

March 24, 2000

Mr. George Bald
Commissioner
NH Department of Resources and Economic Development
PO Box 1856 – 172 Pembroke Road
Concord, NH 03302-1856

Dear Commissioner Bald,

Please accept this letter in response to Okemo's proposal to develop ski trails and a ski-lift in sections of forest that contain elements of old growth forest on Mount Sunapee.

The mission of The Nature Conservancy is to preserve the plants, animals, and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. To accomplish our mission, we feel that protecting rare species and ecosystem types is only one part of our mission; protecting high quality examples of common species and common natural community types is also essential for protecting the full range of biodiversity.

Old growth forest represents a condition of forest that in itself is rare. In fact, conservation biologists are discovering that old growth forest, even in common forest types, is itself as rare as some state-wide and globally rare natural community types.

Based on field data and maps produced by both N.H. Natural Heritage Inventory ecologists, and DRED Division of Forests and Lands Foresters (DRED), we recognize the East Bowl area on Mount Sunapee as containing high quality old growth forest ("Polygons 20 and 23"). Because the old growth forests in Mount Sunapee's East Bowl are currently the only documented old growth forests in Merrimack County, we believe it represents a unique example for the state, and should be protected as a potential natural area for public enjoyment and ecological study.

In addition, we recognize that one of the initial reasons this mountain landscape was protected by The Society for the Protection of New Hampshire's Forests (SPNHF) in 1911 was to protect "primeval forests" in the East Bowl from further logging. State ownership, starting in 1948, continued the protection of old growth in Mount Sunapee State Park.

Continuing the preservation of these forested polygons maintains a benchmark of protected species and ecological processes that can be found nowhere else, and protects

features that we may not yet fully understand. Old growth generally occurs within a forest mosaic that includes forest interior, forest edge, a mix of old and young trees, and many species of plants and animals, some that may *only* occur in old growth forests. Any development along old growth edges increases the risk of negatively influencing the unique assemblage of forest species and ecological processes that define the old growth forest interior.

The combination of the rich history of protection of primeval forests at Mount Sunapee, together with recent data and analysis from ecologists and foresters provides a strong case for continuing protection of this unique forest. These factors lead us to urge you to not abandon this matrix of forest, and to deny Okemo's request to construct a new lift and trails within the East Bowl old growth area.

We applaud your willingness to accept comments, and look forward to working with you to ensure that Okemo's development plans can accommodate their economic viability without threatening the unique and high quality old growth on Mount Sunapee. We would be happy to provide additional comments and information as the process continues. Please do not hesitate to call with questions or concerns.

Sincerely,

Daryl Burnett
Executive State Director

Doug Bechtel
Asst. Director of Science and Stewardship

Cc: Phil Bryce, Division of Forests and Lands
Rich McLeod, Division of Parks and Recreation