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Fayette, Maine 04349

May 12, 2022

Sarah L. Stewart, commissioner  
Department of Natural and Cultural Resources  
State of New Hampshire  
172 Pembroke Road  
Concord, New Hampshire 03301

Dear Commissioner Stewart,

I write to ask that you ensure that a thorough environmental analysis of the ecological effects be done before any action is taken on Wayne Presby's planned expansion of the Cog Railroad's presence on Mount Washington. As I understand Presby's plans, they would involve construction of large platforms and the permanent installation of 18 railroad cars in which people could sleep overnight, and all of this would be above treeline. Yet the state of New Hampshire is supporting this project, at least on an informal basis at this point, as I understand it, even though the state's 10-year master plan for the mountain was written 52 years ago and no thorough environmental assessment has been done there in decades.

It would be hard to overstate the degree of change that has occurred in plant ecology in the past 52 years, including much that relates to our understanding of alpine plant vulnerability to disturbance as well as other environmental threats already facing the alpine communities on Mount Washington, such as nitrogen deposition, warming temperatures, changes in both amount and timing of precipitation, and invasive species.

All around the United States, officials responsible for preserving natural conditions and natural communities in the face of overwhelming demand from visitors have realized that they can not satisfy all visitors while also protecting the natural areas they are charged by law with protecting. Just in the past few years, limits were placed on the number and timing of visitors in Acadia National Park. I understand that limits cannot be imposed without careful consideration and study. The Acadia changes were imposed only after a 3-year study. But the necessity of these limits cannot be denied just because they are not always popular or require extensive study. The need for limits is being recognized nationally, and restrictions on daily attendance have been considered already on Mount Washington. It's clearly coming and it's time to study the issue.

Rather than moving ahead with additional development on the summit of Mount Washington, the state of New Hampshire needs to move ahead with a thorough revision of the master plan for the mountain, taking into consideration the many changes that have occurred in the past 50 years. You do not want New Hampshire's approach to the most magnificent mountain in the Northeast to be driven by thinking that is decades out of date. Furthermore, the master plan cannot be revised without a

thorough assessment of the environmental conditions as they exist now, not as they existed decades ago.

The natural communities on the mountain have not been protected as they should have been. A comprehensive analysis of the plants and animals living on the mountain now does not exist and it is needed. How else will you understand what could be lost before moving ahead with additional development? Alpine mountains like Mount Washington are special. The plants that occur on them are hardy in some ways but delicate in others. They are sensitive to disturbance caused by construction or digging of trenches like that the Cog dug several years ago to put in a fiber optic line. A colleague and I studied the effects of that disturbance, hoping to find that recovery was proceeding quickly; we found it was not. (I can get you a copy of the paper, which was published in Rhodora if you would like it.) And because of continued disturbance along the Cog tracks, where the original digging was done, recovery by the alpine plants has been further retarded. Under the best of conditions, growth and the establishment of plants above treeline is slow and difficult. We need to protect the little alpine environment we have in as near as natural conditions as is possible. That means no unnecessary disturbance should ever be permitted. People come from far away to see Mount Washington. But they don't need to drink cocktails in the alpine habitat while watching the sun go down. They can do that somewhere else. But we don't have a "somewhere else" for alpine plants and animals, which are already facing multiple threats.

I write to you as someone who has hiked in the White Mountains for more than 60 years and as a biologist who has worked for many years to study alpine plant communities in the Northeast, primarily in the White Mountains and in Maine. Any expertise I have would be in the area of alpine plant ecology. But I should also note that, as commissioner of cultural resources, you also are responsible for protecting the aesthetics of our natural environment, and the environment on Mount Washington is already an abomination: the last thing it needs in terms of aesthetics would be more people, more buildings, more commercial activity. That's not what mountains are about for millions of people who love mountains. It's an environment that needs to be protected for future generations of people but also for the plants and animals themselves. The state has another department that is responsible for economic development, but it has no other state official charged with protecting the environment. That protection at this point requires a thorough environmental analysis of Mount Washington and the threats it faces, which should be conducted as part of drafting a new master plan for the mountain. It would be seriously negligent to consider Presby's proposal without knowing more about what already has been lost and what more we may lose if additional steps are not taken to limit destruction of this priceless alpine habitat.

Very truly yours,

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