



WATERVILLE VALLEY RESORT

August 24, 2026

Submitted Electronically

Mr. Derek Ibarguen
Forest Supervisor
White Mountain National Forest
c/o Justin Preisendorfer, Winter Sports Team Leader
71 White Mountain Drive
Campton, NH 03223
justin.preisendorfer@usda.gov

RE: Comments on the Draft Environmental Impact Statement for the Waterville Valley Resort Proposed Expansion (Project #289908)

Dear Forest Supervisor Ibarguen:

Waterville Valley Holdings, LLC (“WVR”) respectfully submits these comments on the Draft Environmental Impact Statement (“Draft EIS”) for the Waterville Valley Resort Proposed Expansion Project (the “Project”).

WVR is the owner of Waterville Valley Resort (the “Resort”) and holder of its special use permit (“SUP”). WVR appreciates its longstanding partnership with the White Mountain National Forest (“WMNF”) and the Forest Service’s substantial effort to prepare the Draft EIS. The Project proposes to implement critical components of the Resort’s accepted 2020 Master Development Plan (“MDP”).

WVR has provided high-quality public recreation on public lands in the WMNF for six decades. Mt. Tecumseh has been at the center of public skiing in New Hampshire since the 1930s. The Resort opened for lift-accessed skiing in 1966, and since that time has provided exceptional public recreation for visitors to the White Mountain National Forest. The Project is needed to carry forward this important legacy and support the next sixty years of skiing at the Resort.

WVR supports the Proposed Action (Alternative 2). WVR does not support the components of Alternative 3 that WVR did not propose and that do not meet the purpose and need for the Project, including the Forest Service proposals to remove approximately 100 acres of high-quality, high-elevation terrain from WVR’s existing permit and to limit the allowable size of the Green Peak Summit Facility.

WVR requests that the Forest Service authorize the Project as proposed. The Project will connect the Resort with the Town of Waterville Valley, modernize the guest experience, and address the Resort's declining market share in a highly competitive regional ski market. Each Project component is critical to the Resort's future.

We appreciate your consideration of these comments and look forward to our continued collaboration. Please add these comments to the administrative record for the Project.

COMMENTS OF WVR ON THE DRAFT EIS

1. The Purpose and Need Statement should incorporate WVR's objectives for the Project.

The Draft EIS states that the purpose and need is "to respond to an application and project proposal submitted under the National Forest Ski Area Permit Act of 1986 and the Ski Area Recreation Opportunity Enhancement Act of 2011 by [WVR] to implement projects from their accepted 2020 [MDP]." Draft EIS at i. The Draft EIS separately identifies WVR's objectives: creating a non-vehicular transportation link between the Town and the Resort; increasing terrain diversity and gladed terrain; improving lift and terrain access at the base area; and providing additional on-mountain guest services—all to respond to rising guest expectations and to retain and increase WVR's declining market share. *Id.*

These are accurate statements, but they present a disconnected and incomplete framing. The Forest Service purpose and need statement should integrate the needs and goals of the applicant, WVR, into a single cohesive statement.

This is directed by the USDA's NEPA regulations. Those regulations provide that when a USDA agency reviews an application for authorization, "the subcomponent may base the purpose and need on the goals of the applicant," and should analyze only "a reasonable range of alternatives that are technically and economically feasible, meet the purpose and need for the proposal, and, where applicable, meet the goals of the applicant." 7 C.F.R. § 1b.11(41), (42).

The Final EIS should integrate WVR's needs and objectives, as the applicant, in the statement of purpose and need. These objectives are drawn from the Resort's accepted 2020 MDP, which became part of WVR's special use permit upon the Forest Service's acceptance of the MDP. The Final EIS should state clearly that the purpose of the Project and each of its components are to address the specific needs of the Resort identified in the accepted MDP.

Please clarify in the Final EIS that the purpose of the Project and its individual components are to address the specific needs of the Resort identified in the accepted 2020 MDP, including the objectives enumerated at page i of the Draft EIS.

2. Components of Alternative 3 do not meet the purpose and need for the Project.

WVR did not propose Alternative 3. WVR supports adoption of the collaborative refinements reflected in the Proposed Action's design to avoid and minimize environmental effects. The components unique to Alternative 3 are not proposed by WVR, are unsupported by the record, and fail to meet the purpose and need for the Project.

- a) The proposed removal of approximately 100 acres of high-quality, high-elevation terrain from the existing SUP is unwarranted and should be rejected.

Alternative 3 would remove "an approximately 100-acre area" in the "undeveloped, northwest portion of the existing SUP area" and convert it from MA 7.1 (Alpine Ski Area) to MA 6.2 (Semi-Primitive Non-Motorized Recreation). Draft EIS at 20. WVR opposes this removal.

It is not clear why, exactly, the WMNF proposes to remove 100 acres of WVR's existing permit. WVR did not propose it. This is not future expansion acreage, it is land that has been within WVR's existing SUP for decades. Keeping it in the permit does not authorize new development. And removing the terrain does not accomplish any element of the purpose and need. Doing so would frustrate the purpose and need by hindering WVR's ability to provide high-quality ski terrain to the public.

This is high-quality, high-elevation terrain already dedicated to management as developed ski terrain within WVR's existing permit. It has been inside WVR's permit for decades. It is allocated to MA 7.1 under the Forest Plan's alpine ski area prescription. High-elevation ski area terrain is uniquely coveted in the Northeast, where elevation, snow reliability, and sustained fall-line pitch are scarce and increasingly valuable as the region's ski areas adapt to a changing climate. Removing this terrain would cause the Resort and the skiing public to forfeit exactly the kind of high-elevation ski resource that is most difficult to replace.

The removal is also unnecessary for Canada lynx and Bicknell's Thrush habitat purposes. There is no demonstrated need for the Forest Service to offset Project impacts to these species by removing longstanding ski terrain from WVR's permit. The Resort's suitable Canada lynx and Bicknell's Thrush habitat is protected by the Project's design

criteria and the Forest Plan's forest-wide standards and guidelines. The Draft EIS confirms that the action alternatives will not cause significant effects to these species and that cumulative effects to lynx are "relatively minor." Draft EIS at 91, 99.

Retaining the 100-acre area north of the High Country T-Bar in WVR's permit will not authorize any new development in that acreage that could result in impacts to species or other resources. Retaining the acreage within WVR's permit simply preserves WVR's long-held management flexibility over terrain the Forest Plan already dedicates for use as an alpine ski area. The approximately 100 acres at issue represents a small fraction of the WMNF, yet it represents a meaningful component of the Resort's high-elevation ski terrain. The Forest Service should not remove this valuable terrain already dedicated to developed skiing from the existing SUP.

Please do not remove the approximately 100-acre area north of the High Country T-Bar from WVR's special use permit or convert it from MA 7.1 to MA 6.2. Please retain this high-elevation ski terrain within the existing SUP as reflected in the Proposed Action.

- b) Reducing the allowable size of the Green Peak Summit Facility does not meet the Project's purpose and need and would unnecessarily limit the Facility's potential.

Alternative 3 would cap the proposed Green Peak Summit Facility at 25,000 square feet, reducing potential guest-service space by approximately 17 percent relative to the Proposed Action's design envelope of 30,000 square feet. Draft EIS at 10, 20, 40. It is not clear why the WMNF proposes to reduce the authorized square footage for the proposed Summit Facility by 17 percent. This reduction does not meet the purpose and need for the Project, would unnecessarily limit the Facility's potential, and should be rejected.

WVR acknowledges that its original proposal referred to the Green Peak facility as a restaurant. But the nomenclature was not intended to limit the facility's purpose. As planning has progressed, WVR has more fully developed and articulated its vision for the facility and the functions it is intended to accommodate. WVR envisions the Summit Facility as a true four-season, multi-function, summit destination, not just a winter day lodge or cafeteria. That distinction is important. WVR envisions the Facility supporting dining, sightseeing, events, interpretive and educational programming, retail, evening functions, and significant summer and fall visitation from the gondola. The Facility is intended to be a premier summit destination on the East Coast, delivering the enhanced year-round, on-mountain experience that directly responds to the identified need to

provide additional on-mountain guest services and to address WVR's declining market share. Draft EIS at i, 3.

The analysis in the Draft EIS fails to acknowledge the full potential and purpose of the proposed Green Peak Summit Facility. Even the naming in the Draft EIS suggests a limited purpose as a restaurant. The Draft EIS paints a picture of a facility designed for pure utilitarian function that will not be significantly impacted by a 5,000 square foot reduction. The proposed Green Peak Summit Facility is more than that.

Summit guest service facilities are ubiquitous in the West. Examples of mountain-top facilities on Forest Service lands in the West, include:

- The Aerie at Copper Mountain (White River National Forest)
- Summit House at Whitefish Mountain Resort (Flathead National Forest)
- Two Elk Restaurant at Vail (White River National Forest)
- Aurora Summit Restaurant at Snow King Mountain Resort (Bridger-Teton National Forest)
- Vista House at Breckenridge (White River National Forest)
- The Cabin and Elk Camp at Snowmass (White River National Forest)
- The Summit at Snowbird (Wasatch-Cache National Forest)
- The Roundhouse at Sun Valley (Sawtooth National Forest)
- Corbet's Cabin at Jackson Hole Mountain Resort (Bridger-Teton National Forest)
- Rendezvous Alpine Kitchen at Jackson Hole Mountain Resort (Bridger-Teton National Forest)
- Eleven53 Cafe at Mammoth Mountain (Inyo National Forest)
- Summit House Restaurant at Crystal Mountain (Mt. Baker-Snoqualmie National Forest)
- Eaton Haus at Beaver Creek (White River National Forest)
- The Lookout at Eldora Mountain Resort (Arapaho-Roosevelt National Forest)

These facilities allow both the skiing and non-skiing public to access and enjoy the natural beauty of their public lands in a year-round setting. They routinely are used year-round for purposes broader than a restaurant. These facilities are rare in the East. The proposed Green Peak Summit Facility helps fill this void. From grandparents savoring the

view over lunch to the aspiring racer refueling between runs, to weddings, family reunions, and meetings, the Summit Facility will welcome visitors of every age and ability, cementing Green Peak as a premier four-season destination on the White Mountain National Forest.

The Proposed Action's 30,000 square-foot design envelope is appropriate and reasonable to support WVR's broader purpose and vision for the Facility. It represents an allowable design envelope for the Facility, not a requirement for WVR to construct a 30,000-square-foot building. WVR has not completed architectural programming or design for the Summit Facility. Authorizing the full design envelope simply preserves WVR's ability to design a facility that meets guest demand and functions as a true four-season destination as envisioned by WVR.

The Draft EIS confirms that the Alternative 3 reduced Facility design falls short. Under Alternative 3, the smaller design for the Facility would accommodate "fewer guests," "could result in more guests leaving the area for other on-mountain services, which would not fully alleviate congestion issues, particularly during peak days and lunch hour," and would limit "the resort's ability to provide the enhanced on-mountain experience offered with the proposed action." Draft EIS at 40. The Draft EIS's own analysis establishes that the reduced Facility design cap under Alternative 3 would unnecessarily hamstring WVR's ability to design and construct a facility that satisfies the identified need for additional, high-quality guest service space.

WVR requests that the Forest Service approve the Green Peak Summit Facility as proposed by WVR and described in the Proposed Action. The visual concerns that motivated the reduction, Draft EIS at 19, can be addressed through siting, architectural design, materials, and screening project design criteria rather than by preemptively shrinking the Facility below the size needed to meet the Facility's purpose and potential.

Please revise the name of the proposed Green Peak facility from the Green Peak Restaurant to the Green Peak Summit Facility in the Final EIS and Draft ROD and acknowledge its purpose and potential as a four-season, multi-function, summit destination.

Please authorize the full 30,000-square-foot design envelope for the Green Peak Summit Facility as described in the Proposed Action, and address scenery concerns through design-based project design criteria rather than a reduction in the Facility's allowable size that does not meet the purpose and need.

- c) Alternative 3's seasonal tree-removal restriction raises significant worker-safety concerns.

Alternative 3 would limit all tree removal to the window between August 15 and April 15 based on breeding northern long-eared bats. Draft EIS at 20. WVR shares the Forest Service's commitment to protecting the northern long-eared bat, but the practical effect of this stipulation is to push a substantial share of the Project's tree clearing into the winter months, raising significant safety concerns and feasibility issues. Further, ongoing and routine trail maintenance and glading cannot be completed during the winter.

Tree clearing in the winter is more dangerous and complicated than clearing in the summer and fall. Snow, ice, cold, and short days make it difficult for crews to run chainsaws and heavy equipment, get in and out of work areas, and respond to potential emergencies. For much of the winter window it is simply not feasible to conduct tree clearing activities.

WVR requests that the Forest Service adopt the Proposed Action without the restrictive timing stipulation on tree clearing. The record does not support the need for the timing stipulation. The potential roosting and foraging habitat within the Project area is limited and of low quality. Biological Evaluation at 12, 14-15. And only very limited presence of the species has ever been detected at the Resort. Biological Evaluation at 14-15. This limited potential for impacts does not support adoption of the proposed timing stipulation and the resulting impacts on project implementation, feasibility, and safety.

WVR separately requests that the Forest Service clarify in the Final EIS and Draft Record of Decision, should the Forest Service proceed with the proposed timing stipulation, that it does not apply to glading, brush clearing, and trail maintenance activities involving trees with a dbh equal to or less than 6 inches. Glade tree removal, brush clearing, and trail maintenance activities involving "smaller saplings and poles" do not have the potential to impact roosting bats. Biological Evaluation at 15. WVR understands that the proposed timing stipulation for tree clearing under Alternative 3 is not intended to apply to these activities. WVR requests that the Forest Service make this clear in the Final EIS and Draft Record of Decision, should the Forest Service proceed with the proposed timing stipulation, by stating that the timing stipulation does not apply to glading, brush clearing, and trail maintenance activities involving trees with a dbh equal to or less than 6 inches.

Please adopt the Proposed Action without the restrictive timing stipulation on tree clearing and reject the Alternative 3 component that would restrict tree clearing activities to August 15–April 15. Separately, should the Forest Service proceed with the proposed timing stipulation, please state in the Final EIS and Draft Record of Decision that the timing stipulation does not apply to glading, brush clearing, and trail maintenance activities involving trees with a dbh equal to or less than 6 inches.

3. Project-specific forest plan amendments are an appropriate and purposeful tool, and the proposed Canada lynx Standard S-3 amendment is reasonable and warranted.

The Proposed Action includes two categories of forest plan amendments: (1) the reallocation of approximately 710 acres of NFS lands to new management area (“MA”) designations; and (2) the removal of the forest-wide Canada lynx Standard S-3 within the proposed SUP boundary expansion and approximately 377 acres abutting the expansion area that would be administratively designated as MA 9.2. Draft EIS at 11-12. WVR supports both proposed categories of Forest Plan amendments.

Project-specific forest plan amendments are a well-established and purposeful tool that the Forest Service routinely uses to authorize ski area projects. The Forest Service’s 2012 Planning Rule and Forest Service directives specifically allow for and direct the agency to amend a Forest Plan, when necessary, in connection with a project-level decision. *E.g.*, National Forest System Land Management Planning Rule, 77 Fed. Reg. 21,162, 21,239 (Apr. 9, 2012). The Draft EIS confirms that the WMNF Forest Plan “has been amended several times since its development in 2005 to reflect various recreation and timber management projects,” including to remove the applicability of Canada lynx Standard S-3 from prior projects at the Resort. Draft EIS at 86. This is consistent with Forest Service practice approving ski area projects on National Forests throughout the country.¹

¹ Examples of Forest Service Forest Plan amendments (including lynx-related) to allow ski area projects to proceed, include: the 2012 Breckenridge Peak 6 Record of Decision (White River National Forest); the 2016 Arapahoe Basin Beavers and Steep Gullies Record of Decision (White River National Forest); the 2019 Crested Butte Mountain Resort Teocalli Expansion Record of Decision (Grand Mesa, Uncompahgre, and Gunnison National Forests); the 2019 Aspen Mountain Pandora Development Decision Notice (White River National Forest); the 2021 Steamboat Resort Improvements Decision Notice (Routt National Forest).

The proposed plan amendment for lynx is substantively reasonable. Standard S-3 limits vegetation disturbance where more than 30 percent of lynx habitat in a Lynx Analysis Unit (“LAU”) is already in an unsuitable condition. Draft EIS at 12, 85. Here, the LAU already exceeds that 30-percent threshold. Draft EIS at 85. The Project’s modest, concentrated development—within an existing, highly developed ski-area setting the Forest Plan already dedicates to alpine skiing—will not meaningfully alter lynx habitat at the LAU or forest scale. The Draft EIS confirms that cumulative effects to lynx “are expected to be relatively minor, with most reductions occurring in areas already impacted by past development.” Draft EIS at 99. A project-specific amendment is the appropriate mechanism to reconcile a forest-wide standard, adopted at the scale of the entire WMNF, with a site-specific ski-area authorization.

WVR supports the proposal under Alternative 2 to remove S-3 applicability within the proposed SUP boundary expansion and the approximately 377 acres abutting the expansion area that would be administratively designated as MA 9.2. Draft EIS at 20, 86. This is the appropriate path forward.

WVR does not support Alternative 3’s narrower amendment, which would leave Standard S-3 applicable to the acreage adjacent to the project proposed for designation as MA 9.2. There is no reason to narrow the proposed amendment. The same rationale that supports removing Standard S-3 within the proposed SUP expansion applies equally to the adjacent block of acreage proposed to be designated as MA 9.2. The LAU already exceeds the 30-percent unsuitable-habitat threshold, the likelihood of Canada lynx occurring near the project area is low, any lynx present in the area are likely transient and do not indicate the presence of a breeding population, and the proposed ski area development will not meaningfully alter lynx habitat at the LAU or forest scale. Draft EIS at 12, 89, 99. Dedicating the adjacent terrain to MA 9.2 for potential future ski area development while leaving Standard S-3 applicable will simply guarantee a second, redundant amendment in the future. The record supports adopting a Forest Plan amendment now to avoid this unnecessary outcome.

Please adopt the Forest Plan amendments as proposed in Alternative 2, including removal of the applicability of Canada lynx Standard S-3 within the proposed SUP boundary expansion and the approximately 377 acres abutting the expansion area that would be administratively designated as MA 9.2. Please reject and do not adopt the narrower Forest Plan amendment for lynx proposed in Alternative 3.

4. The record confirms there are no old-growth stands within the project area.

Certain scoping comments raised concerns about old-growth forest. Draft EIS at 137 (identifying the Old-Growth Forest Network and other commenters). The Draft EIS resolves this issue by stating: “There are no old-growth stands, as defined by the Forest Plan, within the project area.” Draft EIS at 153 (App. C). The Draft EIS concludes that “the proposed projects would not alter the forest health of old-growth forests within the project area.” *Id.*

WVR supports this determination, which is grounded in the project-specific Forestry Report and consistent with the developed, previously harvested and managed character of the project area within an existing ski-area SUP. Draft EIS at 153; see Forestry Report at 3 (“No old growth stands exist in the project area.”). The Final EIS should retain this conclusion. To the extent commenters continue to assert the presence of old-growth, WVR requests that the Forest Service reaffirm, based on the Forestry Report’s stand-level data and the Forest Plan’s old-growth definition, that no qualifying old-growth stands exist within the project area.

Please retain and reaffirm in the Final EIS the determination that there are no old-growth stands, as defined by the Forest Plan, within the project area, based on the project-specific Forestry Report.

5. The no-action alternative would cause severe adverse effects to WVR, the guest experience, and the local economy and does not meet the purpose and need.

The no-action alternative “reflects a continuation of existing management practices without changes, additions, or upgrades.” Draft EIS at 60. The no-action alternative fails to achieve the purpose and need for the Project and would carry forward none of WVR’s objectives in the accepted MDP. Draft EIS at i, 3.

The consequences to WVR of no action are severe. The Draft EIS establishes that WVR’s existing amenities and infrastructure cannot meet rising guest expectations for on-mountain amenities, convenient access, and varied terrain, and that WVR’s market share will continue to decline as a result. Draft EIS at i. WVR’s existing guest service space already falls below industry standards for kitchen, bar, restroom, and seating space, which constrains the guest experience and the Resort’s competitiveness. Draft EIS at 33. Under the no-action alternative, these deficiencies would persist, the guest experience would degrade relative to competitors, and “[d]eclining visitation would continue to adversely

affect WVR's ability to remain competitive in the ski and mountain resort industry." Draft EIS at 34-35.

These guest-experience harms carry real socioeconomic consequences for the Town of Waterville Valley and Grafton County, whose economies are closely tied to the Resort. The Proposed Action would increase the Resort's comfortable carrying capacity by approximately 25 percent, and support development of approximately 55 full-time-equivalent jobs. Draft EIS at 40, 60. The no-action alternative forgoes these benefits and the associated visitor spending, employment, and tax revenue that support the surrounding communities.

The severe and detrimental effects of not taking action in this case supply a compelling reason for the Forest Service to act and to authorize the Project as proposed. WVR respectfully urges the Forest Service to reject the no-action alternative.

Please acknowledge in the Final EIS the severe adverse effects of the no-action alternative on WVR, the guest experience, and the local economy. Please reject the no-action alternative because it does not meet the purpose and need for the Project.

6. WVR requests the opportunity to confer with the Forest Service on project design criteria and best management practices.

The Draft EIS provides that the responsible official "will determine any required project design criteria (PDC) and best management practices (BMPs)" and "may require additional PDC and/or BMPs not discussed in this document, as well as any monitoring requirements." Draft EIS at 4. Because WVR will be responsible for implementing and funding the PDCs, BMPs, and monitoring measures adopted for the Project—and because those measures directly affect the Project's design, cost, and operation—WVR requests the opportunity to review and confer on any PDCs, BMPs, and monitoring requirements before they are finalized in the Final EIS and Draft Record of Decision.

WVR has a strong track record of designing and implementing effective, practicable resource-protection measures. Several of the PDCs already reflected in the Draft EIS, such as the Canada lynx and American marten linkage corridor to be retained along the south ridge of Green Peak, illustrate the value of close coordination between WVR and the Forest Service. See Draft EIS at 145. WVR requests that any additional or modified PDCs and BMPs be developed collaboratively so that they are effective, operationally feasible, and appropriately tailored to the resource findings.

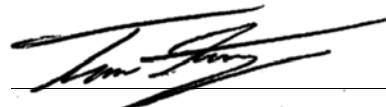
Please provide WVR the opportunity to review and confer on any project design criteria, best management practices, and monitoring requirements before they are finalized in the Final EIS and Draft Record of Decision.

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WVR appreciates the Forest Service's thorough and collaborative work on the Draft EIS and looks forward to continuing to work together to bring the Project to fruition. The Project will modernize a beloved New Hampshire resort, connect it with its host community, and secure the Resort's ability to provide high-quality public recreation on the WMNF for generations.

WVR respectfully requests that the Forest Service approve the Proposed Action (Alternative 2), reject the components of Alternative 3 identified above, and reject the no-action alternative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Smith', is written over a horizontal line.

Tim Smith
President & General Manager
Waterville Valley Resort