



February 16, 2017

John Scarinza
Chair, Coos County Planning Board
PO Box 10
West Stewartstown, NH 03597

Chair, Coos County Zoning Board of Adjustment
c/o Jennifer Fish, County Administrator
PO Box 10
West Stewartstown, NH 03597

Dear Chairman Scarinza and Administrator Fish, and members of the Planning Board and Zoning Board of Adjustment:

We write to express our deep concerns regarding the Cog Railway Company's publicly announced proposal to construct a hotel on Mount Washington, in the mountain's highly sensitive alpine zone.¹ While details about the proposed development are not yet available for public review, the preferred location and general proposal as described by the developer in public statements, in the media, and at your public meetings provide sufficient information for our organizations to express strong concerns about, and opposition to, the adverse impacts such a project would have on one of New Hampshire's most iconic natural and cultural resources. As discussed below:

- (1) the alpine zone of Mount Washington – and indeed Mount Washington itself – is a resource with remarkably important ecological, scenic and cultural values;
- (2) the Coos County Convention and Commissioners, through adoption of a Master Plan and associated Zoning Ordinances for Unincorporated Places, have recognized the need to protect those important values; and
- (3) the construction and operation of a substantial development project in the mountain's alpine zone, such as the one publicly announced by the Cog Railway Company, would greatly undermine those values.

Mount Washington's Significant Values

It is difficult to imagine a more iconic feature of the New Hampshire landscape than Mount Washington. From its status as New England's highest peak, to its dramatically steep and rugged terrain and notorious weather conditions, to its fragile alpine ecology, Mount Washington is deeply engrained in the fabric of what makes the Granite State unique. At a minimum, and indisputably, it provides critically important ecological, scenic and cultural values.

¹ See, e.g., "Coming Soon: a Luxury Hotel With the Worst Weather You've Ever Seen," The Wall Street Journal (Jan. 17, 2017) (<https://www.wsj.com/articles/planned-luxury-hotel-offers-bitter-wind-shrouding-fog-and-a-brutal-hike-1484687865>).

Our organizations have begun to evaluate the natural resources, habitats, and unique alpine vegetation in the area that would be impacted by the proposed development. While no site plan or map is publicly available as yet, the developer has identified the area in public presentations and in the media as “The Skyline,” located at an elevation of 5,600 feet, less than one mile below the summit of Mount Washington. The Skyline site is well above tree-line, defined as alpine habitat, and exposed to some of the severest weather conditions on the mountain.

Alpine habitats are exceedingly rare, with only approximately thirteen square miles of alpine habitat east of the Mississippi River (the most important unit being the Presidential Range),² and with the alpine areas of New Hampshire comprising approximately 4,064 acres, or only 0.07% of the state’s total land area. Given the extraordinary habitat value of the mountain's alpine area, it has been designated as a Tier 1 Highest Ranked Habitat by the New Hampshire Fish and Game Department. Tier 1 habitats are those of highest relative rank by ecological condition in New Hampshire.

According to the NH Wildlife Action Plan (NH Fish and Game),³ alpine habitat:

Occurs above treeline at approximately 4,900 feet, primarily within the Franconia and Presidential Ranges of the White Mountains. This region endures high winds, precipitation, cloud cover, and fog, resulting in low annual temperatures and a short growing season. Alpine habitat is a rare community throughout the Northeast, occurring mostly as isolated islands on high peaks. Unique alpine plant communities, extreme climatic conditions, and isolation lead to rare and endemic insect communities. White Mountain fritillary and arctic butterflies are known to occur only on the Presidential Range, and their host plants may be sensitive to disturbance and climate change. Human impacts exist in almost every alpine zone, with the highest concentration occurring on ridges and summits. The impacts of human presence on alpine birds and mammals is not known. Alpine vegetation and soils are not well adapted to heavy recreational traffic.

Forty plant species found in the alpine areas of Mount Washington do not occur elsewhere in the State. The vast majority of these plants are state listed as threatened or endangered species, and three of them are only found in the alpine areas of New England. This represents the single largest concentration of rare and endangered species in the State. Furthermore, the soils that support these plant communities are extremely shallow, highly erodible, and can require decades to recover from disturbance.⁴

In addition to rare plants, the alpine areas of Mount Washington support two butterfly species, the White Mountain Arctic and the White Mountain Fritillary, that are found nowhere else in the world. The area also provides habitat for two wildlife species of conservation concern, the American Pipit and the Ringed Emerald dragonfly. A list of the New Hampshire Natural Heritage Bureau⁵ tracked species within 500' of the proposed location of the hotel is attached to this letter for reference.

² https://www.fs.fed.us/rm/pubs/rmrs_p015_3/rmrs_p015_3_093_101.pdf

³ <http://www.wildlife.state.nh.us/wildlife/documents/wap/appendixb-habitats.pdf>

⁴ Ketchledge et. al. 1985. Rehabilitation of Alpine Vegetation in the Adirondack Mountains of New York State. Northeastern Forest Experiment Station, USDA.

⁵ <http://www.nhdf.org/about-forests-and-lands/bureaus/natural-heritage-bureau/>

Due to its rare and fragile nature, this unique and important habitat in New Hampshire is almost entirely conserved and managed according to the guidelines and standards delineated in the Land and Resource Management Plan for the White Mountain National Forest (WMNF). In this area, “natural processes are allowed to continue with minimal impediment, effects and impacts of human use will be minimized, primitive recreation opportunities will be provided, appreciation of the qualities of wilderness landscapes will be fostered, and utilization for educational and scientific purpose will be continued.”

In addition to its significant ecological values, Mount Washington – standing at 6,288 feet, the highest elevation of any of the White Mountains and of any mountain in the northeast – has extraordinary scenic and cultural value. Arguably the most prominent mountain east of the Mississippi River, it serves as an unparalleled scenic resource both for people observing it from a distance (from roadways, properties, and other locations within the White Mountains) and for people using the mountain recreationally. Closely related to its scenic value, Mount Washington has taken on iconic status, deeply engrained in New Hampshire’s cultural history, for its dramatic and largely wild geographic features, and for the significant primitive recreational experiences it provides.

Further, the Appalachian National Scenic Trail (ANST) passes over the summit of Mt. Washington. The ANST is a unit of the National Park Service (laid over the White Mountain National Forest) and is managed for outstanding scenic values. It also appears that the location of the proposed Cog Railway hotel would be visible from other locations along the ANST beyond the summit of Mt. Washington.

Coos County’s Master Plan and Zoning Ordinances for Unincorporated Places

In 2006, the Coos County Planning Board adopted the Master Plan for the Unincorporated Places in Coos County,⁶ intended to provide “a framework for growth and a basis for protecting natural resources and supplying public services.” Master Plan at 7. The Coos County Convention and Commissioners subsequently adopted the Zoning Ordinances for Coos County Unincorporated Places. Together, these important planning documents recognize, and are intended to protect, the important values described above that Mount Washington and other similar resources provide. Generally speaking, for example, the Master Plan acknowledges the County’s Unincorporated Places as “contain[ing] some of New Hampshire’s most spectacular mountains,” and the Zoning Ordinance makes explicit that one of its stated purposes is “to preserve ecological, historic, aesthetic and natural values” in the County’s Unincorporated Places. See Zoning Ordinances, Art. I, § 1.02.

More specifically with regard to ecological values, the Master Plan establishes a goal to “[c]onserve and protect the aesthetic, ecological, recreational, scientific, cultural and economic values of wildlife . . . resources” and a related policy to “[s]upport land use activities that protect habitats, . . . ecosystems . . . and other life requisites for wildlife species.” Master Plan, Part II.D (Fisheries and Wildlife Resources). See also Master Plan, Part II.K (Special Resources) (establishing a policy to “[i]dentify and support protection of unique, rare, endangered, threatened, unusual, representative, or critical natural or cultural resources to preserve their ecological, scientific, scenic, social or educational values.”); *id.*, Part II.B (Recreation Resources). Of note, in addressing the protection of ecosystems, the Master Plan specifically recognizes the importance of protecting fragile natural resources at high elevations, establishing a policy to “[p]rotect areas identified as environmentally sensitive and support the provisions of the NH Fish & Game Department’s high elevation memoranda of understanding for the protection of sensitive habitats in high elevation lands above 2,700 feet.” Master Plan, Part II.A.2 (Forest Resources). See also *id.*, Part II.F (Soil and Geological Resources) (establishing goal and policy to “[c]onserve soil and geological resources,” including regulating land uses in areas with “fragile soils, steep slopes, [and] high elevations.”). To advance these important

⁶ http://www.cooscountynh.us/sites/coosconh/files/file/file/masterplanadopted_061306.pdf

goals and policies, the Zoning Ordinance establishes protected districts *“to protect certain critical areas from activities which may degrade their environmental quality,”* Zoning Ordinance §4.03, such as a protective district for areas above 2,700 feet in elevation *“to preserve the natural equilibrium of vegetation, geology, slope, soil and climate.”* Zoning Ordinance §4.03F.

With specific regard to scenic and cultural values, the Master Plan establishes a goal to *“[p]rotect quality, scenic character and natural values”* and the related policies of *“protect[ing] natural aesthetic values and prevent[ing] incompatibility of land uses”* and *“protect[ing] the scenic values of . . . mountain, recreation and other scenic areas.”* Master Plan, Part II.H (Scenic Resources). Similarly, it establishes a goal to *“[c]onserve and protect the natural beauty and unspoiled qualities of the . . . mountains, plant and animal habitats, . . . scenic vistas, trails and other natural and recreational features”* and a related policy to *“[p]rotect remote, undeveloped and other significant recreation areas . . . to protect their natural character for primitive recreational activities.”* See Master Plan, Part II.B (Recreation Resources). To advance the goals and policies related to scenic and cultural values, the Zoning Ordinance protections designed to *“preserve mountain areas for their scenic values and recreational opportunities”* in areas above 2,700 feet in elevation. Zoning Ordinance §4.03F. See also *id.* §4.03H (Unusual Areas).

A Project Such as the Cog Railway Company’s Publicly Announced Hotel Would Greatly Undermine Mount Washington’s Important Values and the County’s Intent to Protect Such Values

It is essential that Coos County, in regulating land uses in its Unincorporated Places, faithfully protect significant ecological, scenic and cultural values, particularly in highly sensitive high-elevation locations. The proposed development of a hotel in the alpine zone of Mount Washington would greatly undermine these values – both on the property itself, and on abutting lands managed by the White Mountain National Forest. For example, a hotel in the alpine zone below the summit of Mount Washington would have a detrimental impact on the fragile vegetation on the abutting WMNF land, both during and after construction. Construction impacts are highly likely to spill over onto the WMNF because of the extremely limited width of the right-of-way. Hotel guests will surely explore the alpine environment, requiring new trail networks, and unintentionally trampling the fragile ecosystem of the area. This concentrated use by hotel guests will degrade and potentially destroy this rare and sensitive habitat.⁷

We hope the Planning Board and any other potential decision-makers, if and when a specific development proposal is submitted that mirrors what the Cog has released to date, will conclude that a hotel in Mount Washington’s alpine zone is not a permissible use. We would also hope that the Planning Board would reject the notion that mitigation of existing environmental conditions on Mount Washington (such as capacity issues with the septic system within the Sherman Adams Building on the summit) is an appropriate means to justify and allow an otherwise impermissible use. Finally, we hope that, to the extent any variance and/or special exception may be sought, the Zoning Board of Adjustment will uphold – and not allow relief from – the important protections provided by the Zoning Ordinance and intended by the Master Plan.

We formally request that, if and when an application is received from the Cog Railway, the Planning Board determine pursuant to Article XIII of the Zoning Ordinance that the development proposal has a potential regional

⁷ New Hampshire’s Wildlife Action Plan identifies as a medium threat to alpine habitat *“degradation from contamination around railway tracks (Cog Railway), including an unvegetated zone resulting from the installation of buried cable and fiber-optic lines adjacent to the tracks. In addition, “habitat degradation from snow compaction related to recreational activity,”* and *“habitat degradation from recreational infrastructure that concentrates visitor impacts around facilities (AMC huts and Mt. Washington summit buildings)”* are identified as lower ranking threats to alpine habitat. While alpine tundra communities are resilient to the extreme weather conditions of the alpine zone, disturbance from foot traffic and related development can take decades – if not much longer - to recover.

impact and implement associated procedures enabling participation by the North Country Council and all affected municipalities. Finally, we request that both the Planning Board and Zoning Board of Adjustment provide to each of the undersigned individuals notice of any and all public proceedings and related activities pertaining to any proposed development by the Cog Railway Company on Mount Washington.

Sincerely,

/s/ Susan Arnold
Vice President for Conservation
Appalachian Mountain Club
75 Sunny Oak Terrace
Strafford, NH 03884
sarnold@outdoors.org
603-664-2050 (home office)
617-391-6595 (Boston office)

/s/ Hawk Metheny
New England Regional Director
Appalachian Trail Conservancy

/s/ Douglas A. Bechtel
President
Audubon Society of New Hampshire
84 Silk Farm Road
Concord, NH 03301
dbechtel@nhaudubon.org

/s/ Tom Irwin
Vice President & Director, CLF New Hampshire
Conservation Law Foundation
27 North Main Street
Concord, NH 03301-4930
tirwin@clf.org
603-225-3060

/s/ Jane Difley
President/Forester
Society for the Protection of New Hampshire Forests
54 Portsmouth Street
Concord, NH 03301
jdifley@forestsociety.org
603-224-9945

/s/ Jim O'Brien
Director of External Affairs
The Nature Conservancy in New Hampshire
22 Bridge Street, 4th Floor
Concord, NH 03301
Jim_obrien@tnc.org
603-224-5853 X 28

List of Natural Heritage Bureau tracked species within 500' of proposed hotel location

Scientific Name	Common Name	State Protection Status	Global Rank	State Rank
Animals				
<i>Anarta melanopa</i>	A Noctuid Moth	--	GNR	S2
<i>Anthus rubescens</i>	American Pipit	--	G5	SNR
<i>Boloria chariclea montinus</i>	White Mountain Fritillary	Special concern	G5	S2B
<i>Lasionycta leucocycla hampa</i>	A Noctuid Moth	Endangered	G5	S1
<i>Lasionycta subdita</i>	A Noctuid Moth	Endangered	G5	S1
<i>Oeneis melissa semidea</i>	White Mountain Butterfly	Endangered	G5T2	S1
<i>Sympistis funesta</i>	A Noctuid Moth	Endangered	G5	S1
<i>Xestia okakensis</i>	A Noctuid Moth	Endangered	G5	S1
<i>Xestia scropulana</i>	A Noctuid Moth	Threatened	G5	S2
Plants				
<i>Bistorta vivipara</i>	alpine bistort	Threatened	G5	S2
<i>Cardamine bellidifolia</i>	alpine bitter-cress	Threatened	G5	S2
<i>Carex bigelowii</i>	Bigelow's Sedge	Endangered	G5	SH
<i>Castilleja septentrionalis</i>	northern painted-cup	Threatened	G2	S2
<i>Diapensia lapponica</i>	Diapensia	Threatened	G5	S2
<i>Epilobium hornemannii</i>	Hornemann's willow-herb	--	G5T1T3	S2
<i>Geum peckii</i>	White Mountain avens	Endangered	G5	S1
<i>Harrimanella hypnoides</i>	Moss-plant	Threatened	G5T2	S2
<i>Kalmia procumbens</i>	alpine-azalea	Endangered	G5	S1
<i>Luzula confusa</i>	northern wood rush	Endangered	G5	S1
<i>Luzula spicata</i>	spiked wood rush	Threatened	G5	S2
<i>Phleum alpinum</i>	mountain Timothy	Endangered	G5?T3	S1
<i>Phyllodoce caerulea</i>	purple mountain-heath	Endangered	G5T5	S1
<i>Poa glauca</i>	glaucous blue grass	Endangered	G5T5?	S1
<i>Poa laxa ssp. fernaldiana</i>	wavy blue grass	Endangered	G5	S1

<i>Poa pratensis ssp. alpigena</i>	alpine Kentucky blue grass	Endangered	G5	S1
<i>Rhinanthus minor ssp. groenlandicus</i>	Greenland little yellow-rattle	Threatened	G5	S2
<i>Rhododendron lapponicum</i>	Lapland Rosebay	Endangered	G5?	S1
<i>Salix herbacea</i>	snow-bed willow	Endangered	G5?	S1
<i>Salix uva-ursi</i>	Bearberry Willow	Endangered	G5	S1
<i>Saxifraga rivularis</i>	alpine-brook saxifrage	--	G5	S2
<i>Silene acaulis</i>	Moss Champion	Threatened	G5	S2
<i>Vaccinium cespitosum</i>	dwarf blueberry	Endangered	G5	S1