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Comments: Mr. Duran,

Taos Ski Valley Inc.'s Gondola and Other Improvements Project comes before the public for comment as just one component of a continuous series of development projects at the resort taking place on both private and public lands.

Many of these massive construction projects have already been completed since Mr. Bacon bought the resort in 2014, without any kind of public review or oversight, and certainly without the knowledge or consent of the traditional downstream acequia and land grant communities of Valdez, Arroyo Hondo, and Des Montes.

As a resident of Valdez, a commissioner on the Acequia de San Antonio, and an anthropologist who has conducted ethnographic research on land and water issues in the Rio Hondo watershed and the Taos valley for the past 40 years, I can assure you that parciantes and other residents in these downstream communities are increasingly alarmed at the rate and scale of development that is transforming the headwaters and fragile alpine ecology of the Rio Hondo watershed.

There is a long history, predating Mr. Bacon by decades, of downstream and environmentalist mobilization and protest against deleterious effects on the river caused by Taos Ski Valley. In light of what is actually happening at TSV today, its B Corp status and carefully targeted public relations outreach do little to assuage downstream grassroots stakeholder anxieties about the future of their watershed.

Your scoping letter asks specifically for comments on the gondola and other "improvements." But it is important to call attention to the larger environmental, social, and historical context into which this particular combination of interrelated parts is being inserted.

The larger context includes the cumulative long-range impacts and ramifying, unintended consequences of an unconstrained corporate plan to convert the upper watershed and its source waters into a year-round luxury resort modeled on the likes of Aspen and Vail.

The de facto policy and practice of approving piecemeal development of individual plans and projects at the resort amounts to a strategy for ignoring and avoiding responsibility for their cumulative hydrological, environmental, and social impacts on the river and watershed as a whole.

At the same time, individualized components of the overall corporate design are being approved with little or no investigation of potential impacts conducted by independent scientific experts, including hydrologists, environmental and wildlife biologists, foresters, geologists, natural resource managers, and system modelers.

At the very least, a full Environmental Impact Study is imperative in this specific instance-but also for every other component of the corporate master plan located on or adjacent to public lands.

It is not credible to claim that the rapidly expanding resort, with its vision of a radically reconfigured alpine landscape and hydroscape, will not further disrupt, damage, and forever change the entire riparian ecosystem. This includes, of course, surface and ground water quality, quantity, and connectivity, especially vulnerable in light of the mega-drought and climate change conditions that local farmers, ranchers, foresters, and even skiers are now witnessing.

Every aspect of the plan, including the new gondola, lift replacements, new and expanded trails and roads, new buildings, new nordic ski center adjacent to the river, and a five million gallon water tank with continuous replenishment to support a variety of uses, requires not only a scientific baseline-plus-impact study, but also a plan for mitigation, restoration, and independent, long-term monitoring.

Only a comprehensive, systemwide water budget that incorporates traditional principles of water sharing calibrated according to changing conditions, can prevent the ultimate desiccation of downstream acequias, farmlands, and ecosystems by an intensifying year-round urban resort planted at the headwaters.

The fact is, from the standpoint of a healthy, sustainable, alpine watershed ecosystem, not one aspect of this plan qualifies as an "improvement."

Respectfully,

Sylvia Rodríguez, Ph.D  
Secretary, Acequia de San Antonio