

Data Submitted (UTC 11): 5/5/2022 6:48:17 PM

First name: Shannon

Last name: Romeling

Organization: Amigos Bravos

Title: Projects and Foundation Coordinator

Comments: James Duran, Forest Supervisor

Carson National Forest, SW Region 3

c/o Paul Schilke, Winter Sports Coordinator

P.O. Box 110

Questa, NM 87556

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

May 5, 2022

Re: Taos Ski Valley Gondola and Other Improvements Project: USFS File Code 1950

Dear Supervisor Duran,

As a 34-year old statewide New Mexico water conservation organization, Amigos Bravos tracks and comments on projects and policies that impact water quality across the state. With our home office based in Taos, we have over the years engaged in issues related to the Rio Hondo and development at Taos Ski Valley. This engagement has included commenting on the wastewater treatment plant National Pollutant Discharge Elimination System (NPDES) permit, engaging in concerns about dredge and fill violations by the Taos Ski Valley Inc. and the Village of Taos Ski Valley, attending land use meetings and successfully advocating for adoption of and implementation of water resource setbacks, working on wetland education projects, and monitoring water quality in the Rio Hondo over a 16-year period. We sample from six monitoring locations along the Rio Hondo with five of the sampling locations located in the upper watershed adjacent to developed areas associated with the ski resort.

We would like to thank the USFS for this opportunity to submit public comments on initial plans for new development at Taos Ski Valley. As an organization with a focus on water quality, our comments focus on concerns about potential sediment loading and other water quality impacts from the proposed increased development in the headwaters of the Rio Hondo. Our largest area of concern is with the proposed new lift 7 restaurant. We also think it is vital that road improvements and a traffic control system be put into place on Twining Road in conjunction with the construction of the gondola. These, and other specific concerns that are written in detail below.

Water Runoff Concerns: There are major runoff concerns involved with building on slopes in an alpine environment. If any of proposed projects are approved, contractors, USFS, EPA, and NMED staff should work together to require and implement best management practices to reduce and treat runoff. This includes erosion control best management practices, water capture and infiltration, noxious weed control, reseeding of native plants, and special attention to stream and river crossings. In addition, any new development should be designed using green infrastructure and low impact design approaches so that any new developed or redeveloped areas are not contributing sediment loading to the watershed. This would include ensuring that any future snow removal and management of finished new development or redevelopment is not resulting in destruction of riparian areas or increased sediment loading of gravel or road materials into the watershed.

Lift 7 Restaurant: Amigos Bravos is concerned about the water and sewer/septic infrastructure associated with this project. Constructing a safe sewer or septic system and providing enough water will require a clear analysis of water use at the Taos Ski Valley, and detailed plans for safe installation of the sewer/septic and water lines. A

7,000 square foot structure would require significant amounts of water and a large capacity sewer or septic system. The National Environmental Policy Act (NEPA) analysis should clearly explain how the water for this building, and other proposed development will not exceed the diversionary right of 200 acre-feet, or 65.2 million gallons of water from the Rio Hondo annually. It should also describe specific best management practices that will be used to decrease soil runoff from the construction and use of the building into the Rio Hondo. In addition, the NEPA analysis should identify the quantity of sewage and planned treatment of the sewage associated with this new proposed facility. A 7,000 square foot restaurant would be expected to produce a substantial quantity of sewage. There are many questions that need to be answered before any sort of development is approved. Where will this waste go? How will it be treated? Will this new facility be in operation during summer months? If so, how much increased summertime road traffic is expected, and what are the plans to minimize erosion and sediment loading from increased traffic up the return trail road?

Regardless of the answers to these questions, there is going to be a substantial increase of disturbance related to the building and operation of this new facility. Amigos Bravos has substantial concerns about the water quality impacts of this project and questions whether a large-scale development at this proposed location is appropriate.

Forest Thinning Concerns: High elevation spruce/pine forest does not require the same level of thinning and management that New Mexico's currently overgrown ponderosa pine forests need. While we recognize the importance of protecting lives and structures from fire, it is important that Taos Ski Valley is not thinning all the forest they come into contact with because the dense spruce/pine forest is very important for wildlife and healthy water systems. Thinning should be focused on protecting structures and not done for aesthetic or misguided ideas of forest health that is more appropriate for lower elevation forests.

Base to Base Gondola: If constructed well and thoughtfully and accompanied by enforceable and serious traffic controls on Twining Rd, the construction and operation of a gondola may alleviate long-time concerns we have had around sediment loading from Twining Rd. However, we believe that before any development work in the Kachina area begins, Twining Road needs to be improved by paving the road and sloping it with runoff directed away from the river. Low impact design and green infrastructure techniques should be utilized in improving the road and reducing impacts to the Rio Hondo.

In addition, in order for the gondola to have positive impacts on road traffic and watershed health, a real time meter system needs to be installed that can indicate when the Wheeler Peak parking lot is full. When the parking lot is full, the road should be closed to all except residents who live along the road. All others wishing to access the upper base could then be directed to use the gondola. This would alleviate the number of cars driving up to a full lot and driving back down again. In addition, traffic control tied to parking availability would alleviate the problem of people parking along the shoulders of the road and crammed into whatever spot they can find in the upper base area, which currently is increasing disturbance and erosion. Without this meter system in place, the road will still be overused despite the gondola. We also recommend that the Gondola be free of charge to encourage use.

It is unclear from the map and scoping proposal how much tree clearing would be involved in the proposed construction of the gondola. Removal of trees in the proposed gondola path could increase sediment loading in the river during construction. Rigorous erosion control and best management practices would be necessary to ensure that water quality is not impacted.

Whistlestop Café Replacement and Relocation: The NEPA analysis should clearly explain the water use impacts associated with expanding this building to 4,000 square feet. Specifically, a detailed water accounting must be provided for all proposed projects showing how the proposed projects will not exceed the diversionary right of 200 acre-feet, or 65.2 million gallons of water from the Rio Hondo annually. It should also describe the specific location for the replacement building, the amount of trees that will need to be removed, if any, and the best management practices that will be used to decrease soil run off from the construction and use of the building into the Rio Hondo.

Lift 4 Hiking Trail: Relieving pressure from the Wheeler Peak Trail would be beneficial for erosion and noise in the Wilderness Area. This proposed trail is not described on the map provided with these scoping comments. The NEPA analysis should describe in detail the best management practices that will be used when the trail is built and how they will be maintained. We also encourage educational signage along this trail.

Construction Access and Staging Areas: Staging sites will need extensive best management practices to keep soil from running off into the Rio Hondo since the parking lot is adjacent to the river. The NEPA analysis should analyze the amount of sediment already entered into the Rio Hondo by Ski Valley operations each year and whether these proposed actions will increase that sediment load. If increased sediment loading is anticipated, increased measures must be taken to control erosion.

Additional Concerns: We are unable to find a copy of the referenced planning documents online and would like to formally request a copy of the Kachina Peak Master Development Plan and the Water Capacity document. The USFS should provide links to these documents during subsequent public notices and comment periods. We have previously requested copies of the Kachina Peak Master Development Plan from TSV but have received no response. This request is attached.

In conclusion, due to the issues outlined above and substantial public concern, a full Environmental Impact Statement should be conducted. Thank you for your consideration and please reach out to us with any questions.

Sincerely,
Shannon Romeling

Projects and Foundations Coordinator

Please see the attachment for the previous Comment letter that is referred to in this letter, it is included below this letter in the attached PDF.