

Friends of Mount Sunapee



Mount Sunapee from Gunnison Lake, Goshen, N.H.



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To: Commissioner Stewart, DNCR and the Mt. Sunapee
Advisory Committee

From: Friends of Mount Sunapee

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Date: October 31, 2020

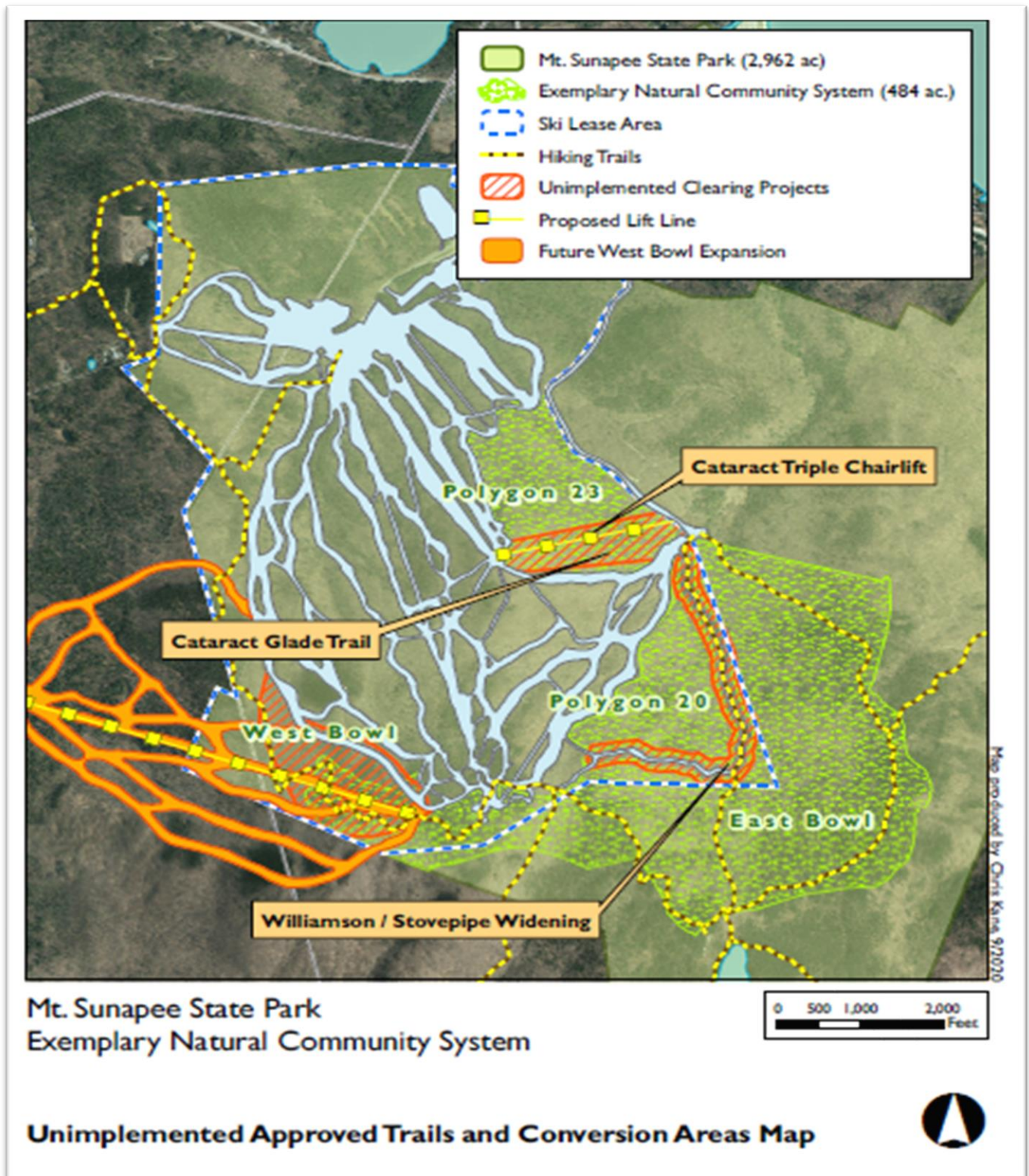
Friends of Mount Sunapee per the 1998 Public Involvement and Oversight Policy offers the following comments on the currently submitted 5 year Master Development/Environmental Management Plan by Vail Corporation.

The 5 year MDP/EMP serves as the public's primary resource to understand past, current, and future activities within the leased area of Mount Sunapee State Park. As such, information contained within the plan should be accurate and detailed.

Our comments concern information contained and omitted within the Environmental Management Plan specifically section, VII Forestry Management section B entitled Old Growth, on page 16. The projects referenced in this section of the EMP would directly impact the Exemplary Forested system on Mount Sunapee.

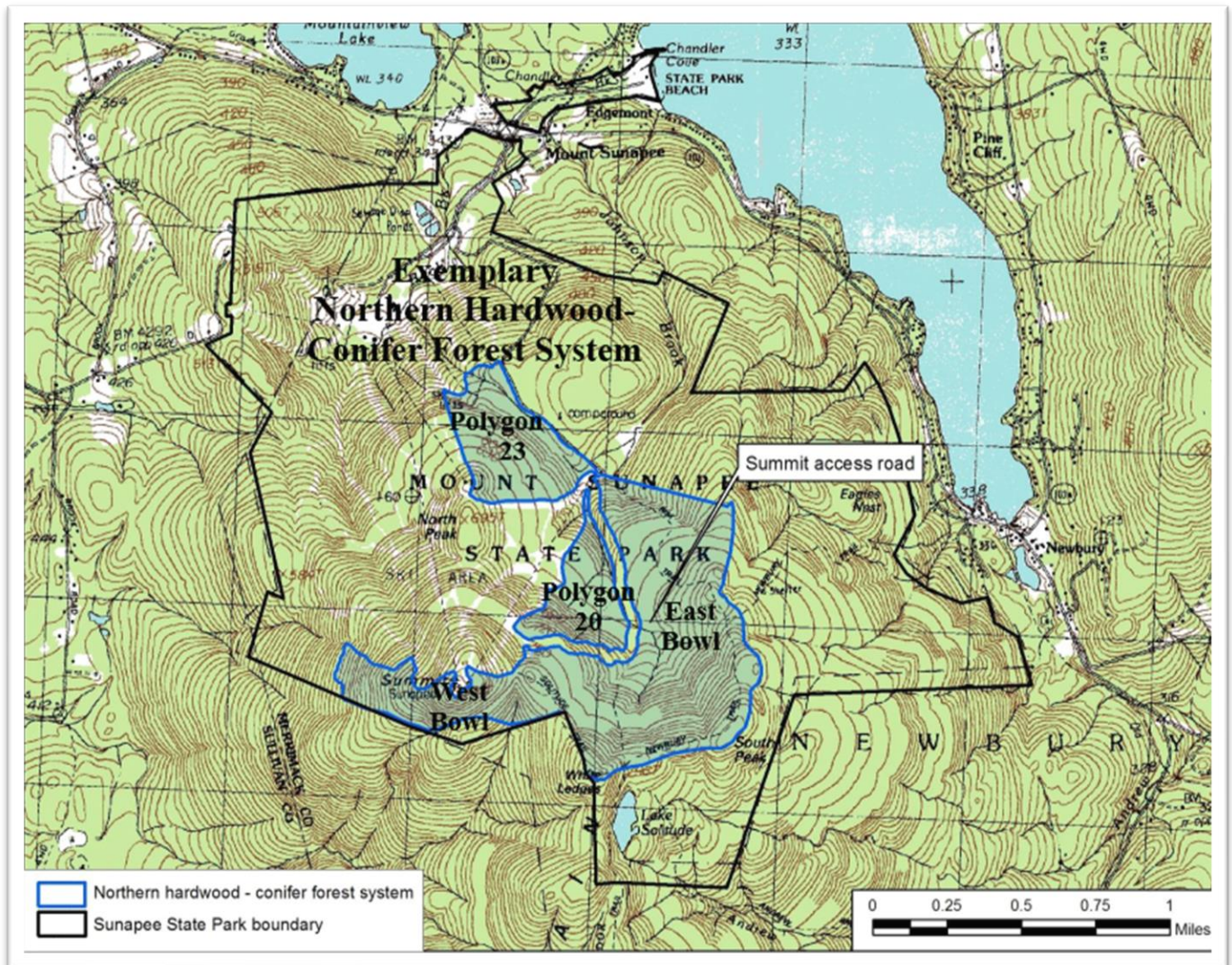
Friends of Mount Sunapee advocates for protection of Mount Sunapee State Park and its essential public values; conservation of the Mount Sunapee highlands and watersheds; and preservation of the unique character and natural beauty of the rural communities in the mountain's shadow.

Below is a map showing impacts to Mount Sunapee's ENCS from previously approved plans contained within the current 2020-2025 MDP/EMP.



The central natural heritage feature documented by the State of New Hampshire's Natural Heritage Bureau* within the leased area of Mount Sunapee State Park is the 484 acre Exemplary Northern Hardwood Conifer Forest System. It is the **only** forested system of its type that is exemplary in the State of New Hampshire. It is not mentioned in this proposed 5 year MDP/EMP.*

New Hampshire's Natural Heritage Bureau (NH NHB) is authorized by statute and retains the sole authority under RSA 217:3 to designate a natural community as exemplary.



New Hampshire Natural Heritage Bureau Map from 2015

Polygon 23

Paragraph two of the Mount Sunapee EMP section, VII Forestry Management section B entitled Old Growth, on page 16 states:

“Consistent with the recommendations of these studies, Mount Sunapee’s management approach to these old growth areas has been avoidance. Lift “J” and associated ski trail were approved in the 2000–2004 MDP within a portion of “polygon 23” outside of the area identified as having “old growth characteristics.”

Mount Sunapee will maintain a 200-foot natural wooded buffer between ski trails and areas within “polygon 23” identified as having “old growth characteristics.”

The EMP fails to mention the defining study of polygon 23 that occurred over a 40 day period and was submitted on November 2, 1999. The study was specifically focused on polygon 23. The conclusion of this study stated the following:

“The Division of Forests & Lands undertook the detailed inventory of Polygon 23 because there was a question about the NH Natural Heritage Inventory’s assertion that any development within Polygon 23 would be detrimental to the old growth forest there. In light of this research, (a) the old growth area is larger than previously thought, and (b) the mature forest area is older and less seriously affected by timber management activities than initially assessed. As such, the NH Natural Heritage Inventory’s initial conclusion stands: any development activities within Polygon 23 would have a detrimental effect on Mt Sunapee’s old forests.”

(Proposed Ski Area Development within Polygon 23 in the Mt Sunapee State Park Ski Lease Area, Division of Forest and Lands Memorandum November 2, 1999)

This conclusion was never refuted by DRED Commissioner George Bald who in his September 19, 2000, letter of approval of the 2000-2004 MDP stated:

“There has been a great deal of discussion concerning the use of “old growth land.” Polygon 23 is a mixture of Old Growth Forest, Young Forest and Mature Forest. The MDP submitted by Okemo will not result in activities in the land designated “Old Growth”. They are, proposing a ski lift and glades in the area defined as Mature Forest.... Although the lift will not be in the Old Growth Forest, I recognize that cutting trees in an area adjacent to the Old Growth Forest could have an effect on the natural processes”.

***(Statement by Commissioner George M. Bald September 19, 2000
Letter of approval for the 2000-2004 MDP/EMP)***

Later in 2003, a comprehensive inventory and study of the old growth forest in the East Bowl emphasized the function and importance of the mature forest to the old forest areas within the Exemplary System.

“....the mature forest surrounding these patches of old growth is significant in and of itself, and is an essential and integral part of the exemplary forest in the East Bowl. It contributes critically to the long-term integrity and viability of the old growth, and over time will acquire certain old forest characteristics as well.”

(Natural Heritage Inventory of the East Bowl at Mount Sunapee State Park-June 2003 pg. 28)

The impacts from the proposed lift and trail are described in detail in the November 2, 1999, report submitted by the Bureau of Forest and Lands:

“The proposed chair lift, 150'-180' ski run, and glade skiing would reduce the core forest area of Polygon 23 by effectively eliminating 30% of the polygon (approximately 6.5 acres would be converted to grassy ski trail*, and 11 acres would have the understory cleared for glade skiing). These proposed activities would further isolate Polygon 23 from the old growth system in Polygon 20 and in the East Bowl, would allow invasive species to penetrate more deeply into the forest, would increase the forest's susceptibility to windthrow and other disturbances, and would eliminate habitat for any old-growth dependent species that were not inventoried. We therefore conclude that any development activities in Polygon 23 would have a deleterious effect on this exemplary old forest system.”

(Proposed Ski Area Development within Polygon 23 in the Mt Sunapee State Park Ski Lease
Area Division of Forest and Lands Memorandum November 2 1999)

*The 6.5-acre ski run was withdrawn; the glade skiing was implemented and the cataract ski lift is still an active plan.

Williamson and Porky's Trail Widening

Not mentioned in the EMP section on Old Growth is the Williamson and Porky's trail widening. (VII Forestry Management sec. B entitled Old Growth)

As part of the conditional approval for the 2000-2004 MDP/EMP:

“Mt. Sunapee Resort agrees to leave the remainder of polygon 23 and all of polygon 20 in their current state with no new trails and no new lifts for the

duration of the lease agreement.” “Mt. Sunapee Resort will not seek to expand into the East Bowl for the duration of its lease.”

(Statement by Commissioner George M. Bald September 19, 2000
Letter of approval for the 2000-2004 MDP/EMP)

However; in 2010, despite the conditions put forward by DRED Commissioner Bald in 2000, permission to expand the Williamson and Porky’s Trail was granted. These trails are located on an access road between polygon 20 and the East Bowl of the ENCS. The widening of these trails would directly impact both the East Bowl and Polygon 20 both of which contain Old Growth Forest.

West Bowl Expansion

Paragraphs three and four of the Mount Sunapee EMP section, VII Forestry Management section B entitled Old Growth, on page 16 states:

“Mount Sunapee is seeking expansion within the West Bowl area to avoid the old growth characteristic areas identified within the East Bowl.”

“Mount Sunapee commissioned a field review of the forest within the West Bowl by W.D. Countryman and Associates (see Appendix F).”

NH NHB conducted two field surveys of the west bowl expansion area. The first was in 2004 and then again in 2015.

Although specifically tasked with conducting this evaluation (of the west bowl expansion area) the NH NHB reports and their findings ***are not referenced*** in the current EMP. By statute NH NHB is the only entity that can confer exemplary status on a plant community.

The EMP instead references the unofficial 2004 W.D. Countryman report, commissioned by the Resort. The Countryman report’s field study, “did not find any areas of old growth forest or areas with ‘old growth characteristics.” in the West Bowl expansion area.

These findings, specifically that the report “did not find any areas of old growth forest or areas with ‘old growth characteristics” are not consistent with the official state reports done by NHB. The narrative in the Countryman report is confusing and misleading.

The following excerpts are from the 2015 NH NHB report (which was an addendum to the 2004 NH NHB report of the west Bowl expansion area.)

“Higher on the slope, and west of the summit, is Polygon D, a 16-acre patch of northern hardwood - spruce - fir forest. This area was identified as mature, with possible old-growth characteristics.”

*“The dominance of spruce suggests that **this area has never been logged** since red spruce was historically selectively logged on Mt. Sunapee, leaving the hardwoods behind. Polygon D was considered statewide significant due to:*

- 1) The condition is good to very good in that it appears to never have been logged;*
- 2) Small patches of old examples of this natural community type (northern hardwood - spruce - fir forest) are rare;*
- 3) Polygon D is part of a larger mosaic of mature and old growth patches of exemplary forest on Mt. Sunapee (East Bowl); and*
- 4) It is contiguous and forms the northern extent of the large, unfragmented forest block to the south (Sunapee-Pillsbury Highlands).”*

(Addendum to 2004 report on Mt. Sunapee State Park from NH NHB - January 26, 2015)

Conclusion:

The current MDP/EMP lacks critical information that is vital to the public’s understanding of Mount Sunapee’s unique Exemplary Natural Community System. Non-official reports are substituted for already submitted and completed state studies. There is no mention of Mount Sunapee’s ENCS (Exemplary Natural Community System.) Omitting the official state findings and substituting the conclusions of a privately commissioned leaseholder’s report creates a false narrative about Mount Sunapee’s forests.

If implemented, the projects described in the EMP would irreparably harm Mount Sunapee’s ENCS, reducing its size and eliminating an exemplary natural community two defining elements of this unique system. The Exemplary Sunapee Forest size, location, and the condition of its forest communities make it an irreplaceable part of New Hampshire’s natural heritage.

The public is entitled to have an accurate and detailed representation of this forested area of Mount Sunapee in order to have a full appreciation of the significance of its unique status as New Hampshire's *only* Exemplary Northern Hardwood – Conifer Forest System.

Based on information provided in NH NHB studies from 1999 to 2015 FOMS respectfully requests that:

- 1) The detailed information from the state sponsored reports be cited in this EMP;
- 2) All previously approved projects impacting Mount Sunapee's ENCS be withdrawn from consideration; and,
- 3) That this forested area be granted formal permanent protective status.

We request that DNCR work with NHB and the current leaseholder, Vail Corporation, to bring about the permanent protection of this unique and irreplaceable part of New Hampshire's natural and cultural heritage.

The DNCR commissioner can by administrative decree grant formal protection to the entire Exemplary Northern Hardwood-Conifer System the *only* exemplary forest system of its type in New Hampshire.

Sincerely,

Steven Russell

Steven Russell
President, Friends of Mount Sunapee