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Organization:

Title:

Comments: Derek Ibarguen, Forest Supervisor

Justin Preisendorfer, Winter Sports Team Leader

White Mountain National Forest

71 White Mountain Drive

Campton, NH 03223

Re: Waterville Valley Resort Proposed Expansion - Project #67459

Proposed by Waterville Valley Resort, 1 Ski Area Road, Waterville Valley, NH 03215

Dear Mr. Ibarguen and Mr. Preisendorfer:

As a resident of Waterville Valley, I submit the following comments regarding the proposed Waterville Valley Resort Expansion Environmental Impact Statement ("EIS"). In my view, the EIS, as submitted, is materially incomplete and in several respects misleading, making it difficult for the Forest Service to conduct a fully informed review.

NEPA regulations (40 CFR §1501.9(e)(1)) require agencies to consider connected, cumulative, and similar actions within the same EIS to avoid segmenting projects in a manner that understates or obscures their full environmental impacts. The current EIS fails to satisfy that requirement in three principle ways.

First, the EIS largely omits the impacts this proposal is intended to have on the Town of Waterville Valley, repeatedly characterized in the document as the "village." The proposed expansion must not be separated from its foreseeable and intentional effects on the Town.

The development plan is expressly designed to shift skiers access to the ski mountain to the Town Square area, where guests would park and use the proposed gondola to access the mountain. Yet the EIS does not meaningfully analyze the burden this shift would place on the Town's municipal infrastructure, public facilities, and public safety resources.

A complete environmental review should evaluate, at minimum:

- *Effects on the Town's built environment, natural environment, and community character;
- *Increased vehicular traffic into the Town;
- *Air quality and noise impacts;
- *Automobile congestion and circulation impacts;
- *Demands on police, fire, EMS, and municipal services;
- *Additional parking demand for spaces that do not presently exist

These impacts are not incidental. They are foreseeable consequences of the proposal's core design and directly affect the quality of life that residents sought to preserve, as reflected in the Town's Master Plan.

In addition, Tyrell Development Corporation, owned by the Sununu family, has presented the Town and Planning Board with a conceptual redevelopment plan for the Town Square area centered on the proposed gondola terminal. Waterville Valley Resort itself is owned by the Sununu family together with minority investors. Regardless of ownership structure, there is a functional and planning relationship between the proposed gondola and the contemplated redevelopment of Town Square.

Accordingly, the Forest Service should consider that these are "connected actions" or, at minimum, cumulative or reasonably foreseeable related developments requiring integrated review under NEPA. The EIS should include

analysis of the redevelopment implications for the Town's natural resources, infrastructure, municipal services, public safety and built environment.

Second, the EIS's discussion of guest service space and on-mountain amenities appears incomplete and materially inaccurate. The document states that "[e]xisting on-mountain guest service space is limited to the Sunnyside Timberlodge and the Schwendi Hütte." This characterization completely ignores the substantial facilities already available at the existing base area.

Existing amenities include, among other things:

- *The main base lodge with cafeteria service;
- *The Freestyle Lounge restaurant and bar;
- *Changing and boot-up facilities;
- *Day lockers;
- *Adaptive Ski Program offices and equipment storage;
- *Kiddie Care and ski school facilities;
- *A commercial ski shop;
- *Waterville Valley ski rental operations;
- *T-Bars restaurant and bar;
- *Seasonal locker facilities;
- *The Waffle Cabin;
- *The racers' competition center; and
- *Outdoor seating and gathering areas with fire pits.

Because these existing facilities bear directly on the stated need for additional guest service capacity, their omission materially affects the accuracy of the project justification and alternatives analysis.

Third, the EIS does not meaningfully discuss alternatives to the proposed village-to-summit gondola. While the Forest Service may determine the scope of alternatives considered, the existence of less impactful alternatives is relevant to informed decision-making under NEPA.

For example, constructing a lift from the proposed mid-station area to the summit could achieve the Resort's stated objective of opening additional ski terrain and expanding on-mountain access. Such an alternative could also support development of a new guest services facility at the mid-mountain location while continuing to utilize the substantial existing infrastructure at the current base area.

Transportation objectives could be addressed through more frequent shuttle service between the Town, the existing base, and any new lift facility, potentially achieving operational goals while substantially reducing impacts to the Town's environment, infrastructure, parking capacity, and municipal services.

For these reasons, I respectfully request that the Forest Service require a more complete analysis of connected, cumulative, and foreseeable impacts; correct material omissions regarding existing facilities and service capacity; and conduct a more rigorous evaluation of reasonable alternatives before proceeding further with this proposal.

Thank you for your consideration of these comments.

Sincerely,

Alan Berko
Waterville Valley Resident