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Comments: I am submitting this comment in opposition to Alternatives 2 and 3 of the Waterville Valley Resort Proposed Expansion. I urge the Forest Service to select Alternative 1, the No Action Alternative, unless further analysis establishes that the proposed expansion is necessary, environmentally responsible, financially sustainable and consistent with the long-term public interest.

I. Concerns around existing infrastructure and maintenance capacity

Before approving such an expansion, the Forest Service should conduct a rigorous and independent evaluation of whether the applicant has demonstrated the institutional, operational and financial capacity to maintain this enlarged footprint throughout its full useful life.

The proposal should not be evaluated separately from the condition, maintenance requirements and remaining useful life of the resort's existing infrastructure.

New construction can create the appearance of improvement without resolving underlying deficiencies in existing buildings, amenities, utilities, lifts, guest-service areas and operational systems. Authorizing additional infrastructure could also divert capital, staffing and maintenance resources away from existing assets.

The Final Environmental Impact Statement should therefore address:

1. The present condition and documented maintenance requirements of existing resort infrastructure located on or supporting National Forest System lands.
2. The extent of any deferred maintenance involving existing buildings, lifts, utilities, snowmaking systems, access infrastructure, guest amenities and operational facilities.
3. The estimated lifecycle costs of maintaining the proposed lift system, buildings, parking area, access road, trails, glades, utilities, snowmaking infrastructure and related facilities.
4. The applicant's demonstrated capacity to fund long-term maintenance, environmental compliance, repair, rehabilitation and eventual decommissioning or removal.
5. Whether committing financial and operational resources to expansion could cause further postponement of necessary investment in existing facilities.
6. Whether an alternative centered on repairing and modernizing the existing resort could satisfy some or all of the project's stated purposes with substantially less environmental disturbance.

The applicant should be required to provide evidence of long-term maintenance capacity rather than relying principally on projections concerning increased visitation or revenue.

II. Concerns around operational and environmental stewardship

The proposed expansion would increase the resort's physical footprint and create additional responsibilities involving construction waste, solid waste, vegetation debris, fuel, oil, hydraulic fluids, batteries, chemicals,

wastewater, food-service waste, vehicle activity and snowmaking infrastructure.

The Forest Service should not assume that prospective mitigation commitments are sufficient evidence of future stewardship. It should independently evaluate the applicant's existing environmental-management systems and compliance capacity.

That review should include:

- Existing solid-waste and operational-waste procedures
- Fuel, oil, chemical, battery and equipment-fluid handling
- Spill prevention, reporting, containment and remediation procedures
- Waste generated by maintenance and on-mountain food-service operations
- Staff training, supervision, safety protocols, employee accident reports, and environmental-compliance protocols
- Relevant inspection, incident, corrective-action and compliance records
- Resources available for monitoring and enforcement under an expanded operation
- Procedures for documenting and reporting environmental incidents to the Forest Service

Any approval should include enforceable standards, independent inspections, transparent reporting requirements and meaningful remedies for noncompliance.

III. The asserted need for expansion requires greater scrutiny

A decline in visitation or competitive position does not establish that the appropriate remedy is development of additional National Forest System land.

A ski resort's competitive performance and guest experience are affected by numerous factors, including:

- The condition and reliability of existing infrastructure
- Quality and consistency of service
- Staffing and employee retention
- Food and beverage operations
- Lodging quality
- Marketing & communications
- Maintenance of guest amenities
- Pricing and overall visitor value

The Final EIS should determine whether deficiencies involving existing operations, maintenance or service are materially contributing to the resort's competitive position. Expanding the physical footprint will not necessarily correct deficiencies within the existing operation.

The Forest Service should require credible evidence demonstrating:

1. Which documented visitor needs would be resolved by each major project component.
2. Why those needs cannot be addressed through investment in existing terrain, facilities, maintenance, services and transportation.
3. Whether projected visitation and revenue are sufficient to support construction and continuing operating expenses.

4. Whether the proposed infrastructure will remain sustainable during poor snow years, economic downturns, staffing shortages or periods of reduced visitation.

5. Whether projected economic benefits will extend meaningfully beyond the applicant to independent businesses, lodging properties, employees, residents and the broader community.

6. Whether the village-to-mountain lift would produce a meaningful net reduction in vehicle traffic, particularly when the proposal also includes new parking and road access.

The Forest Service should distinguish the applicant's commercial desire to expand from a demonstrated public need to authorize additional development on public land.

IV. Environmental consequences and future development

Alternative 3 may reduce some impacts relative to Alternative 2, but it does not resolve the central questions:

- Whether expansion is the appropriate response to the resort's existing challenges
- Whether the applicant has demonstrated adequate maintenance and stewardship capacity
- Whether less damaging investments within the existing footprint could accomplish the project's stated objectives
- Whether the environmental costs imposed on public land are proportionate to the estimated public benefits

Requested action:

I respectfully request that the Forest Service:

1. Select Alternative 1, the No Action Alternative.
2. Decline to expand the Special Use Permit boundary or approve associated Forest Plan amendments without a documented showing of long-term maintenance, financial and environmental-management capacity.
3. Analyze a meaningful alternative centered on repair, modernization and improved management of existing resort infrastructure.
4. Independently examine existing waste-management, material-handling, spill-prevention and environmental-compliance systems.
5. Require disclosure and analysis of existing infrastructure conditions and maintenance obligations.
6. Exclude land designations intended primarily to facilitate unspecified future development.
7. Require enforceable maintenance standards, environmental-performance conditions, independent compliance reviews and financial assurance for restoration or decommissioning.
8. Explain in the Final EIS how the applicant's existing operational capacity was evaluated when determining whether it can responsibly manage the proposed expansion over its full operational life.

The continued success of Waterville Valley Resort is not incompatible with environmental responsibility. However, success on public land cannot be measured exclusively through visitor volume, developed acreage, lift capacity or construction activity.

It must be measured through responsible maintenance, operational accountability, environmental compliance,

financial sustainability and demonstrated respect for the land already entrusted to the operator.

The environmental consequences of this proposal could be difficult or impossible to reverse. The burden should therefore remain on the applicant to demonstrate that the expansion is necessary, sustainable and consistent with the standard of stewardship the public has a right to expect.

Thank you for considering this comment.

Sincerely,
Anonymous Commenter