

May 7, 2022

James Duran, Forest Supervisor  
Carson National Forest

Bruce Katlin  
P.O. Box 520  
Arroyo Seco, NM 87514  
575-224-2135

**Re:** Taos Ski Valley Improvement #61390. Comment for Scoping Period for Taos Ski Valley Gondola and Other Improvements

Dear Supervisor Duran,

Thank you in advance for reading my following comments on the proposed Taos Ski Valley Improvement #61390 Project.

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. In lieu of the FSM, no further action should be taken until these issues are addressed.

I am an outdoor enthusiast who lives in and regularly trail runs, skis, and hikes in the proposed improvement area, I am deeply invested in our natural resources with a commitment to economical and environmental justice, and strongly oppose the proposed TSV Improvement Project as follows:

1. **Irreversible cost of environmental damage**

a) 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 require both huge quantities of water, but also potentially impact water quality in the project area along with 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.

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 must also examine appropriate opportunities to mitigate any/all these impacts.

2. **Erosion on land and infrastructure**

a) With the added on-mountain amenities, upgrading and installing new lifts, and other features in the Proposed Action would increase demand for skier and visitor access. I would like to see analysis of the projected skier visits data from the past twenty-five years to that would be used as baseline data from which Carson National Forest and the public can study and consider impacts relative to projected skier increases. Additionally, I would like to see analysis conducted regarding the construction required to build the proposed additions; what would the costs and damages be to the roads bringing heavy equipment to each proposed site; damages to to the mountain sites themselves; and the effects of air pollution on flora, fauna and humans.

3. **Burden of over development**

Lastly, when is enough development enough? Each organization, be it private or public must put the needs of the majority of its citizens and taxpayers first. This project and those before it, prioritize the owners of Taos Ski Valley (TSV) and one might argue out of town/State visitors and not the majority of the people who live and work in Taos and the surrounding counties.

Repeatedly, we hear the refrain that added amenities to increase visitor numbers with improved experiences will drive economic growth. At what cost? Increasing visitor numbers only drains the limited number of precious water resources that our draught stricken area consistently suffers from; taxes infrastructure, reduces wildlife habitats, and increases air and water pollution.

It is for these reasons that I urge that a thorough and exhausting environmental impact analysis must be conducted using both State and third-party entities and not vendors paid for by Taos Ski Valley, Inc. In order to determine a what would best serve the environment and the flora, fauna and people who live in it.

Thank you for this opportunity.

Kind regards,



Bruce Katlin

