



Upper Valley Lake Sunapee
Regional Planning Commission

June 5, 2015

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

Re: UVLSRPC Comments on Draft Mount Sunapee MDP/EMP Decision

Dear Commissioner Rose,

Thank you for the opportunity to provide written comments on the draft decision for the 2015-2019 Mount Sunapee Master Development Plan and Environmental Management Plan. The UVLSRPC Regional Planning Committee has reviewed the draft decision in detail, and this correspondence describes the Committee's comments and recommendations.

In our correspondence dated September 26, 2014, we noted that DRED must balance the Resort's need to remain economically viable while respecting the unique character of the towns of Goshen and Newbury, and exercising appropriate stewardship over environmentally-sensitive lands at Mount Sunapee State Park. The draft decision clearly attempts to strike this balance, and we appreciate the hard work done by you and your staff throughout this process. In that context, we hope that you find the comments and recommendations detailed in this letter constructive.

Regarding Impacts to Polygon D:

The draft decision relocates proposed trail WB6 outside of Polygon D and narrows the proposed WB4 trail within Polygon D. These revisions result in a net reduction in impacts to Polygon D from approximately 4.2 acres to approximately 1.6 acres. However, recognizing the statewide significance of Polygon D as detailed in the 2004 Natural Heritage Bureau Assessment and confirmed in the January 26, 2015 Addendum, we believe that impacts to Polygon D should be further minimized or eliminated entirely.

Prior to issuing a final decision, DRED and the Resort should redouble efforts to relocate the proposed trail WB4 and West Bowl chairlift outside of Polygon D. In the event that this is not possible due to engineering, topographic, or other constraints, the proposed trail WB4 should be eliminated from the plan. By eliminating the proposed trail WB4, the impact to Polygon D would be solely from the proposed West Bowl chairlift corridor. While this would not completely eliminate impacts to Polygon D, it would further reduce impacts to this exemplary forest, which we believe is firmly in the public interest.

Regarding Impacts to Polygon 32:

The draft decision approves the installation of the proposed Mountain Coaster within Polygon 32 as detailed in the 1999 Natural Heritage Bureau study entitled “Old Forests and Rare Plants at the Mount Sunapee Ski Lease Area.” Per the draft decision, this approval was based on consultation with Natural Heritage Bureau staff to ensure that sensitive ecological values within Polygon 32 would not be adversely impacted.

In the aforementioned 1999 “Old Forests and Rare Plants at the Mount Sunapee Ski Lease Area” report, the Natural Heritage Bureau recommended that Polygon 32 fall under *Management Approach #1* to “protect in perpetuity the entire mosaic of forest types, including old growth, to protect the assemblage of forest conditions and elevate the significance and viability of the site through time.”

Notwithstanding that the most substantial areas of older timber are located in the upper reaches of the Polygon 32, the installation of a Mountain Coaster in the lower ¾ of the polygon is not insignificant as the entire polygon was identified for *Management Approach #1*. With the installation of the Mountain Coaster, the management and character of Polygon 32 fundamentally changes. As such, DRED should require, and Mount Sunapee Resort should offer, fair and proportional mitigation for these impacts.

Regarding the Permanent Protection of the East Bowl:

We commend your recognition of the high value old growth forest within the East Bowl, and support your desire to codify the protection of East Bowl lands. While the proposed lease amendment (whereby Mount Sunapee Resort would agree not to request further ski area development within the East Bowl) is a good start, lease agreements are both timebound and subject to change.

In the final decision, we recommend that DRED endorse the *permanent protection* of the East Bowl and outline an action plan for ensuring the permanent protection of these lands (i.e. via conservation easements or other mechanisms).

Regarding the Summit Trail:

We share the concerns expressed by the Sunapee-Ragged-Kearsarge Greenway Coalition (SRKGC), as expressed in their correspondence to you dated May 22, 2015 related to the 2.4-mile Summit Trail. It is important that the Summit Trail be available for four-season hiking, and a Memorandum of Understanding (MOU) between DRED, Mount Sunapee Resort, the SRKGC, and/or other interested trail groups would be an effective means of outlining future maintenance responsibilities and ensuring that the Summit Trail remains open and accessible year-round.

In crafting the MOU, DRED should consult with all interested trail groups, including but not limited to the Sunapee-Ragged-Kearsarge Greenway Coalition, Monadnock-Sunapee Greenway Trail Club, and Cardigan Highlanders Volunteer Trail Crew to ensure that the MOU addresses all pertinent issues and concerns related to the maintenance of the Summit Trail. The details of the MOU should

be agreed upon by the parties prior to DRED's issuance of a final decision on the Mount Sunapee Master Development Plan and become part of the final decision.

Additionally, we share the SRKGC's goal of reducing the number of ski trail/hiking trail crossings. As we have proposed in this correspondence, the elimination of proposed WB4 ski trail would not only minimize the impacts to the forest of statewide significance in Polygon D, it would also eliminate at least three ski trail/hiking trail crossings resulting in safer, more viable winter hiking on the Summit Trail.

Regarding Parking:

We reiterate our observation that the identified number of required parking spaces in the 2015-2019 Master Development Plan, both under existing conditions and build-out conditions appears to be over-estimated based both on ITE Parking Generation Rates and the site-generated traffic volumes presented in the Traffic Impact Study.

We were pleased to learn that Mount Sunapee Resort's Special Use Permit for parking at the State Beach Parking Lot in winter has been renewed for an additional three years. However, as the proposed Mount Sunapee 2015-2016 Annual Operating Plan details, the State Beach Parking Lot has only been utilized an average of eight times per year over the past five years.

While new parking areas within Mount Sunapee State Park have been proposed and approved, we continue to believe that the existing capacity at the State Beach Parking Lot is underutilized during the winter months. In exercising stewardship over environmentally-sensitive lands, we believe DRED should ensure that existing parking capacity be fully utilized before new parking areas are constructed. To this end, we recommend that employees of Mount Sunapee Resort be *required* to park at the State Beach Parking Lot during the winter ski season. Such an arrangement could minimize the need for previously-approved Parking Lot #4, thereby reducing the environmental impacts related to increased impervious surface coverage within the State Park.

Regarding the Traffic Impact Study:

We reiterate our observation that the Traffic Impact Study (TIS) provided for the proposed West Bowl Expansion is dated June 3, 2004. As such, the information is now more than ten years old and provides limited utility to assess traffic impacts in the context of current conditions.

We were pleased that you included a requirement that Mount Sunapee Resort update the TIS in the draft decision, and we reiterate our recommendation that the revised TIS address the following items:

- Reflect current traffic volumes within the study area, utilizing 2020 as a base year condition and 2030 as the horizon year. Background growth assumptions should be updated in coordination with staff from the NHDOT Bureau of Traffic.
- Conduct new turning movement counts at study area intersections and update the TIS accordingly.

- Reflect current trip generation rates. (The Institute of Transportation Engineers Trip Generation Manual has been updated twice since the publication of the TIS in June 2004.)
- Resolve errors in the traffic volumes listed in the report. For instance, in Figure 2 of the TIS, the listed traffic volumes are identical for I-93 in Lincoln, U.S. Route 3 in Nashua, and I-89 in Sutton. Similarly, in Figure 2 of the TIS, the listed traffic volumes are identical for I-93 in Hooksett and I-93 in Windham.
- Review, and amend as necessary, the proposed off-site mitigation measures to reflect the updated build-out conditions.

When the update of the Mount Sunapee Resort Traffic Impact Study begins, we will call upon Acting NHDOT Commissioner Bill Cass, NHDOT Bureau of Traffic Administrator Bill Lambert, and Acting NHDOT District 2 Engineer Doug King to ensure that the TIS undergoes Statewide Traffic Impact Scoping per Section 6(g) of the NHDOT “Policy Relating to Driveways and Access to the State Highway System” and that representatives of the Town of Newbury, Town of Goshen, Town of Sunapee, and UVLSRPC be invited to participate in the Statewide Traffic Impact Scoping process.

Regarding the Composition of the Mount Sunapee Advisory Committee:

Considering the above discussion of traffic impacts, the traffic-related concerns expressed by members of the public during the Public Hearing process, and the NHDOT’s authority over access to the state highway system, we ask that DRED re-evaluate the composition of the Mount Sunapee Advisory Committee. Specifically, we recommend adding an additional member to the Mount Sunapee Advisory Committee representing the New Hampshire Department of Transportation, and suggest that the NHDOT District 2 Engineer or their designee would be an appropriate representative to advise on traffic-related concerns and the access permitting process.

Regarding Other Clarifications Needed:

We reiterate our request that the location of the proposed 450-space West Bowl parking lot, the proposed building envelope for the West Bowl base area facility, and the location of access roads and any other roads necessary for internal circulation in the West Bowl expansion be identified on Map III-1 (Upgrading Plan) and on any other pertinent maps in the Master Development Plan. While the exact location of these buildings and infrastructure will not be finalized until the site plan engineering process occurs, conceptual building envelopes should be delineated to orient the public to the general location of the proposed West Bowl base area, parking, and infrastructure.

Similarly, we reiterate our observation that the Environmental Management Plan does not provide detailed information about the proposed water system that would support the West Bowl expansion. The Commission continues to receive comments expressing concern that the West Bowl’s source water could be extracted from a different watershed. Additional information is needed to resolve this question, and DRED should coordinate closely with the NHDES Drinking Water and Groundwater Bureau to provide the public with additional information Mount Sunapee Resort’s water supply plans for the West Bowl Expansion.

Regarding Next Steps:

We appreciate the level of transparency DRED demonstrated in its initial review of the proposed Master Development Plan leading up to the issuance of the draft decision, including the publication of public comment summaries. We ask that DRED continue to demonstrate that high level of transparency by publishing a summary of the comments your office has received on the draft decision. Similar to the issuance of the draft decision, we ask that the release of the final decision be made publicly at a meeting of the Mount Sunapee Advisory Committee (MSAC) and that MSAC members be afforded the opportunity to ask clarifying questions, if any, about the final decision at that meeting.

Again, we appreciate the opportunity to provide comments on your draft decision on the proposed 2015-2019 Mount Sunapee Master Development Plan and Environmental Management Plan. If you have any questions about this correspondence, or need any additional information, please feel free to contact me by telephone at (603) 448-1680 or by e-mail at nmiller@uvlsrpc.org.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Nathan Miller". The signature is stylized with a large "N" and "M".

Nathan Miller, AICP
Executive Director

Cc: Bill Cass, Acting NHDOT Commissioner
Doug King, NHDOT District 2
Jay Gamble, Mount Sunapee Resort
Torene Tango-Lowy, DRED Division of Parks and Recreation
Town of Goshen Selectboard
Town of Goshen Planning Board
Town of Newbury Selectboard
Town of Newbury Planning Board
Mount Sunapee Advisory Committee Members
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Rep. James Grenier
Rep. David Kidder
Rep. Steven Smith
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UVLSRPC Commissioners