

The cumulative impacts of the proposed improvements—gondola, replaced chair lifts, new restaurant, replaced restaurant, water tank, Nordic area—are readily apparent: more skiers, more traffic, more incursion into the Wheeler Peak Wilderness area, more pollution of the Rio Hondo, and more water rights if the Office of the State Engineer approves a new well for the proposed restaurant. Approval of the TSV MDP is essentially approval of unlimited growth in a relatively small, contained, and fragile valley.

The EA fails to address the cumulative effects as stipulated in the FS Handbook 1909.15 – NEPA Handbook Chapter 10 Environmental Analysis 15.1: “Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources.”

Nothing in the originally drafted 2021 Taos Ski Valley MDP was amended or excluded in the Draft EA. Neither was a “No Action” alternative proposed or eliminated, which is part of the NEPA process. On page 4 of the TSV Draft EA the proposed MDP was chosen as the preferred alternative essentially because the “proposed action has been developed in accordance with the desired conditions for the Developed Winter and Summer Resort Management Area (DEVRES) outlined in the 2022 Forest Plan (USDA Forest Service 2022a). On page 12, “Alternatives Considered but Eliminated,” only addressed alternative locations or alignments of the proposed improvements.

In Section 3.4 Socioeconomics and Environmental Justice the Draft EA states that “past, present, and future projects with the TSV SUP area have contributed to and would likely continue to contribute to economic growth trends within Taos County” and that “there would be no effects to identified minority or low-income populations.” This is in complete denial of the impacts the TSV has already had on the traditional downstream acequia communities of the Rio Hondo and the Town of Taos. As more amenities become available at TSV visitors drive or fly straight to the valley without staying or visiting the town.

The Village of Taos Ski Valley has a diversion right of 200 afy (15 afy consumptive) for domestic, municipal, and snowmaking, the latter of which is limited by the Office of the State Engineer to between November 1 and April 1. The Draft EA fails to address whether this amount of water rights is sufficient for the increased use due to all the proposed improvements (failure of the Village of Taos Ski Valley’s water system happened twice this ski season). It’s premature to approve a new restaurant before the Office of the State Engineer issues a permit to drill a well to supply the 7,000 square foot structure.

Many longtime Taoseños and recreationists are concerned about not only what impact the Taos Ski Valley MDP will have on the Rio Hondo but also on the Wheeler Peak Wilderness (and the Columbine-Hondo Wilderness Area). Many of us have used the Williams Lake Trail to access the other peaks in the basin and have witnessed the relocation of its trailhead near the El Funko ski run and the increased danger of avalanche. Taoseños who aren’t necessarily downhill skiers need to have input on potential impacts on their public lands.

These concerns are exacerbated by developments outside the TSV Special Use Permit but will undoubtedly contribute to the TSV footprint. The proposed development in the Kachina Basin includes hundreds of commercial and residential structures, roads, parking areas, and trails, on the 57 privately held acres that would directly benefit from the proposed gondola. This development, along with the TSV MDP, raises several questions: 1) will backcountry access to the Wheeler Peak Wilderness be restricted with a road closure to and/or parking lot in the Kachina Basin; 2) will backcountry access be restricted by the proposed Kachina Basin development; and 3) will backcountry users be allowed to use and pay for the proposed gondola as access? Additionally, the potential impact of the gondola on the Lake Fork of the Rio Hondo has not been addressed in the EA. Construction will entail the removal of watershed area trees that may result in decreased water quality and wetland habitat.

While Section 3.8 of the EA addresses Wildlife and Fish, many who commented on the scoping letter and who have been sharing concerns among themselves were surprised to see that neither the pine marten nor the ptarmigan were listed in the “Threatened and Endangered Species Considered” section of the TSV Wildlife Report. Both of these species are present in the TSV and are listed as Threatened species in New Mexico. The Wildlife Report lists only the Threatened and Endangered Species that are not present in the TSV: Mexican spotted owl; Southwestern willow flycatcher; Yellow billed cuckoo; and the New Mexico meadow jumping mouse.

According to Alissa Radcliff, biologist for the Carson National Forest and part of the ID team that drafted the TSV Draft EA, the U.S. Forest Service changed the NEPA rules on how it analyzes wildlife in 2012 with a national rule that replaced the regulation of “Forest Sensitive Species” with the “Report on Species of Conservation Concern (RSCC),” which was incorporated into the Carson Forest Plan. This RSCC reviewed federal and state listed and indicator species and habitat conditions to determine what species were of concern, which reduced the number of those included in the Draft EA. In the case of the pine marten, they determined that because its habitat is in the stable, spruce/fir forests of the wilderness area, projects in the TSV MDP wouldn’t degrade that habitat over time. As for the ptarmigan, they determined that while it’s found within the SUP, its alpine habitat is outside the area of improvements.

Jon Klingel, retired biologist, and Brian Long, wildlife specialist, sent an email to the New Mexico Department of Game and Fish in which they shared their opinion on the status of the pine marten and other spruce/fir species. They disagree with the EA conclusion that their spruce/fir habitat is “stable:”

The continued presence of marten and other species in New Mexico appears to be tenuous, at best, due to extensive habitat degradation and loss which has occurred during recent decades, currently continues, and is forecast to become worse. Marten need to be upgraded from Threatened to Endangered. The habitat loss is from logging, thinning and mastication, “glading” in ski areas, climate change, and possibly increased fire in spruce-fir.

“In the Sangre de Cristo range, the best population of marten in NM occurs in the area of Taos Ski Valley (TSV). On the private lands there has recently been a significant amount of mastication of the mature and old growth spruce-fir forest (some of the best marten habitat) for development of a subdivision. On US Forest Service lands under permit to TSV, there has been extensive “glading” of prime marten habitat. “Glading” is a process of removing the dead and down logs, lower limbs and some trees from prime marten habitat to allow skiing through the trees. The process destroys marten habitat. Areas that have been “gladed” are no longer marten habitat but have become habitat for pocket gophers instead.”