



April 19th, 2022

James Duran, Forest Supervisor
% Paul Schilke, Winter Sports Coordinator
P.O. Box 110
Questa, NM 87556

Re: Comment for Scoping Period for Taos Ski Valley Gondola and Other Improvements

Dear Supervisor Duran:

Friends of the Wheeler Peak Wilderness is a friends group whose mission is; to protect the serenity and the ecology of local wilderness areas from the negative impacts of encroachment and overuse from a growing population, increased technology, and economic based priorities. Our friends group includes a growing number of over 60 locals and visitors who cherish and value the Wheeler Peak Wilderness.

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. *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.* The expansion plans in the proposed action require considerable new support facilities, including lifts, roads, and restaurants. This conflicts with FSM direction and must be addressed in the DEIS.

My letter focuses on potential social, ecological, and environmental impacts resulting from the Proposed Action. We respectfully ask the Carson National Forest and its contractors (CNF) to study, provide data, and analyze the following potential impacts in the upcoming Environmental Impact Statement (EIS) for the Proposed Action:

IMPACTS TO RECREATION

1. **Access.** The backside of Taos Ski Valley, the Kachina Basin, and other lands in the vicinity, particularly those adjacent to the Wheeler Peak Wilderness, are refuges for those seeking solitude. The Kachina Basin and subsequent road is the main access point to the Wheeler Peak Wilderness. How will access be affected by the

Proposed Action? Will the gondola (once completed) be the only access to the backside (Kachina Basin) to non-homeowners? We ask that CNF study potential impacts to those seeking to recreate in these areas, and evaluate the amount of potential impact in terms of access limitations before, during, and after construction for each alternative outlined in the Draft EIS. Summer and winter impact analyses should be separately studied with data reports on each.

2. **Limited access to recreation resulting from construction.** The Proposed Action includes multiple buildings, roads, lifts, and other features that would require a significant amount of construction. We ask that CNF study potential impacts to wildlife and those seeking to recreate in these areas, and evaluate the amount of potential impact in terms of access limitations before, during, and after construction for each alternative outlined in the Draft EIS. Summer and winter impact analyses should be separately studied with data reports on each.
3. **Induced demand.** Adding on-mountain amenities, upgrading and installing new lifts, and other features in the Proposed Action could increase demand for skier visits as well as visits from other recreationists. Please provide an analysis of projected induced demand for each alternative outlined in the Draft EIS. Please provide skier visits data from the past 30 years to be used as baseline data from which CNF and the public can study and consider impacts relative to projected skier increases.

Water, Wildlife, Environment, & Aesthetics

4. **IMPACTS TO WATER RESOURCES.** The Proposed Action seeks to install a septic system or sanitary sewer line based on engineering recommendations, with water supplies coming from an onsite well to support the on-mountain guest service facility at the top of lift 7 and the new Whistle Stop building. These developments would not only require significant quantities of water, but also potentially impact water quality in the project area as well as water quality in the ground and surface waters within the Rio Hondo Watershed. The disturbance of soils along the Lake Fork of the Rio Hondo for installation of the gondola and all its towers will result in impacts to the stream and must be studied diligently.

Recommendation: The DEIS must comprehensively evaluate the direct, indirect, and cumulative impacts of the Proposed Action on water resources. Specifically, the DEIS must examine the potential impacts to water quality, groundwater supplies, surface water supplies including drinking water, and aquatic wildlife. Special attention must be paid to project elements that threaten drinking and agricultural water supplies for the nearby towns of Taos Ski Valley, Amizette, Valdez, Arroyo Seco, and Arroyo Hondo. As well as vital aquatic habitat for trout in Rio Hondo and the Rio Grande, and essential drinking water sources for terrestrial wildlife. The DEIS should also examine appropriate opportunities to mitigate any/all these impacts.

5. **Disturbance to Vegetation.** We ask that CNF identify all areas within the Proposed Action and identify potential impacts to existing vegetation. We recommend including a

tree survey and a determination of the amount of existing trees to be removed with each alternative. Carson National Forest published an updated “Potential Species of Conservation Concern Carson National Forest New Mexico” in June of 2020. Please analyze the impacts that these projects would have on the known Flora in the Wheeler Peak Wilderness and the greater CNF. Given the significance of climate change and increased recreational use that is already impacting species listed, we believe any extra disturbance of habitat is harmful and recommend a full EIS to study the impacts on the plant species listed. We also recommend study of revegetation methods and the duration of various revegetation methods. How long will revegetation take, particularly at high elevations? What is the likelihood that a particular revegetation method will restore disturbed lands to their natural state? How visible will these disturbances be to vantage points along various hiking and wilderness areas? We request that disturbance to vegetation and reclamation be analyzed in each alternative.

6. **Impacts to Wildlife.** Carson National Forest published an updated “Potential Species of Conservation Concern Carson National Forest New Mexico” in June of 2020. Please analyze the impacts that these projects would have on the known species in the Wheeler Peak Wilderness and the greater CNF. Given the significance of climate change and increased recreational use that is already impacting wildlife listed, we believe any extra disturbance of habitat is harmful and recommend a full EIS to study the impacts on the species listed.
7. **Gold Hill-Long Canyon-Wheeler Ridge Viewsheds.** The ridge that is accessed by all the trails in the canyon is a remarkable area (mostly wilderness) that has striking views. We ask that the CNF incorporate a visual analysis to examine the aesthetic integrity of this ridge with its peak views and include all vantage points. Each alternative should include this analysis.
8. **Reflective surfaces.** We ask that CNF identify all reflective surfaces in the Proposed Expansion. This includes buildings, lifts, utilities and all other proposed features. Of special concern are features that are composed of, or clad in, metal. We ask that reflectivity be studied at various points of the day in various times of the year. In particular, please study, and provide data relevant to the impact reflective features will have during different times of the day. Please study this impact in each alternative.
9. **Scale/visibility of buildings.** The scale of proposed buildings should be examined. Of particular interest is the possibility of on-mountain buildings and facilities being visible from the Wheeler Peak Wilderness. Visual impact should be analyzed, and data provided, from vantage points along roadways and also be studied from hiking areas such as the aforementioned ridge as well as the Wheeler Peak Trail and subsequent Wilderness area. Please study this impact in each alternative.
10. **Roads.** We ask that a visual analysis is conducted for all proposed roads in the Proposed Action with a particular focus on road cuts on the mountain side. Visual impact should be analyzed, and data provided, visual impact should be analyzed, and data provided, from vantage points along roadways and also be studied from hiking areas such as the aforementioned ridge as well as the Wheeler Peak Trail and subsequent Wilderness area. Please study this impact in each alternative.

IMPACTS TO CULTURAL AND HISTORIC RESOURCES

- 11. Consultation with Indigenous Peoples.** We understand that the Proposed Action is located within the ancestral lands of the Tiwa, Taos Pueblo, Anasazi, and possibly other indigenous peoples. We ask that the Taos Pueblo and other indigenous peoples be identified, consulted with, and allowed to determine impacts to cultural, sociological, and archaeological resources that may result from the Proposed Action. We further request that said impacts are analyzed in the draft EIS alternatives.

IMPACTS TO TRAFFIC AND PARKING

- 12. Vehicle Miles Traveled (VMT) Analysis for all regional highways into Taos County and leading to the Taos Ski Valley Base Area.** Traffic impacts resulting from each alternative should be studied. We recommend using a VMT metric because we believe it will best to forecast traffic growth resulting from each alternative. We further recommend that CNF establish a baseline VMT metric for comparison purposes. The geographic scope should include all roads in Taos County that people use from the surrounding region to visit TSV. This includes the traffic from those traveling from Denver as well as the airports in Albuquerque and Santa Fe. We request that a baseline VMT is established, and that projected VMT is analyzed for each alternative, particularly on the Ski Valley Road and roads in Arroyo Seco.
- 13. Parking Capacity and Hiker Access.** We request that parking demand is analyzed for each alternative. We are particularly concerned about the potential for loss in parking and access to trailheads especially in winter and during construction resulting from the Proposed Action. Please study this impact for each alternative.
- 14. Impacts to pedestrians and cyclists on Ski Valley Road and the Taos Ski Valley Base Area.** The Ski Valley Road is a popular cycling route and we also note that the Taos Ski Valley Base Area experiences a significant amount of pedestrian traffic within its roadways and parking areas. There will be a direct and significant impact to cyclists and pedestrians due to construction traffic. We request that impacts to pedestrians and cyclists are analyzed in each alternative, particularly along Ski Valley Road and in the Taos Ski Valley Base Area.

IMPACTS TO EMPLOYMENT, POPULATION, HOUSING, AND PUBLIC SERVICES

- 15. Seasonal Employees.** We request that CNF analyze the number of seasonal employees that will be required for each alternative, and how those employees will be housed. Jobs in the Accommodations/Food Service sector pay the lowest of any employment sector in Taos County. The majority of ski area employees are seasonal, supporting the high levels of demand seen in the winter months. In the past, these jobs were almost exclusively done by low-wage employees who are not necessarily residents of nearby communities. Consequently, ski area expansion projects that depend on large amounts of seasonal labor will lead to a greater proportion of the local population being composed of individuals employed in

these types of jobs. Like many other small mountain towns, Taos is in a housing crisis already. Adding jobs (seasonal, construction, year-round) in connection to ski area development is not feasible at this time. There is nothing in the scope that mentions employee housing, which should be mandatory. As such, we believe that determining seasonal housing needs is of extreme importance. This should be analyzed using current and projected figures for each alternative.

16. **Year-Round Employees.** As in Item #15, we request that CNF analyze the number of year-round employees that will result from each alternative and determine how these employees will be housed. This not only includes the new employees that the proposed action will need when complete, but also housing for all the construction workers, contractors, and crews needed to complete these projects.
17. **Population Growth.** We request that CNF analyze the effects that the Proposed Action will have on population growth in Taos County, NM, and provide this analysis for each alternative. We further request analysis of the socioeconomic status of new residents attracted by the Proposed Action and each alternative, and what effect these new residents will have on the cost of land and housing. We also request the effect population growth - and the socioeconomic status of new residents - will have on local property taxes and the ability of existing residents to pay them.
18. **Public Services.** We request that CNF analyze the impact to public services created by population growth resulting from the Proposed Action to be provided by Taos County. Specific areas of consideration should include impacts to schools, health care facilities, law enforcement, emergency services, social services, planning & zoning, transportation, and all other aspects of public services. This should be analyzed for each alternative.

IMPACTS TO LAND USE

19. **Demand for Short-Term Rentals.** The proposed action states:
*“There is a need to **address existing capacity and circulation constraints, deficiencies associated with on mountain facilities, inefficiencies with the snowmaking system, provide an additional means of fire suppression, and to expand existing recreation opportunities**”*
If the goal of the proposed action is to increase visitation, this will have a direct impact on the increase of short-term rentals. Taos, like most other desirable towns, is experiencing a housing crisis and STR’s have been shown to have a deleterious effect on housing affordability, neighborhood integrity, and provision of public services. We request that CNF analyze the demand for STR’s that will result from each alternative.

Impacts to Soundscapes & Night Skies

20. **Noise generated by construction.** The noise generated by construction of roads, buildings, lifts, and other features in the Proposed Action could affect the soundscape elsewhere in the forest. This is particularly true in the adjacent Wheeler Peak Wilderness area, where existing soundscapes are important to humans and wildlife alike. Hiking trails like Bull of the Woods, Long Canyon, Wheeler Peak Trail, and Williams Lake and other areas in the vicinity are known for their stillness. This is particularly true for those wishing to hear the unique chirping, calling, bugling, or other notable sounds coming from the area's wildlife. We request that CNF consider the noise from construction and its impact on users of the Forest. We also request that CNF study the possible duration of construction. This should be analyzed for each alternative.
21. **Noise generated by increased traffic.** In light of traffic impacts discussed in Item #20, we believe that significant increases in traffic could result in increased noise for those living along roads servicing the Proposed Action, particularly Ski Valley Road and the Village of Arroyo Seco. Many residents live within earshot of the road, and could be impacted in several ways. The amount of construction equipment traveling to the site could be significant, and, given the size of the project/s, could occur over many construction seasons. Increased traffic resulting from the Proposed Action could also impact many residents who live near roads accessing the project. We request that CNF analyze the noise generated by 1) construction traffic, both in terms of amount and duration, and 2) the noise generated by any traffic increases resulting from the Proposed Action. This should be analyzed in each alternative.
22. **Night Skies.** We believe that the lights generated from construction and new facilities will impact NM Night Skies. We request CNF analyze the direct, indirect, and cumulative effect of all new lights on our dark skies associated with the projects during and after construction.

IMPACTS TO ENVIRONMENTAL JUSTICE

23. **Impacts to Low-Income Households.** We are concerned that the Proposed Action could disproportionately impact low-income residents living in Taos County. The Proposed Action may result in higher housing costs for low-income households and other protected classes. We request that CNF analyze the impact that the proposed actions will have on housing costs in the county.
24. **Ability to access the resource.** Access to lands subject to the Proposed Action may hinder low-income households and other protected classes from accessing the resource. Environmental Justice for All Act ([H.R. 2021/S. 872](#)), which proposes policy solutions to address inequities in environmental protection and outdoor access for affected communities. The main access to the CNF and the Wheeler Peak Wilderness is on the backside of Taos Ski Valley. This is where parking is for the trails and a starting point for access to our public lands. Any change with that access, whether temporary or permanent, needs to be assessed and analyzed by CNF.

IMPACTS TO SAFETY

25. Skier Safety and Avalanche Hazards. The scoping letter states: *“The lift would also provide direct repeat-skiing on the Rubezahl trail, which would be able to be used by the ski school for teaching.”* Using Rubezahl as a lesson area for beginners and the ski school is a significant hazard to those in lessons and the general public. It is a narrow trail with a double fall-line that has a steep bank that drops into the Lake Fork of the Rio Hondo. There have been numerous accidents on this trail and at least one death of a skier winding up in the creek. By allowing people to “lap” this trail by installing a gondola puts an excessive amount of skiers on the trail and creates a harmful situation for everyone involved. This is also an area that has seen wet slides (warm weather avalanches) more often as our planet warms. The ski patrol has had to close the trail on numerous occasions as our winters get warmer. What effect will this have on the safety of the gondola? We request that CNF analyze potential skier safety risks in the proposed action of the gondola installation.

SUSTAINABILITY AND QUALITY OF LIFE

26. Impacts to Regional Sustainability and Quality of Life. The Scoping Letter states that: *“optimizing ski area operations and promoting sustainability on NFS and adjacent lands”*. Building bigger is not sustainable. What energy alternatives has TSV said they will use to run these new lifts, restaurants, and gondola? How long is the construction going to take, and how much of an increase in truck traffic will it cause? How will they be offsetting the immense carbon footprint these projects will create? People choose to live in and visit this special corner of Northern NM in part for the clean air, fresh water, small town character, wildlife, and scenery, along with outdoor recreation opportunities. Since the installation of the Kachina Peak chair in summer 2014, *TSV has been a nonstop construction project (see below). The amount of construction traffic has increased exponentially and one cannot sit anywhere by the Rio Hondo in the canyon without the constant barrage of gravel trucks and other construction vehicles. We request that CNF explain in what ways these proposed actions are in promoting sustainability on NFS and adjacent lands.

FINAL THOUGHTS

In Closing: We encourage the Forest Service to identify and evaluate a reasonable range of alternatives that meet the purpose and need for the Proposed Action in the DEIS. The DEIS should evaluate all reasonable alternatives, including those that are “practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant,” and with sufficient detail so as to provide the public with a fair opportunity to compare and contrast the environmental impacts of the alternatives. Specifically, the DEIS should evaluate at a minimum: one (1) no action alternative; one (1) alternative that includes the entire Proposed Action; and, no fewer than three (3) different

alternatives that each include some but not all component parts of Proposed Action. If the Forest Service selects a preferred alternative, then it is imperative that the preferred alternative be rigorously analyzed in the DEIS. The DEIS should conduct a comprehensive analysis of any and all direct impacts, indirect impacts, and cumulative effects that would result from implementing the Proposed Action. These should include, but not limited to, socio-economic, ecological, aesthetic, historic, cultural, economic, social, or health impacts.

I wish you the best of luck in your analysis and look forward to reviewing the Draft EIS.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Emily Sadow', with a long horizontal flourish extending to the right.

Emily Sadow

Friends of the Wheeler Peak Wilderness, Founder

*TSV projects since the Kachina Chairlift 2014 include, but are not limited to; Chair 1 replacement with a High-speed quad and removal of lift 5, construction of the Blake Hotel, construction of the Blake condos and courtyard with ice-skating rink, new parking area in the Kachina Basin and remodel of the Phoenix lodge, remodel of the whole base area which included major stream (watershed) mitigation, bridges, and landscaping, the installation of a Via Ferrata and GasEx system, and the new alignment of the Williams Lake Trail and subsequent macerating of a large amount of trees.