

ny
282
o Florida
7513

ALBUQUERQUE NM 870

29 MAR 2023 PM 3 L



Range Staff
Rec. Staff
BMA File
Customer Svs. Rep.

District Ranger
/Asst. FMO
Wildlife Staff
Resource Assit.

James Neuman, Forest Supervisor
c/o Paul Scailke
P.O. Box 110
Questa, NM 87356

87558-011010



Jim Levv

(b) (5)

March 27, 2023

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 Mr. Duran:

I have been a resident of Taos since childhood when the Taos Ski Valley was an abandoned mining town, and a resident of Arroyo Hondo since 1969. Throughout my fifty-three years here, I have had occasion, with many of my neighbors, to comment on and in many cases to protest projects that resulted in the expansion of Taos Ski Valley. When Ernie Blake started the ski resort, it was a modest venue for mostly elite skiers to ski in the winter months. It's ambition now is to become a huge year-round luxury resort. It is my impression that the Forest Service, when issuing its initial Special Use Permit, and revising it in later years, has not taken into consideration this radical change in vision.

As I am sure you are aware, the Ski Valley polluted the Rio Hondo for many years, and it was only through the efforts of downstream residents that the river was cleaned up. We find ourselves once again facing major expansion of the resort, without any clear and specific details about how the project will effect the flow and quality of the river.

My major concern is not only with the specifics of the project, but with the overall process of oversight and regulation. Over all these years, there have been numerous projects that have impacted the ecosystem and the river. One year it might be Taos Ski Valley Incorporated that completes some projects. In another year, it is the village of Taos Ski Valley that does so. In yet other years, it is private land owners and developers. Perhaps the Forest Service itself has added some projects of it's own. Some of these projects has been duly assessed, debated, and, in most cases, approved and enacted. Others have been implemented without any public input. As far as I know, no agency has assessed the totality of these projects, both in terms of immediate impact and long term impacts? No agency has taken responsibility for that, and it is time for the Forest Service, the entity that allows the Ski Valley to exist, to ask the U.S. Government to do so.

The Gondola, water tank and booster station, Nordic and snowshoe trails, lift 7 restaurant, replacement of Whistlestop Café, and a new hiking trail all include displacement of trees and vegetation to one extent or another, and that displacement directly affects the overall watershed and the banks of the Rio Hondo, as well as the habitats of wild animals. Although the proposal states that the project will not increase the current water intake of 65.2 million gallons a year from

the Rio Hondo, it does not mention how the intake is measured, monitored and reported. Furthermore, the project does not address the severe, intermittent drought that is changing the Southwest in dramatic ways. Water sharing is becoming the paramount process to mitigating the effects of drought, but this current plan does not speak to that issue at all.

The Draft Environmental Assessment for the Taos Ski Valley Gondola and Other Improvements (EA) predominantly explains why each component of the project is needed. The EA appears to have been drafted by proponents of the project, with many explanations about the positive results, but there is little mention of the negative consequences of the various components: disruption and harm to the land, watershed, fauna, and flora. Furthermore, there is minimum comment about the effects of the projects might have on Valdez, Des Montes and Arroyo Hondo, as if these downstream land-grant communities do not exist and have no reason to be taken into account.

The Ski Valley, (the company, village and private landowners) does not exist in a vacuum. It is part of an entire alpine ecological and riparian system that the government, with the encouragement of the Forest Service, should assess and protect. To make available recreational opportunities to the public is a valid mission, but it should not be the only one to be considered. The interests of downstream residents and the land and water themselves should be considered as thoroughly as the interests of developers, corporations and others who hope to profit by more development.

The qualifications for comment on the EA are insulting to average citizens. Downstream residents can't be expected to discuss complex scientific details of the projects. All identical comments will be treated as only one comment. And so forth. It is clear to everyone that the comment period is designed to ignore public responses.

In light of the above, I recommend that the comment period on the EA be extended. Furthermore, the Forest Service should declare that the EA inadequately addresses the multiply complex impacts that the projects may have on wildlife, forests, the amount and quality of the water in the Rio Hondo, and on the downstream residents, who should be given a genuine opportunity to participate in the review. For this reason, a moratorium should be placed on this project until a full Environmental Impact Study can be completed.

Sincerely,


Jim Levy