

December 12, 2024

USDA Forest Service
Objection Reviewing Officer, Michiko Martin, Regional Forester
333 Broadway Blvd SE
Albuquerque, NM, 87102

Regional Forester Martin,

Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=61390>

Re: Objection regarding Taos Ski Valley, Gondola And Other Improvements Projects

Pursuant to 36 C.F.R. § 218, I am filing an Objection regarding the TSV Gondola and Other Improvements Project. The objection is submitted on behalf of myself, James Baldonado.

This Objection is filed pursuant to, and in compliance with, 36 C.F.R. Part 218, Subparts A and B. I have previously filed timely, specific and substantive written comments in accordance with 36 C.F.R. 218(a). As required by 36 C.F.R. § 218.8(d), Objector provides the following information: Objection.

3. The project that is subject to this Objection is "Taos Ski Valley,

1. The name and contact information for the Objector is listed below.

James Baldonado
PO Box 828
Arroyo Seco, NM 87514
jamesbaldonado@gmail.com

3. James Baldonado is the Lead and only Objector for purposes of communication regarding this Objection.

4. The project that is subject to this Objection is "Taos Ski Valley, Gondola And Other Improvements Projects" The Responsible Official is James Duran, Forest Supervisor, Carson National Forest. The National Forest on which the Proposed Project will be Implemented is: Carson National Forest, Questa Ranger District. The objection period was announced October 31, 2024.

5. Objector submitted timely, specific, and substantive comments during the Public Comment Period on May 5, 2022 (attached). All points and issues raised in this objection refer to issues raised in that comment letter or are related to new information. Attached hereto are prior comments and I incorporate their arguments and information by reference.

6. In the following Statements, Objector provides the specific reasons why the decision is being appealed and the specific changes or suggested remedies that are sought, along with the related evidence and rationale on why the decision violates applicable laws and regulations.

Before I address my objections here to the EA draft of finding of no significant impacts statement, I would just like to introduce myself. I am a New Mexico native of Mescalero Apache blood.

My father was born near Mescalero in 1941. I have lived in the Taos area for over 30 years now. I have thoroughly enjoyed skiing at Taos Ski Valley for every one of those years. I know the mountain here intimately and I knew the Blake family. I feel that I have a good understanding of how they ran the mountain and I feel I understand how the new corporation (TSVI) is running the mountain today.

My comments here build on, but do not repeat my previous arguments. I ask that you take the time to read again and carefully study my previous comments of which are attached to this letter.

I respectfully ask that you conduct a full Environmental Impact statement. I have done my best to provide quality examples of the environmental problems here and some others elsewhere with these types of impactful on slope improvements.

Around 2005 I read a book called Downhill Slide written by Hal Clifford of Aspen Colorado. What the Downhill Slide book contained was a very well researched document of what the corporate ski industry was doing to skiing, small towns and the environment. I would soon go on to learn that everyone of those chapters told the story of what is now taking place at Taos Ski Valley in New Mexico.

I encourage all of you at the USFS and the general public to get a copy of this book, as it will help you to understand more clearly what is going on with the bigger (cumulative negative environmental impacts) picture of the TSV master development plan.

Today, the ski industry is a highly developed form of industrial tourism that exacts an enormous toll on the natural environment through the process of selling experiences.... It plays on the past of this sport of rugged outdoorsmen and women and endlessly markets images of freedom, nature, and beauty. Yet it creates urban-style problems for mountain valleys. It precipitates a cascade of negative effects, both direct and indirect, on human communities, on air and water quality, on

biodiversity and forest health. Those ski-resort corporations never relent in their quest for a fatter bottom line, and so they strive for growth and more growth in mountain environments that have reached or exceeded the limit their ability to support both human activity and a diverse and robust natural ecosystem. — from DOWNHILL SLIDE

I personally gave a copy to the forest service supervisor in the spring of 2022 and asked him to get back to me on what he thought. I never heard from him and I never saw him in attendance at those two important public comment meetings in TSV and the Sagebrush hotel in town of Taos. I think that's unfortunate that he was unable to attend those meetings, because he would've seen close up, up to 200 people from the local community, getting up to speak their minds passionately in objection to these major on slope improvements that I am are objecting to right now.

I'd like to thank all those community members who took their valuable free time to volunteer to participate in transparency in this very complicated NEPA process.

I'd like to add for the record here, that in both of those meetings I never saw a single person stand up in favor of the on slope improvements. What does a community like Taos have to do in order to get its majority voice heard?

OBJECTION:

I object to the gondola project for the following reasons:

~ I object to the final EA because it lacks an alternative to the gondola.

~ The 2010 Master Development Plan was not shared transparently with the public until the final hours of this objection period. Links in the draft documents and the EA went to a presentation by TSVI employee John Kelly, instead of the actual MDP. This I find curious, as the MDP explicitly states the gondola, "would be used extensively in the evenings to connect the two base areas, for lodging and restaurants." This indicates, contrary to the purpose and need in the EA of skier movement, that the gondola is to facilitate real estate development up in the Kachina Basin.

~ It is clear to me that skier movement is not the actual purpose of the gondola. Accessing a new Kachina basin base area with luxury hotels and hundreds of new luxury residences is what this gondola is primarily for. This monumental fact in conjunction with the construction of a new gondola is what clearly constitutes a finding of significant environmental impact. The mere thought of decades more noise from, chain saws, excavators, rock crushers, dump trucks, cement trucks and endless big rig vehicles carrying building materials up the tight mountain roads is unfathomable for me, as well as my many friends who call TSV home.

~ I believe this gondola topic we are considering is supposed to be about moving people

around the mountain, when it should mean moving people up the mountain and getting ticket holders skiing faster. A base to base low angle gondola connecting the already two problematic (numerous long wind holds every storm cycle now) detachable Poma high speed quad lifts (lifts 1 and 4) is counter intuitive. Fix the 5-7 days of wind holds problem with a back up lift, just like the lift 5 that the ski area foolishly removed recently.

~ The gondola project on the table here for consideration is at least a mile and a half long. It traverses a straight line up a beautiful national historic river watershed canyon called the Rio Hondo. We can't even get a simple white water park built on the Rio Grande without dealing with the tough governmental inter agency restrictions of stream type alterations such as the ones that this gondola will certainly bring. Why is this project exempt from those same NEPA laws? I believe this gondola project should be subject to those same tough environmental protection laws that protect our watersheds.

~ There has been so little scientific data mention by the SE group or other of the extent of the excavation needed for the gondola project in the riparian area for the lift towers, etc.

Also hugely important, is the serious old growth tree removal from this said riparian environment in the form of thousands of old trees needed to be cut to create the "gondola corridor."

~ I would request TSVI and USFS provide us with a detailed before and after map of this massive tree removal project within this irreplaceable river canyon watershed called the Rio Hondo.

~ What is it going to look like?

"Once wilderness is gone, there is no going back." What are we signing off on here so fast? Once this project starts, it will be impossible to go back.

~ Please review these links I have provided here that support the alarming data from other US ski resorts that gondolas present a myriad of irreversible environmental impacts, as well as some other links that are relevant to this gondola project.

~TSV is no different than Stowe VT or Palisades Tahoe/Alpine Meadows Tahoe or Little Cottonwood Canyon Utah.

~We are certainly calling in the traffic and congestion problems that these other ski areas are dealing with right now. Yes, its really that bad there.

<https://www.sierrawatch.org/squaw-alpine-gondola-impacts-released/>

~ Please review here the past work of TSVI CEO David Norden at Stowe Vermont, with his 400 million dollar revitalization MDP to the base area and the on slope areas of Stowe mountain. These same environmental impacts at Stowe Mountain and Smugglers Notch will apply to Taos Ski Valley, as he conducts another one of these massive revitalization projects at a projected 350 million dollars.

https://www.vtcng.com/stowereporter/archives/spruce-peak- realty-losing-its-top-project-leader/article_20a6f9c0-d748-55f5-9dde-a8a12eca1ee4.html

~ Please review here the environmental impact concerns from the paused gondola project at Stowe mountain VT.

<https://www.vermontpublic.org/local-news/2023-10-05/smugglers-notch-and-stowe- pause-plan-to-built-connector-lift>

~Alternatives to the gondola in the path of the Rio Hondo:
Upgrade lift two to a detachable high speed lift similar to lift one. The resulting on slope skier movement is equally comparable to the gondola project without the negative environmental impacts of the gondola project.

- SUGGESTED REMEDY: I respectfully request the USFS prepare a complete environmental Impact Statement that addresses and justifies these conflicts and gaps within the draft EA, within the scope of these improvement projects.

Thank you for your careful consideration here with my objections. I appreciate it immensely.

If you have any questions regarding these objections or need additional information, please feel free to contact me.

Sincerely,

James Baldonado

Data Submitted (UTC 11): 5/5/2022 7:02:53 PM First name:
James Lefthand Last name: Baldonado
Organization: Title:
Comments: May 6, 2022
James Duran, Forest Supervisor
Re: Taos Ski Valley Gondola and Other Improvements Project
Mr. Duran,
Please let me introduce myself. My name is James "Lefthand"

Paul Schilke, Winter Sports Coordinator P.O. Box 110 Questa,
NM 87556

lift two to a detachable high speed lift similar to lift one. The resulting on slope skier movement is comparable to the gondola project without the negative environmental impacts of the gondola project.

Mr. Duran,

Please let me introduce myself. My name is James "Lefthand" Baldonado I am a native Mescalero Apache. My father was born on the Mescalero tribal lands in 1941. My father moved us up to Taos in the early 1990s after climate change became a real problem in southern New Mexico with prolonged drought causing massive wildfires and water shortages and subsequently causing great difficulty for our farming family on our ranch down there.

I have been a ski instructor in NM and California and a wilderness back country guide as well as a season pass holding skier at Taos Ski Valley since the mid 1980's. That's well over 30 years of experience skiing in Taos Ski Valley and knowing the Blake family quite well. Knowing what I know from being a wildland fire fighter in New Mexico and California and a fire scientist as well, I've seen the writing on the wall since about the year 2000 when the Cerro Grande Fire consumed much of eastern slope of the Jemez mountains. I would go on to see other fires like the Las Conchas Fire in 2011 burn clear around the east and south east facing slopes of our tribal neighbors of the Santa Clara Pueblo. Sadly they lost their domestic drinking water source after that fire in the Santa Clara

River valley.

It took millions of dollars and the Army Corps of Engineers to repair and restore the Santa Clara river basin watershed so it could provide water once again for the tribe. Watching these major climate change events all happening in real time there and well as here in Taos, has led me to unequivocally believe that we can no longer be in willful denial of what's coming down the pike for us in Northern New Mexico as well as the entire planet.

It is for these climate change reasons primarily that I strongly disagree with and fully oppose these totally unnecessary master development project plans for the Taos Ski Valley and the sacred Kachina basin wilderness area above the town of Twinning. (Phoenix area of chair lift 4).

So, I please ask you kindly Mr Duran to consider very carefully what is being proposed up on our irreplaceable public wilderness lands of the Carson national Forest in Taos.

I James "Lefthand" Baldonado am deeply concerned that the proposed projects will have a negative effect on the Wheeler Peak Wilderness Area, the Columbine Hondo Wilderness Area, and the Carson National Forest. I am also concerned that the projects will impact the Rio Hondo by reducing its water quality and making less water available to downstream rural historic communities such as Valdez, Cañoncito and Arroyo Hondo. Action Requested: Require TSV Inc. to detail concrete steps to be taken during all phases of the projects to protect the integrity of the headwaters of the Rio Hondo. Action Requested: Require TSV to fund continuous monitoring of the Rio Hondo for water quality and volume. Based on a preliminary study and the advice of acknowledged experts, monitoring sites should be located at a number of places along the length of the Rio Hondo.

Action Requested: Conduct a study to enumerate the expected increases in visitor days in the Ski Valley and identify their impacts. That study must be conducted considering not only the proposed projects but all other projects proposed for the Ski Valley area whether they are public or private.

As being lifelong residents of these sacred lands in Northern and Southern New Mexico, my family here respectfully demands that there should be a full environmental impact study and a full EIS report on any and all of these improvements and or upgrades as well as the private real estate developments in Taos Ski Valley.

Many of the proposed projects require removing additional trees from the Rio Hondo Watershed. Taos Ski Valley (TSV) Inc. has already cleared a significant number of trees in the area, and it has plans to clear many more acres. The loss of trees is a significant contributor to the decline of forest health and an associated decline in nearby water quality and quantity.

Gondola

Action Requested: Conduct a study of forest health that will quantify forest health and guide decisions about how many more trees can be removed from the area.

The proposed route of the Gondola will be immediately adjacent to, and, at points, directly on the Lake Fork of the Rio Hondo. The Scoping Notice says that a corridor will be cleared of trees to allow passage of the gondola cabins. That clearing would be immediately adjacent to the Lake Fork of the Rio Hondo for most of its length and at some points right on the river itself. Among other effects, removing trees along the Lake Fork will increase silting and suspended particulate matter, destabilize banks and increase storm run-off. The end result will be decreased water quality and the destruction of irreplaceable riparian and wetland habitat.

A year-round gondola operating for most of the day and part of the night will discourage animals from visiting the irreplaceable water sources of the Lake Fork of the Rio Hondo and its associated wetlands. Those animal's eating, drinking and mating habits will be seriously affected by the year-round, 12+ hours-a- day noise, visual disturbance and increased presence of humans. In addition, the gondola infrastructure will be easily visible from areas with high scenic integrity, including areas of the adjacent Wilderness Areas.

Action Requested:

Cancel the Gondola Project because it will have significant unavoidable harmful impacts

Water Tank and Booster Station

While TSV holds diversionary rights to 200 acre-feet of water

The Scoping Notice proposes a 5,000,000 gallon water tank near the base of Ski Lift #2. The Notice states "these projects will not increase the current water uptake from the Rio Hondo." If so, where will the initial 5 million gallons of water used to fill the tank come from? What waters will be used to replenish the tanks?

Nordic and Snowshoe Trails

The proposed Nordic and Snowshoe Trails and Buildings would lie immediately uphill from the Rio Hondo. Just like the Gondola, that development will impact wildlife and those rights are severely constrained by their permit which allows only 21.42 acre feet to be consumed. Those rights are further limited by a hard cap of only 0.11 acre feet of daily consumptive use between April 11th and October 25th each year. Given these limitations on its water usage, Taos Ski Valley Inc. must demonstrate that it has sufficient water rights to support its proposed activities before it begins construction on a costly and permanent water system.

The Notice is silent on how the water will be used once it is pumped up the mountain. Does TSV Inc. have uses other than snowmaking in mind? If so, how will those uses be monitored? Without additional information on the source and usage of the water to be pumped up the mountain it is impossible to know if that diversion and usage is permitted.

Regardless of where the water comes from, sequestering five million gallons of water and frequently replenishing the tank will affect the already stressed Rio Hondo watershed and impact the amount of water available to downstream rural historic communities.

Action Requested: Delay the Water Tank and Booster Station Project until TSV Inc. provides more information on how the water will be used and until it can prove it has water rights to support those activities. Conduct a study to understand the effects of removing that water from the Rio Hondo Watershed including the water needed to replenish the tank on a regular basis.

Water quality in the Rio Hondo. Clearing trees uphill from the river and placing building sites there will increase runoff thereby increasing silting and sedimentation in the Rio Hondo. Increased silt and sedimentation will negatively affect the beaver colonies and fish spawning areas downstream from the site and decrease water quality for the communities along the Rio Hondo.

Action Requested: Require TSV Inc. to develop a site specific plan to address the direct and indirect impacts of the Nordic and Snowshoe Trails center on beaver and fish habitat and overall water quality and quantity in the Rio Hondo with a focus on eliminating run-off and reducing silting, sedimentation and SPM in the Rio Hondo.

Lift Replacement

Completely replacing lifts #2 and #8 will require excavating the old lift towers, removing the debris, filling in the holes and then digging new holes for the replacement towers. While the lift cable and moving parts do wear out the tower has a much longer life span. The excavation work will disturb the soil, increasing runoff and erosion and potentially impacting the hydrology of the watershed.

Action Requested: Require TSV Inc. to reuse the existing towers Restaurants

11,000 square feet of new development high on the mountain will disturb the soil, increase runoff and erosion and potentially impacting the hydrology of the watershed. It will also require additional infrastructure for utilities with similar impacts. The Ski Area has multiple restaurants close to the lifts and slopes, additional facilities are not needed. Action Requested: Deny the request to build additional restaurants. Suggest refurbishing the existing Whistlestop facility if updated on-mountain dining is needed. Overall, I am asking you to cancel some of these projects and take additional time to study the potential effects of the others in detail. In addition to the actions requested above I'm asking the Forest Service to conduct an Environmental Assessment and to also develop an Environmental Impact Statement for these projects.

Thank you in advance for acting on my concerns.

Sincerely,

James "Lefthand" Baldonado