THE ANNOTATED

DRAFT MT. WASHINGTON COMMISSION MASTER PLAN, JULY 2022

I offer this annotation of the July 5 Draft to assist citizens who are not familiar with all the issues covered (or not covered) in the Draft Master Plan and during the public debates that have preceded its release. The Draft Mt. Washington Commission (MWC) Master Plan text is in black type. My annotated comments are in red type. —Jamie Sayen

Note: The Mt. Washington Commission's July 5 Draft Master Plan can be accessed at: https://www.nhstateparks.org/getmedia/92318d92-d2c4-4688-9b49-308a71af1944/Master-Plan-Draft4-7-5-22_1.pdf

I. Statutory Requirements

Pursuant to RSA 227-B:6: The commission shall:

I. Prepare a master plan for the summit including but not limited to:

(a) Capital improvements to be made by the state over a 10-year period;

(b) The proposed operation of the summit by the commission including fees to be charged for the facilities operated by the commission, the method of collection of such fees, employment of personnel, franchises to be granted to concessionaires, and any other items deemed necessary to the proper operation of the summit by said commission;

(c) Promotion of the use of the summit by the public as a recreational, historic or scientific attraction;

(d) Protection of the summit as to its unique flora and other natural resources; Note that protection of ecosystem integrity is fourth on the list of priorities. There is no mention of assessing the impacts past, present, and future of climate change. Fortunately, RSA 227-B:6 ("but not limited to") allows for addressing climate change. Climate change was not mentioned in the various drafts written between February and June 6. At the June 10 meeting of the MWC, the public insisted it add climate change to the list of elements for the Environmental Assessment. This "oversight" lends credence to the widespread perception that the Master Plan is viewed as a tool to promote additional development on and near the Summit of Mount Washington,

including the state-promoted Lizzie Bourne Station Railway Hotel proposal of the Cog Railway.

(e) The negotiation of public rights-of-way to the summit over private lands which benefit from the improvement of facilities on the summit;

(f) Cooperative arrangements between private interests and the commission relative to the collection of fees, joint personnel, and any like subject.

II. Submit the said master plan to the governor on or before January 1, 2010, and on January 1 every 10 years thereafter, for approval and for enabling legislation in the New Hampshire legislature. Note: the current Master Plan was produced in 1970. Efforts to produce a new MP in 2010 and 2013 failed due to lack of support from the "partners" who comprise the membership of the MWC, including the State of NH and the Cog Railway.

III. Monitor all fees being paid to the state for the use or lease of state-owned facilities on the summit, such fees to be used by the commission in its duties and for its expenses.

IV. The governor and council are to authorize the expenditure of funds for final design and contract plans out of funds appropriated for that purpose when requested by the commission. The governor and council are to authorize the construction of the capital improvements to the Mount Washington summit authorized by the general court in a manner consistent with the 10-year master plan prepared by the commission. Note: The RSA states that the State shall authorize (and fund?) development projects, but is silent about the State's obligation to maintain the ecological integrity of Mount Washington.

V. Cooperate and consult with the division of parks and recreation of the department of natural and cultural resources concerning the daily operation of the summit as carried on by the division of parks and recreation.

VI. Consult and advise with the commissioner of the department of natural and cultural resources[.]

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II. Purpose

The summit of Mount Washington is iconic and emblematic of the Granite State. Note: The congested summit eloquently testifies to the

State's dereliction of its obligation to protect the health of the Summit and its natural, wild beauty.
Visitors to the summit should have the opportunity to observe and experience its unique environment. The purpose of this Master Plan is to provide for this experience while enabling the success of all Summit Partners[1] by ensuring that the summit of Mount Washington, featuring the Mount Washington State Park, continues to be a must-see destination for visitors to the region while also ensuring that resource values are protected. Note: The "Purpose" of this MP is a contradiction and an impossibility. The congestion at the Summit is proof that we cannot have both land health and ever-growing profits on Mt. Washington's Summit. This will be achieved by: maintaining a high quality mountain experience that respects Mount Washington's uniqueness; recognizing the mountain's flora and fauna, its facilities, and its history; and, using a coordinated approach to address the capacities of the summit environment, buildings, sewage, waste, energy, and water systems, and transportation modes that must accommodate the full number of people expected or permitted to visit the summit each year. Note: "recognizing" Mt. Washington's flora and fauna does little to reverse the forces that have, and are, degrading the habitat that sustains its flora and fauna.

[1] "Summit Partners" shall refer to Commission members who own, lease, or otherwise contractually occupy an area on the physical Mount Washington summit. However, the Commission recognizes that it benefits from the efforts of all of its members including the voluntary support and assistance of the U.S. Forest Service. The Commission also recognizes that many parties have legal interests in the summit area. Note: The Commission members include: the State, the Supervisor of the White Mountain National Forest, the Cog Railway, the Auto Road, the Observatory, the owners of the Broadcasting towers, the Appalachian Mountain Club, a State Senator, a State Representative, and three members representing the public. Currently the seats of two of those three public representatives are vacant. The land itself has no representation. Conflict of interest cripples the work of the MWC. We need an independent MWC that represents the general public interest in preserving the ecosystem integrity of Mt. Washington, not a Commission that is dominated by vested public and private interests.

The "Summit" referenced in RSA ch. 227-B is comprised of State property and facilities.[2] Overall management of the Summit and facilities to support visitors was entrusted to the N.H. Division of Parks and Recreation ("N.H. State Parks") when the Summit became a State park in 1964. The existence of the Summit Partners is inextricably linked to the physical and geographic attributes of Mount Washington

but the degree to which they succeed is dependent, at least in part, on State park operations. N.H. State Parks strives to provide a quality public recreational experience that includes education and interpretation. Its management is enhanced by public-private partnerships. Note: The State cannot afford to hire a naturalist to inform the public, or to monitor the status of the flora and fauna.

[2] RSA 227-B:2, II states: "'Summit' shall mean the Mount Washington summit property owned by the State." A map of the Summit is attached as Attachment 1. Note: The State wants to limit the focus of its Master Plan to the 60 acres it owns at the very summit. The hidden assumption is that nothing done on the summit or on the routes to the summit would have any impact on any part of the rest of Mt. Washington.

Among other things, the Mount Washington Commission ("Commission") advises and assists N.H. State Parks in its management of the Summit. In doing so, the Commission must try to balance conflicting goals. The Commission values restoration, protection, and preservation of the alpine environment of the Summit and surrounding landscape. The Commission similarly recognizes the importance of access, recreation, and fiscal responsibility which necessarily includes providing Summit infrastructure systems that incorporate high-quality services to serve capacity needs. The Commission strives to maintain the quality of the mountain environment in perpetuity while accommodating the significant number of people and vehicles that visit the Summit. Note: The State and the Commission accept that summit congestion will continue to grow worse. This is the meaning of "balance" of "conflicting goals." When human aspirations conflict with natural laws and limits, something has to change. We cannot change natural laws and limits; therefore, we must alter human aspirations and behaviors. To restore and preserve ecosystem integrity on Mt. Washington and its Summit, we must reduce human impacts, including the carbon footprint of all the users of the Mt. Washington and the summit. This Draft Master Plan reads as a pro-development manifesto of an already intolerably congested summit.

III. Process

The Commission has attempted to set forth goals, objectives, and tactics in detail in this Plan. To create the Master Plan, the Commission used a process:

- Wherein Commission members trusted and respected each other. Note: To prepare for the Master Planning process, the Commission engaged the Harvard Negotiation and Mediation Clinical Program, whose report, submitted in November 2021, concluded: "The partners' differing expectations regarding the MWC's role has led to distrust…" The Report intimated that certain vested interests are viewed as enjoying too much power on the Commission. At the April 22, 2022 MWC meeting, Senator Jeb Bradley, chair of MWC, announced the Commission would disregard the Harvard Report's recommendation it hire a facilitator to build trust and a common purpose. Calls by Commission members and the public that the MWC authorize a thorough, independent Environmental and Climate Assessment before writing the MP have been ignored, and on June 10, rejected. I see no evidence of trust building.
- Wherein all Summit partners contributed to success and ultimate outcomes.
- Wherein the Summit partners recognized their *interdependence* but also respected their *independence*.
- Wherein the Summit partners ensured that the communal support that each organization gives to each other in times of need continued.
- Wherein Commission members recognized that when all Summit Partners work together, all will benefit.
- Wherein the Commission recognized the "all hands on deck" approach to managing important issues, especially as it relates to responding to emergencies and safety.
- That maintained and carried on the culture of helping one another, especially among operational staff on the Summit and on the mountain generally, which arises, in part, from the need to withstand extreme and often dangerous conditions.
- That recognized the important contributions and services provided by the U.S. Forest Service.
- That recognized the evocative reputation and the critical summit-related research of the Mt. Washington Observatory and the Appalachian Mountain Club ("AMC").
- That recognized the public service and security importance of the various Summit communications systems.
- That recognized the essential roles of the historic and special experiences provided to Summit visitors by the Mt. Washington Cog Railway and the Mt. Washington Auto Road.
- That recognized the hard work and dedication of N.H. State Parks.
- That involved both the general public as well as Commission members.

- That encouraged creative thinking and respected the rights of all parties.
- That took advantage of prior work.
- That utilized third-party expertise where appropriate. Note: Third Party expertise is essential for the development of a credible Environmental and Climate Assessment. The draft MP you are reading has been written in ignorance of the current and projected ecological and climate conditions on Mt. Washington, and with an inadequate understanding of current and projected ecosystem conditions. Such a Master Plan is not a credible or serious document. It must be rejected, and its preparation must await the results of a scientifically credible ecological and climate assessment.

IV. Operation and Maintenance A. Environment, Summit Assessment, and Aesthetics

Summit management by N.H. State Parks in cooperation with Summit Partners should aspire to minimize harm by ensuring that human presence is consistent with the environmental goals and protections established in this Master Plan. Note: Without the Environmental Assessments, there are no credible goals in this draft Master Plan. Just platitudes about protecting the flora and fauna while congestion and development intensify.

As an initial step, a Summit assessment should be completed. The assessment should examine damage to and deterioration of the environment including, but not limited to, an analysis of contaminated groundwater and soils around the summit, the impact of climate change, and other environmental considerations. Note: This is correct, an assessment should be performed and completed before drafting a MP. "Contamination" in this context is to be interpreted broadly. Prior recommendations related to protecting flora and fauna and information from the N.H. Natural Heritage Bureau (NHB) database will help inform the assessment. Note: Yes, all NHB data is essential as a preliminary to the full assessment. It is not a substitute for an assessment. Assistance from the N.H. Dept. of Environmental Services and the N.H. Fish and Game Dept. should be requested to help determine a scope of work. Note: Any data possessed by DES and F&G should be part of available to the Assessment team. NH Fish and Game is inadequately funded, and cannot afford to perform basic monitoring on Mt. Washington State Park or any other State lands. Where are the regular monitoring reports from F&G or any other entity on the impacts of development and congestion on the Summit of Mt Washington since the state

assumed ownership in 1964? The assessment should also include a building survey and an infrastructure survey; however, such surveys shall not impinge on the confidentiality or privacy interests of State Park tenants. Note: This reads as a statement that private interests' confidentiality trumps the health of the land. This is a poor start for a thorough assessment. This assessment will form a baseline for planning. Note: THIS DRAFT HAS BEEN WRITTEN WITHOUT NECESSARY BASELINE DATA. The MWC has refused to conduct the thorough environmental assessments prior to writing this draft MP. Given its importance and estimated cost, the Commission will help seek a capital appropriation for this assessment.[3] Note: Asking the tight-fisted NH Legislature for a million dollars or so to gather baseline data on a document already written without baseline data is not responsible policy-making.

To the extent possible, N.H. State Parks and Summit partners should address damage and deterioration of the environment, including stressed or damaged vegetation and impacts of invasive species, identified in the assessment. This could include remediation of impacts or mitigation – meaning avoidance, minimization, or offsets achieved by restoration. Adverse impacts should also be avoided using lessons learned. Summit Partners should continue to enhance the protection of the fragile alpine ecosystem at the Summit through pathways, trails, and signage. Implementation will be informed by the environmental assessment discussed above. Note the use of the conditional: "to the extent possible," "should," "could." The only strong verb, "will be informed," is used for an assessment that has not been performed, and may well go under-funded, or un-funded, by the NH Legislature. Efforts by citizens attending the June 10 MWC meeting to excise the conditional for strong assertions: "shall address," "shall include," were rebuffed.

With respect to structures, the Commission, through this Master Plan, hereby adopts a high standard for planning and performance aimed at avoiding unnecessary additional structures. The negative environmental consequences of existing and future Summit structures should be minimized while balancing ongoing needs and considering other objectives such as the creation of important historic depictions. Note: "balancing" is a term used to hide the fact that the intent is to place profits ahead of land health. This standard does not prohibit new structures; however, it embodies a commitment to minimize environmental damage when performing necessary construction, repairs, or maintenance. Opportunities should be sought to make new structures even less impacting than previous structures such that construction could actually promote positive environmental changes. Management practices to conserve resources, for example, taking

advantage of opportunities to reclaim water or creatively manage sewage need, are also encouraged. Note: this paragraph clearly points to more development at the Summit. It also glosses over the fact that the Cog's proposed railway car hotel ("The Lizzie Bourne Station") will be located just outside the State's land, and that this major development will have profound, negative impacts on the already intolerably congested Summit.

[3] The Commission also encourages completion of a visitor survey, using expertise from entities like UNH. Depending on the scope of this survey, it may be able to be completed as part of the larger Summit assessment.

N.H. State Parks should account for aesthetic impacts. For instance, it should endeavor to reduce the visual impact of fuel tanks. Measures may include reducing the quantity of tanks but could also simply include reducing impacts by wrapping tanks in material that helps them blend into the landscape. Note: The visual impact of the Lizzie Station platforms that are nearly one-tenth of a mile long and just above where the Great Gulf trail merges with the Gulfside Trail will be even worse than the ugly fuel tanks.

B. Operation of the Summit Generally

The Summit should be managed to promote desirable experiences including the enjoyment of iconic views and unique visitor experiences. Operations should ensure a good experience for hikers understanding that hikers appreciate the services offered at the Summit because they know that they will soon return to the rugged above-tree-line experience of the Presidentials.

The Mt. Washington Cog Railway and the Mt. Washington Auto Road each bring well over 100,000 visitors to the Summit each year. Note: This should read "approximately 150,000 visitors." In 2021, the Cog transported 147,948 visitors to the Summit and the Auto Road transported 149,138 visitors. The number of hikers each year is currently unknown but likely rivals that of other transportation modes. Consideration must be given to management techniques and objectives for the Summit that take into account the number of current and expected visitors. However, N.H. State Parks must recognize that ownership of the Summit is subject to several deeded reservations related to access including the following:

The rights of the passengers, guests, and employees of the Mount Washington Road Company and the Mount Washington Railway Company, and of the students and faculty of educational institutions, and of hikers, skiers and other members of the general public, to pass and repass, in common with others, over and across the premises [] which are not occupied by buildings or other structures for the purpose of scientific research and for the purpose of obtaining a view from and observing the summit of Mount Washington. Note: The 1964 agreement between Dartmouth and the State granted the Cog, Auto Road, and others, including the public, the right to access the Summit. Section E of the 1964 agreement stipulated that access is "*subject only to such restrictions as may be reasonably necessary to safeguard the property of the State of New Hampshire*." Protecting the ecosystem integrity of publicly owned lands that are in the care of the State is not only a valid limitation, but an essential limitation.

Book 481, pg. 212, Coos County Registry of Deeds. Nevertheless, N.H. State Parks can limit the capacity of structures like the Sherman Adams building. The Sherman Adams Building currently can only lawfully hold 495 people on the main floor and 298 people on the ground floor. Note: these are requirements set by the State Fire Marshall. At the MWC meeting on February 19, 2021, Wayne Presby, owner of the Cog Railway, "wondered if the state could exempt the SAB [Sherman Adams Building] from fire marshal's restrictions…." His solution to overcrowding is to suspend fire safety laws. If this number is likely to be exceeded, actions will need to be taken to limit visitors to the building at one time, additional amenities (i.e. restrooms, water) will need to be provided at the Summit to support the visitors, or hours extended to allow access to the Sherman Adams building earlier and later in the day. N.H. State Parks asserts that the operating season is dictated, for the most part, by the weather. Note: Visitation often reaches 5,000 people a day on peak summer days. Currently there are 2 stalls and 3 urinals in the Sherman Adams Visitor Center's Men's Room. There are often lines on days when visitation is relatively low. Expanding facilities only increases congestion. The only responsible option is to reduce daily and annual visitation below carrying capacity. The State has no idea what the summit's carrying capacity is. The Environmental and Climate Assessment would provide the answer, but the State refuses to perform the Assessment prior to writing the Master Plan.

With this information in mind, experiences should be tailored to meet identified needs and limitations. In general, N.H. State Parks should evaluate limiting the number of visitors, using reservation systems, or changing operating hours with respect to structures while recognizing the requirements of relevant deeds and the Commission's charge in RSA 227-B:6, I(c) relative to the "[p]romotion of the use of the summit

by the public as a recreational, historic or scientific attraction." Recognizing that there will always be a physical limit to the number of people on the Summit at any given time, the Auto Road and the Cog Railway should investigate ways to limit their visitors in order to contribute to the long range success of the Mount

Washington experience. Similarly, the AMC, N.H. State Parks, and the U.S. Forest Service should investigate ways to limit the number of hikers or associated impacts. The Commission may update this recommendation as it deems necessary. Note: The public and private entities that profit off of visitor congestion may have a right to operate a business, but they do not have a right to inflict damage on the summit or any part of Mount Washington. If they cannot make a profit at visitor levels that sustain ecosystem integrity, they should invest elsewhere, not assert a non-existent "right" to exacerbate congestion.

C. General Maintenance

Maintenance upgrades for Summit structures should be proactively planned consistent with the terms expressed in this Master Plan. There are a number of pending repairs needing attention including: tiles on the observation deck, cracked cement, roof leaks, and paint on the Sherman Adams Building. Cleanup of the Summit and a neat appearance should be an ongoing priority. Abandoned items around the summit (those not offering historic value), including construction debris, and other debris should be removed. The foundation of the former generator should be evaluated for re-use in the context of a long-term plan for Summit structures (e.g., new building for Observatory, additional visitor service, maintenance support, of another viewing platform) and removed if there is no use. Note: More development only exacerbates this unacceptable situation that has gone unaddressed since the State took over management of the Park in the early 1960s.

D. Finance

The Summit should be a model of sustainable tourism and land management. Note: Yes, it should be a model, but, sadly, it is a monument to mismanagement. All parties should acknowledge the need for a fiscally sustainable State Park and should explore options to cover operating expenses and generate revenues that will be able to contribute to maintenance and improvement projects that are typically now and previously funded only through Capital Improvement funding. If the State is sincere about a "fiscally-sustainable State Park," the NH

Legislature must appropriate adequate funds for its operation, and entrance fees must be charged that reflect the damage a visitor, on average, inflicts to the land and that visitor's carbon footprint.

Currently, Mount Washington State Park is the only park that does not support the operations of the park system statewide. All revenue to the Park is deposited in the Mount Washington Fund to be used on the Summit. None of the revenue is used to support parks administration or support less iconic locations that cannot generate enough revenue to support themselves. Capital funds used on the Summit are also not available to support improvements in other locations that do financially support the entire park system. However, like Hampton Beach, the Park is an important revenue generator for private sector businesses. Summit Partners should consider how to support the Mount Washington State Park and understand that their interaction with the Park, and with each other is not a zero-sum game. Note: The State can require the private, for-profit users of Mt. Washington pay what it costs to maintain the ecosystem integrity of Mt. Washington. All partners benefit from the success of the others. The Commission, including Summit Partners, should work to ensure the financial viability of the Summit while also ensuring that a quality Summit environment and experience are maintained. The Commission as a whole should explore a summit Stakeholders' agreement or other means to financially support Summit betterment projects. Note: Asking a Commission riddled with conflict of interest to altruistically reform itself is naïve.

The Commission should work with N.H. State Parks to determine whether a fee should be charged to enter or use Park facilities. As part of that, a third party should evaluate Park operations unless Commission members can provide such an evaluation free of charge. As noted above, the entrance fee should reflect the carbon footprint and other ecological impacts of the average visitor, and that should recognize that an auto driving to the summit, and the Cog's coal- and biodiesel-powered engines emit more hydrocarbons than a hiker. Hikers also impose substantial impacts.

Retail and food concessions are the primary source of revenue to support the entire operation of the State Park. The gift shop generates the highest per square-foot return in the parks system. However, space is insufficient to operate efficiently and there is little opportunity

for future expansion. Note: Fast food and souvenirs such as shot glasses, refrigerator magnets, and doggie food, have their own carbon footprint and exacerbate our waste disposal crisis. We should not

support expanding the sale of these items. In particular there is a lack of storage space on the summit. Kitchen space, refrigeration and ventilation are inadequate. Therefore, existing space in the building should be evaluated to optimize return while preserving visitor experience. Note: The solution is to reduce motorized visitation. Year-round online sales should continue to be explored.

To ensure smooth operations, N.H. State Parks should explore and consider opportunities closer to the base of the mountain to support Summit operations. Note: Relocate the Sherman Adams building to the base or to Conway. Provide virtual reality experiences to visitors. Visitors who spend an hour on the summit, mostly visiting the bathrooms the cafeteria, and the souvenir shop, are hardly experiencing the wild, dangerous world of the summit.

E. Education/Outreach

Management activities should result in information, education, access features, and trail maintenance that promotes protection of the fragile alpine environment and an environmental ethic. They should educate visitors about the unique scientific, botanical, meteorological, and geological aspects of the Summit. Educational programs and visits from school and other groups should be coordinated to showcase information on the history of the Summit, climate, environment, and conservation work. Synergy among Summit Partners should be increased to do things like, for instance, establish a joint communications package that gives consistent signage and information to Summit visitors, many of which hail from all around the region and the world.

The Commission, Summit Partners, and N.H. State Parks should promote the scientific research and monitoring on the Summit conducted by the Mt. Washington Observatory and the Appalachian Mountain Club to enhance public understanding. Efforts should be made to create a greater presence for the Museum so that it can provide an “interpretive experience” for interested Summit visitors. Measures should also be taken to create or maintain world-class Mt. Washington Observatory weather research facilities, indoor/outdoor laboratory, and testing space. Note: the small Museum is one of the few visitor services on the summit that is not tacky. But it could easily be housed in expanded space near the base of Mt. Washington.

Summit Partners should provide for the creation of display boxes of rare flora indigenous to the alpine climate to educate about the importance of protecting the Summit. Similarly, Summit Partners should encourage creation of a Nature Gallery as the terrain from the

base to the Summit hosts a very diverse population of plants, animals, and insects.

N.H. State Parks, with the assistance of the Commission, should review the Pike's Peak plan for ideas on how to begin integrating technology-based experiences. Ideas include guided tours, educational interpretive plans, and a summit-related "App." to be collaboratively and aggressively promoted. The "App." could include such features as educational and historical audio and visual presentations, a "Summit Challenge," a "Summiteers" program, or programs that encourage people to post and share pictures on social media. Commission members including Summit Partners will help advertise and promote any such "App." along with the existing "Online Donation to Mt. Washington State Park" option and will integrate the donation link into Summit Partner websites. N.H. State Parks should also consider collaborating with other high-traffic parks/tourism sites and organizations such as White Mountain Attractions to establish effective messages and information for visitor management. Note: Modeling the development of Mt. Washington on Pikes Peak, as the Cog Railway suggested at a presentation at the MWC's June 10 meeting is a terrible idea. Pikes Peak has 900,000 visitors per year. It recently underwent a massive re-development that was largely taxpayer funded. The Cog wants the public to subsidize a multi-million-dollar development expansion on the summit of Mt. Washington. That would be a disaster for alpine flora and fauna and ecosystem integrity.

F. Safety

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State Parks should continue assisting and coordinating with rescue professionals to generally maintain a safe and enjoyable experience within the Park. Where needed, N.H. State Parks should ensure that it has an updated emergency response plan and that it, and Summit Partners, acknowledge their respective roles within response efforts led by the N.H. Fish and Game Department and U.S. Forest Service outside of the Park. Please note that job descriptions for State Park employees on the Summit do not include a requirement to perform emergency responses off site; however, staff often have that training and have assisted hikers on a limited basis. Park staff members also take responsibility for the safety of visitors within the Park boundary, including buildings, to the same degree they would in any State Park. Generally, search and rescue efforts outside of the Park are led by the N.H. Fish and Game Department except that from December 1st to May 31st, the U.S. Forest Service has search and rescue responsibility over

the Cutler River Drainage Basin. *See* Attachment 2. As a "rule of thumb," State Park staff and other entities should call the N.H. Fish and Game Department "for those situations that are beyond their capability."[4] All Summit Partners should emphasize cooperation and coordination among the relevant entities. Note: This reminds us that Mt. Washington's rugged terrain and wildly unpredictable weather make for a very dangerous place to visit. Trivializing these dangers for motorized tourists who mostly visit the souvenir store and the cafeteria is a disservice to visitors and the health of the Mountain and alpine ecosystems.

State Parks should continue to promote hiker safety education by its Summits Partners for all season hiking. With respect to safety, education is key.

[4] This advice courtesy of N.H. Fish and Game Lieutenant Mark W. Ober, Jr., District One Chief.

G. Real Property Management

State Parks should report on how State property at the Summit is being utilized, along with any analysis it may have on the full market value of relevant leases or licenses. The Commission may then request an independent analysis of full market value if it deems appropriate. Note: Charging both "full value" and the ecological and carbon costs of current activities would drastically curtain activity on the summit, and significantly reduce congestion.

Leases and agreements are between the lessee and the State of New Hampshire rather than the "Commission." The State has not consulted with the Commission regarding leases in recent years. Consultation is awkward because of the specific rights and interests that many of the Commission members have in the Park through agreement and deed. However, with the new focus on master planning and the strengthening of both relationships and the function of the Commission, the Commission should be presented with leases and agreements including terms, compensation, rights granted, and rights received. This will allow the Commission members to provide comments and advice relative to achieving the Master Plan and the impact on their own operations, visitor experience, and the Park as a whole. Commission members should recuse themselves as appropriate and when agreements are in negotiation, the Commission may need to go into non-public session to discuss (as is the case with the State Park System Advisory Council review of agreements). Generally, N.H. State Parks should ensure that Summit Partners are engaged and heard with

respect to leases or contracts on the Summit. Note: Time to terminate all conflicts on interest on the Mt. Washington Commission.

Summit Partners, including N.H. State Parks, should also work to clarify and solidify existing property rights at the Summit. The land should belong to the flora and fauna and the general public, not “for-profit” private and public entities.

V. Capital Improvements

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A. General Goals

The Commission hopes to achieve a balance between historic and modern facilities at the Summit. Capital improvements, to the greatest extent practicable, will provide for accessibility, inclusiveness, visitor experiences, trail experiences, and energy efficiency as described below. Note: Missing from “General Goals” is any acknowledgement that current visitor levels and other uses are seriously degrading ecosystem integrity on the Mountain and its Summit. A scientifically-rigorous Environmental and Climate Assessment would confirm this and radically transform the writing of a MP.

B. Accessibility and Inclusiveness

The Commission will, to the extent practicable, ensure that the Summit is accessible and inclusive. Note this necessary addition: “without degrading the habitat of native alpine flora and fauna, or further exacerbating climate change.” This means providing quality information and access for a diversity of visitors including those with varying physical and intellectual abilities. Therefore, capital improvements should provide for outdoor accessibility and inclusion for those of all ability levels. The visitor experience should be enhanced for all persons using technology and designs to improve access to natural features and historic or scenic elements. The Commission will also explore opportunities to lower financial barriers of access to the Summit in an effort to achieve additional demographic equity.

The Commission notes that Mount Washington is one of only two of New Hampshire’s forty-eight “four-thousand-footers” with non-hiker access (Cannon is the other), making the Cog Railway and Auto Road integral components of a special experience for hundreds of thousands of visitors annually from around the globe. Note: “a special experience” that has unacceptable negative impacts. Therefore, it would be beneficial to create walking surfaces that are safe and

accessible to all people with an eye towards permeability, considering limiting factors such as climate, and ensure any work is performed within the context of overall master planning objectives. To help further inclusiveness, a public process of research and investigation should be undertaken to determine the significance of the Summit to indigenous people and, thereafter, identify and considerately incorporate features sensitive to such significance. Note: From time immemorial, the Abenaki believed it a sacrilege to climb New England's highest mountain. Abenaki names for this wild, dangerous peak were: *Kodaak Wadjo* (translation: "summit of the highest mountain"), *Agiochook* ("At the concealed place"), and *Maji Neowaska*, where a demon, or bad spirit, was supposed to dwell on the highest peak

C. Enhanced Visitor Experience within Structures

Capital improvements should be funded that enhance visitor experiences in public structures. These should include:

- Posting historical interpretive panels on the walls of the Sherman Adams Building; and,
- Creating updated and more modern informational displays within the Sherman Adams Building that provide visitors with better knowledge and understanding of the overall uniqueness of and history of Mount Washington. This could include a looping video display or enhancements to the museum.

D. Trails

Ways to disperse visitors throughout the Summit should be considered in order to enhance visitor experience by limiting overcrowding in certain locations. Modification of the hiking trail network and the inclusion of new signage to keep visitors on the trail, entertained,

and dispersed should be explored. Prior to modification, a trails assessment should be performed. The trail around the Sherman Adams Building should then be improved consistent with N.H. State Park and Commission recommendations. Eventually, the possibility of creating a loop trail should be evaluated. Note: The State and the Cog have been pushing for a paved "Summit Perimeter Trail" for tourists. The State already has drawn up some scoping documents. There is plenty of pavement on the summit already. NO PAVED SUMMIT PERIMETER TRAIL!!

E. Yankee Building

The Yankee Building supports many systems of State and national importance.
However, the building is currently in a state of disrepair and was not designed for its current function as a communications facility. At the request of the Commission, an assessment of the building was completed in 2019 addressing fire protection, communications equipment, and alternatives for building use with recommendations. An opinion of costs for reconstruction and a proposed Summit site plan were provided. The Commission should continue to pursue actions to determine how to properly provide an up-to-date communications and maintenance facility including consideration of what other uses might be incorporated in such a facility. As part of this process, the Commission should explore funding opportunities to determine whether there is federal public safety funding for items like, for instance, fire suppression. The Commission shall also assist N.H. State Parks in utilizing the Capital Budget Process, the American Rescue Plan Act ("ARPA") funding, and other funding sources such as the private sector. Elements other than just communication, such as aesthetic and environmental impacts, will be considered when siting, building, or maintaining summit towers and the Yankee Building. As part of its efforts, N.H. State Parks should consider the potential of having a third party construct and operate a telecommunications facility. Note: Replacing the Yankee Building could cost in the vicinity of $15 million. The broadcasting services could be relocated off the Summit. TownSquare Media, owner of the broadcasting rights, opposes relocation because it enjoys many benefits that have been grandfathered in over the years. It would lose its grandfathered rights if it relocated to the valley. What are these grandfathered privileges? Also, US government agencies (possibly the CIA, the military) use these broadcast facilities.

F. Water and Waste

Capital improvements should make sure that waste management systems are designed, sized, and operated to meet the long-term rather than short-term needs while minimizing environmental degradation. This can be furthered by the use of conservation, utilization and reclamation technology.

A project is underway to replace the sewage treatment tank and modernize the water systems. It consists of upgrading the seasonal Summit water system to a year-round
system. Two new 20,000-gallon water tanks will be installed adjacent to the Sherman Adams Building to replace the deteriorating steel tanks currently located 300 yards down slope from the Sherman Adams Building. The existing sewage treatment plant will be replaced with a

larger plant that will provide capacity for anticipated growth in the number of annual visitors over the next decade. Funding for the project has been secured through a combination of capital funds, ARPA, and Land and Water Conservation Fund monies totaling $3,575,417. The contract for construction has been approved by Governor and Council and is underway. Note: The Summit's overtaxed waste water treatment plant is a high maintenance operation. There are problems with its pipeline in winter. A 2018 report on a possible new sewer interceptor pipeline from the Summit to the Cog's Base Station found that the current sewer system, with a capacity of 5,000 gallons a day, is out of compliance with its permit: "The existing system on the summit of Mount Washington does not reliably meet the permit levels for groundwater disposal under Groundwater Discharge Permit 199007007." (https://www.nhstateparks.org/getmedia/6da29141-b715-44d6-9991-4df60ec3b46b/Mt-Washington-Sewer-Interceptor-Feasibility-Study-01-26-2018.pdf.

Congestion creates waste water problems. The sensible solution—reduce the number of daily and annual visitors—would diminish the Cog's and State's revenue flows. Phil Bryce, the retiring Director NH Parks and Recreation told the MWC on April 22, 2022 that "concessions and retail" are the major revenue sources for "upgrading" the Park: "We are dependent on our visitors for our well-being."[1] It appears that the State promotes more congestion to finance the Department of Parks and Recreation.

Restroom facility needs should also be evaluated, using data and accounting from Summit Partners. Future facilities should be constructed based on that evaluation. Note: The Summit is a very small space. The solution to acute overcrowding on the finite Summit is to reduce summit visitation levels to below the Summit's carrying capacity, not to intensify Summit congestion and expand sewage treatment facilities. Currently, the summit's carrying capacity is unknown, but it could be established by a credible Environmental and Climate Assessment(E&CA).

G. Energy Efficiency and Sustainability

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Capital improvements should be evaluated and chosen consistent with sustainability principles in order to achieve sustainable operations while serving the needs of the visitor. Protective and energy efficient features should be incorporated into Summit structures with designs that reduce intrusion into visitors' Summit experiences and the environment. To the maximum extent possible, and consistent with the preservation of historic settings, Summit, equipment, facilities and infrastructure should incorporate energy and resource efficient technologies, which would be upgraded, consistent with these

[1] Jamie Sayen, "Notes of April 22, 2022 Mount Washington Commission Meeting."

principles, to incorporate technical advances. Changes should encourage the lowest possible emissions. Changes that are compatible with energy certifications or the equivalent and that incorporate renewable energy sources should be encouraged. These may be structural, such as the use of modern building materials or techniques, or non-structural such as switching to LED lights and induction cooking. The Cog Railway will lead efforts to determine if electrical infrastructure and use related to its activities could contribute to cost efficiencies. Note: Reducing carbon emissions requires maximum efficiency, but it also requires substantial reductions in visitation and other carbon-emitting activities. The Draft MP, by ignoring reduced visitation, is proposing to expand energy generation, and even if the new system is less wasteful, it fails to reduce summit-related carbon emissions.

VI. Implementation

The deliverables within this Master Plan shall be implemented as soon as possible and, if applicable, will continue to be implemented throughout the planning period unless modified by the Commission. Note: Among the unaddressed 1970 directives: “Summit environs not preserved;” and “Mountain Flora not identified and protected;” This Draft MP does not require annual monitoring of the impacts of human activities on the ecology and climate of Mt. Washington. Without regular, on-going monitoring, implementation of this Draft MP will further degrade conditions on and near the Summit. The Commission shall support a request for funding for the Summit assessment described in Part IV.A. of this Master Plan. It shall review that assessment and modify the Master Plan based upon the recommendations in the assessment. Note: This refers to the MWC’s plan to use the MP to persuade the Legislature to appropriate adequate funds for the Environmental and Climate Assessments it has refused to perform before writing this Draft MP. What happens if the NH Legislature refuses to appropriate adequate funds for the Assessments? Answer: This Draft MP, written in near total ignorance of the current ecological and climate status of Mt. Washington flora, fauna, and ecosystems, will be the governing document for at least the next one to five decades.

VII. Conclusion

This Master Plan fulfills the Commissions responsibilities under RSA 227-B:6. The Commission may update or amend this Master Plan as the Commission sees fit. Note: This statement is untrue. The MWC has not fulfilled its responsibility to assure the “(d) Protection of the summit as to its unique flora and other natural resources.”

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