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Title:

Comments: James Duran, Forest Supervisor

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

Re: Taos Ski Valley Gondola and Other Improvements Project

May 5, 2022

Dear Supervisor Duran:

My name is Phaedra Greenwood. I am a parciante on the Acequia de Atalaya in Arroyo Hondo. In the 1980s I was secretary for the Committee to Save the Rio Hondo. The Rio Hondo runs through our property and I visit it every day.

A historical and ecological overview of the impact of Taos Ski Valley Gondola and Other Improvements Project on the Rio Hondo watershed and surrounding communities is now so complex it involves many land and water issues, environmental justice, all three cultures, a wide variety of community organizations and all of the acequias on the Rio Hondo. It includes not only Taos Ski Valley, Inc. but also Wheeler Peak Wilderness Area, Carson National Forest, Taos Pueblo, New Mexico Acequia Association, historic Land Grants and priority dates in Valdez and Arroyo Hondo, the Abeyta Adjudication, the Arellano Adjudication, the Office of the State Engineer and a hard look at water sharing agreements-or lack of them-between Taos Ski Valley, Inc. and all of the acequia systems in Valdez, Arroyo Seco, Des Montes and Arroyo Hondo.

As I'm sure you know, we are in D4 severe drought, threatened by "historic" winds, billowing clouds of smoke, Red Flag warnings and roaring wildfire danger. Like you, we are following the INCI reports day by day on the Calf Canyon Fire, the Cook's Peak fire. We are clearing out brush piles, firewood, gingerly planting our trees, gardens and crops. Will there be enough water in the acequias to get us through the summer? Probably not. Will wildfires spring up on our side of the mountain? Maybe. Are we prepared? No.

The cumulative sociological and environmental impacts on the watershed, riparian areas and disenfranchised agrarian cultures downstream from Taos Ski Valley, Inc. are huge and are not going to go away. Parciantes know that their quiet, rural way of life is in jeopardy and are paying close attention. They are well informed, courteous and united in the desire to maintain a healthy watershed and viable irrigation system that serves everyone equally. I urge you to heed the call for help from your community and give us an Environmental Impact Study to find remedies for the relentless development at the headwaters of our river that is damaging the whole hydrological and ecological system. It's the right thing to do.

Here are some of the issues:

TAOS SKI VALLEY GONDOLA AND OTHER IMPROVEMENTS PROJECT

Taos Ski Valley Gondola and Other Improvements Project includes "improvements" such as a gondola and gondola terminal complex; a 65.2 million gallon water tank and booster station; replacement of Lifts #2 and #8; two new restaurants; expansion of a cafe; a Lift 4 hiking trail; Nordic snowshoe trails; a construction base and new construction roads. There is no mention of a skier limitation. I understand that Taos Ski Valley, Inc. doesn't want to turn anyone away to Angel Fire or Red River.

In the Village of Taos Ski Valley Region Source Water Protection Plan it says that Taos Ski Valley hosts about 300,000 visitors during the four-to-five months of ski season "and roughly 1,500 people per day during ski season." They brag of an Uphill Capacity to transport 15,000 skiers per hour over the mountain. Fifteen thousand per hour when they only get fifteen hundred skiers per day? Someone seems to have dropped a zero somewhere. Or is that 5,000/day going up and down three times an hour? In my opinion, a skier limitation of let's say, 5000 skiers/day, would eliminate the "need" for a ten million dollar gondola and gondola terminal complex. If Bacon is indeed worthy of his Golden Eagle award, he will back off on the gondola and agree to a skier limitation. Thus, I object to the Gondola as an unnecessary "improvement" that will disturb the environment and damage the watershed even further.

RIGHT TO ENJOY THE OUTDOORS

"Enjoyment of the outdoors is a basic human right," says the Taos Ski Valley Green Corridor proposal. Yes, I agree. Back in the day, locals reached what is now Taos Ski Valley, Inc. while riding in a wagon up a long dirt road for a picnic. "This was an all-day outing," said a senior Arroyo Hondo resident. "Back then we called it Twining. All that was up there was a little copper mine." Established in 1893, the unproductive copper mine was abandoned two years later.

ERNIE BLAKE

In 1955 when Swiss emigre and entrepreneur Ernie Blake arrived in Taos and founded Taos Ski Valley, it was a small family business. It took Blake fifteen years to get the road paved. Blake's goal was not just to make money, but to establish a world-class, expert-skiing and fine-dining experience for the elite, not for the masses. The tone was Swiss chalet, the expansion modest. At first. They even offered a recreation program for the Taos Municipal Schools to teach local children how to ski. In grade-school my son learned to ski at Taos Ski Valley on the Bunny Hill and then down Al's Run. I am grateful.

1980s SKIER LIMITATION

Back in the 1980s when the Taos Ski Valley Master Plan was being revised by Carson National Forest (CNF), Ernie Blake agreed to a skier limitation of 4800/day for the next thirty years. Blake stated in a Your Turn to The Taos News that Taos Ski Valley was not interested in expanding, that he didn't think it would be good for the resort, nor good for the area. Blake quoted hydrological studies which showed that "the water supply has decreased in the last ten years from twenty-five to forty percent for all rivers in our drainage . . ." But when the state legislature was considering wilderness designation for the area around Wheeler Peak, Blake complained that Taos Ski Valley was the only ski area in America that was being threatened by the proposed designation of a wilderness area. Though they had no current plans to expand, he said the plan for a wilderness area was "very shortsighted."

LIMITS TO GROWTH

In 2013 the Blakes sold their skiing operation to Taos Ski Valley, Inc. Forbes billionaire Louis Bacon was touted as the only ski area owner who had received the Golden Eagle award for environmental excellence, a "force for good" through social responsibility, environmental sensitivity and economic sustainability. Ernie Blakes' daughter, Adriana Blake, said that her family chose Bacon because, "They aren't going to come in and knock down all the buildings and build an Intrawest ski area. They are sticking with the flavor and character of the ski area."

But since the resort changed hands, Taos Ski Valley, Inc. has expanded the mountain's terrain with new lifts like the iconic 12,481-foot lift to Kachina Peak. Ten years ago, climbing from Kachina Basin up to the ridge was a vigorous hike, but worth the effort. At the top you might see big horned sheep, ewes and lambs nibbling spring grasses. Hidden trail cams might catch a shot of a mountain lion or the clever face of a marten.

Now, with seemingly endless and noisy construction, Taos Ski Valley, Inc. and the Village of Taos Ski Valley has

certainly lost its "flavor and character". The stark 80-room Blake Hotel, constructed less than 20 feet from the banks of the Rio Hondo, is crammed into the middle of what once looked like a Swiss village. The Village of Taos Ski Valley is complete with 24 "fully appointed slopeside residences" near the Blake Hotel, a boardwalk over the Rio Hondo that involved actually rerouting the river, and other new confections of massive steel and cement as Taos Ski Valley, Inc. strives to compete with Aspen and Vail.

Standing on Twining Road last Easter Sunday, looking at fifteen-foot-high piles of dozer slush, dirt and gravel already dripping down the slopes of the Bull Of the Woods Trail into a tributary of the Rio Hondo, I can't help wondering what the National Ski Area Association who awarded Louis Bacon the Golden Eagle for Environmental Excellence, would say about this urban tangle. Carson National Forest, Land of Many Uses, is public land. For everyone. The Forest Service should be protecting and nurturing our national forest, not aiding and abetting the ongoing destruction of what was once a pristine alpine watershed, at the expense of the wildlife and of the agrarian communities that have a legal and historical right to the waters of the Rio Hondo.

MOTHER NATURE'S REVENGE

Walking quietly through a sun-sparkled old-growth forest at 9,000 feet with the fresh smell of pine in the air, listening to the lilting song of the wood thrush and the Rio Hondo splashing beside the trail, was a special pleasure for both local hikers out-of-town visitors. A pleasure that no longer exists. On December 15, 2021, a megastorm with winds up to 100 mph tore through Taos, ripping off roofs, snapping up to twenty electric poles and plunging the whole county into darkness from the Colorado state line to Ranchos de Taos, just south of Taos. This powerful "inland hurricane" blasted the Sangre de Cristos and blew down about 3,000 mature fir and spruce in Kachina Basin at the headwaters of the Rio Hondo, and another 3,000 at Bobcat Pass above Red River, in Enchanted Forest.

Sadly, at Kachina Basin above Taos Ski Valley, it destroyed most of what had been the last marten habitat in New Mexico. Retired biologist Jon Klingel pointed out that "Marten are very limited in New Mexico and the [Kachina] area that was destroyed was the best habitat in the state-old growth spruce-fir forest with considerable dead and down logs." Marten are currently listed "threatened" by the New Mexico Department of Game and Fish. Many other species are also dependent on this habitat such as the red-backed vole, the lynx, the snowshoe hare and boreal owl. Carson National Forest should honor and preserve the ecology of wildlife habitat on the edge of a designated wilderness. Instead, Taos Ski Valley, Inc. was given a slice out of the wilderness area for bike paths to promote year-round recreation. Back in the '80s, in May when ski season was over, the Blakes were satisfied with their efforts and willing to give nature a rest.

The final blow to Kachina Basin was that in spite of advice from former wildlife biologists to leave the downed trees alone so the forest could reseed, Taos Ski Valley, Inc. cut all the damaged trees, pulled out the boles, stacked the logs and trucked them off-some say to Bacon's lumber mill in Colorado. In an ironic twist, nature itself had cleared the very basin that Bacon wanted to develop.

EXPANDING RECREATION

Enjoyment of a peaceful natural habitat without human interference is a basic wildlife right, too. Also, downstream acequia parientes also have the right to a peaceful agrarian life without having to constantly worry about an aggressive and ever-expanding recreation area at the headwaters, pushing for more and more "improvements" while polluting the river and degrading the watershed, sucking up groundwater from the springs that feed the Rio Hondo, rearranging the river and everything else around to suit its unsustainable needs.

WE DESERVE AN ENVIRONMENTAL ASSESSMENT AND AN ENVIRONMENTAL IMPACT STUDY

To contemplate Taos Ski Valley Gondola and Other Improvements Project we need a serious Environmental Assessment, and then an Environmental Impact Study that will include the hydrology, climate change, fire danger

and endangered habitat. Taos Ski Valley, Inc. needs to face reality and limit growth, set a daily skier limitation, and fix their leaky pipes. (Every summer for the past five years I have seen fewer and fewer trout and documented more and more algae in the Rio Hondo.) Let's take a serious look, along with the State Engineer, at the overall cumulative impact of continuous growth in such tight quarters during exacerbating climate change, severe drought and megastorms that take down the old-growth forest because it has been weakened by thinning, construction and new recreation trails.

WE NEED WATER SHARING AND MONITORING

As I am sure you are aware, an unresolved and crucial sociological and environmental issue hangs over all Taos Ski Valley development regarding Rio Hondo water rights and a legal water sharing agreement. According to the Arellano Adjudication, a side-shoot of the Abeyta, the downstream communities on the Rio Hondo share the water, in flood and drought, by percentage based on how much acreage they each own. This is carefully monitored, while at the headwaters in Taos Ski Valley, Inc. and the Village of Taos Ski Valley, they say they have water rights from 200 afy to 400 afy, and access to a million gallons a day from the Phoenix Spring. And yet, they still have an eye on Gunsite Spring? More water, more flushes, more sewage. In summer when the Rio Hondo is low, the algae blooms with too much nitrogen and phosphorus. The Arroyo Hondo Acequia Association is grateful for the generous Green Corridor grant of \$500,000 that will help us monitor what is actually happening with the river.

But in times of severe drought and climate change, the most important unanswered question is will Taos Ski Valley, Inc. and the Village of Taos Ski Valley be part of the Rio Hondo water sharing agreement by percentage, or can they just help themselves to as much water as they choose? The issue of water sharing in times of drought has to be settled by the State Engineer's Office. Soon, I hope.

Given all the ongoing social conflicts and degradation of our fragile alpine environment, I highly recommend a moratorium on all unnecessary development until the water issues between Taos Ski Valley, Inc., the Village of Taos Ski Valley and the downstream communities are resolved. The only thing in the TSV "improvement" plan that I approve is the 65.2 million gallon water tank for fire suppression. The last thing we want to see up there is a wildfire that would impact the whole watershed.

It doesn't have to be this way.

We can adapt.

We can mature.

We can use less.

We can share.

We can co-operate.

As we face the Sixth Mass Extinction of thousands of species on this planet, wondering if our children and grandchildren will survive, let us stand strong together in a love of clean water and an ecologically sound environment for all living creatures.

Let's face it. We have to change.

Phaedra Greenwood,
Prize-winning author of *Beside the Rio Hondo*;
Videographer and freelance journalist for *The Taos News*;
Former Secretary for The Committee to Save the Rio Hondo