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Comments: I'm commenting on the Waterville Valley Resort Proposed Expansion (Project #289908). After looking through the project information, I don't support expanding the special use permit into old-growth or mature forest areas. These forests are some of the most stable and resilient parts of the White Mountain National Forest, and once they're cut or fragmented, they're gone for generations.

Old-growth stands do things younger forests simply can't. They store more carbon, regulate water flow on steep terrain, and support complex wildlife habitat structures that take centuries to develop. Removing or breaking up these areas for more ski terrain would permanently reduce those benefits. You can't replace a 150-year-old forest with new plantings and call it equal.

I'm also concerned about cumulative impacts. The Forest Service already acknowledges that public participation becomes part of the project record, and I hope the NEPA analysis fully accounts for how additional development will increase noise, human presence, and habitat disruption on top of existing resort operations. Wildlife in this region is already dealing with recreation pressure and climate stress, and pushing development deeper into intact forest makes those pressures worse.

I also don't think Forest Plan amendments should be used to carve out exceptions for commercial expansion into old-growth. That sets a precedent that weakens long-term forest protection goals. The Forest Plan is supposed to guide stewardship, not be adjusted whenever a permit holder wants more acreage.

For these reasons, I'm asking the Forest Service to choose an alternative that avoids old-growth and mature forest impacts and keeps the ecological integrity of the White Mountain National Forest intact.

Thank you for considering my comment.

Christian