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Comments: The Draft EIS for the Waterville Valley Resort Expansion should not move forward to a Final EIS or Record of Decision without addressing a significant gap in its own analysis: the document itself states in the Forest Plan and 2012 Planning Rule section (Table 3.5-7) that development in Canada lynx habitat within the Lynx Analysis Unit is prohibited under Forest Plan Standard S-3 and that 'the action alternatives cannot be made compliant.' Instead of redesigning the project to avoid this legal barrier, the agency proposes to simply amend away the standard that stands in its path, using the project's own incompatibility as the amendment's justification. This is a serious procedural shortcut: the agency has identified that its preferred alternative violates a forest-wide protective standard and is responding by removing the standard rather than the violation.

Several other holes compound this problem. The same table discloses at least six additional Forest Plan violations concerning riparian management zones, wetlands, vernal pools, and floodplains (Guidelines G-1, G-2, G-5, G-8, G-10, G-11, and the Water Resources G-2, G-4, G-5 guidelines), all attributed to 'engineering and terrain limitations' without a rigorous showing that alternative siting was infeasible. The Wildlife section (3.6.4) discloses that the proposed action would degrade 77 percent of viable Canada lynx denning habitat and 65 percent of viable foraging habitat in the project footprint, yet still concludes the action 'may affect but would not likely adversely affect' the species, a conclusion that seems hard to square with the scale of habitat loss disclosed. And in the Hydrology section (3.8.4), the agency's own methodology (the WRENS model) is explicitly stated to not simulate flood peaks, yet its output is used to support a conclusion that flood risk will not measurably increase, even as the same section acknowledges that rain-on-snow events combined with snowmaking-enhanced snowpack could increase peak runoff.

The Forest Service should be asked to: (1) analyze a genuine alternative that avoids high-quality lynx denning and foraging habitat rather than relying on a plan amendment to eliminate the applicable protective standard; (2) provide a rigorous site-specific analysis demonstrating why each infrastructure element causing wetland, vernal pool, and RMZ violations cannot be redesigned or relocated to avoid those impacts; (3) reconcile the wildlife effects determination with the disclosed magnitude of lynx habitat degradation; and (4) conduct event-based flood modeling rather than relying on a tool the document itself says cannot simulate flood peaks, particularly given the documented risk of rain-on-snow events interacting with snowmaking-enhanced snowpack.