



Upper Valley Lake Sunapee  
Regional Planning Commission

September 26, 2014

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

Dear Commissioner Rose,

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

As you know, Mount Sunapee Resort is fundamentally important to the region's economy, both as an employer and as a tourism destination that helps to sustain scores of locally-owned small businesses (e.g. inns, restaurants, retail stores, etc). The operator of the Resort is well-regarded locally, and the Resort's partnership with the State of New Hampshire has been and continues to be a success for our region.

We recognize that improvements to the Mount Sunapee Resort must be made to ensure that the Resort remains competitive with other ski areas across New Hampshire and Northern New England. All successful public-private partnerships require balance and transparency. In this case, 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. In that context, we hope that you find the comments and recommendations detailed in this letter both insightful and constructive.

*Regarding Real Estate Development in the West Bowl Expansion:*

We concur with former DRED Commissioner George Bald's statement (2002) that the Master Development Plan should "encompass all proposed development activity associated with [the Operator's] management of the ski area, and any adjacent land [the Operator] intends to develop." Commissioner Bald's statement reflects the inextricable link between the infrastructure, buildings, and amenities proposed on both State Park and privately-owned lands in the West Bowl Expansion.

To make an informed decision, it is essential that the communities of Goshen and Newbury, the Region, and the State have complete information about the scope, scale, and impacts of the proposed West Bowl Expansion, both on public and private land, including but not limited to trails,

lifts, facilities, parking, utilities, infrastructure, and any associated residential or commercial real estate development.

The 2005-2009 Master Development Plan, which proposed the West Bowl Expansion, identified the potential for 175-250 units of residential real estate development at the base of the West Bowl. This discussion was removed in the 2009-2014 Master Development Plan (which did not propose the West Bowl Expansion). However, the draft 2015-2019 Master Development Plan, which again proposes the West Bowl Expansion, makes no mention of potential residential real estate development. The Commission has received numerous verbal and written comments noting this omission, and we concur that this is an issue that needs resolution.

If the Operator has no plans for real estate development in the West Bowl, now and in the future, this should be explicitly stated in the Master Development Plan. Otherwise, the scope, scale, location, timeline, and impacts of real estate development at the West Bowl should be identified and detailed in the Master Development Plan.

Regarding Land/Asset Ownership and Revenues in the West Bowl Expansion:

As the proposed West Bowl Expansion would result in the construction of ski trails, lifts, and other infrastructure spanning both state-owned and privately-owned land, clarification is needed about the operational details of such an arrangement. Who will ultimately own this land and these assets (e.g. lifts, trails, etc)? In the event that the Lease and Operating Agreement with the current operator terminates, or is not renewed/extended, how will these lands and assets be merged or divided? Additionally, we recommend that DRED consult with the NH Attorney General's Office to review the operational details of such an agreement in the context of Land and Water Conservation Fund regulations.

The Mount Sunapee Lease and Operating Agreement stipulates that the Operator shall pay the State a base annual lease fee plus a variable fee of three percent of gross annual revenues from the operation of the ski area. The Lease and Operating Agreement defines gross revenues as *"the total amount received by or accruing to the Operator [...] from sales or rentals by the Operator or its subcontractors to patrons, for cash or credit, sold for consumption or use on the Leased Premises, of food, beverages, recreational equipment, rentals, tickets or other merchandise or services, including vending machines or coin operated devices."*

We request that DRED clarify the interpretation of this clause as it relates to revenues from the West Bowl Expansion. In other words, would the calculation of "gross annual revenues from the operation of the ski area" (as defined in the Lease and Operating Agreement) include the entire West Bowl Expansion?

Regarding Old Growth Forest in the West Bowl Expansion:

The draft Environmental Management Plan (p. 19-20) cites both a privately-commissioned study by W.D. Countryman and Associates and a 1999 Study developed by the NH Natural Heritage Inventory (DRED Division of Forests and Lands) entitled "Old Forests and Rare Plants at the Mount Sunapee

Ski Lease Area” to assert that there is minimal evidence of old growth forest characteristics within the West Bowl.

It is important to note that the 1999 Study entitled “Old Forests and Rare Plants at the Mount Sunapee Ski Lease Area” only included lands within the formerly-recognized Ski Lease Boundary. That study did not include an analysis of forests between the former Ski Lease Boundary and the State Park Boundary.

Rather, in November 2004, the NH Natural Heritage Bureau (DRED Division of Forests and Lands) published a report entitled “Evaluation of Proposed Ski Lease Area Expansion on Mount Sunapee.” This report did assess forest characteristics between the formerly-recognized Ski Lease Boundary and the State Park Boundary. However, this report is not cited in the draft 2015-2019 Environmental Management Plan.

The 2004 “Evaluation of Proposed Ski Lease Area Expansion on Mount Sunapee” report identified four forest polygons above 1,800 feet in elevation as having potential ecological significance. Most notably, “Polygon D” was reported to be a “mature, possibly old-growth patch of northern hardwood-spruce-fir forest.” The following is an excerpt from the report regarding the statewide significance of “Polygon D”:

*“Although this polygon’s size (16 acres) is small compared to other old growth northern hardwood - spruce - fir forests in the state, and ski trails and roads to the north are fragmenting features, Polygon D is considered of statewide significance for the following reasons: 1) the condition is good to very good in that it appears to have never been logged (indicators of this are the forest history, the considerable dead and downed woody debris, and the old trees); 2) even small patches of old examples of this natural community type (northern hardwood - spruce - fir forest) are rare in throughout central and southern NH; 3) it is part of a larger mosaic of mature and old growth patches of exemplary forest on Mt. Sunapee; and 4) it is contiguous with and forms the northern extent of the large, un-fragmented forest block to the south (the Sunapee-Pillsbury Highlands).”*

It is important that the draft 2015-2019 Environmental Management Plan provide comprehensive information about forest impacts related to the proposed West Bowl Expansion, and given the omission detailed above, it appears that the Plan’s discussion of old growth forest characteristics in the West Bowl is incomplete. Accordingly, we recommend that this section of the draft Environmental Management Plan be revised to include the results of the 2004 “Evaluation of Proposed Ski Lease Area Expansion on Mount Sunapee” report.

Regarding the Proposed Mountain Coaster:

The location of the proposed Mountain Coaster as identified on Map III-3 (Base Area Upgrading Plan) appears to impact “Polygon 32” and potentially “Polygon 30” as detailed in the 1999 Study developed by the NH Natural Heritage Inventory (DRED Division of Forests and Lands) entitled “Old Forests and Rare Plants at the Mount Sunapee Ski Lease Area.”

The forest areas identified as “Polygon 32 and “Polygon 30” were noted in the study as having “high quality forest with small areas of old growth conditions.” Given the ecological significance of these

areas, as detailed in the aforementioned study, additional information should be provided about the design of the proposed mountain coaster and any potential impacts to forests with old growth characteristics (i.e. "Polygon 32" and "Polygon 30") associated with the mountain coaster's installation.

Regarding Parking Capacity:

In the proposed 2015-2019 Master Development Plan, the identified number of *required* spaces, 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. Thus, we question the necessity of (previously approved) Parking Lot #4. Rather than building a new parking lot that would go unused during the majority of the year, we suggest that Mount Sunapee Resort coordinate with DRED to make better use of the existing parking capacity at the State beach parking lot by enhancing the shuttle bus system. Such an arrangement would potentially eliminate the need for Parking Lot #4, thereby reducing the environmental impacts related to increased impervious surface coverage within the State Park.

Regarding the Traffic Impact Study:

The Traffic Impact Study provided for the proposed West Bowl Expansion is dated June 3, 2004. It uses 2010 as a base year condition and 2020 as the horizon year. This information is now more than ten years old and provides limited utility to assess traffic impacts in the context of current conditions.

We recommend that the Traffic Impact Study (TIS) be revised as follows:

- Update the TIS to 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.
- Update the TIS to 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.

Regarding Historic Preservation:

The proposed West Bowl ski trails cross the Newbury/Goshen Town Line (and Merrimack/Sullivan County Line) at a number of locations. This boundary line has monuments of historic and

perambulatory value. These monuments should be identified, and a plan for their preservation should be included in the Master Development Plan.

Regarding Other Clarifications Needed:

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 should be identified on Map III-1 (Upgrading Plan) and on any other pertinent maps in the Master Development Plan.

The Environmental Management Plan does not provide detailed information about the proposed water system that would support the West Bowl Expansion, and the Commission has received 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 review Mount Sunapee Resort's water supply plans for the West Bowl Expansion.

Regarding Next Steps:

Following the close of the public comment period, we recommend that DRED convene a meeting of the Mount Sunapee Advisory Committee to review and discuss comments on the draft Master Development Plan and Environmental Management Plan received at the August 26, 2014 Public Hearing and submitted in writing.

Again, we appreciate the opportunity to provide comments 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](mailto:nmiller@uvlsrpc.org).

Respectfully Submitted,



Nathan Miller, AICP  
Executive Director

Cc: Torene Tango-Lowy, DRED Division of Parks and Recreation  
Jay Gamble, Mount Sunapee Resort  
Town of Goshen Selectboard  
Town of Goshen Planning Board  
Town of Newbury Selectboard  
Town of Newbury Planning Board  
Mount Sunapee Advisory Committee Members  
UVLSRPC Commissioners