

The attached proposal for the Bog Pond Scenic Area in Lincoln, NH was sent to John Morrissey, Regional Forest for the Pemigewasset District of White Mountain National forest in early 2016 by the Easton Conservation Commission. It was rejected by him on March 25, 2016.

The Easton Conservation Commission has been concerned with the protection of the Bog Pond area since 2010, when Northern Pass was proposed.

In 2013 the Commission presented to Tom Wagner and other Forest Service employees the attached presentation on Northern Pass and the Bog Pond area. The concluding paragraph is: The best case scenario for WMNF would be to bury a second line along the alternative route, to replace the existing above ground line – allowing the Pemi District, Bog Pond and Appalachian Trail Corridor to revert to pre-electrification wilderness.” The proposed alternative route was burial along route I-93.

http://media.northernpasseis.us/attachments/Att_5079_WMNF_Town_of_Easton_and_Northern_Pass.pdf

PSNH's 1947 proposed route for the existing powerline was in the area of the Coppermine Trail, passing over Cannon Mt. Near Lonesome Lake. PSNH felt the area over the Kinsman Ridge was too difficult. The Forest Service strongly opposed siting the powerline where it would be visible to visitors to the Notch, and suggested the Kinsman Ridge crossing, perhaps also because it did not then own the 4,055 acre Bog Pond Tract the powerline would traverse. PSNH agreed to site the powerline here, running it through Bog Pond and its surrounding bog. At the time NEPA and the EPA did not exist.

Northern Pass was not the first threat to the Bog Pond Area. In 1979, a year after its purchase by WMNF, the Bog Pond Area was an alternative highway location to the Franconia Notch Parkway.

“The Bog Pond and Kinsman Notch Corridors have certain features that are major factors in their rejection In the case of the Bog Pond Corridor it is its location in the middle of highly valued WMNF lands In the case of the Kinsman Notch Corridor it is the likely irreversible and irretrievable socioeonomic changes that would be caused in the Easton Valley

The entire WMNF holdings bounded by US Route 3 I 93 on the east and north and New Hampshire Routes 112 and 116 on the south and west have recently been classified roadless areas as part of the 0.5 Forest Services Roadless Area Review and Evaluation The area is being considered for inclusion in the National Wilderness Preservation System Both bypass corridors pass through this area but the Bog Pond Corridor represents a much more serious threat.

The impact of the Bog Pond and to a greater extent the Kinsman Notch Corridor on the Easton Valley and the Town of Easton itself has been previously cited The area has been described as pristine and it is this quality that makes it unique especially as the surrounding area is becoming increasingly developed While neither the Bog Pond Corridor nor the Easton Valley can claim the same type of unique natural features that characterize Franconia Notch the undeveloped character of these areas is not only in sharp contrast to the high level of human activity throughout Franconia Notch but also is an invaluable asset.”

<https://books.google.com/books?id=Gro1AQAAMAAJ&q=bog+pond#v=snippet&q=bog%20pond&f=false>

In 1981 the Lincoln-Dickey 345kV steel double circuit powerline project was proposed to be built alongside the existing line.

In 1987 the existing easement was proposed as the eastern alternative to the Hydro-Quebec Phase II project, a 450kV HVDC metal grid double circuit powerline with towers roughly 90'.

In the 1960s the Forest Service began classifying its lands into management areas.

“The formal announcement of the first six designated Scenic Areas occurred during the celebration of the 50th Anniversary of the Weeks Act, On Oct.6, 1961. Forest Service Chief Richard McArdle made the announcement during the celebrations at the Crawford House Hotel, within sight of one of the areas he was designating, the Gibbs Brook Scenic Area.

Scenic Areas continued to be added to the original six. The first ones, established in October,1961 by Regional Forester Hamilton K. Pyles, included:

Gibbs Brook: 900 acres of old growth forest along the Crawford Path.

Pinkham Notch: 5,600 acres including Tuckerman and Huntington Ravines.

Snyder Brook: 36 Acres of old growth hemlock, spruce and maple.

Sawyer Ponds: 1,130 acres with two ponds nestled under Mount Tremont.

Lafayette Brook: 990 acres along the brook to the summit of Mount Lafayette.

Rocky Gorge: 70 acres including the gorge and small pond along the Swift River.

Two more areas were designated Scenic Areas on October 22, 1964 by Regional Forester Richard Droege:

Greeley Ponds: 810 acres of old growth forest near Waterville Valley.

Nancy Brook: 460 acres of old growth spruce forest and two remote ponds.

Two more were designated on January 10, 1969 by the Regional Forester

Lincoln Woods: Scenic Area, 18,500 acres of remote forest near Shoal and Ethan Ponds.

Mount Chocorua: 6,100 acres around the summit of Mount Chocorua.

“The White Mountain Forest Plan describes management areas as “the grouping of land areas allocated to similar management goals.” All of the scenic areas fall under Management Area 8.5 (MA 8.5). Even though each scenic area has a specific management plan the overall purpose is to manage these areas “for their outstanding natural beauty.” http://whitemountainhistory.org/History_of_Scenic_Areas.html

Issued in 2001, the Roadless Area Conservation Rule is a guideline that prohibits a wide range of activities, most notably road building, in America’s wildest remaining national forests. The Roadless Rule is less stringent than the earlier Wilderness Act. For instance, the former allows limited timber harvesting, provided it does not require building new roads; the latter does not. It allows some off-road vehicle use (e.g., snowmobiles); the Wilderness Act does not. The Roadless Rule might be seen as a

Wilderness Act “lite” or precursor: areas designated as roadless periodically come under scrutiny for reclassification into the stricter management regime of wilderness areas. Management of wilderness areas is more aggressive; non-conforming structures, for instance, are removed, trail maintenance is minimal, etc. The Rule has undergone numerous challenges and modifications in ten years, including state control, and there appear to be constant efforts to reinterpret it, but it now protects some 60 million acres of national forest in 39 states from certain kinds of development that fragment habitation, open up corridors for invasive species, and lessen opportunities for experiencing solitude in nature. Nearly half of the White Mountain National Forest’s 800,000 acres has been classified as Inventoried Roadless Area (IRA), while only 115,00 acres are managed as wilderness area. The WMNF lies within a five hour drive of twelve million people in the urban northeast, and there is relatively little national land managed as wilderness within their reach. Prior to 2005, the WMNF documented an increasing demand for wilderness experience by its visitors, and, accordingly, it considered reclassifying some IRAs to be managed as wilderness in the 2005 forest plan. Two of the IRAs that were considered for this “upgrading” share a common boundary: the current PSNH power line that runs through ten miles of the WMNF in Easton, Lincoln, and North Woodstock on a renewable special use permit. Built around 1950, this line pre-dates current WMNF management techniques as well as NEPA. Indeed, the PSNH power line determined the boundary of these two IRAs when they were designated within the last ten years. IRA #2272, Kinsman, is bounded on the east by state land adjacent to US Rt 3/93, on the west, by private land adjacent to Rt 116, and on the south by the PSNH high voltage line. IRA #2275, Mt. Wolf-Gordon Pond, has the same eastern and western boundaries, and its northern boundary is formed by the PSNH power line. An IRA would not ideally have even a pre-existing power line bisecting it, and the cart drove the horse, so to speak, in order to configure IRAs that were nominally unfragmented by such a corridor. But even if the waters parted around it, the PSNH power line has not been a welcome feature of the WMNF. The [2005 forest plan](#) targets it as one of the reasons neither IRA could currently qualify for wilderness management:

The Inventoried Roadless Area [2772] is of adequate size and general configuration to be managed as Wilderness. The most significant influence on the Inventoried Roadless Area is the adjacent powerline, which provides a significant visual intrusion to the area. (C-115)

However, it’s important to note that PSNH does not hold a permanent deeded easement or right-of-way over the national forest. It is granted a special use permit that must be renewed periodically. This temporary arrangement acknowledges the fact that forest usage and management goals change over time, and this line has been there for over 60 years. The continuing existence of a visually intrusive power line is always subject to review. And the 2005 plan raises the idea several times that the removal of the power line would be a good thing given the changing use and perception of the forest but defers it as not feasible at the time, e.g.:

“As stated above, the area’s southern boundary is delineated by the powerline. Removal of the powerline between this Inventoried Roadless Area and the Mt. Wolf-Gordon Pond Inventoried Roadless Area would facilitate Wilderness management of a combined, significantly larger area. The powerline’s removal, however, is considered prohibitively impractical at this time.” (C-106)

“Removal of the powerline and combination with the Kinsman Inventoried Roadless Area would result in a larger, more easily managed unit, however powerline removal is impractical at this time.” (C-108)

From a management perspective, the WMNF thought it was a good idea in 2005 to remove the powerline, albeit impractical at the time. If it found the current 60' wooden poles to be a significant visual intrusion, how will it find the towers "in excess of 130 feet" that Northern Pass is proposing for the WMNF (Martin Murray, Union Leader, March 27, 2011)? This will be a monstrous visual intrusion. It flies in the face of current WMNF efforts to manage the area as roadless and to provide more naturally appearing landscapes for increasingly urban-weary visitors and second-home neighbors. Not only should Northern Pass be denied a special use permit, the WMNF should begin taking steps now to remove the current PSNH power line when its special use permit expires. Almost everyone who hikes into this area wonders why it was ever allowed to go through back in 1950."

<https://burynorthernpass.blogspot.com/search?q=lincoln>

miles) from the perimeter to the core of the area. There are many off-site intrusions that diminish the solitude of the Inventoried Roadless Area, including Cannon Mountain Ski Area, I-93 to the east, Route 116 to the west, and the power line to the south.

C-105

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