## **Mount Washington Commission Master Plan Comments**

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A primary purpose of this Master Plan is to secure a legislative appropriation to fund "a summit assessment" [p. 13, 2<sup>nd</sup> deliverable]. A professional assessment is critically important but to be credible and useful it must:

- Be done by a professional third party unaffiliated with summit partners;
- Address what the Commission specifies it needs/wants to know (v. what the provider chooses to study and deliver);
- Include alternative recommendations for evaluation by the Commission, that is, not just identifying problems and deficiencies but also potential solutions and remedies;
- Be followed by a facilitated implementation/management plan such that the assessment report is not 'shelved' or cherry-picked for piecemeal actions;
- Generate or lead to the creation of a capital improvement plan, specifying capital expenses to be targeted by year to accomplish specified goals.

The Commission must be clear with respect to its expectations for and specifications of an assessment in order for it to be a useful and productive investment. How this assessment is implemented – after it is written and submitted – is critical to its success in achieving the other deliverables in the master plan framework.

Elsewhere in the draft plan, there are calls for a visitor survey [p. 13, 3<sup>rd</sup> deliverable], and trail assessment [p. 19, 2<sup>nd</sup> deliverable]. Each of these assessments would require specialized expertise and would need to be conducted independently. Because of the professional fees that would be needed to conduct these assessments, it would be prudent if the legislative appropriation targeted for the summit assessment discussed above also included funding for the visitor survey and trail assessment as well.

It is widely acknowledged that the summit of Mt Washington is experiencing stresses and strains on both its physical infrastructure and the natural environment. One of the strategies that has been discussed to manage or perhaps mitigate these stresses and strains is to "disperse visitors throughout the Summit" [p. 19, first deliverable]. It should be of great concern that the dispersal of visitors would likely result in the dispersal of stresses and impacts. In many instances, this is recognized as sprawl.

The State Park should not become a sacrifice zone. A responsible plan would identify specific constraints, quantify or otherwise parameterize each constraint, determine how to either alleviate or live within those constraints as an action item, and then monitor the effectiveness of each action. Without explicitly recognizing and assessing constraints and stressors, the likely outcome of dispersal would simply be sprawl and expansion of negative impacts.

The 2<sup>nd</sup> deliverable under Operation of the Summit Generally on page 14 states "Tailor experiences to meet needs, limitations, and carrying capacity". Unless the needs, limitations, and carrying capacity are defined, this is an unattainable goal; there would be no way to know if needs and limitations are being met or not. What are the actual metrics that would determine attainment or progress?

The capacity of the summit isn't merely the quantity of visitors that can make it to the summit, but also the ability to provide a positive visitor experience and protect the resource from degradation. If the number of visitors exceeds this capacity, the State Park is vulnerable to negative visitor experiences which is counter-productive to the desired intent. Carrying capacity must consider the thresholds where either the visitor experience becomes negative or the impacts on the environment become detrimental.

Determination of carrying capacity has been avoided due to operational complexities and difficulties in controlling access. These challenges should not excuse the need for understanding limitations and impacts. Effective management should be able to know when the summit is being operated below, at, or above capacity, whether it has the current means to control that capacity or not. It behooves the State Park to know and understand the capacity constraints in order to manage expectations and avoid inept 'crowd control'.

Of course, the operational revenue is critical to the functioning of the State Park. It would be short sighted and counter productive however, if the focus on operational revenue were outweighed by the cost of remediation due to unsustainable levels of visitation. It is far more expensive to remediate damage done than to prevent damage from occurring. Strategic decisions require knowing and understanding the full extent of consequences, both positive and negative.

The deliverables cited in this document may reflect intent or desire as a framework, but unless or until there are specific actions that can be measured and monitored, it is only a wish list rather than a "plan" to achieve desired results. To be a useful management tool, each deliverable should be expanded to include tasks or action items, resource requirements, and dependencies. Given that there are limited resources to address all the deliverables, resources will need to be prioritized and allocated (over time) to achieve desired results. This can't be done effectively unless tasks are evaluated on the basis of costbenefit. A capital budget, separate from operations, that is tied directly to the elements of this strategic framework would be a pragmatic way to manage improvements over a span of years.

Phil Bryce has stated that the Mt Washington State Park is a very unusual and difficult park to operate due to the limited access, off-the-grid infrastructure, alpine environment, and "world's worst weather". Successful implementation of this master plan will require a generous allotment of time and a high degree of coordination and oversight above and beyond day-to-day operations. Not to disparage current management in any way, serious improvements at the summit may require a short-term management position devoted to planning and implementing capital improvements called for in this document. Perhaps this position can be bundled with the legislative appropriation for assessment.

This draft framework has the potential for some significant improvements on the summit if the Commission and DNCR staff are willing and dedicated to following through with the deliberate planning required for implementation of these deliverables.