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Comments: To Whom It May Concern,

My last comments I submitted in the spring of 2025 when I was a year-round resident of Waterville Valley, and thus, had a front-row seat to every public-facing decision the resort made over the previous eight years. I wrote to express my strong opposition to the proposed expansion of Waterville Valley Resort (WVR), as outlined in the scoping newsletter for the Environmental Impact Statement (EIS). I have since left Waterville Valley and live full-time in Maine now, but my comments remain virtually unchanged, and they are outlined below. But I wish to highlight the absolute most important thing - WATERVILLE VALLEY RESORT NEEDS TO IMPROVE WHAT IT HAS, NOT EXPAND ITS MEDIOCRE BUSINESS MODEL ONTO PRISTINE PUBLIC LAND! I question the whole PURPOSE for the proposed expansion. IT'S BOGUS!!

WVR claims that expansion is essential to remain competitive. However, their current deficiencies aren't due to limited terrain and lack of on-mountain facilities-it's the result of poor decisions, underinvestment, and lack of vision for what already exists. WVR has vast untapped potential within its current operating footprint.

Declining skier numbers are due to tired, outdated skier facilities-both at the ski area and in town, and lack of investment in sensible, attractive, modern upgrades. Aside from a partial, budget-friendly renovation of the main lodge, lodges, restaurants, and public amenities are worn and uninspiring. The most recent expansion at Green Peak repurposed a slow, fixed-grip lift-the "fast, efficient access" the resort now claims it needs could be achieved by replacing this with a modern lift. Promised glades from that project were never built-now they are requesting 200 acres for glades. The new bubble lift, also done on a budget, has been plagued by operational issues and low-quality materials. A single inadequate flatbed truck and a few old school buses serve as a parking lot shuttle and resort-wide transportation. This isn't a problem of space or access-shuttle service could be easily and vastly improved with an expanded, modernized fleet. WVR partially upgraded its ticketing system to an RFD based one, but didn't install the necessary electronic infrastructure at the lift access points to ensure all skiers have passes, resulting in well-known, widespread "free skiing." Ticket sales as a proxy for skier visits may well be underreported.

Waterville has two on-mountain facilities: Schwendi Hütte, still wildly popular despite its age, and Sunnyside Lodge, closed for years due to high operating costs. Revitalizing, expanding or rebuilding these would be a more responsible step-and a meaningful demonstration that the resort can manage, enhance, and sustain what is already within its operating footprint before seeking to take over hundreds of additional acres of National Forest land. Requesting permission to build two (20,000 sq.ft. and 30,000 sq. ft.) on-mountain facilities seems preposterous! Bretton Woods' beautiful new Rosebrook Lodge is only 17,000 sq.ft. and was mindfully constructed without expanding past the existing Forest Service boundary.

The request to remove Canada Lynx habitat protections (Standard S-3) to allow new ski trails-despite over 30% of the area already being in degraded condition-reveals where the resort's priorities lie. WVR's proposal contains no mention of minimizing its environmental impact, investing in sustainability initiatives, or any other ecologically responsible commitments.

This is public land. The Forest Service is not obligated to rubber-stamp a speculative expansion. Your responsibility is to steward these lands for the public good-not to subsidize private investment. WVR's proposal doesn't read as a sincere effort to improve the skier experience. It reads as a speculative business move designed to inflate perceived value. Meanwhile, the cost of this "wishlist" is paid by the public in the form of lost forest, fragmented wildlife habitat, and the erosion of protected lands.

Waterville Valley's current performance does not justify additional land. If the ownership group wants to run a successful, desirable ski resort, they should look inward-not outward-at what's broken, neglected, and ignored within their current boundaries, and not be granted more public land.

Specific questions are as follows:

What specific data sources (e.g., skier surveys, third-party audits, industry benchmarks) has the Resort provided that the Forest Service will use to validate WVR's assertion that additional terrain and a gondola are essential to maintain competitiveness?

Has the Forest Service ever denied a ski area's request to expand its Special Use Permit (SUP) boundary within the White Mountain National Forest or Region 9 in the past 20 years? If so, what were the grounds for denial?

What are the specific environmental or policy-based thresholds that would warrant denying an SUP expansion request under NEPA or the 2005 WMNF Land and Resource Management Plan?

How many SUP expansions have been approved for ski areas within the WMNF over the past two decades, and how many were modified or denied based on environmental or public interest concerns?

What is the current annual revenue the Forest Service receives from Waterville Valley Resort operations under the existing SUP? Has revenue declined, or has only skier volume declined?

What is the projected increase in revenue (in dollars and percentage) if the proposed expansion is approved? What assumptions underlie this projection? Did the Resort provide projected revenue or skier volume increases for the Green Peak Phase I expansion? If so, were the projections accurate?

Does potential revenue generation influence decision-making in the EIS or permit evaluation process?

What measures are in place to ensure that financial incentives do not unduly affect environmental stewardship decisions?

The scoping newsletter notes that over 30% of the local Lynx Analysis Unit (LAU) is already unsuitable. How can the Forest Service justify removing Canada Lynx Standard S-3, which explicitly prohibits further habitat degradation under such conditions?

How many acres of currently suitable lynx habitat would be rendered unsuitable or fragmented if the proposed SUP expansion is approved?

What cumulative impact analysis has the Forest Service conducted regarding previous expansions (such as the Green Peak Phase I project) in evaluating this proposal's total ecological footprint?

Considering New Hampshire ski areas saw a 13% increase in skier visits during the 2022-2023 season, does the Forest Service acknowledge that WVR's stagnation may stem more from operational or infrastructure deficiencies than from lack of terrain or transport access?

Has the Forest Service required the resort to evaluate a "renovation and reinvestment" alternative focused solely on modernizing existing infrastructure and facilities? If not, why wasn't this alternative included in the NEPA process?

Over the past five ski seasons, how many days per year has WVR's existing glade terrain been open and

skiable? What snowfall thresholds or snowpack models support the viability of expanding glade terrain by 200 acres?

Which regional climate models or snowpack data were used to assess the long-term sustainability of expanded terrain and snowmaking operations in the project area?

What is the current water use limit the Resort must adhere to? Will this be expanded to support increased snowmaking infrastructure, and by how much? What are the current sources of snowmaking water under Forest Service jurisdiction?

What is the total acreage of National Forest land proposed for tree removal, grading, permanent facilities, lift corridors, roads, or other infrastructure development?

Will the Forest Service consider alternatives such as allowing a village-to-summit lift corridor without adding new ski terrain, parking, or mountain facilities beyond the resort's current footprint?

Does the Forest Service buy into the assertion that two new on-mountain facilities, one 20,000 sf and the other 30,000 sf, are needed to maintain competitiveness? On what grounds?

What justification exists for allowing 377 additional acres for future expansion?

Respectfully submitted,
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