



May 2, 2022

Carson National Forest
208 Cruz Alta Road
Taos, NM 87571

Re: Taos Ski Valley Improvements #61390

Submitted online at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61390>

To whom it may concern,

Thank you for the opportunity to provide scoping comments in response to the Notice of Intent for the Taos Ski Valley Improvements, project #61390. Winter Wildlands Alliance (WWA) is a national non-profit organization whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Many of our members ski at Taos Ski Valley and recreate in the adjacent Wheeler Peak Wilderness. Our concerns with the proposed project relate to direct and indirect effects that the project may have on the Wheeler Peak Wilderness, including public access to the Wilderness area.

National Policies

The Ski Area Outdoor Recreation Enhancement Act (SAOREA) and Forest Service Manual (FSM) provide direction on what activities and developments are permissible concerning ski areas operating on Forest Service lands. Under SAOREA, "Each activity and facility authorized...shall (A) encourage outdoor recreation and enjoyment of nature; (B) to the extent practicable (i) harmonize with the natural environment of the National Forest System land on which the activity or facility is located; and (ii) be located within the developed portions of the ski area"¹ SAOREA also mandates that authorized activities and facilities shall encourage outdoor recreation and enjoyment of nature. As this Environmental Assessment is developed, we encourage the Forest Service to consider that not all activities that occur outside necessarily further the enjoyment of nature and to be discerning in determining what types of infrastructure fit within this restricted category.

FSM §2343.14(1)e1 states that recreation and facilities at ski areas must harmonize with the natural environment of the site where they would be located by being visually consistent with or subordinate to the ski area's existing facilities, vegetation and landscape. The EA must include a viewshed analysis that considers how new or upgraded will be visible from the surrounding area. This viewshed analysis can help the Forest Service to determine whether the proposed projects are consistent with the ski area's existing facilities, vegetation and landscape. The viewshed analysis is also necessary to determine what effects the proposed projects may have on the Wheeler Peak Wilderness viewshed. Clearly, Taos Ski Valley is already within, and impacts, the Wilderness viewshed. Compliance with FSM §2343.14(1)e1 is critical to ensuring that Forest Service does not approve new projects that will further degrade the viewshed.

¹ Ski Area Outdoor Recreation Enhancement Act §3



FSM 2343.14(1)g directs that activities and associated facilities at ski resorts increase utilization of snow sports facilities and not require extensive new support facilities, such as parking lots, restaurants, and lifts. Taos Ski Valley's proposed new restaurant and the new roads required to construct the various projects proposed in the scoping letter may possibly conflict with FSM direction and must be addressed in the EA.

New Infrastructure

The Forest Service must consider the direct, indirect, and cumulative effects the proposed projects, as well as the construction access and staging areas will have on public access to Wheeler Peak Wilderness. The Kachina Base Area is adjacent to the Williams Lake trailhead, while the Wheeler Peak trailhead is located adjacent to the Frontside parking area. Construction and operation of the gondola, as well as other project-related construction and staging areas, should not impede public access to or use of these trailheads in any manner. This includes temporary as well as long-term effects. Please ensure that the EA adequately discusses how public access to the Wilderness area will be maintained throughout the course of this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen". The signature is fluid and cursive, with a large initial "H" and "E".

Hilary Eisen
Policy Director