

12/13/2024

Michiko Martin
Southwestern Regional Forester
333 Broadway Blvd SE
Albuquerque, NM 7102

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

Re: Objection to Taos Ski Valley Gondola and Other Improvements, Project #61390

Dear Regional Forester Martin,

I, [REDACTED], file this objection to the Carson National Forest's Draft Decision Notice (draft decision) and final Environmental Assessment (EA) regarding the Taos Ski Valley Gondola and Other Improvements Project, noticed October 31, 2024. James Duran, Carson National Forest Supervisor, is the Responsible Official.

I filed timely comments on the Notice of Intent for this project on May 6, 2022 as well as the draft EA on 5/21/2023 (2 submissions) and am eligible to object under 36 CFR 218, Subparts A and B.

On Jun 11, 2024, I filed a Freedom of Information (FOIA) request with the Carson National Forest to obtain information necessary to better understand this project with the intent of informing my comments and objections. My FOIA requests sought information on how the Forest Service has worked with Taos Ski Valley, Inc. (TSV), associated companies, and key landowners to develop the current project and the Master Development Plan, and how the ski area is currently managed. These requests were assigned tracking numbers 2024-FS-R3-05473-F and 2024-FS-R3-05640-F, one for operations documents, and the other for correspondence. In response to these FOIA requests, I received the operating plans but not the email communications that I requested. I recognize that this objection period is not the venue for discussing concerns with the FOIA process, but mention my FOIA requests here in light of the fact that my requests were directly connected to our wish to better understand the project for the purposes of informing how and whether to object to the draft decision.

Objection

1. I object to the lack of a gondola alternative presented in the EA, specifically the combinatorial operation of Lifts 1 and 2 instead of a gondola.

I disagree with the Forest Service's rationale for not having an alternative identified or studied related to adequately dispersing guests onto the ski area. This is a reflection on the incredibly narrow Purpose and Need statement developed for this EA, which simply restates what TSV has requested the Forest Service approve a gondola. The Purpose and Need thus created a narrow path wherein the only possible route is the one defined by the project proponent. This sets a predetermined outcome, which does a disservice to the entire NEPA process and the many members of the public who took the time to engage with it.

As I cited in my initial comment to the MDP and in my draft EA comments, The operational combination of a new improved Lift 2 along with the existing capacity of Lift 1 can disperse even more guests onto the ski area at a position that is suitable to all levels of skiers/riders and at a position that puts them at the

midpoint of the runs accessed by the Kachina Basin lift 4. Thus, they are already skiing rather than just arriving by gondola drop off at the Kachnia Basin.

I cited that “operation of gondola would disrupt wildlife”, “placement of pads in riparian areas would have adverse environmental effects”, and “operation at night (if allowed) is not relevant to improving the recreational offerings at the resort but is more likely a desire of the Resort developers to enhance their subsidiary real estate intentions. These points motivate an alternative different from a gondola.

I also cited that mention in the purpose and need for a gondola to mitigate vehicular traffic is inappropriate as it is a Village issue and that a gondola should not affect in any way the public’s ability to access Williams Lake and Kachina Peak by the historical trail. Inevitably, giving the resort any control of access to the trailheads or promotion of hiking within the SUP as opposed to the existing hiking on the SUP (outside of winter operations) and within the wilderness and adjacent FS land (anytime) is also inappropriate. The public should be free to continue accessing the portions of the SUP outside of winter operations, adjacent FS land, and the Wilderness without any corporate or private landowner control.

The Decision does include some “clause” about limiting use of a gondola to ticketed passengers, but without a clear ruling into perpetuity, this is expected to just erode into a situation with adverse impact socioeconomically.

In short, the only appropriate purpose and need related to a gondola is guest dispersion, and the forest Service failed to consider the alternative of no gondola - instead another viable consideration.

Resolution: The Forest Service must develop, study, and consider an alternative that meets the purpose and need of the project but is substantially different from the proposed gondola. To achieve this, it may be necessary to broaden the Purpose and Need Statement so that all intentions are transparent or stick to the existing goal to improve guest dispersion..

Thank you very much for your consideration of the above objection. This project will have significant long-term impacts to National Forest lands and has the potential to affect over development in the resort area and adjacent private lands that is detrimental to the fragile valley. Once new development is approved and constructed it is difficult or impossible to reverse course. For this reason, it is critically important that any approvals are granted only with careful consideration of all that is at stake. If there is an opportunity to do so, I would like to meet with the Reviewing Officer at a mutually convenient time to discuss my objection and participate in the analysis of guest dispersal by the alternate method(s). Please inform me in writing of any responses to these objections, of any further opportunities to comment, or decisions related to this project.

Sincerely,

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]