

New Hampshire Natural Heritage Bureau

Division of Forests & Lands - DRED PO Box 1856 -- 172 Pembroke Road, Concord, NH 03302-1856 (603) 271-2214

To: Jeffrey J. Rose, Commissioner

Via: Brad Simpkins, Director, Division of Forests & Lands

From: Sabrina Stanwood, Administrator

Date: October 14, 2014

Subject: Mt. Sunapee Master Development Plan and Environmental Management Plan

Thank you for requesting input on the Master Development Plan and Environmental Management Plan for 2015-2019 submitted by Mt. Sunapee Resort.

According to RSA 217-A:2I, natural communities and native plants throughout New Hampshire should be protected and conserved. In 2003 and 2004, several forests in Mt. Sunapee State Park were documented as exemplary natural communities. RSA 217-A:3 defines exemplary natural communities as a viable occurrence of a rare natural community type or a high quality example of a more common natural community type as designated by the Natural Heritage Bureau based on community size, ecological condition, and landscape context.

NHB recommended additional protection of these ecologically significant forests due to the age of cored trees, condition, rarity, and their role in a larger mosaic of contiguous forest that forms the northern extent of the large, un-fragmented forest block to the south. The exemplary natural community systems on Mount Sunapee State Park are some of the oldest remnants known in Merrimack County.

Several public comments were submitted to the Commissioner and copies sent to the Mt. Sunapee Advisory Committee that cited the importance of the older forests in Mt. Sunapee State Park. The commentators asked the Commissioner to protect the forest in Mt. Sunapee State Park and deny the West Bowl expansion.

NHB requests several clarifications to the MDP, EMP, AOP and respective maps:

- 1. Include data from the studies conducted in 2003 and 2004 by Natural Heritage Bureau.
- **2.** The lessee should report when mowing has occurred and if the recommendations were followed. NHB has recommended to the lessee to restrict mowing until mid to late summer in the areas near the cable towers for the Spruce Triple Chair lift in order to protect a population of rare plants (NHB Datacheck Results Letters).
- **3.** Page 20 of the MDP should state that the 1999 study conducted by NHB recommended that the old growth polygons should be studied more closely. The 1999 study encompassed the entire lease area, whereas the 2004 report focused specifically on the West Bowl expansion. A 2003 NHB report focused on the east bowl part of the park.

The Native Plant Protection Act (217-A:7) further outlines working with other state agencies to protect exemplary natural communities. "All state agencies shall assist and cooperate with the commissioner to carry out the purposes of this chapter. To the extent possible actions funded or carried out by state agencies shall not jeopardize the continued existence of any protected plant species or exemplary natural community."

Prior to any project moving forward, NHB requests additional information on the MDP. Also, NHB requests working with the lessee Mt. Sunapee Resort and their contractor(s) **during** the planning and siting stages. The goal is to avoid or minimize impacts to the exemplary natural communities in order to protect the inherent legacies in Mt. Sunapee State Park that have survived through the centuries.