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June 3, 2015

Commissioner Jeffrey Rose
Department of Resources and Economic Development
172 Pembroke Road
P.O. Box 1856
Concord, NH 03302-1856

Re: Comments on Mount Sunapee draft decision

Dear Commissioner Rose:

I am writing on behalf of the Audubon Society of New Hampshire in opposition to the proposal for ski area expansion at Mount Sunapee State Park at the present time. We are a statewide non-governmental organization dedicated to protecting New Hampshire's environment for wildlife and for people.

In considering this decision we have carefully reviewed the history of this proposal and previous Department policy with respect to expansion of the ski area. After the initial expansion plan was proposed in 2001, then-Commissioner George Bald recognized the need for "a careful balancing of interests... and sufficient time for a thoughtful process to unfold," and articulated three conditions that needed to be met prior to a recommendation to Governor and Council that lease expansion be approved. While the issue of lease expansion has now been resolved in court, we believe that the conditions articulated by Commissioner Bald continue to be reasonable and appropriate for approval of ski area, and we strongly urge you to adopt them as your policy.

Our understanding of the current status of meeting these conditions is as follows:

- 1) *Condition:* "Okemo will reopen the Master Development Plan or create a new 5-Year Master Development Plan that will include plans for the use of the additional land in the area created by the expansion of the lease boundary. The proposed plan will encompass all development activity associated with their management of the ski area, and any adjacent land Okemo intends to develop. The new or revised plan must then be reviewed and

approved through the process required by the Lease and Operating Agreement.”

Status: Okemo has created the Mount Sunapee Five Year Master Development Plan (MDP) 2015-2019 and Environmental Management Plan (EMP) of June 1, 2014. These documents include plans for the use of the additional land in the area created by the expansion of the lease boundary. However, they do not address development of any adjacent land Okemo intends to develop. We itemize further concerns regarding the MDP and EMP below.

- 2) *Condition:* Okemo will involve local citizens, businesses, the Planning Boards of Goshen and Newbury, all abutters, as well as the Regional Planning Commission, in their preparation of the new or revised Master Development Plan. Public involvement will further be sought in accordance with the Public Involvement and Oversight Policy, adopted August 31, 1998.

Status: It is standard practice to include in plans of this nature a list of groups involved in plan development, dates of input sessions held with specific groups or with the general public, and a summary of public input. The Master Development Plan provides no documentation of public involvement in the development of the Plan, and we are aware of no evidence that this condition has been met.

- 3) *Condition:* Okemo will identify a parcel of land adjacent to the Mt. Sunapee/Pillsbury Greenway of at least 100 acres. The property will be acquired by Okemo and donated to the State of New Hampshire for inclusion in the Greenway.

Status: Your Draft Decision indicates that the Sunapee Resort has purchased a 208-acre parcel with the intent of donating it to the State when the West Bowl expansion is initiated. However, it is our understanding that this parcel has already been protected by a conservation easement secured with public funds under the Land Conservation Investment Program. Transferring this parcel to State ownership would not increase protected lands within the Mt.Sunapee/Pillsbury Greenway.

Additional concerns:

- 1) We consider the EMP to be inadequate as a basis for evaluating the environmental and ecological elements of the proposed ski area expansion. The field data on which this report is based was collected in 2004 and was inadequate at the time. At minimum, the EMP needs to address potential impacts on species of conservation concern identified in the New Hampshire Wildlife Action Plan and on the Northern Long-eared bat (*Myotis septentrionalis*), which has been listed as a threatened species by the U.S. Fish and Wildlife Service. We strongly urge that appropriate field surveys for this bat and for other species of conservation concern likely to occur within the expansion area (e.g., all tree-roosting bat species, Northern Goshawk, Canada Warbler) be conducted prior to any decision regarding the ski area expansion.
- 2) We strongly support the DRED proposal that the MDP/EMP be revised to reference New Hampshire Heritage Bureau reports regarding the presence and location of exemplary natural

communities, and further urge that development plans be revised to avoid damaging the integrity of the exemplary natural communities located within Sunapee State Park. As steward of the natural resources within the state park system, DRED has a direct responsibility to protect this exemplary natural community system for current and future generations.

- 3) The MDP and EMP consistently fail to distinguish between Mount Sunapee State Park, the Mount Sunapee Resort, and the topographic feature of Mount Sunapee itself, frequently referring to any of the above as "Mount Sunapee." This creates considerable confusion for readers and complicates understanding of where and by whom activities are being proposed. This practice also extends to signage and marketing by the Resort. We believe that when the State's public lands are leased to a private entity for commercial purposes, the relationship with the State should be consistently made clear in all public documents and signage, and we urge you to require that this occur.

In closing, we believe that a decision to approve the proposed expansion plan for ski facilities at Sunapee State Park without consideration of current data would be premature, and would not be in the best interests of New Hampshire citizens. We strongly urge the development of a revised five-year plan that addresses the concerns outlined above and is subject to public review and comment before a decision is made.

Thank you for the opportunity to comment.

Sincerely,



Michael J. Bartlett
President