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Comments: Comments on the Forest Service's Draft Environmental Impact Statement and White Mountain National Forest Plan Amendment: Waterville Valley Ski Resort Special Use Permit

The proposed expansion of the Waterville Valley Ski Resort raises significant concerns regarding impacts to late-successional and old forest conditions, rare ecological attributes, and habitat features that are rarely found across the White Mountain National Forest and the broader New England landscape. The Final Environmental Impact Statement and Record of Decision should give particular consideration to these attributes and should demonstrate how the Forest Service will avoid or minimize impacts to them.

The supporting Forestry Technical Report acknowledges that portions of the proposed expansion area contain high-quality late-successional and old forest characteristics. Although the report concludes that none of the evaluated stands meet the White Mountain National Forest's specific criteria for designation as old-growth forest, the narrow criteria should not preclude special consideration and treatment of these areas.

A narrow administrative definition of old growth cannot capture the full range of ecological characteristics associated with older forests, which was evidenced by the Botany Report and Forestry Report's notes on rare lichen, exceptional habitat trees, and findings of stems exceeding 350 years in age in addition to landscape evidence that boulder fields likely precluded or substantially limited historical timber harvesting. These conditions provide habitat complexity and ecological functions that are not necessarily represented by assessments based on whether a particular stand meets the Forest Plan's old-growth criteria.

Forests that are approaching or exhibiting many characteristics of old growth are especially valuable in New Hampshire and New England because truly old forests are exceptionally scarce across the region, and therefore offer conservation values that require special consideration, which was not well represented in the Draft Environmental Impact Statement. Protecting the remaining older and late-successional forest patches provides an opportunity for continued development of old-growth characteristics over time, rather than removing forests that are most near that mark and preventing the return of truly old forests that were present prior to Western Colonization.

The approximately 10-acre area surrounding Botany Observation Point #6 warrants particularly careful protection. Field investigations identified a lichen that is extremely rare in New Hampshire and New England. None of the current alternatives offer information on the potential direct and indirect effects of the proposed development on the lichen and its associated habitat and how it may be mitigated. and establish an appropriately protective buffer. The Forest Service should develop an appropriately sized protective buffer that will prevent not only direct clearing for glades or gondola structures, but also changes in canopy cover, humidity, wind exposure, and other microclimatic conditions that the recreational infrastructure, including snow blowing, would produce. Considerations like these should also extend toward avoidance measures for wildlife habitat, particularly for Canada lynx and northern long-eared bats.

Existing Old Forest Habitat Requirements

The Forest Plan prohibits timber "harvest in stands identified to provide old forest habitat," however the Forestry Technical Report acknowledges that proposed actions would affect areas of high-quality late-successional and old growth forest. The Draft Environmental Impact Statement does not provide adequate information on how the Forest Plan's directions for old forest habitat apply to proposed actions for the ski resort expansion. Additionally, the Decision documents should identify which recommendations and findings from these technical reports are

being adopted, which are not being adopted, and the rationale.

For these reasons, the Forest Service should not amend the Forest Plan or special use permit in a manner that allows avoidable impacts to these rare and ecologically significant forest areas. The agency should also substantially revise the alternatives, if necessary, to reduce impacts on late-successional and old forest habitat.

The remaining older forests within the White Mountain National Forest are an irreplaceable ecological resource precisely because forests with these characteristics are so scarce across New Hampshire and New England and take very long timespans to redevelop. Though a forest does not meet every element of an administrative old-growth definition, it does not eliminate the ecological significance of its age, structure, rare species, or developmental trajectory toward those outlined criteria.

The Final EIS and Record of Decision should therefore take the furthest practicable steps to leave these areas untouched and establish ample buffers around them. The preferred alternative should be the alternative that most effectively avoids the loss and fragmentation of these rare late-successional and old forest conditions.