

## Weeks Comment

### Why just an EA?, and Where are the Alternatives?

I am baffled that given the plethora of the first scoping period comments citing specific reasons for an Environmental Impact Statement (EIS), the Carson National Forest (CNF) interdisciplinary team determined that **only** an Environmental Assessment (EA) was required. Maybe the most obvious flaw in this process is the fact that, in general, the 2021 Master Development Plan (MDP) does not provide technical specifics (e.g. gondola pads locations, comparative amounts of water and sewage quantities for Whistlestop and Lift 7 restaurant projects, etc.) necessary for any determination of environmental impact. And the EA doesn't address these deficiencies. The EA reads like a real estate brochure and has the flavor of everything being fine and all aspects of the proposed projects should proceed.

As I ponder what has transpired in the past year and review the EA, these thoughts and questions come to mind:

The National Environmental Policy Act (NEPA) process is supposed to focus on protecting public lands. Instead it seems this process is set up to support the proponents of development without any consideration of the reality of the impacts that are certain to result. Why wasn't the MDP required to have specifications for each project that could even be assessed?

The 2010 TSVI MDP had a less extensive list of proposed projects, yet it resulted in an EIS. Why only an EA for 2021. How can that be?

Since the NEPA process is US government oversight through the USFS, why does a private consultant craft the EA? The private consultant (SE Group) used by CNF/Taos Ski Valley, Inc. (TSVI) is the same private consultant that does this service for many other ski resort improvements and expansions. A concern could be that this is a "cottage industry" that serves its (and the client's) desire to ensure projects get approved rather than give thorough consideration and analysis for the sake of protecting environment, wildlife, and environmental justice.

The private consultant is paid by the corporations proposing the projects. Isn't that a conflict of interest?

### Purpose and Need?

Digging further into the EA, I try to follow the logic of why the projects are necessary, why what is proposed is the best (and only) alternative, and what environmental assessments (and how extensive) would be required to ensure NEPA compliance.

The Purpose and Need section lists “expanding and improving recreational offerings within the Special Use Permit (SUP) area.” Sounds good. Then, it continues “while simultaneously optimizing ski area operations and consolidating recreational use on NFS lands.” Whoa, red flag! Is the implication that TSVI projects would contribute to constraining recreational activities that already exist in the forest (wilderness) surrounding the SUP by constraining access and “encouraging” the public to migrate into the SUP area to recreate in the commercialized area? This should be clarified - explicitly. (Another comment about forest access forthcoming)

The specifically listed purpose and need objectives are:

- Improve winter out-of-base lift capacity and guest dispersal across the mountain
- Increase non-vehicular transportation between the Frontside and Kachina Basin base areas
- Address the deficiency of indoor on-mountain restaurant seating and increase on-mountain guest service space
- Increase storage and pump pressure of water on the Frontside for snowmaking and fire suppression purposes
- Increase the variety of nature-based, non-Alpine skiing recreation opportunities available at TSV.

The EA then follows with expressions of need to “address existing capacity and circulation constraints, deficiencies associated with on mountain facilities, inefficiencies with the snowmaking system, deficiencies in existing recreation opportunities, and provide additional fire suppression capabilities.”

My hope is that CNF officials will see that this (and many other comments about specific impacts) make a very good case for switching to an EIS and affording a genuine opportunity to really assess the impact of the proposed projects.

REQUEST: Requiring TSVI to separate out each MDP project into a detailed proposal that provides details and technical specifics necessary for valid assessments. This should be done because the approach to a wholesale proposal of multiple projects is confusing and proving too difficult for a correct assessment.

REQUEST: The CNF interdisciplinary board should reconsider switching to a full EIS for each of the projects and should not allow the utilization of a third party contractor to perform any assessments. There is too much potential for bias and incorrect assessment due to conflict of interest.

The NEPA process is to include alternatives to proposed projects and their objectives. There are basically no alternatives given in the EA. I consider possibilities and make requests:

Gondola and Dispersal of People (Skier Circulation)

With a gondola rate of 1800 PPH and an improved Lift 2 rate of 2400 PPH, taking into account a 7 minute ride up chair 1 and assuming the gondola and Lift 2 lengths are the same results in moved people from the base:

450 people at the Kachina basin in 15min.

600 people at the top of Lift 2 in 22min.

One conclusion is that more people are disbursed to the center of the resort in roughly the same amount of time, and able to ski because of an improved Lift 2 as compared to a lesser number arriving at the bottom chair 4 and still slogging. Sure, gondola riders would get to Kachina lift quicker, but those that ride up chair 2 will have a longer day of skiing, and be initially presented with a smorgasbord of opportunities. And the beginners, they start skiing the goods earlier if riding up Lift 1 as compared to Gondola/Lift 4. I conclude that improving Lift 2 is a clear alternative to building a gondola. This scenario should be considered in this process.

REQUEST: Provide a full assessment of the restoration of Lift 2 and increased carrying capacity to determine that this is a viable alternative to building a gondola for the purpose of dispersing people throughout the resort.

Increase Non-Vehicular Transportation...

Why is this desired? Because some residents don't appreciate dust that comes from the dirt road? According to the VTSV, there is a proposal to pave the lower portion of the road that is most notorious for dust (and dangerous travel) which would improve the access to Kachina Basin and the hiker parking lot. And honestly, when I imagine a completed gondola in TSV, I'm reminded of the similar situations in Vail, Olympic Valley, etc. where the roads to the trailheads as ski area accesses get closed off and are nothing more than a way to seal off the new real estate, gated community style.

REQUEST: Include into an assessment for the necessity of a gondola an objective look at what this purpose and need claim really means and how it has the potential to affect access to the forest above the Kachina Basin (details presented in a separate comment). The responsibilities and interests of both the VTSV and the TSVI should be separated and not considered as a joint venture. Keep the purview of the TSVI strictly about "improving the resort" and not having influence or logistical connection to the business of the Village.

Restaurants and Deficiencies Associated with Indoor On Mountain Restaurant Seating.

The Phoenix is an already-constructed ski lodge with dining capabilities that can satisfy claims for a need for more restaurant options on the backside. Complete with existing utilities, water and sewage, it was very popular and well utilized until it was converted into an entertainment and events facility. The same can be said for the closed Martini Bar and Restaurant at the Base. Why aren't these listed (and chosen) as alternatives?

REQUEST: Include in assessments of proposed Lift 7 restaurant and relocated Whistlestop the fact that facilities already exist that can satisfy the claimed purpose and need.

Included in this comment is a final concern about the big picture in terms of development in the Taos Ski Valley. The intent of TSVI should be transparent and fully vetted with all stakeholders, most importantly the public. The Village infrastructure is fragile. The upper valley environment is delicate. Water usage is tenuous. The amount of people accessing the area has reached its limit. Are more changes that are intended to support increased development necessary? Is any further development sustainable?

REQUEST: A hold on all further development in the TSV including improvements to the recreational offerings by the resort, Village infrastructure, and private land development until sufficient consensus can be reached by all stakeholders (including the CNF and water users downstream) regarding any future development.