

Weeks Comment - Forest Access

I want to bring “forest access” to the Carson National Forest official’s attention. A problem that needs solution before further consideration of the TSVI MDP and many of its elements.

I understand that the new Forest Service (FS) paradigm for revenue includes recreation activities in the forest, but fundamentally I believe the FS is a steward of the health of the forest and the equitable use of our public lands. As a steward, the forest service is naturally a team player in a global effort to consider climate problems, social and economic effects on surrounding communities, and fairness of use.

Within the 2021 Master Development Plan and draft Environmental Assessment (EA) and supportive technical documents are many statements of “Purpose and Need” that state that expanding and improving the recreational offerings while “*simultaneously optimiz(ing) ski area operation and promoting sustainability on the NFS and adjacent lands.*” The problem I ask the FS to consider is that both the introduction of a gondola and additional hiking trails in the vicinity of lift 4 will detrimentally affect the existing Williams Lake/Wheeler peak trail.

During Winter ski resort operations a portion of the trail begins at the Village hiker’s parking lot in the Kachina Basin and passes nearby the Phoenix facility. During non-Winter operations, the trail is also accessed from the resort base parking lots along the Rubezal trail to connect near the upper hiker’s parking lot. Changes that have already been implemented by Taos Ski Valley, Inc. (TSVI) have resulted in disturbance of this important and popular public route. Horseback riders have been denied access from the base. Attempts to revise the WL/WP trails (speaking specifically about moving a portion of the trail near the El Funko run) have occurred without transparency or adequate public input and said additional trail is dangerous. This proposed trail change would result in a disruption of many users like backcountry skiers, snowshoers, campers, horseback riders, etc.

I believe this is a problem that must be resolved before the TSVI 2021 Projects are further considered, especially in the case of a gondola and additional hiking trails near lift 4.

If the projects were even considered for approval, then questions should be answered:

What are the details of the gondola - location, etc.?

Where specifically are lift 4 trails locations? What is their purpose? How will their introduction in combination with summer biking and climbing options affect the forest access?

The EA says the gondola will put people up to the Kachina Basin and that ski classes would occur on Rubezal. So then it is a lift for beginners and the traffic pattern would impede skiers that want to freely go from the Basin to the base.

Will the TSVI charge for the gondola, or require a paid pass? This is exclusionary and would constrain forest access.

Rerouting users to enter SUP on alternate section of WL/WP trail (along El Funko) introduces danger and forces the public into area of control by TSVI.

What is the cultural impact of constraining and limiting public access to the popular WL/WP trail and forest area.

The EA cites a solution to the problem of road access to the Kachina Basin, but the Village has plan to pave the road and will maintain the hiker's lot.

Consider further the base-to-base gondola and proposed Lift 4 hiking trail:

The main purpose of the Gondola is to solve a perceived problem of dispersing the public uniformly over the mountain and to effect efficient transit of skiers from the base to the Kachina Basin. A comparison and contrast study should be performed by the Forest Service to determine if upgrade of chair 2 or relocation of the gondola from base to lift 2 terminus adequately solves this problem.

There is also another problem with the proposed gondola project that is not obvious unless one gets past vagueness of the Master Development Plan and Environmental Assessment and the obfuscation of the discussion about dispersing skiers over the resort in Winter. The proposed gondola project along with the proposed Lift 4 hiking trail project (and the already accomplished approval to move a section of the historic Williams Lake/Wheeler Peak trail) are more about putting in year-round infrastructure supportive of future real estate development in the Kachina Basin. Perhaps even the intention of evolving it into a gated community with controlled access? Perhaps the most important reasons that these projects should not be approved are:

The proposed gondola and Lift 4 hiking trail projects would impede or prevent the public from freely accessing the USFS public land inside the TSVI Special Use Permit area or the Wheeler Peak Wilderness and adjacent US Forest lands.

The unique and fragile upper Taos Ski Valley can't handle any more development that would introduce additional numbers of people and increased water usage and sewage needs.

If further consideration is giving to the idea of a gondola, then the following should be considered:

The 2021 Master Development Plan does not provide specifics about the placement of gondola tower platforms and where they would be located in the riparian regions. The Environmental Assessment does not take into account the placement of these platforms. These specifications should be provided and an EIS should be required.

Assessments of the impact of the proposed gondola on the privacy and disturbances (visual and noise) of the residents and homeowners adjacent to the proposed gondola path are needed.

Grading would be required at both the gondola terminals and intermittently along the lift corridor up the Lake Fork of the Rio Hondo to install tower footings

Assessments are needed for each area to be graded and tower footings installed to determine the specific impacts to the Lake Fork of the Rio Hondo that include increased sediment load, changes in erosion and runoff, robustness to potential flooding and debris flow from wildfires in the Upper Rio Hondo Basin.

Analysis is needed on the visual impacts to the homeowners and residents that live adjacent to the proposed gondola path.

Tree clearing along the Lake Fork of the Rio Hondo would be required within the gondola corridor to allow for the passage of the gondola cabins

Analysis is required to assess how many trees need to be cleared, the impact of the tree removal on sediment entry into the Lake Fork of the Rio Hondo

Analysis required on the visual impacts from proposed tree removal for the gondola lift corridor.

Analysis is needed on impacts to Threatened/Endangered Species, and Species of Conservation Concern. Northern Goshawk, Boreal Owl, Pine Martin, Pika, North American River Otter, White-tailed Ptarmigan, and Rio Grande Cutthroat Trout have

been documented in this area. Need a detailed analysis of the impact of the gondola on wildlife along the Lake Fork of the Rio Hondo.

Construction of the base-to-base gondola requires development outside the existing USFS Special Use Permit area currently granted to the Taos Ski Valley Inc. This should be established with the Village of TSV before any construction should commence.

Should the gondola project commence before all land agreements have been made for the construction requirements (i.e., pads for gondola lift towers, easements, tree removal, utility easements)? We think no.

The proposed gondola lift would be used extensively in the evenings to connect the two base areas for lodging and restaurants and in the summer to improve access to summer activities from the main base area. The night-time operation of the proposed new gondola along the Lake Fork of the Rio Hondo will potentially disturb wildlife movement in this important corridor. An EIS is needed to fully analyze how the Threatened/Endangered species and Species of Conservation Concern will be affected by the gondola operation during evening hours.

The proposed gondola project could have impact on the riparian areas in the Kachina Basin and has the potential to affect the Rio Hondo River. The Rio Hondo environment, especially the quality and availability of its water is a serious concern to all stakeholders. For more detailed coverage of related issues and concerns, please visit [Friends of the Rio Hondo](#) and read this article from [La Jicarita](#).

Further thoughts about the proposed Lift 4 hiking trail:

The Lift 4 hiking trail project is part of the 2021 Master Development Plan and is mentioned in the draft Environmental Assessment (EA).

The general purpose and need relevant to this project is stated to be:

*“The purpose of the currently proposed projects from the 2021 MDP is to expand and improve the recreational offerings within the TSV(I) SUP area, while simultaneously optimizing ski area operations and **consolidating recreational use on NFS lands.**” TSV(I) has specifically identified the following objective for this project:*

- *Increase the variety of nature-based, non-Alpine skiing recreation opportunities available at TSV(I).*

The description of the Hiking trail at Lift 4 states:

*“A hiking trail would be constructed in the vicinity of Lift 4 that generally follows the existing Hunziker ski trail. This trail would be approximately 2 miles long and would provide users an intermediate, high alpine hiking experience with access to the amenities of the Kachina Basin base area. This trail, which would be located entirely within TSV(I)’s existing (Special Use Permit (SUP) area), would provide an additional option for hiking alongside the popular Williams Lake Trail. The intent of this trail is to **relieve some pressure on the Williams Lake Trail** and the adjacent Wheeler Peak Wilderness (WPW). Further, this proposed trail would **complement the existing suite of summer activities** at TSV, as well as **those that are previously approved but not yet implemented in the Kachina area.**”*

While this project may be suitable for providing a hiking experience for which TSVI can attract tourists. It should not have any affect on the already existing abilities of the public to freely hike within the boundaries of the SUP or in the adjacent forest and wilderness including to William’s Lake and Wheeler Peak via the historic trails (**as the bold statements indicate**). Within the SUP (which is National Forest), the public should be able to hike anywhere provided it doesn’t conflict with the existing mountain bike trails or zones of operation within the SUP. That should include the proposed hiking trail designated along the Hunziker area and Lift 4, and it should remain free to the public.

The words “**consolidating recreational use on public lands**” is troublesome and should be explicitly investigated by the Carson National Forest. In no way should TSVI have any control or influence on the already existing access to the Forest and wilderness around the SUP area, the hiker parking lot owned by the Village of TSV, and the easements that already exist from this lot to the WL/WP historic trails (even across public lands and the SUP). The EA does not provide adequate substance on why the trail is needed and how it will relieve pressure off the Williams Lake Trail.

This project and the proposed gondola project are unnecessary especially if a significant purpose (which is not determinable by the EA or the MDP) is to move people to the Lift 4 hiking trail. Because that means “more” people which is an expansion rather than an improvement of the resort.

No alternatives were given for this hiking trail project. A very obvious alternative is to provide a hiking trail in the same area as the snowshoe and cross country trails.

If this project were to be approved by the forest service, then these should be considered:

The specific location of the trail and activities required to construct the trail are not adequately described in the EA. The EA needs to better describe the need and purpose, as well as the location and construction impacts of the proposed trail.

Analysis on impacts to Threatened/Endangered Species, and Species of Conservation Concern. Northern Goshawk, Boreal Owl, Pine Martin, Pika, and White-tailed Ptarmigan have been documented in this area. Before project approval there should be a detailed analysis of the impact of any new trail on wildlife along any proposed area.