



ATV Watch
PO Box 34
Fitzwilliam, New Hampshire 03447
ATVWatch.COM (603) 785-7722

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State of New Hampshire
Department of Resources and Economic Development
Concord, New Hampshire

Re: Public comment on Connecticut Lakes Headwaters Working Forest recreational use changes

Dear Planning Team:

The New Hampshire Department of Resources and Economic Development (DRED) holds a conservation easement on the Connecticut Lakes Headwaters Working Forest (CLHWF). DRED is charged with managing and making decisions regarding the recreational uses of this 146,000 acre property, including the use of ATVs*.

Before commenting directly on the CLHWF recreation plan, it is important to note that DRED, the easement holder, receives funding directly from ATV registration fees. DRED has clearly demonstrated in the history of their actions and in their support of legislation that they that they are an aggressive proponent of expanding ATV use on public lands. ATV Watch understands that it is an unenviable position to be in where funds from a narrow user group are dedicated to a State agency making decisions affecting all user groups.

ATV Watch is opposed to changing the current restriction to ATV use on the CLHWF. We are against any recreational use of ATVs on this land for the following reasons:

1. ATVs are fundamentally incompatible with the environment. Their use results in soil erosion which damages plant and animal habitats. The short history of the new Berlin ATV park is already demonstrating this.
2. ATVs cause air pollution.
3. ATVs cause water pollution. Unburned and leaking fuel which may contain MTBE eventually reaches the surface and ground water supplies.
4. ATVs are noisy which negatively impacts wildlife habitats and the use of the lands by those partaking in more passive activities.
5. ATVs can pose a danger to other users of the lands.
6. ATV use requires disproportionate maintenance and management resources for the small number of users. DRED and the Fish & Game Department do not have sufficient resources for maintenance or law enforcement related to ATV use.

* All of the above comments pertaining to ATVs are equally applicable to the use of motorized trail bikes and 4WD off highway recreational trucks.

One may argue that limiting ATVs to already established roadways would minimize the environmental damage. However, ATVs are not designed, not marketed and not sold to be used on established roadways. They are “all terrain vehicles” and are designed to go off the designated trails. The short history of the Berlin ATV park has already proven this to be true.

One may argue that the statutory requirements set forth in RSA 215-A:43 and referenced in various DRED CLHWF documents provide sufficient environmental protections. However, it should be noted that DRED recently contracted with a firm to conduct a study, part of which is to determine how “realistic” these statutory requirements are. Where the study team determines that the criteria are not realistic, they will “provide draft rewritten versions.” The statutory environmental protections cannot be relied on as a basis to allow ATV use in the CLHWF if DRED is seeking to change them.

Prior to the State acquisition of an easement on the property the landowner did not allow ATV use, perhaps due to potential liabilities. There were sound reasons for this decision. The fact that the State acquired an easement should not provide any fundamental changes in the basis on which this well founded decision was made.

For all of the above reasons ATV Watch urges the Department of Resources and Economic Development and the landowner to not change the current restriction to ATV use on the Connecticut Lakes Headwaters Working Forest. Doing otherwise would place the interests in the entertainment activities of a few individuals above the negative impact on the majority and place the lands at risk for future generations to enjoy.

Sincerely,

Andrew Walters, Director
ATV Watch
Andrew@ATVWatch.com
www.ATVWatch.com