

May 6th, 2022

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

Dear Mr. Duran,

Thank you for receiving my comments on “The Taos Ski Valley Gondola and Other Improvements Project.” Initially, I respond to information provided in the introduction of the Scoping Letter, and then state questions, concerns and requests about the proposed actions - related to social, environmental and ecological considerations/determinations and combinations thereof. At the end, I state some general requests that pertain to many of the proposed actions in common.

It was stated that “All proposed projects would be within the existing Special Use Permit (SUP) area—administered by the Carson National Forest—or would be on adjacent private lands within the Village of Taos Ski Valley (VTSV).” I'm concerned that any development that might be done by both TSVI and VTSV, either together or separately, related to this overall Project be held to the same USFS standards and requirements determined by the outcome of this evaluation process.

Request: All planning, development and impact assessments related directly or indirectly to this proposed Project be coordinated between TSVI, VTSV and state and federal agencies and proactively transparent to the public.

If the 1986 CNF Land and Resource Management Plan (1986 Forest Plan) is currently being revised, then it seems reasonable to postpone further consideration of this proposed Project (and certainly any approvals for additional development until compliancy can be tested to the final Forest Plan.

Request: Postpone approval of any or all of this proposed Project until after the 1986 Forest Plan is revised and finalized and used to consider this proposed Project.

The question is posed “Why is this Work Needed?”

A couple of the stated proposal objectives are to “improve winter out-of-base lift capacity and guest dispersal across the mountain” and “increase non-vehicular transportation between the Frontside and Kachina Basin base areas” As a long-time TSV local skier, I've observed that there is rarely line pressure at Lift 1, and any pressure would be mitigated by an improved, faster Lift 2 for those racing up to powder on the ridge or wishing to cruise over to Kachina Basin. So improving Lifts 2 and 8 basically negates the first reason for a gondola.

Another stated objective to “address the deficiency of indoor on-mountain restaurant seating and increase on-mountain guest service space” could be solved if the Phoenix were returned to being a ski lodge/restaurant and the Bavarian would be devoted to skiers (with inside seating) and not frequent private parties.

The last two stated objectives for “increased snow making” and “nature-based non-alpine adventure opportunities” are moot if you agree that snowmaking is adequate at present and you don't need a commercial hiking trail when there are dozens of ways to hike around the ski area when the lifts are closed (even avoiding the mountain biking trails).

In summary, I see no validity to most of these objectives and feel many of the proposed actions would lead to a out-of-control overdevelopment (like Vail/Aspen and Squaw Valley) of the geographically constrained TSV valley. Fire mitigation and solving the issues related to Twining/Kachina road were mentioned, but could certainly be handled by VTSV improving (paving) the road and taking the lead on water storage (at a much less volume) for fire mitigation.

The opportunity to provide input during this scoping period is greatly appreciated. It should be pointed out that I also appreciate a corporation taking on the challenge of operating a ski resort in our National Forest, making it viable, providing Winter and Summer recreation through lift-operated activities, and some amenities. But I have become increasingly concerned about changes that have occurred over the past several years. Without enumerating, suffice it to say that things seem to happen in a “vacuum” and arrive on the scene as changes that had seemingly no adequate public input, especially locals' input. There is a perception that the “spirit” of the SUP is misaligned with its intention to make skiing/riding available to the general public and not be exclusive or discriminatory, especially to those who have Carson NF as our local playground.

Request: I ask Carson NF to hold yearly public forums to consider the USFS intent of the SUP for TSV, its execution by the permit holder, and input from all community stakeholders.

The main access to the Wheeler Peak Wilderness is on the backside of TSV. 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.

Request: I ask Carson NF to consider the 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.

In general and pertaining to the following itemized proposed actions.

Request: I ask the Carson NF (and any contractors) study, provide data, and analyze the following potential impacts in an Environmental Impact Statement (EIS) for the proposed actions:

Base-to-Base Gondola

A gondola between the ski area base (frontside) and the base of the Kachina Basin (bottom of lift 4 and the Phoenix/Bavarian restaurants) is presented to be a solution to problems related to 1) traffic on the Twining/Kachina road that services residences, the Wheeler Peak Trailhead parking area, 2) to disperse people over the ski area, and 3) to use Rubezahl for ski school training.

I've already mentioned that improving Lifts 2 and 8 would have the affect of efficient dispersal of people over the mountain negating one main argument for a gondola.

I suspect there are other hidden motivations driving this proposed Project like increased real estate values for the adjacent private, yet undeveloped, land and increased mall-like specialty shops catering to shoppers more than focusing on skiing/riding as a recreation. Is this project already slated to received funds for construction from taxpayer dollars? If so, perhaps another hidden motivation is just

that there is “free” money for it, but what about the other ways our state could use this money that more appropriately benefits the wider community? This is a warning about negative aspects of overdevelopment that is well known and should be worrisome to TSV and Taos communities. [see *Downhill Slide*, Hal Clifford, Sierra Club Books, 2002].

Request: I request that Carson NF explain in what ways these proposed actions are in promoting sustainability (in terms of understanding when building bigger is not always better) on USFS and adjacent lands.

Using Rubezahl as a lesson area for beginners and the ski school is a significant hazard to those in lessons and the general public.

Request: I request that Carson NF analyze potential skier safety risks in the proposed action related to using Rubezahl as a beginner run for the ski school of the gondola installation.

Mention is made that the gondola would be used in the evenings to connect the bases, but presuming that public direct access to the Wheeler Peak Wilderness and Williams Lake Trail from the existing base area would be closed as a consequence, the US Forest backcountry essentially would be excluded from the public during these times. If during times of operation, the extra time it takes to ride a gondola and hassle and inconvenience would be a deterrent to accessing the backcountry.

Request: I ask that Carson NF study potential impacts to people seeking to recreate in the backcountry, and evaluate the amount of potential impact in terms of access limitations before, during, and after construction.

For these reasons, I am against building the gondola.

I also see that clearing more trees and disturbing the wetlands would be bad for the environment.

Replacement of Lift 2

I am in favor of this improvement.

Grading and tree removal is an environmental issue.

Replacement of Lift 8

I am in favor of this improvement.

Grading and tree removal is an environmental issue.

Water Tank and Booster Station

I feel that additional snowmaking is unnecessary and there are significant environmental and ecological

risks. The Rio Hondo water source would be negatively affected by this proposed action. I am against this proposed action.

Request: Include a full study in the EIS of the effects on the environment, ecology, and downstream social effects. Take into account this reference and its results about pollution etc. [Impact of the Ski Industry on the Rio Hondo Watershed, Sylvia Rodriguez, Annals of Tourism Research, Vol. 14, pp 88-103, 1987]

Nordic and Snowshoe Trails

As stated previously, I am against this aspect of the proposed Project.

Lift 7 Restaurant

As stated previously, I am against this aspect of the proposed Project. It's not necessary given the Phoenix already exists and access to either base with food service is already adequate.

Whistlestop Café Replacement and Relocation

As stated previously, I am against this aspect of the proposed Project.

It's not necessary if the Phoenix reopened, and it's not evident that there is ever sufficient demand to warrant an expansion. One possibility would be to improve the bathroom access at the Whistlestop.

Lift 4 Hiking Trail

As stated previously, I am against this aspect of the proposed Project. If ever taken as an action, it should not be a pay-to-use feature of the ski area nor should there be any closure times. The resort should not inhibit people climbing and skiing/riding when lifts are closed.

Construction Access and Staging Areas

With the assumption that no additional restaurants are added and no water tank is constructed, then all this proposed action related to only upgrading the ski lifts is reasonable.

Request: I ask the Carson National Forest to study, provide data, and analyze the following potential impacts in the EIS for the this proposed action.

My requests for each above action often overlaps with others, so I summarize the remainder of those that are related to social, environmental and ecological considerations/determinations and combinations thereof:

Request: I ask that the EIS comprehensively evaluate the direct, indirect, and cumulative impacts of

the Proposed Action on water resources. Specifically, the EIS 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 TSV, 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 EIS should also examine appropriate opportunities to mitigate any/all these impacts.

Request: Given the significance of climate change and increased recreational use that is already impacting wildlife in TSV, I believe any extra disturbance of habitat is harmful and recommend a full EIS to study the impacts on the species listed.

Request: I 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.

Request: I ask that a traffic study be included in the EIS related to how any proposed action would affect traffic flow, parking capacity at the resort, pedestrians, and bicyclists.

Request: I request that disturbance to vegetation and reclamation be analyzed for each of the proposed actions. Especially in terms of the existing effects of tree removal for “fire mitigation” and from the pervasive knockdowns in January 2022 and how it affects the vegetation, environment, wildlife and ecology.

Request: I ask that there be a study related to employment, population, housing and public services. Considering seasonal and long-term employee effects and short-term rental and low income housing effects.

Thank your for accepting my input to your Scoping of the “Taos Ski Valley Gondola and Other Improvements Project.” I look forward to reading your recommendations and results in the EIS.

Respectfully,

Daniel Weeks
Taos Resident