF. Some of those potential uses are campgrounds, dams, commercial mining, wind towers and other structures or facilities that might be constructed for certain activities (parking areas, restrooms, maple tapping processing facilities, etc.) In the past, LURC has approved the WMNF Plan as the Resource Protection Plan for the P-RP zoning without such specifications. Depending upon the nature of the activities/facilities proposed and the details and standards provided by the WMNF, the Commission may or may not wish to retain such authority.

It may well be that a meeting to discuss some of these items would be helpful to LURC's understanding of the proposed management plan. I am very willing to come over to Bethel, if that seems desirable.

After today, I will not be in the office until January 4th, so will be in touch then, as necessary. Please respond to my supervisor, Fred Todd, in

the meantime.

Susan Burns  
Chief Planner, LURC  
Maine Dept. of Conservation  
207-287-4969  
susan.burns@maine.gov <mailto:Susan.burns@maine.gov>

December 17, 2004

Forest Planner  
White Mountain National Forest

Dear Forest Planner:

Please accept the comments below regarding the *White Mountain National Forest Plan Revision* discussions and treatment recommendations concerning Heritage Resources on behalf of the Maine State Historic Preservation Officer.

#### **DRAFT EIS**

Throughout the *DEIS* and the *Proposed Land and Resource Management Plan*

Designation of wilderness areas and the subsequent decision to allow such areas to go back to their “natural” state is an undertaking as defined by the National Historic Preservation Act of 1966, as amended and has the potential to adversely affect above-ground historic properties; Section 106 consultation should be completed prior to such designations.

#### **Pg. 30 (Definitions)**

The definition of an “undertaking” in Section 106 is “...funded in whole or in part under the direct *or indirect* jurisdiction of a Federal agency...”; “or indirect” was left out of the definition.

“Undertaking” should be included in the definitions section of the Draft EIS and should be quoted verbatim from 36 CFR 800.16(y) of the Section 106 regulations. Definitions of “National Register of Historic Places”, “Section 106”, and the “National Historic Preservation Act of 1966, as amended” should also be included.

#### ***Heritage***

**Page 3-402** of *DEIS* and **Page 46** of the *Executive Summary of the DEIS*

The first paragraph should indicate which types of heritage resources it refers to (prehistoric archaeological, historic archaeological, architectural, landscape, etc.). We also recommend including a paragraph briefly describing the different types of heritage resources (prehistoric archaeological sites, historic archaeological sites, historic structures, objects and landscape features; including road and trail systems) that may be found within the WMNF. Please note that in reviewing *Appendix D* of the Draft EIS, it is apparent to our office that the road and trail systems warrant further examination for their historic significance, integrity, and potential National Register eligibility.

#### **Pg. 3-403**



Prior to the section headed *Environmental Effects*, we strongly recommend including a section with the heading “*Heritage Resource Identification*”. This should provide a brief summary of identification efforts required by Section 106 of the National Historic Preservation Act (see 36 CFR 800.4 of Section 106 regulations), a statement that the vast majority of the WMNF has not been surveyed for these resources, and that identification efforts will be necessary prior to commencing any undertaking.

It may also be helpful to include in this section, or under the Definitions section, a description of what “Listed in” and “Determined Eligible for” National Register of Historic Places means (formally determined eligible by the National Park Service and/or preliminarily determined potentially eligible by the SHPO).

**Pg. 3-404 Direct and Indirect Effects**

All of the subheadings under this section, with the exception of **Facilities Maintenance Effects**, appear to assume that adverse effects requiring mitigation measures are a foregone conclusion. This is not an appropriate approach to heritage resource protection in theory or in the legal context of the National Historic Preservation Act, and is not consistent with the stated goals for Heritage Resources on page 1-5 of the *Proposed Land and Resource Management Plan*. Section 106 of the NHPA specifically states under 36 CFR 800.6 (Resolution of Adverse Effects) that:

AThe agency official shall consult with the SHPO/THPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties.@

Mitigation of adverse effects resulting from undertakings should be a last resort option, when consultation results in a determination that no alternative exists to avoid or minimize adverse effects to heritage resources.

Furthermore, we feel that it would be appropriate to include a brief statement at the beginning of this section indicating that the examples given of direct and indirect effects under each heading are not inclusive of all potential effects. For example, there is no mention of effects to the historic setting of heritage resources that could result from the construction of utility corridors, telecommunication towers, or wind turbines. It is not uncommon for the Area of Potential Effect for undertakings such as telecommunication tower and wind turbine construction, which can be in excess of 400' high and lighted, to encompass an area of one mile in radius from the project location.

**PROPOSED LAND AND RESOURCE MANAGEMENT PLAN**

**Page 2-8 Heritage Resources**

**S-2**

The first paragraph should be shortened and clarified to read:

“Any proposed undertaking (see definition) must, prior to the approval of the expenditure of any Federal funds or issuance of any license, comply with Section 106 of the National Historic Preservation Act of 1966, as amended.”

Additionally, the first sentence of the second paragraph should be removed altogether as it is required as part of Section 106 consultation and should follow identification efforts, which were not discussed, but are also required by Section 106 consultation.

**Page 2-9**

**S-3**

Should read "...requiring compliance with Section 106 of the National Historic Preservation Act."

**Page A-50**

**Heritage**

Under the first bullet, "earth disturbing activities" should be replaced with "undertakings".

Under second bullet, may want to state that "All National Register eligible and listed resources will be...", rather than "All cultural resource sites".

Under the third bullet, "All sites" should be replaced with "All sites, and structures over fifty years of age..."

Please contact Mike Johnson if we can be of further assistance in this matter. We will be pleased to review any further amendments to this document.

Sincerely,

Earle G. Shettleworth, Jr.  
State Historic Preservation Officer

EGS/mj

**North Country  
Resource Conservation and Development Area, Inc.**

**719 North Main Street – Room 220, Laconia, NH 03246-2772**  
**Phone: 603-527-2093 Fax: 603-527-2095**



December 15, 2004

Forest Planner  
White Mountain National Forest  
719 North Main Street  
Laconia, NH 03246

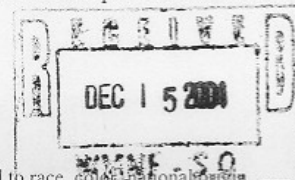
RE: Comments regarding the proposed Land and Resource Management Plan for the White Mountain National Forest from the North Country Resource Conservation and Development (RC&D) Area Council.

The North Country RC&D Area Council is an independent not for profit organization provided authority from the US Secretary of Agriculture to conduct land conservation, community development and water resource protection activities, according to locally identified needs, in Belknap, Carroll, Coos and Grafton counties of New Hampshire. The North Country RC&D Area Council is governed by a representative body of 15 which includes representatives from the 4 County Conservation Districts and the 3 Regional Planning Commissions operating in this area and 8 members at large.

Let us begin by saying that we are impressed and satisfied with the process to date concerning the development of this Forest Plan Revision which is so important to the economic, social and environmental lifeblood of this region.

Last summer we adopted the following position and encouraged the region's communities to endorse them as well:

- An annual timber harvest of 35 million board feet using forestry practices that meet high environmental standards;
- managing a diversity of forest stand ages, including young and mature forest habitat;
- moderately increasing recommended Wilderness management areas, but only after careful consideration of the economic and social impacts to timber harvesting and recreation areas;
- supporting the current practice of reviewing summer motorized recreation opportunities (e.g., ATV's and dirt bikes,) on a case by case basis;
- supporting the NH Fish and Game Department's recommendations to develop alternatives that put more emphasis on wildlife habitat and timber management.



All RC&D programs and services are offered on a nondiscrimination basis, without regard to race, color, national origin, religion, gender, age, sexual orientation, marital or familial status, political beliefs or disability.

We have reviewed the details of the Recommended Preferred Alternative 2, and make the following comments regarding that choice:

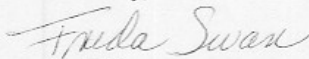
1. We concur with the recommendations for Vegetative Management as explained in Alternative 2, however we hope that an annual sustainable harvest of 24 mbf on 280,000 acres (46 percent of the forest land base) will be considered a minimum to insure that mature timber values are not lost, which we believe has been the case in the last 15 years. This is important to maintain a healthy forest resource base and to insure that local economies are supported.
2. We concur with the moderate increase approach to Wilderness designations contained in Alternative 2 and agree that the Wild River Drainage and Sandwich Range are the most appropriate locations for that consideration in this time period.
3. We concur with the Alternative 2 recommendation of an annual 940 acres of early successional habitat management, but encourage emphasis on management areas of at least 40 acres to maximize wildlife habitat benefit while considering visual impact and incorporating public education to explain what is going on in that management area.
4. We concur with and applaud the position taken regarding Summer Motorized Recreation in Alternative 2.

As one management tool for the implementation of this Plan Revision, we recommend that the White Mountain National Forest aggressively begin to utilize the National Cooperative Soil Survey to obtain modern soil data and interpretations that are so important to many land use and resource decisions.

Finally, we recognize that times have a tendency to change terminology, but we strongly recommend that the original concepts of multiple use remain the backbone of land and resource decisions on the White Mountain National Forest.

Thank you for the opportunity to make these comments and recommendations.

Sincerely,



Freda Swan  
Vice Chair



PR-5515



United States Department of Agriculture

**NRCS** Natural Resources  
Conservation Service

Federal Building, 2 Madbury Road, Durham, NH 03824-2043 (603) 868-7581 Fax: (603) 868-5301

[www.nh.nrcs.usda.gov](http://www.nh.nrcs.usda.gov)

December 14, 2004

Forest Planner  
White Mountain National Forest  
719 North Main Street  
Laconia, New Hampshire 03246

pg 1 of 2

RECEIVED DEC 16 2004

Dear Sir:

The USDA - Natural Resources Conservation Service (NRCS) has been an active participant in the current Land and Resource Management Plan process for the White Mountain National Forest (WMNF) from the initial meetings back in 1997. We have been interested in following and providing comment on issues of mutual concern to both of our agencies. NH - NRCS staff have invested time in this process because we feel it falls within the mission of the NRCS, and in accordance with the Plan the WMNF has encouraged input from Federal, State, and local agencies as well as from private citizens.

During the early Public Planning Meetings held by the WMNF, there were 31 potential revision issues put forth for discussion. One of these topics of particular interest to NRCS is to "...prevent decreases in soil productivity over time due to harvesting and acid deposition. Provide soil survey information." Throughout the planning process, NRCS has been a strong proponent of the need for complete, modern soil resource information that meets the standards of the National Cooperative Soil Survey (NCSS). Additionally, the Coos, Grafton and Carroll County Conservation Districts, as well as members of the public, support the need for up to date soil survey mapping information.

At a Local Public Planning Meeting in 2002, NRCS provided information on the NCSS and its methodology for mapping soils. Forest soils on private and state owned lands in NH are currently mapped at Order 2 and Order 3 intensity levels, i.e., minimum delineations are from 2 - 3 acres in size in Order 2 areas and 10 - 50 acres in areas of Order 3 mapping. Ecological Land Type (ELT) mapping, as presently used by the WMNF, typically identifies minimum delineations of 1,000 acres on average. Upon review of the ELT mapping concepts used in the WMNF, there is a soil component that identifies general soil properties, with the driving force of the delineations being forest species. Although the ELT mapping concept provided adequate information at the time it was carried out, a number of advances in the methodology of mapping soils and generating soil related interpretations has evolved to the present standards of the NCSS.

We believe that, as part of the forest-wide planning process, the WMNF should be consistent with soil resource information used in all other National Forests east of the Mississippi River as well as other counties and states across the U.S. We also believe that it is in the best interest of the public and the WMNF to utilize the benefits of modern soil resource inventory available as part of a National Cooperative Soil Survey soil inventory designed specifically for forest-wide planning purposes.

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2

It is important to note that there have been recent cooperative efforts between NH - NRCS and the WMNF to evaluate the benefits of utilizing accurate NCSS detailed soil survey information, by providing small scale project mapping in areas of particular interest within the WMNF. These efforts have been carried out at: Hubbard Brook Experimental Forest, the Cone Pond Watershed, during a cooperative evaluation of ELT soil components in the WMNF, the Bartlett Experimental Forest, the Jeffers Brook Watershed and the Great Gulf Wilderness area. We welcome the opportunity to meet with the various resource managers of the WMNF to review and discuss the benefits of these mapping projects. It seems quite feasible to meld existing ELT delineations with more detailed Order 2 and 3 mapping depending on the site.

pg 2 of 2

Is the soil resource inventory adequate enough for the management needs of the WMNF? We don't think so. Critical issues such as acid deposition seem to cry out for an adequate resource inventory with which to make decisions regarding this and other issues.

We believe that the WMNF would benefit from Soil Survey information in these ways:

- Provide Forest wide management information.
- Provide data to manage for sustained yield and wildlife habitat development.
- Provide locations of hydric soils and potential wetland habitats.
- Identify sensitive and highly erodible soils.
- Provide data to be used to evaluate sites for future development such as building location, ski areas, shelters and huts.
- Provide important information for timber sale planning and management.
- Provide information to research related to forest sustainability, acid precipitation, soil health/soil quality.
- Provide information for Environmental Impact Statement to verify feasibility of projects and supply information for Biological Evaluation to satisfy the National Environmental Protection Act (NEPA).
- Provide watershed management information and flood protection data.
- Provide forest wide soils and attribute interpretive data.
- Provide information to locate/expand campgrounds, parking lots, campsites, plan/repair hiking trails and access roads.
- Provide information to identify soils which are suitable for valuable tree species when planning for natural regeneration.

We welcome the opportunity to comment on the Land and Resource Management Plan and look forward to discussing these issues with you in the near future.

Sincerely,



THERESA M. CHADWICK  
State Conservationist

cc:

Tom Wagner, USFS, WMNF, Forest Supervisor, Laconia, NH  
Randy Moore, USFS, Eastern Region Forester, Milwaukee, WI  
Richard Demark, North Country RC&D Coordinator, Laconia, NH  
Diane Bennett, District Administrator, Coos County Conservation District, Lancaster, NH  
Pam Gilbert, District Office Administrator, Grafton County Conservation District, Woodsville, NH  
Joan Richardson, District Manager, Carroll County Conservation District, Conway, NH

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PR-5918

THE STATE OF NEW HAMPSHIRE  
DEPARTMENT OF TRANSPORTATION

CAROL A. MURRAY, P.E.  
COMMISSIONER



December 16, 2004

RECEIVED DEC 20 2004

Forest Planner  
White Mountain National Forest  
U.S. Forest Service  
719 North Main St.  
Laconia, NH 03246

Sent via email: wmnfplan@fs.fed.us

Forest Planner:

Re: White Mountain National Forest's Proposed Land and Resource Management Plan

The NH Department of Transportation (NHDOT) is pleased to provide comments on the White Mountain National Forest's Proposed Land and Resource Management Plan. Hereinafter this plan will be referenced to as "Plan". Our comments are noted below.

The Department owns and operates a patrol site located in Pinkham Notch, which is located in an area noted in the Plan as "Pinkham Notch Scenic Area". The Department retains a Special Use Permit for this site. Section MA 8.5 – Scenic Areas, S-2 notes "Expansion of facilities for existing permits is prohibited. The following were specifically identified in the Designation Order:.....The permitted NH Department of Transportation site must not be allowed to increase in size or number of facilities." This site currently contains piles of sand, which are either uncovered or partially covered. No salt is stored outside. The Department proposes to construct a structure to enclose these products fully in the near future. Both sand and salt have the ability to impair water quality of our State's groundwater and surface waters, which are important natural resources. The Department has been, and will continue to evaluate water quality improvements through structural BMPs and the administration of good housekeeping practices.

This site previously contained structures that have recently been torn down. It is our belief that the construction of a replacement structure to cover both sand and salt would **not** be an "increase in size or number of facilities". If this were not correct, the prohibition would prevent us from providing appropriate water quality protection. To address this potential encumbrance, we recommend adding language that would allow environmental improvements to be made after consultation between the Department and the U.S. Forest Service. We believe this would be consistent with the intent of the Plan's goals and objectives, as well as the protection of the State's valuable natural resources.

In addition, the Department owns and operates a patrol site in Chatham that is located within the White Mountain National Forest. Currently, this site contains a tractor shed and a stockpile of sand that is fully covered by a tarp. We do not anticipate any improvements to this site in the near future; however, any improvements at this site

JOHN O. MORTON BUILDING • 1 HAZEN DRIVE • P.O. BOX 483 • CONCORD, NEW HAMPSHIRE 03302-0483  
TELEPHONE: 603-271-3734 • FAX: 603-271-3914 • TDD ACCESS: RELAY NH 1-800-735-2964 • INTERNET: WWW.NHDOT.COM



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Pg. 2 of 2

Forest Planner  
Page Two  
December 16, 2004

would be coordinated through the U.S. Forest Service. Although this site is not specifically noted in the Plan, we want to bring this to your attention.

We look forward to our continued cooperative efforts and collaboration on facilities and projects located within the White Mountain National Forest.

If you have any questions, please contact me at Tel. 271-3226 or e-mail at: [bhauser@dot.state.nh.us](mailto:bhauser@dot.state.nh.us).

Very truly yours,

*William R. Hauser*

William R. Hauser  
Administrator  
Bureau of Environment

WRH:dsl

CC: Butch Knowlton  
Mike Pillsbury  
Jim Colburn  
Deb Loiselle  
Greg Placy  
Mark Morrill  
Jack Cilley  
Bill Dauer, USFS  
(all c.c.'s via e-mail)

S:\STAFF\DSL\H20qual\IndustrialFacilities\Response to LRMP 2004.DOC



R. SEAN O'KANE  
Commissioner

RICHARD MCLEOD  
Director

STATE OF NEW HAMPSHIRE  
DEPARTMENT of RESOURCES and ECONOMIC DEVELOPMENT *pg 1 of 9*  
DIVISION of PARKS and RECREATION  
172 Pembroke Road P.O. Box 1856 Concord, New Hampshire 03302-1856

(603)271-3556  
FAX: (603)271-3553  
WEB: [www.nhstateparks.org](http://www.nhstateparks.org)  
E-MAIL: [nhparks@dred.state.nh.us](mailto:nhparks@dred.state.nh.us)

December 9, 2004

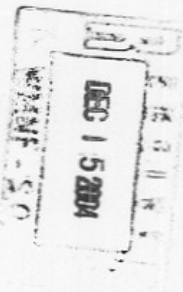
Barbara Levesque, Forest Planner  
White Mountain National Forest  
719 Main Street  
Laconia, NH 03246

Dear Barbara,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Preferred Alternative for the proposed WMNF Land and Resource Management Plan.

Over the past several years our staff have provided technical and general information to members of your staff, both in writing and in person at office and field meetings. The majority of that information involved management topics for public snowmobile and ATV trails, funding alternatives and possible solutions to questions that are often raised.

Our staff has carefully reviewed your proposed plan, dated August 2004, and has raised several concerns regarding Alternative 2 as the Preferred Alternative. After review of the proposed plan it is apparent that your preferred alternative does not adequately address the concerns or issues that we have raised in the past.



TDD ACCESS: RELAY NH 1-800-735-2964



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pg 2 of 9

The following narrative will specifically identify our ongoing concerns with the language in your draft plan, as it pertains to your proposed land allocations and the impacts to public recreational trails and public access to the forest.

1. One of our questions is the mileage of snowmobile trails that are actually located on the forest. The draft plan continuously references 400 miles of snowmobile trail located on the forest, however map 2-06, page 2-51 of the EIS, notes several trails that are not located on forestland. Are the 400 miles identified in the plan the same as those drawn on the above-mentioned map? The map shows two State-owned rail corridors and trails that are located within the WMNF Proclamation Boundary, but not on the actual forest. Is there an accurate figure of snowmobile trail mileage located within the forest boundaries in NH?
2. An issue of significant concern to us is the proposal to completely prohibit the potential for summer motorized trail discussions or considerations. The 1986 plan allowed for ATV use on designated trails. Though there are no summer-motorized trails currently designated on the forest, the potential for a feasible proposal within the next few years is very high. In the 1980's and even 90's the recreational use of ATVs was just beginning and the organization of the users was lacking. Over the past 3 years the number of organized ATV clubs has more than doubled and the total trail mileage designated for summer use has doubled. Currently, there are five ATV clubs within 10 miles of the forest; two of those clubs



p93019  
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are almost entirely surrounded by the Forest. Alternatives 1 and 4 provide for some summer motorized recreation opportunity. Alternative 4 specifies two specific areas that could be developed for trails. In discussions with WMNF staff and ATV users, it was felt that this alternative was not truly feasible. The Moat Mountain area would present social pressures against such use and the Landaff area is noted (page 3-25) to have soils of concern. Alternative 1 allows for consideration of a trail proposal (up to two areas), which is more in line with the previous policy from the 1986 plan; on a case-by-case basis. The EIS notes that there are some potential impacts from a summer motorized trail system, however the EIS also points out that soil erosion can be reduced by timely application of BMPs and that "...stream turbidity from soil erosion is not a concern with carefully planned activities." (page 3-19). The summary statements on page 3-26 noted that summer ATV use may generate some soil erosion, but well maintained trails and stream crossings should minimize this effect. Your analysis for Alternative 1 states that based on current monitoring it is unlikely that increases in developed areas and trails would lead to violations of water quality standards and that existing standards, when combined with BMPs are expected to be effective for water quality standards. (page 3-42). The EIS notes areas of concern for summer ATV trails, specifically in regard to invasive plant species however notes that it cannot be precisely predicted but only estimated and that only trail edges would likely be subject to this type of vegetation. Threatened and Endangered Species (TES) are noted but only to the extent that any trail proposal would be restricted from any areas with species of concern. One of the arguments made about summer ATV trails

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stated that funding was an issue of concern and as discussed with WMNF staff in previous years, NH has a substantial funding source not only for trail development and maintenance but also for funding of law enforcement patrols. In summary, we feel that the preferred alternative of the EIS draft does not sufficiently address this recreational activity, which is recognized, accepted and promoted in the States of NH and ME. The WMNF encompasses approximately 1/6 of the landmass in this state and it is irresponsible to ignore this recreational activity, the responsible trail users and attempts from State agencies to work with the forest to provide for this type of recreation. The national focus for OHV management on Forest Service lands is for designated use on designated trails. The user group and this Bureau agree with that philosophy. Designate appropriate trails for use and maintain the trails. Prohibiting the potential to review a feasible trail proposal is not management. The trails potential that could be considered under Alternative 1 is a better solution and allows for review of a feasible proposal if one is made.

3. Another major concern of ours is that Alternative 2 allows for only 20 miles of new snowmobile trail within the life of the plan (5% of existing listed mileage). With existing time requirements for EIS reviews of proposed trails, that would feasibly provide for only one trail to be developed with the 10-15 year life of this proposed plan. Due to changes in private landowners, logging activities and other development pressures it is feasible to presume that more than 20 miles of new trail would be needed within the next 10 years to address trail mileage that might be closed due to any of the above-

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mentioned reasons. We would rather see the potential mileage increase to that, which would be allowed by Alternative 1 (30 miles) or Alternative 4 (60 miles). Allowing for the potential increased mileage is not an indication of approval of that many miles of additional trail, just those proposals could be considered if more than 20 miles of new trail was needed in the future. Future development pressures and changes in land ownership will ultimately lead to the use of public lands for more recreational opportunities for all and those recreational opportunities will be the economic life of northern NH. The plan also references the priority to protect, reroute if necessary NH Corridor trails. However, NH Primary trails and club trails could be closed for forestry activity, social or environmental concerns. We would like to see efforts to reroute and protect NH Primary trails as well as Corridor trails. Primary trails serve a valuable function within the winter recreational trail program and are quite often as valuable for protection as Corridor trails. We would like to see language to the effect that "efforts will be made to protect, reroute if necessary, all designated snowmobile trails within the forest."

4. We are also concerned with the proposed management of the so-called Wild River Watershed. The watershed begins in NH and traverses into Maine with the flows leading into the Androscoggin River in Gilead. We recognize this is an outstanding watershed and that it must be managed and afforded some additional protections, however in the 1986 plan there was an allocation for one snowmobile trail to travel an abandoned rail corridor and through the valley connecting Shelbourne, Gilead and Chatham together



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creating a north-south trail corridor in eastern NH/western ME. Several years ago the Forest Service closed the corridor trail through the Wild River Valley, which resulted in the two area trails being combined into NH Corridor 19 and ME ITS 80 along Rte 113. The Maine DOT has not committed to keep that road unplowed and we are concerned that future social and economic pressures may result in that road being maintained for winter travel and the trail will be lost. This trail is the only north-south corridor in eastern NH and is of vital importance to protect. With that in mind, we do not support the current alternative to designate the Wild River watershed as wilderness or roadless unless there is a consideration to allow for a north-south connector trail, such as previously existed under a 5-year permit with 2-year extension. In 1983 an Ad Hoc Advisory Committee recommended that the Wild River area not be designated as Wilderness and the advisory committee recommended the use of the Wild River area for a snowmobile trail. Further, the 1984 NH Wilderness Act directed that the forest not be managed for wilderness designation. The existing snowmobile trail was closed in 1989, with future use placed on hold until the next forest plan. We are asking for this to be addressed now. The only other two alternatives to the former trail were use of Moriah Brook, which was determined not feasible or use of a trail parallel to Rte 16 through Pinkham Notch, which is rugged and predominantly through 6.2 area, presented multiple other problems. There is no guaranteed future for the trail through Evans Notch and as such we want priority placed on designating a north-south corridor trail within NH. None of the alternatives provide for this vital winter trail possibility, however we feel it should be a priority to locate and

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designate this trail, within the NH boundary, to protect the future sustainability of the winter trail system and the economies of the local communities that are affected in this area.

5. We continue to be concerned with the significant increase in the designated "roadless" areas and the potential impacts to existing trails. On page A-6 of the proposed Land and Resource Management Plan, August 2004, it states: "the forest will strive to maintain the integrity of the current snowmobile trail system. Individual snowmobile trails may be affected by roadless criteria and wildlife concerns. The Forest will analyze the impacts of the alternatives on the current system and use of snowmobile trails including the North-South Trails. There may be closures because of social or economic concerns." This comment appears to be contradictory to the statements made in the Roadless Area Conservation Final Rule: Questions and Answers, where on page 9 it says "The final rule will not affect existing access to the National Forests or grasslands for hunting, fishing and other dispersed recreation activities. Nor will it affect off road vehicle use on existing designated motorized trails in inventoried roadless areas." Will existing trails be affected by roadless designation? If so, which existing trails? As noted in concern 3, above, we would like more assurances that existing designated motorized corridors will be protected, whether in roadless areas or developed areas.
6. In regards to more developed recreational areas, on page 3-329, of the Draft Environmental Impact Statement, your narrative does not exactly describe the relationship of the Mittersill Ski Area to the



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Forest or the adjacent Cannon Mountain Ski Area. As written in the Draft EIS, "Lands within this MA are adjacent to existing ski areas, and have been set aside for expansion by current ski area permit holders, after requiring NEPA analysis." Even though we are pleased that the area has been identified as future ski area expansion, Mittersill Ski Area does not currently hold a ski area permit, however, Cannon Mountain Ski Area's Master Development Plan (1998) clearly identifies the need to enter into a land exchange or lease to develop the upper trails and lift terminal. The State of New Hampshire would like to continue pursuing these options.

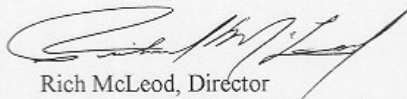
7. Finally, developed recreation in alternative 2 does not permit the redevelopment of campgrounds or trailheads to meet changing recreational trends. Alternatives 1, 3 and 4 refer to "improved" as an option without it being defined. Improvements can be thought of in several ways, different mix of types of campsites or the change of mix of types of parking spaces in parking lot (add more bus spaces for example). The Division believes the option of improvement needs to be included in alternative 2 to be most responsive to the changing recreational trends.

Thank you again for opportunity to comment on this Preferred Alternative for the next Forest Management Plan. We hope you will take our questions and concerns under serious consideration. We look forward to continuing to work with you as the plan works closer to final adoption and approval.

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If you have any questions or comments please feel free to contact our office. We have enjoyed the working relationship that we have had with the WMNF over the past decades and we look forward to increased cooperation and coordination in the future.

Sincerely,



Rich McLeod, Director  
NH Division of Parks & Recreation

RM/cg



Lee E. Perry  
Executive Director

## New Hampshire Fish and Game Department

11 Hazen Drive, Concord, NH 03301-6500  
Headquarters: (603) 271-3421  
Web site: [www.wildlife.state.nh.us](http://www.wildlife.state.nh.us)

TDD Access: Relay NH 1-800-735-2964  
Fax (603) 271-1438  
E-mail: [info@wildlife.state.nh.us](mailto:info@wildlife.state.nh.us)

These Comments are submitted by e-mail, with a follow-up hard copy mailing.

December 17, 2004

Forest Planner  
White Mountain National Forest  
719 North Main Street  
Laconia, NH 03246

e-mail: [wmnfplan@fs.fed.us](mailto:wmnfplan@fs.fed.us)

RE: New Hampshire Fish and Game Department comments  
on the WMNF Draft Forest Plan and Environmental Impact Statement

Dear Forest Planner:

The New Hampshire Fish and Game Department and Commission (NHFG) appreciate the opportunity to submit our comments on the White Mountain National Forest (WMNF) Draft Forest Plan (Plan) and Environmental Impact Statement (DEIS). We complement the WMNF on your thoughtful analysis of the issues, evaluation of alternatives, and the thoroughness of the Forest Plan revision process. We acknowledge the important contribution of the WMNF in sustaining both our state's fish and wildlife populations and the public's access to these resources for hunting, fishing, viewing and other related activities. Further, we recognize the importance of the Forest Plan in setting the management direction that allows the WMNF to maintain and provide these benefits.

We support the WMNF selection of Alternative 2 as the preferred alternative, with the modifications we suggest below. Alternative 2 provides the most appropriate mix of management area allocation, timber production, habitat management and recreational opportunities of the four alternatives analyzed. Overall, we agree with most of the plan. However, we have a number of comments, presented below, that address areas of concern, specific goals,

proposed standards and guidelines, and vegetative composition objectives. We have provided topic headings and direct references to sections of the plan to assist your review of our comments.

Biodiversity and Vegetative Composition

We support and advocate for a strong WMNF role in maintaining regional biological diversity. While there is much in the draft Forest Plan that promotes biodiversity, such as the described coarse and fine filter approach, vegetative composition goals, and managing within site capability, there is one area that concerns us. The WMNF does not seem to acknowledge the full importance of the aspen community type and other early successional habitats in sustaining regional biodiversity, nor the significant role that the WMNF can and should play in maintaining these vital habitat components.

In the Need for Change section of the Executive Summary, the paragraph on wildlife habitat management states that “others believe not creating young habitat limits wildlife diversity”. The tone of this sentence implies that these “others” are reflecting personal opinion, when in fact there is a significant body of scientific research demonstrating the importance of early successional habitats in sustaining regional wildlife diversity, including many uncommon or declining species. Further, we feel that, as manager of the largest block of public land in New England, the WMNF has an important leadership role in sustaining the full range of habitat diversity by applying wildlife science to land management, by demonstrating the proper application of silvicultural techniques to achieve identified wildlife objectives, and in educating people on the relationships between forest management, wildlife habitat and population dynamics.

The Plan and DEIS correctly state that much of the aspen-birch habitat type across the Forest will decline and be lost over the next 20 years. Yet the Plan fails to recognize this as a concern. We are concerned about this deficiency. Many of the wildlife species on the WMNF utilize these habitats. Across the region, a number of species associated with early successional communities and forest types are declining. From its position as a public agency, able to plan and implement long-term sustainable management, we would hope the WMNF would feel the obligation to enhance habitat quantity and quality for these species.

To that end, we strongly recommend separating aspen from birch in the vegetative composition goals and, at a minimum, maintaining the percentage of these forest types at the levels identified in Alternative 1 and the 1986 Forest Plan. Further, to begin to compensate for the significant loss of these forest types from the 54% of the WMNF not available for vegetative management, we recommend the WMNF identify all suitable stands in Management Area 2.1 that have the capability to be managed to sustain aspen (primarily) and birch community types. In the interest of biological diversity, achieving the aspen composition goal of Alternative 1 should be a management priority.



Discussions of age class objectives within the plan should acknowledge that many of the wildlife species on the WMNF have habitat requirements that are disturbance related. A few are tied to a particular age class or type, but many use or require regenerating or early successional forest as principal components of their home range. Recognizing this provides support for age class objectives that include adequate amounts of regeneration and early successional forest types, particularly aspen communities.

#### Regional Wildlife Conservation Initiatives

New Hampshire and Maine, along with all other states, are developing Comprehensive Wildlife Conservation Strategies, as mandated by Congress through the State Wildlife Grants program. These strategies will be directed at species of greatest conservation concern, including many that occur on the WMNF. Early successional and other significant habitats are also being addressed. In addition, several other regional wildlife conservation initiatives, such as Partners in Flight and Bird Conservation Regions, have established (or are developing) species and habitat goals for landscapes that include the WMNF. The sections of the Plan on wildlife, biodiversity, and rare and unique features should acknowledge these initiatives and address the WMNF role in partnering with them to achieve common goals and objectives. Further, the role of the WMNF in supporting the objectives of the NH Forest Resources Plan, developed with input from NHFG and the Forest Service, should also be acknowledged.

#### Timber Harvest Volume

We support the timber harvest volume recommendation made by the NH Timberland Owners Association. That approach sets the allowable sale quantity (ASQ) at 24 MMBF/yr for the first five years of the plan. It then increases by 2 MMBF/yr for each following five year period, so that in years 16 through 20 of the plan the ASQ is 30 MMBF/yr. A phased approach such as this provides the WMNF with an opportunity to build capacity to achieve a higher ASQ. The higher ASQ may provide an opportunity to better address the aforementioned early successional forest concern while still harvesting at a level below forest growth.

#### Recreation and Wildlife

The Plan recognizes that recreational use of the WMNF will continue to change and to increase, and that recreational activities need to be managed to prevent unacceptable ecological impacts. However, these ecological impacts are not well identified or defined. NHFG is concerned about the actual and potential impacts of recreation on wildlife habitats and populations. The Rare and Unique Features and, to a lesser degree, the Wildlife sections of the DEIS Environmental Effects Chapter do discuss potential recreational impacts on certain wildlife. However, we don't perceive that the Plan and DEIS sections on recreation



recognize or address recreational impacts to wildlife, including monitoring of and responding to concerns, and identifying proactive strategies for correcting or mitigating adverse effects. We are concerned that some levels, locations and types of recreational use may already be too high for some wildlife species to fully utilize available habitat, or for others, such as lynx, to re-colonize the WMNF.

Recreation on most of the Forest is directed at dispersed semi-primitive activities. However, hunting and fishing are seldom mentioned in the Plan. When they are, it is in the context of wildlife rather than recreation. The irony is that there are few recreational activities that better fit a dispersed semi-primitive philosophy more than hunting and fishing. The Plan should acknowledge the importance of hunting, fishing and other wildlife associated recreation on the WMNF, and recognize that as opportunities to pursue these activities diminish elsewhere due to development and land posting, the WMNF will be increasingly sought out as a place to conduct these activities. Related to this is a need for the WMNF to address access for public hunting and fishing, as well as for habitat management operations, in road management decisions.

We are concerned about a permanent prohibition against summer motorized trail development. While acknowledging that currently the time may not be right for authorizing this activity on the WMNF, there may be a point in the future when OHRV technology, rider ethics and accountability, social acceptance, wildlife and natural resource concerns, and WMNF funding would allow consideration of this activity. It may not even be during this planning period, but we urge flexibility in leaving the option open for potential future consideration of summer motorized trail use.

Both the Plan and the DEIS sections on motorized recreational trails, whether they are summer or winter, do not appear to contain language preventing these trails from being placed in critical wildlife habitats such as deer wintering areas. Further, monitoring of summer motorized trails should include assessing impacts on wildlife, particularly during the breeding season, in those habitats.

#### Additional Wilderness

We do not feel that the DEIS and Plan present a compelling case for recommending additional wilderness on the WMNF. There are no identified wildlife populations, natural resources or recreational activities that depend on additional Congressionally designated Wilderness for their continued sustainability or that, in our opinion, would be better managed as Wilderness than they can be in their current management area designation. What Congressional designation as Wilderness would do, however, is permanently remove these acres from future assessment of social or environmental need.

We don't believe that recommending additional Wilderness to spread out increased public use is a sound approach to either Wilderness designation or Wilderness recreation management. Particularly when that designation may lead to tradeoffs in other management options and is likely to be just a temporary solution. The DEIS acknowledges that the recreation value of solitude and unconfined recreation is not unique to Wilderness and may be found in other management areas on the forest (p.3-337).

We also do not support the argument that additional valley bottom should be added to designated Wilderness just because this land type association (LTA) is not proportionally represented in Wilderness on the WMNF. With 22% of this LTA currently in management areas in which vegetation changes primarily through natural processes (Figure 3-03), we feel it is adequately represented. Note that we would also oppose making this same argument for expanding vegetative management into Moutaintop and Upper Mountain Slope LTAs, where these management areas are under-represented.

#### Scenery Management and Wildlife

We agree that scenic resources are important to overall management and should receive equal consideration with other basic resources of the land (DEIS, p.3-379). However, it seems to us that the forest-wide management direction and the standards and guidelines by Management Area, as written, require that scenery management objectives ultimately take priority over other natural resource objectives. There is no indication that wildlife habitat composition goals and spatial considerations are equally factored into scenery management decisions. We do not support scenery as the top priority, at the exclusion of other resource considerations, when making management decisions on MA 2.1 lands.

We further suggest that by trying to "hide" timber harvesting the WMNF is missing an opportunity to educate the public about the appropriate role of land management and silviculture in the conservation of natural resources. For example, we support the WMNF vegetation management and wildlife standards and guidelines in Management Area 8.3, Appalachian National Scenic Trail, that allow commercial timber harvesting where MA 8.3 is adjacent to MA 2.1. We also encourage the WMNF to explore opportunities to expand vegetation management into other suitable sections of MA 8.3.

Specific Comments on Proposed Land and Resource Management Plan

GOALS OF THE WMNF PLAN

Rare and Unique Features:

Gray Wolf: As wolves do not currently exist on the WMNF and no restoration effort is anticipated, we recommend that any discussion relative to future management be deferred and addressed as an amendment to the Plan.

Bicknell's Thrush: Only the objective for Bicknell's thrush identifies human activity levels as a factor that may limit goal attainment, even though levels of disturbance from human activity may limit the recovery or expansion of other rare species, such as lynx. Suitable habitat may not be all that is needed.

Canada Lynx: The goal for Canada lynx should acknowledge that high quality foraging habitat means an abundance of snowshoe hare and their associated early successional habitat.

Recreation:

The objectives should include recreational user impacts to natural resources as a factor in the "limits of acceptable change" equation.

The winter motorized and non-motorized dispersed recreation goals should include the protection of sensitive or significant habitats, such as areas with potential for threatened, endangered or sensitive species (TES) and deer wintering areas.

Scenery Management:

Scenery management goals and Scenic Integrity Objectives should be coordinated and integrated with the vegetative composition goals and wildlife habitat needs. Scenic concerns should not over-ride other natural resource concerns.

Wildlife:

The stated goals and objectives are good, although objective 4 is vague and arbitrary, especially considering the habitat needs of most species inhabiting the WMNF. Also, the objective may potentially conflict with current day laws relative to management of TES species.

We suggest adding an objective that the WMNF land management will cooperate with regional wildlife initiatives, including the New Hampshire and

Maine's Comprehensive Wildlife Conservation Strategies, Partners in Flight, Bird Conservation Region goals, and other regional wildlife conservation initiatives.

We do not support an objective to maintain aspen-birch and wildlife openings at existing levels in MA 2.1. As correctly stated in the Plan, the aspen-birch component across the WMNF will decline significantly as Management Areas other than 2.1 advance toward old forest conditions. Every effort should be made to compensate for this loss by identifying all suitable stands in MA 2.1 that can be managed to promote an aspen community type. Note that aspen should be favored over birch in MA 2.1. The composition goal for aspen in the 1986 Plan and Alternative 1 (not aspen-birch) should be considered a minimum goal. Given the apparent age of existing stands across the WMNF, achieving the aspen composition goal in the shortest possible time should be a priority.

This section provides the only reference to the concern about recreation impacts on wildlife. It should also appear in the standards and guidelines and in sections discussing recreation.

#### FOREST-WIDE MANAGEMENT DIRECTION

##### Geological Resources:

Habitats of TES species should not be disturbed for mineral extraction.

##### Lands:

Should outfitters/guides be included in the special uses section of Land Use Authorizations?

##### Rare and Unique Features:

TES Species: S-1 is good and provides broad protection.

TES Species: S-2 provides good protection. We suggest clarifying land uses to include "...and recreational activities..." in the last sentence of the paragraph.

Canada Lynx: This is a very comprehensive set of standards and guidelines. We suggest that comparable standards and guidelines be developed for other key species. In S-3a, unsuitable condition should be defined. In S-3b, good lynx habitat is closely connected to snowshoe hare availability. While opportunistic in their prey selection, alternate prey will not compensate for a lack of snowshoe hare. The standard should not imply otherwise. In G-7, the word "hare" is missing.

Recreation:

Developed Recreation: A standard should be added that adverse impacts to wildlife and other natural resources must be assessed and avoided.

Motorized Dispersed: A standard should be added that sensitive habitat and deer wintering areas shall be avoided. See related guidelines in the section on lynx in Rare and Unique Features.

Summer Motorized trails: We support not opening the WMNF to summer motorized trails at this time. Direct and indirect impacts to wildlife and habitats are generally unstudied but believed to be potentially significant.

Non-motorized Dispersed: In General G-1, the phrase “should be managed” is unclear and should be changed to “shall be managed”. S-2 under Trails is good; how is it monitored?

Special Uses – Recreation Specific, S-3: Dog training field trials, currently allowed on the Forest by special permit, should be added to the list of exceptions to this standard.

Riparian and Aquatic Habitats:

G-3 and the last sentence of G-2 are good exceptions to the restrictions in G-1 and G-2.

Roads:

Road Management, G-1: This guideline needs language related to providing hunting and fishing access. Gates are closed, sometimes on paved roads, that limits access for dispersed recreation even though the road is suitable for public motorized use. G-6: A needs assessment for decommissioning a road should consider the need for hunting and fishing access. We would like to work with the WMNF in the development of road closure guidelines that can address these concerns.

Scenery Management:

G-1, in effect, states that scenic integrity objectives over-ride all other land management objectives. We do not agree with this philosophy. Vegetative composition and wildlife habitat objectives, that may be equally or more important in specific situations, need to be factored into the decision making before scenic concerns determine that a proposed management activity cannot go forward. This should be reflected in the standards and guidelines.



Vegetation Management:

The limit of a maximum size of 30 acres for openings created by even-aged management is arbitrary and has no biological basis. Occasional larger openings will add diversity to the landscape and to wildlife habitats, as well as fit with natural disturbance patterns.

Wildlife:

Habitat Management: In S-6, a 66 ft undisturbed buffer is not adequate around an active raptor nest. Nesting woodland raptors are generally very sensitive to disturbance. This standard should be revised. Good Forestry in the Granite State offers recommended practices that should be adopted here.

G-2 should acknowledge that converting a stand to aspen increases vegetative composition diversity, which frequently is more important than any reduction in within stand tree species diversity.

Revise G-7 to read "shall be" rather than "should be".

G-8 should also be added to the road management section.

G-9 needs to be strengthened. Surveys from elsewhere indicate wind turbines are a significant mortality concern for birds and bats. Detailed study and effective mitigation must be required prior to approval of any of these facilities on the WMNF.

G-10: Effective mitigation should be required, not merely considered.

Wildlife Reserve Trees: Bear clawed beech trees indicate a key mast resource. A separate guideline should be included to ensure their retention.

MANAGEMENT AREA DIRECTION

MA 2.1 – General Forest Management:

Desired Condition: The second paragraph states that openings will occur "consistent with scenic objectives". Many, perhaps most, openings are created and maintained for wildlife, yet wildlife objectives are not mentioned here. Hunting and fishing should be added to the list of recreational activities in the fourth paragraph.

Recreation: We support the concept outlined in G-1.

Scenery management: Is G-1 coordinated with the vegetative composition goals, or does it over-ride them? It appears to be the latter, which we do not agree with.

MA 5.1 – Wilderness

Riparian/Aquatic: In S-1, consider allowing reintroduction of indigenous/native/heritage strain brook trout in streams when desirable to restore ecological integrity.

MA 6.1 – Semi-Primitive Recreation:

Wildlife, S-1: We do not agree with prohibiting the maintenance of wildlife openings, particularly when some vegetative management for recreation and salvage can occur.

MA 7.1 – Alpine Ski Areas

Wildlife, S-1: We don't agree with prohibiting maintenance of wildlife openings in this MA, which is heavily impacted by human activity and management. In the off-season, ski trails provide wildlife openings and should be managed as such. This same comment pertains to MA 9.2 – Alpine ski Area Expansion.

MA 8.2 – Experimental Forests

Wildlife, S-1: This standard should be similar to the guideline for vegetation management, habitat can be manipulated only to meet research objectives.

MA 9.1 – Recommended Wilderness

Riparian/Aquatic: If additional Wilderness is recommended, S-1 should consider allowing reintroduction of indigenous/native/heritage strain brook trout in streams when desirable to restore ecological integrity.

MONITORING AND EVALUATION

Management Indicator Species

The second paragraph states that the management direction pertaining to MIS populations and habitat must be monitored to determine consistency with predictions. There is no discussion, however, of what actions will be taken if the results of monitoring are not consistent with the predictions in the EIS.

Again, we appreciate the opportunity to provide the comments above. Please do not hesitate to contact us if we can provide additional information, or if you have questions on any of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee E. Perry". The signature is fluid and cursive, with the first name "Lee" and last name "Perry" clearly distinguishable.

Lee E. Perry  
Executive Director

December 17, 2004

Forest Plan Revision  
White Mountain National Forest  
719 Main St.  
Laconia, NH 03246  
Via email: wmnfplan@fs.fed.us

Dear Members of the Planning Team:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Proposed Land and Resource Management Plan for the White Mountain National Forest (WMNF).

The Division of Forests and Lands in the Department of Resources and Economic Development (DRED), State of New Hampshire is charged by state statute (RSA 227-G:3 I.(a)) to: “Execute all matters pertaining to forestry, forest management, and forestlands within the jurisdiction of the state...” In addition, the Department is also charged by statute as follows:

**12-A:2-i Multiple Use Management of White Mountain National Forest Land.** – The commissioner of the department of resources and economic development, or designee, shall have the authority and responsibility to consult and work with the United States Department of Agriculture Forest Service in order to promote and maintain continued multiple use management of White Mountain National Forest land. **Source.** 1999, 142:6, eff. June 25, 1999.

The following comments from the Division of Forests and Lands will focus primarily on timber harvests, wildland fire, wilderness and biodiversity. For specific comments on recreation we refer you to any comments submitted by the Division of Parks and Recreation in DRED. For specific comments on wildlife, we would refer you to comments submitted by the New Hampshire of Fish and Game Department.

The WMNF is by far the largest single forestland ownership in the state. How the forest is managed not only has a significant impact on the quality of life of citizens and the state’s economy but is significant in defining the relationship that the state’s citizens and visitors have with the land.

The Division of Forest’s and Lands generally supports Alternative 2 with four primary areas of concern:

1. The reduction in timber harvest levels in the plan to 24MMBF,
2. The justification for additional wilderness designation,
3. Treatment of wildland fire, and
4. The analysis used for biodiversity.

#### 1. Timber

The North East State Foresters Association published the Economic Importance of New Hampshire’s Forests in 2001. The direct value of New Hampshire’s forest based manufacturing and forest related tourism and recreation was calculated at \$2 billion. Each acre of forestland in New Hampshire is estimated to contribute \$421 per year in economic activity, \$313 per acre per year in forest based manufacturing alone. The economic opportunity that the acres in the WMNF represents to the forest products industry based upon these numbers could exceed over \$200 million per year. And, according to the NH Forest Resource Plan, for each one dollar of value in a standing tree, the forest products

sector adds an average of \$27 and the pulp and paper industry adds value to a cord of pulpwood by a factor of 50.

The size of the WMNF in combination with the quality of the timber and the sustainable way in which timber is produced makes it the single most important ownership in New Hampshire supporting the forest products industry into the future.

We believe that the WMNF can and should support a timber harvest closer to the 35 MMBF than 24MMBF. The reasons are as follows:

- a. The information points to a forest that is very well stocked. (EIS page 3-92): “In each of the community types, the overwhelming majority of the acreage is in mature and overmature age classes. EIS Page 3-100: “The most recent NH Forest Inventory and Analysis conducted in New Hampshire indicates that the quality on the National Forest is unusually high.”
- b. EIS Page 3-111. The EIS notes that more coordination would be required with the harvest activity levels under Alternatives 1 and 4 but does not go so far to say that it is incompatible.
- c. EIS Page 3-115. We question the suppositions under cumulative effects on Page 3-115 regarding marginally operated stands. The concern that harvests will end up in marginal stands and not be bid upon should not drive the ASQ as much as it appears to here. Both pulpwood from low value stands and high valued sawlogs are needed to support the forest products industry. The ASQ should not presuppose one end of the spectrum or the other of market conditions, logging capacity, budgets etc. A target should be set based upon the capability of the land to produce the volume sustainably, compatible with the multiple uses of the forest. In hardwood harvests would 20%, 15% or even 10% sawlog yield be unacceptable in the marketplace?
- d. In addition, the mature condition of the forest begs the question how many marginally operational stands would have to be operated. And if marginal stands are the focus of treatment, can they be bid out with higher valued stands to create economically viable operations? We do not agree that it is important to sacrifice volume for the more selectivity in sale design and overall program marketing. A balanced combination of high quality logs and low quality stands could result in greater harvest volume than currently proposed. This all suggests a range of volumes to establish an ASQ or several ASQ’s identified in the plan that are defined by certain assumptions and conditions in the marketplace. No one should criticize the WMNF for trying to sell wood to a market that is not there.
- e. The EIS notes on page 3-117 that the market for chips remains uncertain and that haul costs may be too high to the new Schiller Station in Portsmouth. This may be true but it does not account for the ripple affect and product substitution in wood markets. First, when pulpwood markets are good and chip markets are poor, bolewood can move as pulp instead of chips. The converse is also true. Secondly, the purchase of wood closer to the Schiller Station has a ripple affect on remaining wood supply. Competition exists where purchasing radii overlap. However the purchasing radii may extend in different directions. So if mills that compete with Schiller at their southern procurement regions area can get the wood up north instead of further south, they will. This has the effect of bring the Schiller market closer to the WMNF.
- f. The point on page 3-118 in the EIS is an important one to remember “While pulpwood is not as valuable as sawtimber it is an important resource for mills in both Maine in New Hampshire.” The value added for pulpwood is actually higher than sawlogs as noted above. Harvesting low grade stands for pulpwood will also allow for over all improvement of timber quality.
- g. It appears that the level of harvest may not have been achieved in the 1986 harvest because of the substantial amount of un-evenaged management that was to be implemented. New



silvicultural techniques would allow the substitution of un-evenaged management for even aged management.

- h. The EIS acknowledges land use change in the region and that one of the roles of the WMNF is to provide benefits not provided elsewhere. The WMNF will play an increasingly important role in providing a sustainable source of timber under scientifically applied principles of forest stewardship.
- i. Since the 1986 Forest Plan, the capability of the logging industry, both professionally and technologically, have improved greatly.
- j. There is a substantial road system in place.

## 2. Wilderness

We support the general concept of additional wilderness to WMNF in combination with substantially less reduction in the ASQ. Public lands are managed under a social license that is influenced by public perception. The 30% reduction in ASQ in combination with the increase in wilderness is not creating the right public perception. However, maintaining a higher ASQ and proposing wilderness is sending the right message: many uses continue to be compatible on the WMNF.

With respect to the Wilderness areas discussion in the EIS we would like to confirm to what degree their ecological functions were considered in their selection. Comments on this subject also follow in the section on Natural Heritage. If the selection was based predominantly upon recreational use it makes us wonder if the benefits provided to the public could be realized through designation in MA 6.2 without a Congressional Designation that is unlikely to be reversed and removes flexibility in future planning. And for wilderness areas that are selected we would urge you to be true to the concept.

## 3. Wildland fire

We support a prescribed fire program and leaving fires under certain circumstances in a monitor status. Our concern is whether it is a lightning strike or a prescribe fire is civilians, fire towers and air patrols people will be calling in on the smoke, If a report was to occur the local towns would respond for suppression of the fire incurring suppression costs. We would suggest that the Division of Forests and Lands as well as the local area dispatch be notified of any fires to prevent an unnecessary response from the State and town. This may be covered already in the Fire Management Plan or other guiding documents but we wanted to bring this issue to your attention. I hope that will be of assistance.

## 4. Biodiversity

WMNF Coarse filter approach (EIS pp. 3-2 to 3-4). The first two paragraphs of “Conservation Approaches” describe the coarse and fine filter approaches where coarse filter includes communities and the processes and species associated with them, and the fine filter picks up species not picked up by the coarse filter. However, the Plan goes on to describe how the WMNF approach does not follow this - that is, the WMNF coarse filter includes only common communities, but does not include rare, uncommon and “naturally restricted” natural communities (it leaves it to the “fine-filter” addressed through Standards and Guidelines – see below). This is not only inconsistent with the WMNF’s own definition of coarse and fine filters approaches in the first two paragraphs, but advocates a different approach than followed by other practitioners of the coarse filter approach (e.g., Stein et al. 2000, Jenkins 1996) – the basic premise of which is to protect high-quality examples of *all* types of natural communities, including rare and common ones.

The WMNF coarse filter focuses on protecting common communities through habitat composition and age-class objectives. Although communities are the intended focus of this coarse filter approach, there

is no mention or attempt to reference an actual classification of communities or specifically described communities for the WMNF. There is a plethora of information available on communities on the WMNF by the NH NHB, the Maine Natural Areas program, and the National Vegetation Classification system (NVC). Although the EIS would seem to suggest that ELTs and habitat types are equivalent to or adequate surrogates for natural communities, we have found that there are significant differences that warrant the specific utilization of natural communities as the basis of measurement. Further, there are many exemplary natural communities recorded in the NH and Maine natural Heritage databases that are not specifically considered as warranting protection. These exemplary natural communities represent the best known examples of these forests in the WMNF - their protection ought to be addressed in the plan, either through adjusting their MA status or through Standards and Guidelines for exemplary natural communities.

The Plan leaves the conservation of rare spp and rare to uncommon and “naturally restricted” communities (the WMNF “Fine filter”) to protection under Standards and Guidelines for “outstanding exemplary natural communities”. The plan goes on to conclude that “old growth enriched hardwood forest” and “calcareous cliff” communities are the only two communities on the Forest worthy of specific protection under Standards and Guidelines for exemplary communities.

First, “old growth” describes the condition of a forest, one of the aspects of the *quality* of a community, but is not an actual community type itself. It does not address why this is the only type of old growth forest on the WMNF deserving of special protection. Additionally the vast majority of enriched hardwood forest on the WMNF is probably not old growth.

Second, the selection of only two communities for specific protection is an inadequate approach to protecting the diversity of natural communities on the WMNF. The other uncommon to rare natural communities were eliminated from consideration because: “a) they are too common; b) they don’t occur; or c) they are addressed elsewhere in the revision effort.” There is no mention or reference to what the communities are that were considered and which ones were eliminated for what reason. Further, this rationale does not address the fact that some of the natural communities that were eliminated from consideration are uncommon to rare. While some of these may be considered through the Species Viability approach, the plan does not have any specific protections for exemplary occurrences of these communities themselves, particularly if they do not harbor any sensitive species.

There are several erroneous references and assumptions about the communities on the Forest, particularly that many of these communities occur only as individual trees and not as communities. For example, trees such as red pine, red oak, and pitch pine all occur as components of specific natural communities on the Forest, and as such, should be reconsidered. Further, the list of communities that was consulted was a key to the *upland* communities only, and contained no descriptions that refer to distribution and rarity. In referring only to this document, no consideration was given to open or forested wetlands on the Forest in this same way. We recommend that the “Natural Communities of New Hampshire” be considered as the most comprehensive and up-to-date document for natural communities on the WMNF (Sperduto and Nichols 2004). This classification is comprehensive and will serve both the NH and ME portions of the Forest (although the corresponding Maine classification should also be consulted for the status of and variation in the equivalent communities in the state of Maine).

A quick GIS analysis by NHB staff indicates that most of the exemplary natural communities on the current 2.1/3.1 lands remain largely in general Forest management lands (2.1/3.1) in the various Alternatives, and were not specifically considered in designing the MA allocation for any of the

Alternatives (although the proposed Wild River Wilderness Area does include a number of exemplary natural communities that would benefit from this designation). Most of the exemplary and non-exemplary examples of communities restricted largely to low elevation landscapes remain in disproportionately high amounts in the timber base and not well represented in non-extractive MAs (e.g., 5.1, 6.1, 6.2, 8.4, 8.5).

The following natural communities currently occur largely on and will remain largely on 2.1 lands under the preferred alternative (Alt 2), reflecting the fact that these communities are found only or primarily in low elevation landscapes on the WMNF (these are described in “Natural Communities of New Hampshire”, Sperduto and Nichols 2004).

Communities for which all or nearly all exemplary occurrences and acreage occur on 2.1 lands (Alt. 2):

- Hemlock - beech - oak - pine forest
- Hemlock - spruce - northern hardwood forest
- Lowland spruce – fir forest
- Semi-rich mesic sugar maple forest
- Balsam fir floodplain/silt plain
- Sugar maple - ironwood - short husk floodplain forest
- Mixed pine – red oak woodland
- Pitch pine - scrub oak woodland
- Red spruce swamps
- Northern hardwood - black ash - conifer swamp
- Forest seep
- Northern hardwood seepage forest
- Northern white cedar – hemlock swamp
- Northern white cedar seepage swamp
- Medium level fens
- Poor level fen/bogs
- Kettle hole bogs
- All riverbank communities
- Rich mesic forest (more than half of acreage & occurrences occur on)

## *White Mountain National Forest — Final Environmental Impact Statement*

About half the occurrences or most of acreage occur on 2.1 lands:

- Red oak - pine rocky ridge
- Dry red oak - white pine forest
- Sugar maple - beech - yellow birch forest
- Rich red oak rocky woods
- Montane basin marshes

We suggest that the Plan consider (regardless of which Alternative is chosen) protecting exemplary natural communities in the ME and NH Heritage databases through adjustment of Managed Area designation where possible, or through consideration under the Standards and Guidelines for outstanding exemplary natural communities. Even without considering specific locations of exemplary natural communities, there appears to be little consideration of natural communities restricted largely to low elevation landscapes features directly in MA allocations in the various Alternatives and Wilderness Area designations.

Further, we recommend that the plan recommend that the Forest consult with the State Natural Heritage programs (NH Natural Heritage Bureau and Maine Natural Areas Programs) when managing lands in or proximal to exemplary natural communities, WMNF sensitive species and other state-listed rare species. This would be equivalent to the WMNF's stated obligation (Plan p 2-8) to coordinate with the State Historic Preservation Offices in protecting the state's cultural Heritage.

Alpine and subalpine areas, by WMNF definition, occur on many other peaks than just the Presidential and Franconia Ranges, although they are not being mapped as their own MA units. We suggest that if they are indeed not mapped as their own MA, they still qualify definitionally and ecologically and should benefit from the same Standards and Guidelines as the larger alpine areas.

### General Comment

The composition objectives and projections for the property should be presented two ways, for MA 2.1 (and 3.1) to support management decision specific to these MA's and then for the forest as a whole. Presenting structure and composition goals for only a portion of the property does not accurately represent the condition of the property as a whole and the true impact of the plan.

In closing, the management of the WMNF will continue to have great influence in defining our relationship with the land. Since the plan in 1986, the Northern Forest Lands Council completed Finding Common Ground to address changes in the landscape. In that report they state that: "As members of a society that consumes the greatest percentage of the world's natural resources, we have a moral and ethical responsibility to use our own resources, use them efficiently, and conserve them for future generations." We believe that this principle sets an important context for dealing with issues outlined in the plan.

Thank you for the great work you have done and we wish you the best as you bring the plan to completion (and implementation). If we can be of any assistance, please let me know.

Philip A. Bryce  
Director  
NH Division of Forests and Lands

PR-3016

## Office of the Selectmen

130 Durand Road • Randolph, New Hampshire 03593 • Tel: (603) 466-5771



November 29, 2004

RECEIVED DEC - 2 2004

Forest Plan Revision  
White Mountain National Forest  
719 Main Street  
Laconia, NH 03246

To whom it may concern:

The Selectmen of the Town of Randolph, NH, a town with over a third of its area part of the National Forest, would like to go on record as supporting the Forest Service's choice of Alternative 2 of the Proposed Forest Plan Revision.

The National Forest represents a key part of Randolph's history and character. Randolph still draws a large number of summer visitors attracted to the opportunity to hike and enjoy nature, to say nothing of the beautiful vista provided by the Northern Presidentials. The region and the Town are also important suppliers to the paper and forest products industry, so we strongly support the multi-use nature of the plan, including winter motorized use where appropriate. As you may know, the Town of Randolph owns a 10,000 acre Town Forest which abuts the National Forest Lands to the North and supports just such a diversity of use.

We would like to point out that we feel that the National Forest lying South of US Route 2, which forms the Northern slopes of Mt Madison, Mt Adams, and Mt Jefferson should be left untouched by harvesting activities and wheeled motorized recreational use. This scenic and historic area, whose recreational users from Randolph significantly contributed to the passage of the Weeks Act, should be left as natural as possible, catering to its traditional uses of hiking and camping.

Thank you for your consideration of our desires.

Sincerely,

The Randolph Board of Selectmen

Kenneth R. Lee, Chairman

John W. Turner

Sara B. Glines



PR-5626

RANDOLPH CONSERVATION COMMISSION  
Randolph NH 03593

14 December 2004

RECEIVED DEC 17 2004

Forest Planner  
White Mountain National Forest  
719 N. Main Street  
Laconia NH 03246

Re: Forest Management Plan

We are pleased to comment on the proposed plan Preferred Alternative #2. We agree with your recommendation with additional thoughts.

As a north country town where the WMNF owns over 44% of our total land area, we are acutely aware of the land uses, both allowed and prohibited. We believe that the health of the Forest, within and adjacent to Randolph, has both economic and mental/restorative dimensions. Yes we want the Forest to permit sustainable timber harvesting at essentially the same level as the current plan permits. Yes, we agree with the prohibiting of summer motorized trail use. Perhaps in another plan this stance could be modified when the users have demonstrated that they can operate without degrading the Forest's trails. Yes, we favor the Forest permitting a wide range of recreational uses which do not degrade the Forest. The disjoint here, as you note in the report, is the need for "additional resources allocated on overall education, monitoring and visitor information". More permitted uses=more people=more usage=more erosion of site and trail. Degradings can lead to prohibition and/or policing. We believe that investment in visitor education is the better trade-off than more "cops on the beat". We believe that most users want to do "right". We must all help them know "right".

We support your choice of Alternative #2 as a balance resolution to the Plan for the next 10-15 years.

For the Commission,

  
James H. Meiklejohn, Chair

**Tamworth Conservation Commission - PR-985**  
**Tamworth, NH 03886**

p9 1082

**To:** Forest Planner  
WMNF  
719 N. Main Street  
Laconia, NH 03246

November 8, 2004

**From:** Tamworth Conservation Commission  
Tamworth, NH 03886

**Subject:** Review and Comments on  
**The Proposed Land and Resource Management Plan, and the**  
**Draft Environmental Impact Statement**

The Tamworth Conservation Commission (TCC) commends the U.S. Forest Service for the work it has put into the developing this draft plan, and for seeking public involvement throughout the planning process. We hope that you will consider our suggestions and recommendations for your final plan.

Based on an initial reading and analysis of the draft plan, the TCC offers the following comments and observations:

**The Tamworth Conservation Commission supports continuing multiple use of the forest. The majority of the Commission encourages stronger protection for large, wild places. The Commission believes the most appropriate overall management plan would combine the land allocation scheme of Alternate 3 (herein after referred to as “#3”) with the timber and wildlife habitat management approach of Alternate 2 (“#2”).**

The land allocations scheme of #3 provides significantly stronger protection to large, wild places in the WMNF than the other proposed alternatives. It is the only alternative that increases the amount of land on the forest that would be managed as natural area. The majority of the TCC supports the level of new Wilderness proposed in this alternative, as well as the increased protection of the other parts of Inventoried Roadless Areas through reallocation to management areas intended to maintain natural forest ecosystems. At the same time, the timber and wildlife habitat management approach of #2 creates certain benefits (including greater maintenance of early-successional wildlife habitat and greater marketability of timber sales) not provided by #3.

**The TCC believes the plan would be significantly strengthened by a provision that would define the possible construction of new roads in those portions of the Inventoried Roadless Areas allocated to General Management.**

PR-985  
P9 2012

**We strongly support the prohibition on ATV use that is common to #2 and #3! and strongly oppose the allocation in #4 of certain parcels for ATV use!**

**We support the general approach to recreational management that is common to #2 and #3.**

We believe this is an appropriate approach that maintains the current balance of recreational use that allows for some increase in use while providing oversight aimed at avoiding degradation of both recreational experiences and the natural environment on which these experiences depend.

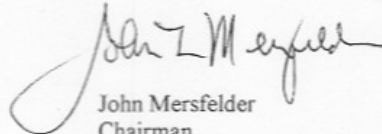
We support the designation of new management areas that will allow for the development of specific standards and guidelines for the Appalachian Trail (AT), the alpine zone and the Wildcat River Wild and Scenic River corridor.

**In Summary:**

Based on our review of the Proposed Land Management Plan and Draft Environmental Impact Statement for the White Mountain National Forest, the Tamworth Conservation Commission favors the timber and wildlife management approach offered in #2 (the Forest Service's Preferred Alternative), and we would recommend that it be combined with the land allocation scheme of #3, which provides significantly stronger protection for large, wild places in the WMNF than the other alternatives.

Please feel free to contact us if we may be of any further service in support of your efforts to encourage responsible recreation, conservation and proper land use management.

Yours truly,



John Mersfelder  
Chairman  
Tamworth Conservation Commission

CC: Tamworth Board of Selectmen  
Tamworth Planning Board





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

PR-5915

79 1 of 4

December 14, 2004

OFFICE OF THE  
REGIONAL ADMINISTRATOR

RECEIVED DEC 2 2004

Barbara Levesque, Forest Planner  
White Mountain National Forest  
719 Main Street  
Laconia, New Hampshire 03246

Re: Draft Environmental Impact Statement for Forest Plan Revision White Mountain National Forest Eastern Region (EPA ERP # AFS-B65011-00)

Dear Ms. Levesque:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Forest Service's (FS) Draft Environmental Impact Statement (DEIS) for the White Mountain National Forest (WMNF) Eastern Region Plan Revision (Forest Plan). We reviewed the DEIS with an emphasis on how the alternatives discussed in the proposed Land and Resource Management Plan, if implemented, would affect water and air quality.

The DEIS describes four alternatives developed by the FS for management of the 794,000 acres of land that comprises the White Mountain National Forest in New Hampshire and Maine. The current forest plan was adopted almost twenty years ago. The current effort to revise the plan is intended to incorporate new information about the forest and changes in conditions and use since the development of the existing plan. In addition to the opportunity to review the DEIS, EPA appreciates participating in numerous interagency meetings to learn more during the development of the plan. This was an effective interagency forum which we applaud along with the inclusive public participation process the FS conducted in conjunction with the draft plan development.

The four land allocation/management alternatives described in the DEIS present a reasonable range of use intensity for the forest. While we believe either Alternative 2 or 3 would be acceptable, we agree that Alternative 2 presents an acceptable balance among the various uses of the forest and demands on its resources. We appreciate the goal of maintaining traditional uses of the forest as a way of sustaining the economies that depend on them, and as a hedge against more intrusive and deleterious forms of development.

We offer the following comments for your consideration as you work to develop the Final Environmental Impact Statement for the Forest.

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### Ski Area Development

We note that all alternatives continue to allocate land (in management areas (MAs) with the MA 9.2 designation) for potential ski area expansion. According to the DEIS, land in these areas "would be managed so as not to preclude future ski area development." The DEIS explains that, "Although development of new ski areas was not considered in the Forest Plan, the expansion of existing ski areas was identified as a cost-efficient approach for addressing future demand." No analysis of future demand, alternatives, or the likely environmental impacts associated with future expansion activities is provided in the Forest Plan. However, the DEIS notes that future development within existing SUP boundaries will depend on proposals from the permit holders and FS review of those proposals pursuant to NEPA. We recommend that the FEIS clarify that future ski area expansion EISs will include analysis of demand, alternatives, and direct, indirect and cumulative impacts.

### Water Quality

We support the use of the timber management zone guidelines specified for wetland and riparian areas in "Good Forestry in the Granite State," by the New Hampshire Forest Sustainability Standards Work Team. We encourage the FS to use the same standards for operations in the Maine portion of the Forest.

We are very interested in impacts on water quality from developments, roads, and parking lots, and are willing to provide technical information related to the prevention and mitigation of impacts. We note that the Forest Plan's Standards and Guidelines for Roads, G-15, states that appropriate control and management of storm water should be considered in parking lot design. We suggest that the emphasis be on requiring innovative and/or traditional Best Management Practices (BMPs) in the design of both refurbished and newly constructed parking lots. With respect to road construction and improvements, we didn't find comparable standards and guidelines. According to Appendix A of the Proposed Land and Resource Management Plan (Summary Analysis of Management Situation, Roads, Need for and Opportunity to Change Management Direction, No. 2), current road construction and reconstruction standards have proved unworkable and have the potential for increased erosion and sedimentation. We recommend that BMPs be a required component of any road construction and improvement in the Forest. Moreover, we suggest that standards and guidelines be developed for cleaning up roads following the winter season such as the requirement for road sweeping, or other similar BMPs, in the spring before rains wash road sand and salt into water bodies or drainage areas.<sup>1</sup>

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<sup>1</sup>The WMNF is a perfect place to educate the public about storm water treatment, and we encourage the FS to take the opportunity to use signage or other demonstration techniques to draw the attention of the public to the use of BMPs and their benefits.



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### Green Buildings

We were not able to find references in the standards and guidelines section to designs for buildings. We recommend that the FS consider supplementing the standards and guidelines of the Forest Plan to incorporate "green building" strategies and goals consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System. These standards would provide requirements for building designs (again, both for new buildings and refurbished ones) that conserve energy, use recycled materials and include BMPs such as green roofs, rain gardens, and cisterns for capturing rain for reuse or delaying its release as storm water runoff as well as other measures to reduce the environmental impact of the structure.<sup>2</sup>

### Wind Power & Communications Infrastructure

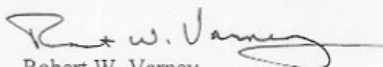
EPA supports the FS's plan for limiting the development of a very few communication sites to locations adjacent to existing man-made structures at existing alpine ski areas as a way to minimize environmental impacts. Moreover, we support consideration of wind energy proposals in the Forest in conjunction with robust NEPA analyses that provide a comprehensive exploration of alternatives both on and off the Forest and likely impacts to resources (e.g. including but not limited to birds, bats, bears, and water from road and facility construction).

### Air Quality

EPA encourages the use of more efficient, less polluting snowmobiles with 4-stroke engines on the Forest. We suggest use of winter trailheads and other places where snowmobilers gather to promote the use of snowmobiles with 4-stroke engines and educate users as to the benefits of this technology to the Forest, the environment and other users of the Forest. We also suggest that the FS partner with snowmobile dealers to promote the new technology engines as EPA has successfully done with marine dealers who are promoting the new technology outboard motors.

Thank you for the opportunity to comment on the DEIS for the Forest Plan Revision. Based on our review of the DEIS we have no objections to the project as described and we rate this EIS "LO-1 - Lack of Objections-Adequate" in accordance with EPA's national rating system, a description of which is attached to this letter. Please contact Steven Winnett (617-918-1687) of EPA's Office of Ecosystem Protection with any comments or questions about this letter.

Sincerely,



Robert W. Varney  
Regional Administrator

attachment

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<sup>2</sup>The US Green Building Council has information about LEED that may be helpful at [www.usgbc.org](http://www.usgbc.org).

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#### SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

##### Environmental Impact of the Action

###### **LO--Lack of Objections**

The EPA review has not identified any potential impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

###### **EC--Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

###### **EO--Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

###### **EU--Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

##### Adequacy of the Impact Statement

###### **Category 1--Adequate**

EPA believes that draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

###### **Category 2--Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

###### **Category 3--Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.