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September 30, 2026

Sandra Imler-Jacquez
Española District Ranger
U.S. Forest Service
18537 US 84/285, Suite B
Española, NM 87508

RE: Comments of the New Mexico Environment Department on the Ski Santa Fe Snowmaking Modernization Project (PALS# 68982)

Dear District Ranger Imler-Jacquez,

The New Mexico Environment Department (NMED) appreciates the opportunity to review and comment on the Environmental Assessment (EA) for the proposed Ski Santa Fe Snowmaking Modernization Project. Collaborative planning on National Forest lands is vital to ensure recreational modernization projects safeguard downstream aquatic ecosystems and local water resources.

NMED has concerns regarding protection of surface water quality and wetland integrity during project construction and long-term operation. Specifically, the ground disturbance, tree clearing, and pipe installation along surface streams present risks of heightened soil erosion, sediment delivery, and turbidity. Additionally, potential impacts to wetlands and temporary stream crossings call for rigorous site-specific mitigation. Construction activities need to maintain state-designated beneficial uses and comply with New Mexico Surface Water Quality Standards (20.6.4 NMAC) under Section 401 and Section 402 of the Clean Water Act.

NMED urges the USFS to incorporate NMED's attached comments and recommended Best Management Practices (BMPs) into the Final Environmental Assessment. Key recommendations include oversight of the Stormwater Pollution Prevention Plan (SWPPP) under the NPDES Construction General Permit, thorough coordination with the U.S. Army Corps of Engineers for Section 404 permitting, and post-construction monitoring to protect adjacent wetlands and downstream water quality. We look forward to continuing our partnership with the Forest Service to achieve these environmental safeguards.

Sincerely,

Signed by:
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Christina Keyes
Acting Director
Office of Strategic Initiatives

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New Mexico Environment Department Comments to the U.S. Forest Service on the Ski Santa Fe Snowmaking Modernization Project (PALS# 68982)

Background: Ski Santa Fe operates under a Special Use Permit on National Forest System lands within the Santa Fe National Forest and the Rio Nambé watershed. The proposed project aims to modernize and expand existing snowmaking infrastructure, construct an approximately 4.6-million-gallon water storage tank, install up to 4,170 feet of co-located snowmaking and electrical piping, and undertake ground disturbance and tree clearing within the ski area's permitted footprint. The project area encompasses surface waters and adjacent emergent wetlands that support state designated uses subject to surface water quality standards under the Clean Water Act. All proposed activities will operate within existing water rights of up to 69.72 acre-feet of annual diversion and 16.39 acre-feet of annual consumptive use. The project requires Section 404 permit coverage from the U.S. Army Corps of Engineers for temporary stream crossings, the implementation of a Stormwater Pollution Prevention Plan (SWPPP) under National Pollutant Discharge Elimination System (NPDES) Section 402 Construction General Permit requirements and adherence to Best Management Practices (BMPs) to mitigate soil erosion, protect surface water quality, and maintain downstream watershed integrity.

Surface Water Quality Bureau

The Santa Fe National Forest (SFNF) has prepared an Environmental Assessment (EA) for the proposed Ski Santa Fe Snowmaking Modernization Project. The purpose of the proposed project is to modernize and expand snowmaking infrastructure within Ski Santa Fe (SSF), to improve efficiency and reliability of snowmaking operations and to support emergency response capabilities. Specifically, the project includes the construction of a new water tank, upgrading and extending snowmaking infrastructure higher up on the mountain, and terrain grading along the Sunrise ski run. The project would occur on National Forest System lands within SSF's existing special use permit area administered by the SFNF.

The New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) has reviewed the EA for the proposed Ski Santa Fe Snowmaking Modernization Project. NMED SWQB opposes Alternative 2 in favor of Alternative 3, because Alternative 3 results in four fewer acres of ground disturbance than Alternative 2. Minimizing ground disturbance and maintaining healthy riparian buffers is critical for protecting the Rio en Medio and is necessary for attaining water quality standards. The Rio en Medio (Aspen Ranch to Headwaters) is currently listed on the Federal Clean Water Section 303(d) list of impaired waters due to excessive sedimentation, and the 2025 Total Maximum Daily Load (TMDL) for the Rio en Medio (Aspen Ranch to Headwaters) identifies probable sources of the sediment impairment which include highway/road/bridge runoff and recreation (camping, hiking trails, ski area). Regrading the hillslope in close proximity to the Rio en Medio has the potential to mobilize additional sediment which could further impact the Rio en Medio. Alternative 2 is more likely to contribute to further degradation of the Rio en Medio. Therefore, NMED SWQB strongly encourages SFNF to select Alternative 3 as the preferred alternative.

SWQB Comment	Original EA Text	Recommended EA Text
SWQB Comment 1 Water quality standards are established to protect designated uses. References	Beneficial Uses and Water Quality	**Designated** Uses and Water Quality

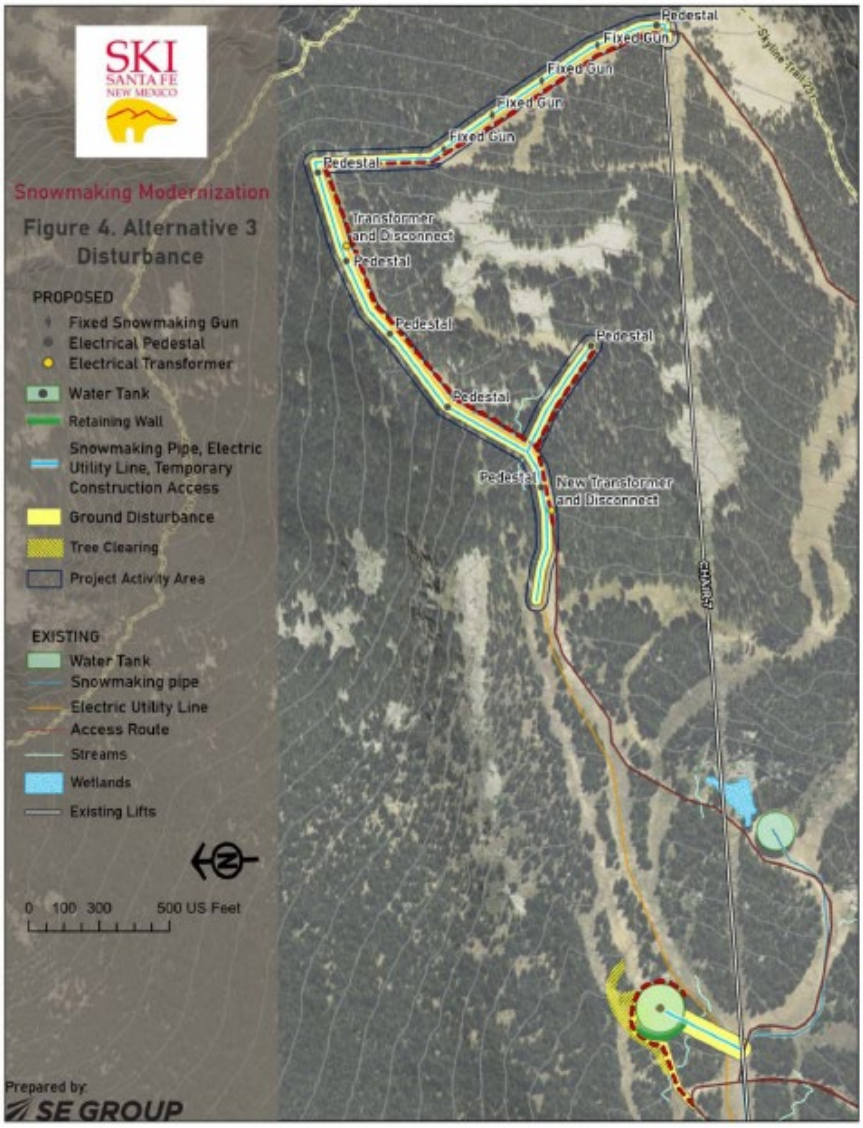
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in the EA to "beneficial uses" with respect to surface water quality standards should be revised to say, "designated uses." The only surface water Assessment Unit within Ski Santa Fe is the Rio en Medio (Aspen Ranch to Headwaters). The reference to the Rio en Medio (nonpueblo lands Pojoaque R to Aspen Ranch) can be omitted. The EA refers the reader to Table 2 in the **Soils and Watershed Specialist Report** to view a complete list of designated uses and impairments. However, this table does not appear to be in the EA. SWQB recommends describing the impairments within the EA.	The New Mexico Environment Department (NMED) has identified water quality standards and beneficial uses for waters of the State. As illustrated in the NMED Integrated List of Assessed Surface Waters, the following reaches apply to this project: Rio en Medio (Aspen Ranch to headwaters) and Rio en Medio (nonpueblo lands Pojoaque R to Aspen Ranch).	The New Mexico Water Quality Control Commission adopts water quality standards to protect designated uses for surface waters in New Mexico. The New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) coordinates with local, state, and federal agencies and organizations to monitor, assess, protect, and restore surface water quality throughout New Mexico and fulfill the requirements set forth in the State's Water Quality Act and Federal Clean Water Act (CWA). The CWA Sections 303(d)/305(b) Integrated Report identifies the Rio en Medio as "not supporting" the designated use for High Quality Coldwater Aquatic Life due to excessive sedimentation and siltation. The 2025 Total Maximum Daily Load (TMDL) for the Rio en Medio (Aspen Ranch to Headwaters) identifies probable sources of the sediment impairment that include highway/road/bridge runoff and recreation (camping, hiking trails, ski area).
<u>SWQB Comment 2</u> The EA references permitting requirements under CWA Sections 402 and 404, but the EA does not include requirements for CWA Section 401. The EA should be revised to include CWA Section 401.	It is the responsibility of the Forest Service as a federal land management agency through implementation of the Clean Water Act (CWA) to protect and restore the quality of public waters under its jurisdiction. Protecting water quality is addressed in several sections of the CWA, including sections 303 and 319. BMPs are used to meet	It is the responsibility of the Forest Service as a federal land management agency through implementation of the Clean Water Act (CWA) to protect and restore the quality of public waters under its jurisdiction. Protecting water quality is addressed in several sections of the CWA, including sections 303, 319, **<u>401, 402, and 404</u>**. BMPs are

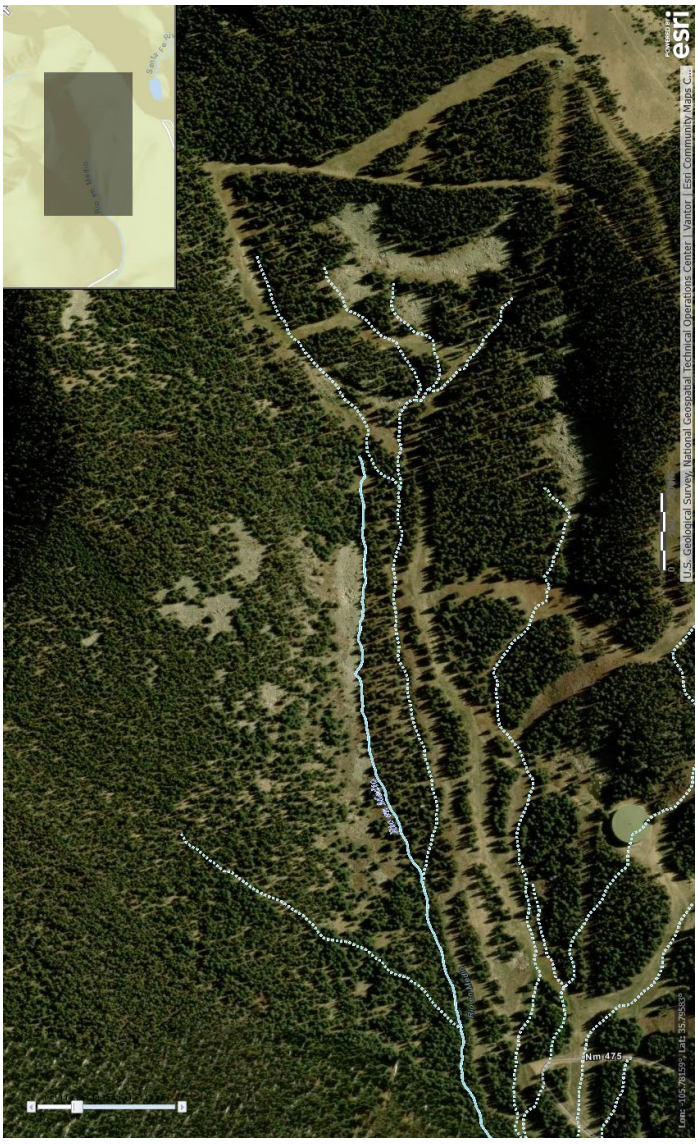
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	water quality standards (or water quality goals and objectives) under Section 319. Prior to construction, SSF would prepare a SWPPP consistent with CWA § 402 Construction General Permit requirements. SSF would obtain all required USACE authorization prior to construction.	used to meet water quality standards (or water quality goals and objectives) under Sections **319 (for nonpoint sources of pollution) and 401 (for point sources of pollution that may result from 402 and 404 permitted activities)**. Prior to construction, SSF would prepare a SWPPP consistent with CWA **§§ 401 and** 402 Construction General Permit requirements. SSF would obtain all required USACE authorization prior to construction **including the appropriate CWA Section 401 Water Quality Certification.**
SWQB Comment 3 SWQB recommends revising the Figures in Appendix 3 to more clearly show the Rio en Medio. The mainstem of the Rio en Medio headwaters runs directly along the project area.	See map below.	See map below.

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Top: EA Appendix 3, Figure 4. Alternative 3 Disturbance
Bottom: National Hydrography Dataset with perennial (solid blue lines) and ephemeral streams (dotted blue lines)

Petroleum Storage Tank Bureau

The request contains no actions that will impact storage tank systems currently regulated under 20.5 NMAC and does not propose the installation of new storage tank systems. There is one active facility within one half mile of the proposed site and it is S/P Santa Fe Ski Area - Loan (Facility ID 30467) with one aboveground storage tank located at 1477 State Hwy 475.

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There are no active confirmed release sites within the project boundary. There is two (2) "no further action" status site located within the project area. The site information is listed below:

No Further Action (NFA) sites:

RID	FID	Release Site Name	Street	Status
382	30467	Ski Basin	1477 State Hwy 475	No Further Action, Confirmed Release
4724	30467	Santa Fe Ski Basin	1477 State Hwy 475	No Further Action, Confirmed Release

If an abandoned storage tank system or petroleum impacted soil and/or water is discovered during construction, the Petroleum Storage Tank Bureau (PSTB) *must* be notified (20.5.118 NMAC, etc.). In the event that an abandoned storage tank system or petroleum impacted soil and/or water is discovered during any construction activity, notify PSTB during business hours via the "Leak of the Week" at: https://www.env.nm.gov/petroleum_storage_tank/ (see box on the right labeled "Report a Leak or Spill"), or call 505-476-4397. During non-business hours, notify PSTB by calling 505-827-9329. Owners, operators, and others dealing with petroleum storage tank systems *must* comply with all regulations in 20.5 NMAC, New Mexico's petroleum storage tank regulations.

Air Quality Bureau

The Air Quality Bureau has reviewed the proposal for the Ski Santa Fe Snowmaking Modernization Project and does not object to its implementation, but does recommend that construction activities, including grading and travel to the construction sites, use controls to curtail fugitive dust. The best means of control would be the use of water sprays, and/or the application of surfactants designed for short term suppression.

Drinking Water Bureau

The New Mexico Environment Department (NMED) Drinking Water Bureau (DWB) does not object to this project provided that best management practices (BMPs) are followed to protect sources of public drinking water supplies.

Santa Fe Ski Basin is a regulated public water system (PWS ID: NM3593526) that operates two water sources within the proposed project area: Spring #1 and Well #1. These sources are located along an access route identified for proposed Alternatives 2 and 3.

DWB recommends that BMPs are developed to protect the water quality of Spring #1 and Well #1. BMPs should include directing construction traffic away from the water sources and connecting infrastructure, implementation of a Storm Water Pollution Prevention Plan, selection of dust suppression chemicals that do not contain contaminants or degradants subject to the Safe Drinking Water Act, and careful management of grading and other surface disturbances. Alternative 3 is preferable to Alternative 2 because it requires a smaller acreage of surface disturbance upgradient of the drinking water sources.

Revisions to the Environmental Assessment (EA) should include the following:

1. A description of the Santa Fe Ski Basin drinking water sources and historical water quality results under subsection *Beneficial Uses and Water Quality* (subsection 3.4.1). Compliance water quality results and other water system information can be found at https://nmdwv.gecsws.com/ or https://dww.water.env.nm.gov/ by searching for the system name or ID.

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2. The location of the drinking water sources plotted on map figures. Coordinates are provided below in reference system WGS84:

   Spring #1: 35.791179°, -105.793653°
   Well #1: 35.791076°, -105.794791°

Resource Recovery Bureau

The Resource Recovery does not oppose the project, but improvements may include the removal of aged water system components. An asbestos survey should be planned to determine if system components for removal contain asbestos. If asbestos waste is generated, handling, transportation, and disposal must adhere to Solid Waste Rules, including 20.9.8.12 NMAC, to ensure protection of the environment and the public health, welfare, and safety. Plans should include the processing and/or reuse of trees felled for the project. Materials generated during construction activities should be recycled as appropriate, and all solid waste should be disposed of properly at an approved transfer station or landfill. As stated in the Solid Waste Rules, 20.9.2.8.D NMAC, anyone who generates, stores, processes, transports, or disposes of solid waste shall do so in a manner that does not create a public nuisance.