

Supervisor Iburguen,

since they were constructed, the Cog Railway, the Auto Road and Mt. Washington State Park have been degrading the land that is now White Mountain National Forest.

The Cog Railway's construction has damaged and contaminated the terrain beneath and surrounding it. The engine cars have been discharging CO2, mercury, noise, coal and other pollutants into WMNF since 1868. The damage done by the 2010 burial of the fiber optic cable remains.*

The Auto road has been a source of erosion and dust since 1861 and a source of CO2, lead, noise, microplastics, oil, dust and other pollutants that have been degrading WMNF since 1902.

These two corporations perpetuate ten miles of destruction of wild high-altitude terrain.

Mt. Washington State Park is a visual and environmental excrescence in the middle of WMNF. The Department of Environmental and Cultural Resources (formerly DRED) which manages the Park, plans to increase the summit facilities and the number of visitors and has refused all requests for an environmental assessment of the park and its carrying capacity. DNCR has sovereign immunity.

The AMC huts alter the wildness of the Presidential Range and increase the amount of hikers in this overused range. WMNF required an Environmental Impact Statement (a rarity in your agency) for their re-permitting. Compared to the summit, Cog and Auto Road, the huts are gems of minimalism.

Now we have the 'Lizzie's Station' proposal with 1/10 of a mile of new track, 500' of new platform (50,000 coverage) and an unknown area that would be damaged during construction. The eighteen dwelling, dining and defecation cars would be seen from an extensive area of White Mountain National Forest. Erosion, air pollution, noise pollution, light pollution and the disturbance of animals, insects, lichen, flora and people would extend into White Mountain National Forest.



The applicant's simulation of 'Lizzie's Station' (above) "shows" each new siding with six cars rather than the nine cars that are proposed.

It also eliminates the rise in this area shown above, altering the location of the track. The simulation also appears to have been taken from a slightly different location, altering the dimensions.



The Lizzie Bourne monument is visible at the far right of both images. Though they are at the same scale, the cars and engine in the simulation are smaller than the one in the photo above.

The simulation below may be more accurate though it still fails to show the real track location or how the sidings and cars will be constructed on the level, thus diverging in height from the existing track.

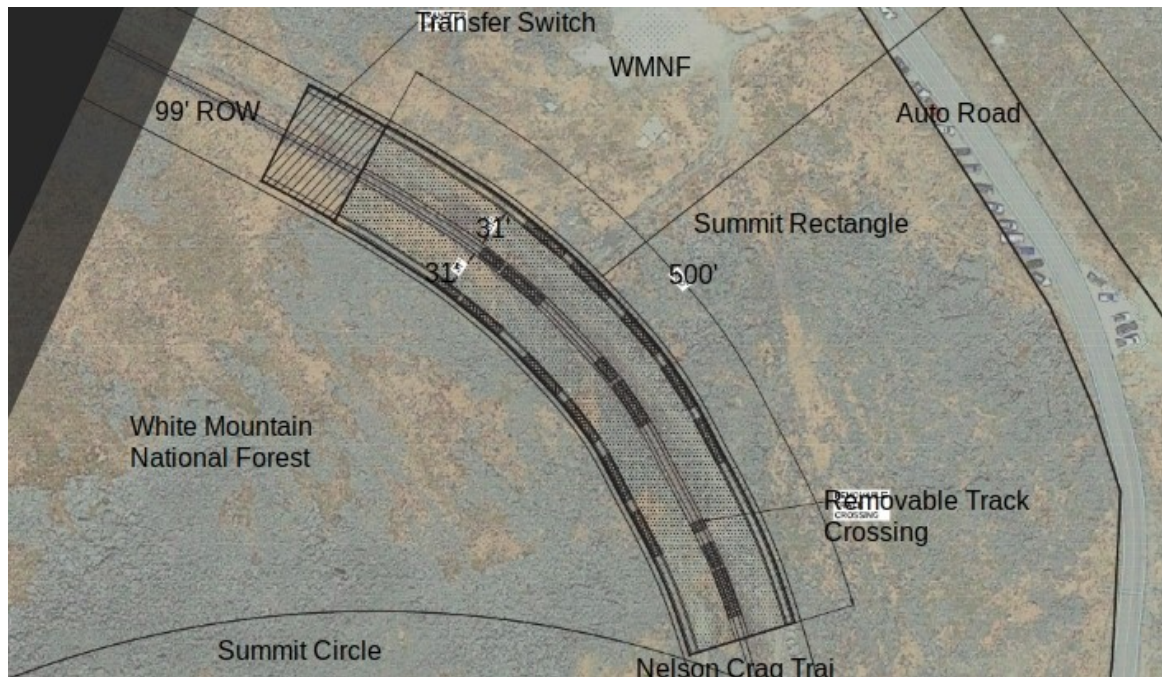


The diagram below, from the Applicant's presentation, is difficult to read, but the distance from the edge of the present track (no dimension given) to each of the two new proposed tracks (no dimensions given) is 31'. Would this 62' be two platforms to connect the nine cars on each new siding, allow access to the cars, and give the occupants somewhere to go? The area around the proposed "Lizzie's Station" is fragile Alpine terrain, not the pavement and concrete that covers much of the summit.

The proposed construction would occupy the whole of the applicant's 99' right of way. No information has been presented on the construction of the tracks, sewage car, switching station, wastewater pipe, platform or cars, beyond a few of the the proposed dimensions. The Commissioner of DNCR, Sarah Stewart, had no response to the question of how DNCR could approve a project for which it had no construction plans.

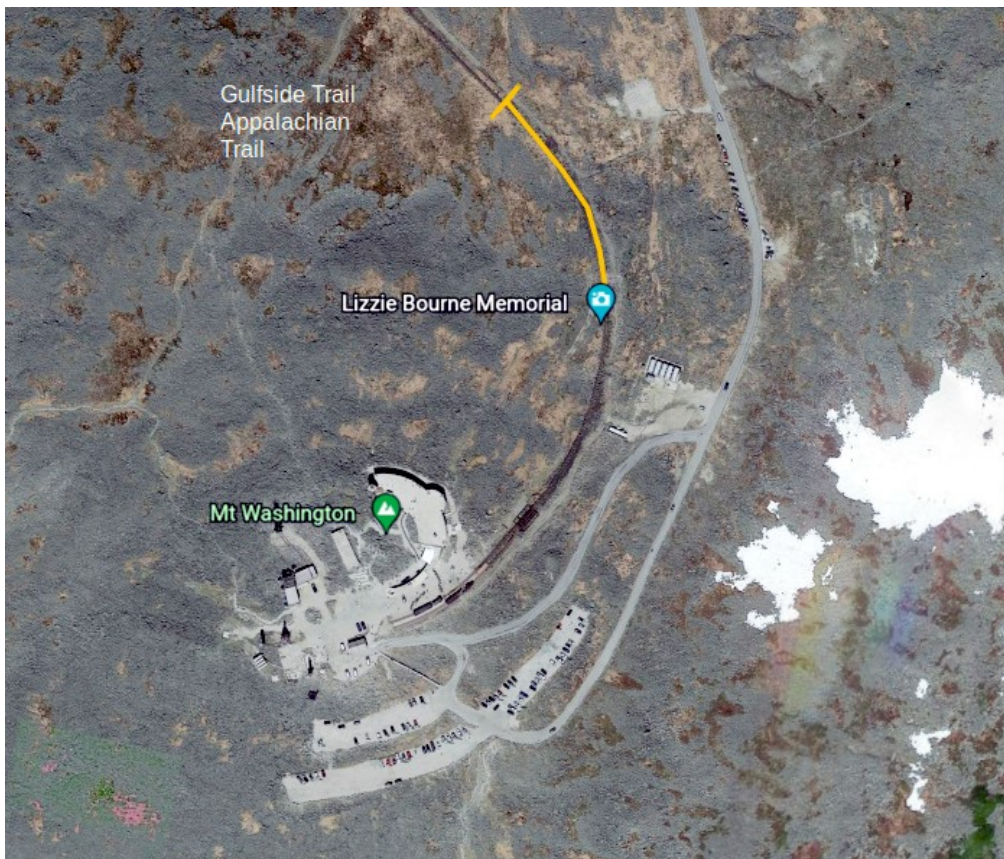
WMNF has, so far, joined the state in failing to express any substantive aesthetic or environmental concerns about the project.

The presentation produced by the applicant is available [here](#) or on the MWC website.



(Above) Applicant's diagram of their proposed development area (text added for clarity.)

(Below) Google Earth imagery with proposed development length and width shown in yellow, excluding transfer switch.



WMNF permitted the Northern Pass project with the claim that this decision was based on the Environmental Impact Statement produced by the Department of Energy.

I request that you require an Environmental Impact Statement for the proposed development of “Lizzie’s Station.”

You can’t remain silent and continue to collude with the State in refusing to provide credible research and documentation on the effects of “Lizzie’s Station” on;

- the breeding success of the American pipit,
- the White Mountain Fritillary, a state endangered species that has been found only in the Alpine Zone of New Hampshire, including Mt. Washington,
- the amount of microplastics, pfas, air pollution and other toxins being released into White Mountain National Forest,
- the integrity of the Alpine tundra ecosystem,
- the environmental impacts and potential problems with piping wastewater and hauling sewage from the proposed project to the Cog Base Station.**
- the Cog Railway’s exemption from current regulations for air pollution,***
- the experience of the hikers in the extensive area from which the project would be seen (no visual impact map was provided by the applicant.)
- the creation of a second, connected, summit complex.
- the exclusion of WMNF from the negotiations between the State and State agencies,
- the overcrowding of the summit,
- the ongoing and relentless ecological, auditory and visual degradation of White Mountain National Forest by the Cog Railway, Auto Road and Mt. Washington State Park,
- Global Warming, the sixth extinction and overshoot:

“[The Anthropocene Age](#) – the age of humans, which has caused [extinctions of plant and animal species](#) and the pollution of the soil, air and oceans – is accelerating. Sea levels are rising three times faster than predicted. The arctic ice is vanishing at rates that were unforeseen. Even if we stop carbon emissions today – we have already reached 419 parts per million – carbon dioxide concentrations will continue to climb to as high as 550 ppm because of [heat trapped in the oceans](#). Global temperatures, even in the most optimistic of scenarios, [will rise](#) for at least another century. This assumes we confront this crisis.

The earth is becoming [inhospitable](#) to most life. The average global temperature has risen by about [1.1 Celsius](#) (1.9 degrees Fahrenheit) since 1880. We are approaching a [tipping point](#) of [2 degrees Celsius](#) when the biosphere will become so degraded nothing [can save us.](#)” * _

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* SLOW RECOVERY IN A MOUNT WASHINGTON, NEW HAMPSHIRE, ALPINE PLANT COMMUNITY FOUR YEARS AFTER DISTURBANCE. Robert S. Capers and David W. Taylor , Rhodora, Vol. 116, No. 965, Jan. to March, 2014

** From the [2018 feasibility study](#) of piping sewage (not wastewater) from the Sherman Adams building to the Cog Base Station:

“Construction of the proposed pipeline below the frost line is assumed to be cost prohibitive due to expected depth to frost line, and shallow depth to bedrock. The pipeline is generally assumed to be buried with two feet of cover for physical protection from damage due to temperature fluctuations, wind and ice damage, among other things...

Concrete pipe anchors are assumed every 50’ ...

Runoff protection to prevent erosion of the pipe bedding is required due to the steep pipe slope. Pipe bedding is typically more permeable than the surrounding soils, which can lead to the trench forming a conduit for runoff and stripping of the pipe bedding. Runoff protection may include trench dams every 300’ and import of engineered low permeable fill material...

Cleanouts are assumed every 1,000’. The number of cleanouts is minimized because the EPA Cold Climate Utilities Delivery Design Manual identified them as a point of vulnerability in shallow buried pipelines due to damage association with freeze thaw cycles.

Energy dissipation structures such as drop manholes or stilling basins are typically included to prevent hydraulic jumps and reduce velocity...

Venting, including air and vacuum, may be required for pressure release and should be confirmed during design...”

***. “The steam locomotives on the railway generate large amounts of smoke, nicknamed "Cog Smog".^[28] The railway is exempted from the state's air-pollution-control law (RSA 125-C:20),^[29] which exempts "any steam locomotives and engines or replacements thereof used in connection with the operation of a railroad or railway which were in operation or on order prior to January 1, 1973, and are located entirely within the state." “ https://en.wikipedia.org/wiki/Mount_Washington_Cog_Railway