

5/6/2023

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Comments: TSV Gondola and Other Projects

I am a parciante on the Acequia de San Antonio in Valdez, NM. As such, I am deeply concerned regarding the scope and nature of the TSV proposed development of the Ski Valley. These comments focus on the part of the *Draft Environmental Assessment* that concerns water quality, quantity, and how those concerns affect long-term survival and health of the Valdez valley acequia system.

WATER QUALITY

The Valdez Valley is part of the Rio Hondo watershed, and residents depend on that water for acequia irrigation of crops, gardens, and live stock. Without the water, it will be difficult and, in some cases, impossible for families to survive. Moreover, the acequia system is not only the mechanism by which individuals obtain their water, it is also an community organization and, as one specialist has stated, "the heart and life blood of New Mexico". How the question of communally shared water will be resolved in the face of the proposed development is unknown. The watershed and acequia issues are supported by NEPA (1970), as well as, the 1994 Executive Order for environmental justice. Both documents require that the the Carson National Forest, as the lead agency, resolve and incorporate the concerns of the community.

There are major flaws in the TSV water system and treatment plants that must be corrected and made public. Between January and March, there were two large failures of the treatment facilities, one of which required closing the ski valley for two days. When the plants fail, the effluent is discharged into the river and ends up adversely affecting water quality down stream in Valdez, Arroyo Hondo, and the Rio Grande. Humans, flora, and fauna are all impacted.

An independent scientific evaluation of water quality above and below the treatment plants by Dr. Sam Fernald, Professor of Watershed Management and Director, Water Resources Research Institute at NMSU. The evaluation is a necessary and important first step that can contribute to the Forest Service developing and making public a full and unbiased Environmental Impact Statement.

WATER QUANTITY

Water quantity is equally significant, especially in light of climate change predictions. The rate of change in water quantity is decreasing more rapidly than predicted, and the periodicity is unpredictable. We don't know how much and at what times of the year water will be available. We do know that most of the water in this state derives from snow melt and that current snow pack is 25% less than it was just 20 years ago and is

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1. The first step in the process of identifying a problem is to recognize that a problem exists. This is often done by comparing current performance with a desired state or goal. If there is a discrepancy, a problem is identified.

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unpredictable. This loss is due to our warming climate. As a result, every development proposal must factor in the reality of substantially less shared water in the next five, ten or twenty-five years.

This issue must be addressed in a way that is sustainable to both the ski valley and the acequia communities. On the one hand, public media has reported that due to sub-standard plumbing, the TSV loses thousands of gallons of water daily. On the other hand, the three acequias on the Rio Hondo apportion water regardless of quantity. In times of water scarcity, everyone gets less, but still has some water. If, however, there is less water in the Rio Hondo due to cultural practices, precipitation, and snow pack, everyone will have less water demanding accommodation among all parties. So, the question is how to accommodate both the development goals of the Ski Valley and the community goals of the acequias. As one example, the TSV has proposed a 5 million gallon water storage tank, but what is the source of that water? And how will that storage facility affect water quantity down stream?

I do not support any further development of the TSV until agreement regarding both these issues are resolved to the satisfaction of all the stake holders. Water is the scarce resource in our high altitude, arid climate. It must be shared among a diverse set of organizations with different goals. So, even though the TSV has repeatedly stated that the proposed development is not an expansion, that does not mean that the changes proposed will have no effect. Intensification can have profound and lasting effects on both water quality and quantity.

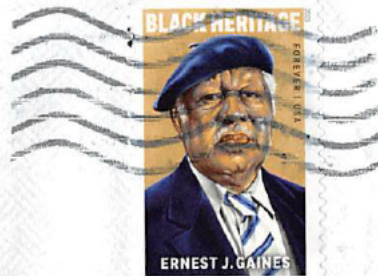
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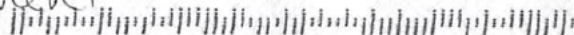
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Comments: ^{Att:} Draft Environmental Assessment

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