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James Duran, Forest Supervisor  
Care Of: Paul Shilke, Winter Sports Coordinator  
United States Department of Agriculture  
Carson National Forest  
P.O. Box 110  
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22 May, 2023

Re: Draft Environmental Assessment for Taos Ski Valley Gondola and Other Improvements #61390

Mr. Duran,

Thank you for responding to public comments made during the original 30-day comment period by creating a second 30-day comment period that ends today. I am writing to submit comments on the Draft Environmental Assessment (DEA). The proposed action includes several projects described in the Taos Ski Valley, Inc. (TSV) 2021 Master Development Plan, including construction of a new gondola lift from the main base to the base of Lift 4, construction of a new restaurant near the top of Lift 7, construction of a new five-million-gallon water storage reservoir, construction of a new snowmaking water pump station, installation of new snowmaking pipe, replacement of Lifts 2 and 8, replacement of the Whistlestop Café with a new mid-mountain restaurant, addition of a new Nordic ski and snowshoe area, a new hiking trail and a new support facility.

According to the DEA, the purpose and need of the proposed series of projects is to improve guest dispersal from main base and increase transportation between base area and the base of Lift 4. In addition, the DEA asserts that the proposed series of projects will address the deficiency of indoor on-mountain seating and service area, increase on-mountain water storage and pump pressure capacity for snowmaking and fire suppression, and increase the variety of recreation opportunities available.

The DEA includes a brief chapter entitled, "Description of Alternatives" (Chapter 2), that presents the series of proposed projects as the "Proposed Action" (Section 2.1.1) and design criteria for each (Table 2.-1). The last half-page of this chapter entitled, "Alternatives Considered but Eliminated from Detailed Analysis" lists an alternative location considered for the 5-million gallon water storage reservoir and booster pump station that was dismissed because it would not serve the greatest extent of the mountain or provide adequate pump pressure. This section mentions that an alternative location for the new snowshoe and Nordic trails was considered, but dismissed for being too steep and too small to support an interesting trail network. It also states that alternative alignments for the base-to-base gondola were considered, but dismissed due to feasibility, visibility, and meeting the supposed need to

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improve circulation and connectivity between base areas. Finally, this section states that an alternative that did not include the new Lift 4 Hiking Trail was considered but that the trail project was added to provide a hiking opportunity within the TSV Special Use Permit Area to offset TSV's commercial use of the Williams Lake Trail and Wheeler Peak Wilderness access.

Simply stated, this EA document fails to properly or fully consider the environmental impacts of the proposed projects. The details for each project element are not sufficiently described. Project descriptions do not provide sufficient design and construction detail to allow thoughtful analysis. The purported need for these projects is not fully presented. Furthermore, the DEA fails to put these actions into the proper context of ongoing development and other recent National Environmental Policy Act (NEPA) actions at TSV necessary to evaluate the cumulative impacts of interrelated projects.

The Description of Alternatives lacks actual alternatives for each of the major projects included. This section should present real alternatives in detail and describe potential impacts on the human and natural environment for each. Alternatives to the Gondola should be presented and potential impacts analyzed in relation to one another. For example, the alternatives for construction of a new gondola ought to consider not only an alternative alignment to a new gondola, but also another type of lift instead of a gondola, a skier shuttle bus system, and no action. Likewise, a range of alternatives to the massive 5-million gallon reservoir and booster pump station should be presented and analyzed. For example, a No Action alternative should be considered here. Is this really needed or being done to extend the natural beginning and end of the ski season? If an alternate location was considered, the specifics of that analysis should be presented, including map location, construction footprint, construction access roads and staffing areas, etc. Another alternative could include a smaller reservoir and smaller pump station. Alternatives for the new restaurant near the top of Lift 7 and the replacement of the Whistlestop should also be presented. The DEA should put the proposed new on-mountain restaurants into context by describing the major recent expansion to TSV's existing Bavarian Restaurant at the base of Lift 4. It would also be appropriate to also describe the recently upgraded capacity of main base dining areas when describing need, presenting alternatives and analyzing impacts. Finally, a No Action alternative should be presented and analyzed.

Public Access-- The historic Twining valley where TSV is located is perhaps the most publicly accessible subalpine environment within the Carson National Forest and New Mexico. The Williams Lake/Wheeler Peak Trailhead is as the most visited trailhead in New Mexico. The DEA does not adequately describe how the proposed series of projects will affect public access to this popular trailhead neither during various phases of construction nor over the long-term. The DEA should describe the history and current use of this highly used public resource with visitor data and other statistics and should describe how the various proposed activities could potentially affect trailhead access and use in both winter and summer seasons and over the short and long-term.

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Furthermore, the DEA should describe how the proposed gondola project is related to the development and sale of TSV's private real estate holdings surrounding the base of Lift 4. The proposed new gondola will purportedly address connectivity and congestion issues for both TSV guests as well as non-guests travelling to private properties and the public trailhead near the base of Lift 4. Given this purpose and need, the DEA should address how the new facilities and infrastructure within TSV's SUP Area are related to the development and future use of private real estate holdings within the upper basin. The analysis of impacts to public land access, water quality, wildlife, etc. should consider the inter-relatedness of these activities.

Watershed impacts. The DEA ought to address potential impacts resulting from runoff from construction sites, staging areas and access roads for each alternative considered. Soil and water contaminants such as micro trash, salts, motor oils, hydraulic fluids and various chemicals ought to be addressed in the DEA for each alternative. Likewise, it should address impacts to downstream water quality resulting from increased usage, more residences and more guests. In addition, potential introductions of invasive plants and other forest pests also ought to be analyzed in the DEA for each alternative and best management practices described for various project components and locations.

Wider community impacts are not addressed. The projects included in the DEA all contribute to the realization of TSV's stated vision of becoming a world-class resort. The local towns and northern New Mexico communities are finding that the transformation of TSV from a local New Mexico Ski Area to a world class resort affects the entire region in ways that are not all positive. Short and long-term impacts on the local labor market ought to be analyzed. Given the absence of employee housing, a lack of affordable housing in the Taos area, and TSV's increased reliance on foreign H1 Visa laborers for low-wage positions such as in housekeeping and food service, an analysis of impacts of positions, wages and labor sources should be included for each alternative. Due to the fact that the projects described in the DEA are designed to fit into TSV's larger transformation, the potential impacts of international and elite luxury class travelers ought to be evaluated at some level.

The DEA fails to describe the presence of culturally significant resources and analyze potential impacts to them. It also fails to describe what procedures and precautions will be taken to avoid and minimize potential impacts. The DEA should have a section that accurately describes cultural resources known from the SUP and surrounding area and the cultural landscape, including the indigenous group(s) that have a connection to the area where the proposed activities will occur. It should also analyze potential short- and long-term impacts to cultural resources associated with the proposed projects and TSV's future operation.

TSV has a flawed record in responsibly stewarding cultural artifacts found within the SUP area. At some point prior to 2015 a large intact earthenware pot estimated to have been constructed approximately 1300 years ago was found in a protected rocky location somewhere near the top of Lift 4 by an on duty

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Lift Operator. The item was placed on display within TSV's Pheonix Lodge for several years before being transferred to the Blake Hotel by a TSV Facilities Maintenance employee in 2018 working under the direction of then TSV Hospitality Director. The process by which this culturally significant object was taken from its resting location and put on display demonstrates a lack of cultural sensitivity by TSV's management and employees and may represent a violaoation of the Antiquities Act.

Wildlife – The DEA needs to address impacts to critical species as well as common species of wildlife for each alternative presented. Populations of beavers, Black bears, otters, and other species of plants and animals have been impacted by TSV's activities in the past and it is reasonable to assume that this pattern will continue if not considered in detail.

I assert that the projects described in the DEA are tied to TSV's larger vision, as are other recent improvements, and the cumulative impacts of all phases of TSV's transformation ought to be evaluated through a comprehensive Environmental Impact Statement. I believe that a remand of the Draft Environmental Assessment for the Taos Ski Valley Gondola and Other Improvements Project is warranted to provide time to expand the scope of the NEPA analysis and consider development of an EIS.

Sincerely,

*John M. Castillo*

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