



NEW ENGLAND BACKCOUNTRY HUNTERS AND ANGLERS

October 17, 2019

Johanna Lyons, State Park Planning and Development Specialist
Department of Natural and Cultural Resources
Division of Parks and Recreation
172 Pembroke Rd
Concord NH 03301

Re: Bear Brook State Park Management Plan Revision

Dear Ms. Lyons and the Bear Brook State Park Management Plan Steering Committee and Technical Team,

We are writing on behalf of the New England Chapter of Backcountry Hunters & Anglers (BHA). BHA is one of the fastest growing conservation organizations in the country. We work collaboratively with other stakeholders to maintain the backcountry values of solitude and silence, and to promote sound stewardship of clean, free-flowing waterways and intact, interconnected habitats for wildlife. The New England chapter of BHA was formed by members from New Hampshire and across New England who saw the need to advocate for our public lands and be for a voice for our region's backcountry hunting and fishing heritage. Our New Hampshire membership greatly values the remaining undeveloped, natural areas of our State parks and other public lands.

Hunting and fishing are central to New Hampshire's outdoor identity; however, numerous studies have identified lack of access to quality places to hunt as a primary obstacle to hunter participation and recruitment. Although this lack of access comes in many forms, one that BHA is particularly concerned about is the incremental loss of large areas of public land habitat minimally affected by human disturbance. As one of New Hampshire's largest State parks, Bear Brook State Park (BBSP, Park) contains large undeveloped areas of public land; however, they are increasingly under pressure from diversifying recreation and associated human disturbance.

During the June 2019 steering committee meeting for the BBSP Management Plan Revision, several folks representing various recreational groups made statements and requests for the steering committee's consideration. Unfortunately, hunters and anglers were not represented during this public comment opportunity. Please consider our comments as you prepare the draft revised BBSP Management Plan (Plan).

1. BHA is deeply supportive of Bear Brook State Park and the recreation and environmental benefits those lands provide. We understand that BBSP is a self-funded facility and funds are limited for maintenance, improvements, etc. BHA's members regularly volunteer time with State land management agencies on maintenance and improvement projects (e.g., https://www.backcountryhunters.org/national_public_land_day_bridge_redecking_project). We look forward to working with BBSP in the same capacity.
2. BHA is concerned about expanding the network of trails in BBSP:
 - a. As seen in Figure 1¹, the existing trail network in BBSP is extensive and has already substantially reduced areas in which one can experience trail-less, solitary recreation—a decidedly different experience from other uses of the Park. These areas are increasingly rare in BBSP and generally on public lands in southern NH.
 - b. Trails facilitate human access and increase disturbance of wildlife through human presence, human and vehicle noise, etc. While some species are particularly sensitive to disturbance, all species need respite from disturbance, at least at some point during their life cycle. Because there has already been significant growth of new trails since the last BBSP management plan, new trail placement should err on the side of preserving intact habitats. We recommend that new and existing infrastructure such as trails and other areas of 'development' and concentrated use avoid ecologically sensitive areas such as deer yards, moose wintering areas, wetlands, known bear habitats and denning areas, as well as generally preserving unfragmented habitats.
 - c. Trail networks fragment backcountry habitats and diminish backcountry hunting opportunity and quality by chipping away at the number of large areas of habitat without concentrated human traffic. Further, every trail reduces huntable area in the park for hunters who apply safety buffers around trails to avoid conflict and safety issues with other trail users. We request BBSP preserve the existing large blocks of the Park without trails for dispersed, non-motorized, non-mechanized recreation. Currently, these areas exist primarily in the southern half of BBSP.
 - d. The new management plan should strive to avoid situations where new and/or heavily-used trail systems have a significant impact on traditional users. This may be especially likely to arise with bike trails. Mountain bike trails on slopes can include continuous switchbacks both to enhance downhill riding distance and complexity, and because bikes have to contour up any significant terrain. A high density of switchbacks dramatically increases trail miles. Also, frequent switchbacks are less compatible with the preferences of hikers and equestrian users and encourage "short-cutting" and the associated increased erosion. However, we are aware of good examples where challenging bike trails are concentrated in a smaller area and expect that well planned trails can be very challenging and take up a reasonable amount of space at the same time. We request that any proposed new trails take into consideration multiple user needs and the overall impact of the area.
3. BHA supports the archery course and accessible fishing access at Catamount Pond and Archery Pond. The archery course is important for archers who don't have access to archery facilities at fish and game type clubs, and Catamount Pond and Archery Pond are important for beginning anglers and those who cannot access more difficult-to-reach fishing spots.

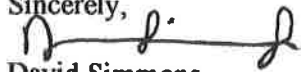
¹ Image from onxmaps.com, accessed 16 October 2019


4. The Park's forest diversity program benefits many species that use early successional, shrubby habitats. However, there are few grassland type habitats, and maintaining more of these would increase the Park's species diversity.
5. Opening the Catamount Pond Horse Camp and Bear Hill Pond Camp will seasonally increase the human density in those areas of the Park and cause increased habitat disturbance in upland, wetland, and waterfront areas. In the case of the Bear Hill Pond Camp, this is in an area that currently experiences relatively light human activity. As a compromise between user groups, we recommend that BBSP close the Bear Hill Pond Camp seasonally prior to September 1, which begins the earliest of New Hampshire's Fall hunting seasons.
6. Hunting in the BBSP Wildlife Refuge should be expanded to include all species that can be taken legally by bow and arrow in NH, subject to NH Fish and Game Department management rules. Currently, the signs posted at the periphery of the Refuge limit hunting to deer by bow and arrow.

Access to public lands and waters ensure people have the opportunity to hunt and fish and secure food resources for their families. While many private landowners in New Hampshire generously allow the public to access their property, the State is rapidly losing open space to development, and more no trespassing signs appear each year. Public lands are strongholds of important fish and wildlife habitat, and cherished wild places where we all can go to challenge ourselves and pursue adventure and game. We looking forward to working with BBSP to maintain and enhance these opportunities in the Park.

Thank you for the opportunity for comment and for taking our comments into consideration.

Sincerely,


David Simmons
NEBHA NH State Leadership Team
[REDACTED]
Allentown, NH 03275


Heather Kusmierz
NEBHA Secretary and Treasurer
[REDACTED]
Bow, NH 03304

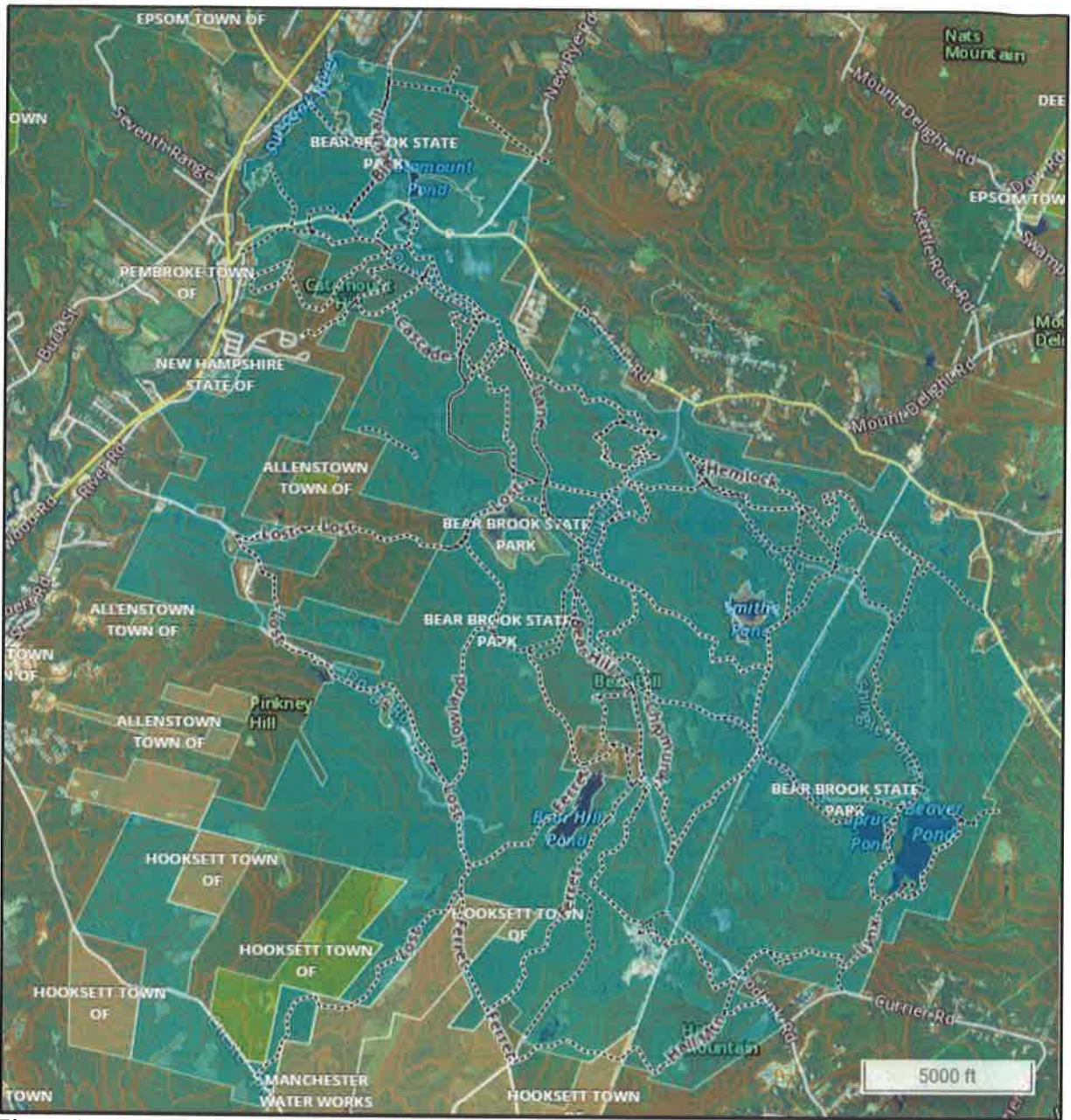


Figure 1. Map of Bear Brook State Park showing current trail network.