

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

Re: Taos Ski Valley Gondola and Other Improvements Project

Dear Supervisor Duran:

My name is Brooke Zanetell and I am Assistant Professor & Director of the Natural Resources Management Program at the University of New Mexico in Taos. I am also an avid skier and regular season pass holder at Taos Ski Valley ski area. I am a frequent visitor to Carson National Forest lands in the upper Rio Hondo Watershed including numerous trails that originate in the Village of Taos Ski Valley and provide access to the Wheeler Peak Wilderness Area and the Columbine Hondo Wilderness Area. I've been a resident of Taos, NM since 2005.

Growing up in Colorado, I've watched a lot of ski areas make the transition from local and family-friendly alpine wonders to high-rise urban centers that serve up luxury real estate, summer recreation, fancy food, and high-end lodging to society's elite – all at the cost of the water resources, the plants and wildlife, and the local people. I am convinced that the outcome of this scoping process will either be a rubber stamp from the Carson National Forest for TSV Inc. to do just that, or that the Forest Service will respond legally and appropriately to all of the concerns raised that make it clear that development within the Rio Hondo Watershed must be done within the true limits of the watershed's capacity to sustain not only the area's flora and fauna, but also the acequia-dependent communities downstream.

The first time I visited Crested Butte Mountain Resort after it had undergone the Ski Industry Makeover being proposed for Taos, I was disoriented trying to find my way from the parking lot I knew as a kid to the lift. I snaked my way on cold and shaded walkways between mini-skyscrapers with no view of the mountains I knew and loved. Almost all the green at the bottom of the ski hill – the grass, the wildflowers, the aspens – had been built on or paved over. After skiing that day, we found our way to a balcony crowded with skiers and beer. It turned out it was the only place left that was still locally owned. The ski resort owned all other businesses and churned out the same formula of uptight and upscale food and drink at each of them. As I looked around more closely, it became obvious. We were at the only place with any character, any spirit, any good vibe. Everywhere else looked the same, somehow, like they had all materialized out of the same high-end architectural magazine, and the people also looked the same, like they had all bought their ski jackets out of the same high-end catalog. The crowd reminisced about the days before CBMR became so corporate, so cleansed of anything at all cultural, historic, funky, gritty and local. The same summer, I drove to visit my cousin in South Lake Tahoe and made a quick stop at Heavenly Mountain Resort & Ski Area to buy a rain jacket for my daughter. Walking from the parking lot to the base area shops, I had that same sensation of disorientation amidst the mini-skyscrapers that crowded the bottom of the mountain. Everything had the same overly polished and overbuilt look I'd seen in the new and improved Crested Butte Mountain Resort. It could have been the same place. There was nothing left that made the Lake Tahoe resort unique or rooted to where it was. Shortly after, I drove along I-70 west from my brother's house near Denver. I stopped in Breckenridge for a bite. Déjà vu all

over again. Was I going crazy? I felt like the ski industry had scooped up every ski area in the country, every beautiful mountain town near a ski lift, and was making them all exactly the same: densely populated zones of urban, luxury living and tourism with little left of the wildlife, water, and people that once called the place home.

As it turns out, some of the same top guns of the ski industry that developed Breckenridge and Aspen have been brought in to develop Taos Ski Valley – the village, the private land, and the public Forest Service land. The master plan for all the hotels, condos, water pumps, restaurants, lifts, parking garages, and waste-water treatment pipes looks like it could be for Breckenridge, Crested Butte Mountain Resort, or Heavenly. And as sad as it is to see the unique local character of Taos Ski Valley squeezed out, the most concerning part of all is that the Rio Hondo Watershed simply doesn't have the water resources to handle it. And it all goes to show how incredibly out of touch the proposers of these developments are with the local environment. There's a reason Taos is known for steep ski runs. It's because all we've got are steep mountains with a little, but mighty stream at the bottom. That's very different than the big, sprawling mountain complexes upon which Heavenly, Breckenridge, Vail, Aspen, and Crested Butte are built. There simply isn't room or water to support a bunch of new hotels, restaurants, condos and houses up at TSV. The entire area, from Williams Lake, to Lake Fork Stream, to Phoenix Springs, to Gunsight Pass Springs, to Bull of the Woods Springs is one big water catchment area for the most important tributary to the Rio Grande in Northern New Mexico: The Rio Hondo. And the only way TSV Inc. can fulfill its development plans is to capture all that ground and surface water and use it for themselves. If that sounds like a recipe for lowering the flow in the Rio Hondo, maybe that is why water rights from the San Juan Chama River Project were purchased and transferred to TSV. This means that legally, less water can flow from the Rio Hondo into the Rio Grande because that same amount will be made up by what flows into the Rio Grande from the Chama River downstream.

Therefore, it is unwise to divide the comments received during this public scoping period as those in favor of the proposed expansion and those who are opposed. That perspective is an oversimplification, like teenagers who think their parents are against them when those parents put limits on the teenagers' behavior. Ultimately, everyone needs to learn how to grow up within limits. And that is exactly what Taos Ski Valley Inc. is going to need to do. They've arrived in the county with guns blazing, on fire with all their stereotypical ideas about how a ski resort needs to grow to turn a profit and be popular. All these concerns about limited water resources and a loss of traditional, acequia-dependent cultures are actually providing TSV Inc. with an opportunity to listen, learn and change their plans. No one is asking them to go away. No one is asking them to do anything but change their approach so it fits in with where they are at, fits into the limits of the watershed and the water available. And lots of people are offering them knowledge gained from living and working on land sustained by the Rio Hondo for many, many generations. The Carson National Forest would be taking an important and needed leadership role to respond appropriately and legally to public comments by requiring that TSV Inc. complete an EIS of the direct, indirect, and cumulative effects and include a No Action Alternative. The CNF needs to fulfill its multi-use mandate on public lands by guiding TSV Inc. toward the sustainable use of public lands and toward development that will not result in short-term profit through the exploitation of all available resources, but rather toward limited development that will benefit TSV Inc. for many, many generations to come.

In addition, I've included technical comments written by the New Mexico Acequia Association. I am in full support of these comments. The only technical comments I would add are:

- The EIS must address impacts to all Species of Conservation Concern on the Carson National Forest, of which many are confined to the fragile alpine environment found at Taos Ski Valley. Considerations should be made for current and proposed SCC. In particular, the proposed gondola, built in and above the Lake Fork tributary of the Rio Hondo will need to be studied thoroughly for its potential negative impacts on plant and wildlife species, both terrestrial and aquatic.
- The EIS must address impacts to water quality indicator species like trout and stoneflies and study impacts of salts and other compounds added to snow for ski races/competitions and used to de-ice walkways and roads that are included in the expansion. Cumulative impacts on aquatic life and water quality of these and other salt and de-ice compounds already used in the area need to be considered.
- The EIS must address impacts of sedimentation into the Rio Hondo and its headwaters and of increased sunlight that will raise water temperatures and lower dissolved oxygen levels. Sediment and sunlight pollution will occur as a result of removing riparian vegetation, forest disturbance and thinning, and construction. This is already occurring in the Rio Hondo adjacent to forest thinning done in advance of the proposed cross-country ski/snowshoe trails: See Photo.



- The EIS must address the impacts of destroying rare wetland habitat in the headwaters which is not only vital to recharging groundwater that supplies the Rio Hondo, but also is critical to many plant Species of Conservation Concern. The area proposed for the Gondola Terminal in the Kachina Basin is an example: See Photo.



- The EIS must assess if free and easy access to forest service trails and wilderness is maintained.

I. Environmental Justice Concerns, Including Cultural and Socioeconomic Impacts, that Must Be Addressed in an EIS:

- The EIS must take a hard look at whether Tribes, Pueblos, acequia, land grant and other environmental justice communities have been sufficiently involved in the decision-making process. This includes whether CNF has engaged in tribal consultation prior or during this scoping phase, consultation with impacted acequias and land grants, and with other environmental justice communities. This also includes whether CNF has invited Tribes, Pueblos, acequias and/or land grants with political subdivision of the state status to serve as cooperating agencies in the NEPA process, and whether traditional ecological knowledge is being centered in the NEPA process.
- The EIS must also take a hard look at how traditional land-based communities including Tribes, Pueblos, acequias, and land grants currently suffer and have historically suffered, from environmental and health risks or hazards, and from large-scale development projects such as the Proposed Action.
- With respect to natural resources such as water, land and wildlife, the EIS must include Tribal, Pueblo, acequia, and land grant dependence on natural resources for their economic base, as well as the cultural values that the Tribe, Pueblo, acequia, or land grant community places on water, land and wildlife at risk by the Proposed Action.
- The EIS must also include an analysis of the socioeconomic impacts to environmental justice communities, specifically addressing the Proposed Action's contribution to low-wage seasonal employment, skyrocketing demand for short-term housing rentals, unsustainable population growth, increased stress to public services, and overall decreased quality of life.

II. Water Resource Concerns that Must Be Addressed in an EIS:

- Generally, the EIS must take a hard look at the direct, indirect, and cumulative impacts of the Proposed Action on all surface water and groundwater resources. This includes analyzing the potential impacts to water quality, groundwater supplies, surface water supplies including drinking water, and aquatic wildlife. Special consideration must be given to project elements that threaten traditional agricultural water supplies for impacted acequias. Baseline data is also needed to meaningfully analyze these impacts.
- Specifically, 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 Cafe building. These developments would not only require significant quantities of water, but they would also likely impact water quality in the project area, as well as the

greater Rio Hondo Watershed. For example, disturbance of soils along the Lake Fork of the Rio Hondo for installation of the gondola and all its towers would result in impacts to surface waters, therefore requiring diligent analysis and collection of baseline data. The EIS must therefore take a hard look at the Proposed Action's impacts to water resources, mitigation measures, long-term monitoring of water quality and volume, and a No Action Alternative. Any mitigation measures identified in the EIS must include detailed measures to protect the integrity of the Rio Hondo headwaters through all phases of the project.

- Also specifically, the Proposed Action seeks to utilize a 65.2 million gallon water tank (annually storing a diversionary right of 200 acre-feet) and booster station near Lift #2. The EIS must take a hard look at whether this action will result in over-appropriation of the Taos Ski Valley's 200 acre-feet water right and conditions of approval associated with the Taos Ski Valley's water rights permit. For example, while Taos Ski Valley, Inc. holds a diversionary right of 200 acre-feet, this water right is severely constrained by the permit condition limiting consumption to only 21.42 acre feet, and a hard cap of only 0.11 acre feet of daily consumptive use between April 11th and October 25th of each year. The EIS must analyze whether the Taos Ski Valley, Inc. has sufficient water rights to implement the proposed project actions, must clearly identify the source and usage of water to be pumped up the mountain, and must analyze effects of removing water from the Rio Hondo Watershed, including the water needed to replenish the tank on a regular basis.

Thank you for considering my comments. I look forward to working with you to craft a resort experience on public land that is within the limits of the water resources available, maintains the rich plant and wildlife that thrive in the area, is accessible to tourists and locals alike, and is sustainable for generations to come.

Respectfully,

A handwritten signature in black ink that reads "Brooke Zanetell". The signature is written in a cursive, flowing style.

Brooke Zanetell, Ph.D.