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Organization: Trout Unlimited

Title: New Mexico Public Lands Coordinator

Comments: Please see attachment for formatted comments. Text pasted below.

May 6, 2022

Re: Taos Ski Valley Gondola and Other Improvements

James Duran, Forest Supervisor

c/o Paul Schilke, Winter Sports Coordinator

P.O. Box 110

Questa, NM 87556

Dear Mr. Duran,

Founded in Michigan in 1959, Trout Unlimited (TU) today is a national non-profit organization with 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Our staff and volunteers work from coast to coast to protect, reconnect, restore and sustain trout and salmon habitat on behalf of today's anglers and coming generations who value the connection between healthy, intact habitat and angling opportunity. While we are focused on trout, TU is a watershed-based conservation organization, and our comments reflect that mission.

On behalf of our organization I would like to thank the USFS for this opportunity to submit public comments on plans for the scoping of new development at Taos Ski Valley (TSV). Our comments generally focus on the Rio Hondo. Three main topics of concern are; the persistence and survival of the watershed's trout populations, particularly its native Rio Grande cutthroat trout, maintaining water of the highest possible quality, and the quantity and timing of water diversion from and delivery to the river. Specific comments on the scoping document sections can also be found below.

Cutthroat Trout

The Rio Hondo watershed was historically home to Rio Grande cutthroat trout (RGCT). Because of a variety of factors, these native trout have mostly been pushed to marginal habitat in four of the tributaries of the basin. TU has been working recently to protect those existing populations while attempting to dramatically increase the number and health of RGCT in the mainstem of the Rio Hondo, including throughout TSV. These fish provide important ecological, historical, cultural, and recreational significance to the upper Rio Hondo. RGCT are an indicator species for outstanding water quality, only thriving in cold, clean, water. The upper Rio Hondo and the Lake Fork both are prime candidates for robust RGCT populations as they are the most climate change resilient subbasins in the Rio Hondo watershed, and are critical headwaters for the overall health of the remainder of the river. There is the possibility that the proposed development impacts RGCT and many other downstream users of the Rio Hondo. For these reasons, TU asks that the Forest Service take into consideration and ensure that current RGCT populations are protected and that habitat conditions, including water quality and quantity are maintained or enhanced to accommodate future RGCT re-introduction efforts during the review of the proposed development at Taos Ski Valley.

Water Quality

The Rio Hondo provides drinking water, irrigation, and recreational opportunities for many communities downstream of the Ski Valley. Trout Unlimited shares the views of these communities that any proposed development should not impact the quality of water in Rio Hondo. Even if permissible under TSV's discharge permits and allowances from the Forest Service's land management guidelines, we suggest that the next phase of review analyze a scenario which would have no permanent degradation to water quality. In addition, TU requests that a detailed water quality monitoring plan be established during the Environmental Analysis and the data therefrom be made publicly accessible.

This scoping presents opportunities to both negatively and positively impact future water quality in the Rio Hondo. We ask that all possible scenarios are examined in an Environment Analysis, specifically in regard to all water quality parameters typically assessed by NMED. More site-specific water quality issues are discussed below.

Water Quantity

The only mention of water quantity in the scoping document is the Ski Valley's right to 200 acre feet annually, and the newly proposed storage tank. TU asks for a refinement of the water quantity impacts within this proposal. A water balance with analysis of timing of water diversions and impacts to the source streams will be a necessary step in the Environmental Analysis. Documentation of water rights, and assurances of non-injury to other right's holders such as the acequia's downstream must also be explained in detail. Although there is potential to achieve the same delivery of water downstream, there is also the potential for increased consumptive use of water in the proposed projects.

A detailed water budget should be created that compares the existing water storage system vs. the proposed replacement system. The water budget should include at a minimum, timing, rate, and method of diversion, evaporation and other storage loss, consumptive use of the application of the water for snow making and other proposed uses including sublimation and transit loss. Lastly, a detailed operations plan for the water rights used by TSV should be created, and this plan should be informed by the priority of other water rights in the Rio Hondo and to the extent possible by the habitat needs of the native and wild trout in Rio Hondo.

Base-to-Base Gondola

The gondola proposal component has potential for improving water quality if the project is accompanied by traffic control, restriction, or paving on Twining Road. As a conveyance intended to reduce pressure in the first place, it appears logical that such a strategy would include consideration of auto pressure as well. The road and gondola project should be considered in conjunction, though was not discussed in detail in the scoping. TU is most concerned about sediment loading to the Rio Hondo and its tributaries as a result of road traffic. These impacts are greatest during the summer, and TU requests that the impacts concerning Twining Road during the entire year be analyzed under different alternatives linked to the gondola construction. Additionally, site specific analysis for the placement of gondola infrastructure must be included in the analysis as some sensitive wetland and riparian resources exist in the vicinity of the proposed development.

Water Tank and Booster Station

The following criteria should be evaluated, not only in the interest of the efficacy of snowmaking and fire suppression, but regarding impact of water withdrawals on trout and downstream communities: how and where water is diverted; when it is diverted and at what rate; the impact of withdrawals at key times in trout life history. For example, withdrawals before November could jeopardize brown trout spawning success. Withdrawals during summer could injure senior downstream water rights. If at anytime the proposed project activities dewater the Rio Hondo, major catastrophic ecosystem impacts would be observed.

Regarding water quantity, we trust that proper attention will be paid to TSV's full compliance with its legal water rights. Trout Unlimited is adamant that, in the context of water supply, no injury come to downstream farmers and

villagers as a result of the installation of the water storage and snowmaking system.

Nordic and Snowshoe Trails

Sediment loading can be of concern in the context of trail construction, glading, or any proposed activity requiring significant ground disturbance. The scoping document focuses on the winter use and impacts of these trails, but does nothing to address the time of greatest impact -when snow is not present. During the development of alternatives in the analysis, TU suggests that development and summer use also be evaluated. Foot trails for example have far less erosional impact than mountain biking or motorized trails. Soil retention, reseeding, and other best practices must be implemented to minimize erosion and sediment transport during construction, and type of summer use be considered. TU would like to see angling and river access improved during this phase of the project.

Lift 7 Restaurant and Whistlestop Café Replacement and Relocation

To any extent that new facilities might impair water quality, the impacts must be included in an EA. Of particular concern with the construction of new dining facilities with bathrooms is the additional tax on TSV's water and sewage treatment capacity. Increased volume processed could have an impact on the coldwater fishery below the treatment plant for many water quality parameters including temperature. Included in future assessments should be confirmation that water treatment infrastructure can accommodate the increased effluent.

Increased number of people using these facilities will result in increased water demand. In the event that new wells are drilled, water use and consumption must be reconciled with TSV's water rights and it must be shown that the impacts on groundwater supplies are not negatively impacting trout populations.

Especially in the proposed construction of large dining facilities, water and soil analysis should be conducted to establish baseline conditions with which future sampling data can be compared.

Lift 4 Hiking Trail

Similar to the comments above for the Nordic trails, TU suggests that multiple scenarios be considered for this proposed improvement.

Construction Access and Staging Areas

TU asks that BMP's be observed during all stages of the proposed construction access and staging and that specific care is taken around riparian and wetland areas. Similarly, we suggest consulting with New Mexico Department of Game and Fish for impacts to other wildlife at other times of the year.

Summary

Trout Unlimited is committed to the long-term viability of the Rio Hondo, its watershed, and its communities. We believe that there exist mutually beneficial ways to accomplish that, and we will continue to work with acequia associations, businesses, communities, Taos Pueblo, Taos Ski Valley, and the Carson National Forest to that end. We also acknowledge that it is locally informed and driven processes that will have the best chance for long term success.

For that reason, we encourage more local participation from Caron Forest Service staff in this process. We want to acknowledge the value of Taos Ski Valley as a large and trusted employer in the region, and feel that preference should be given to the local workforce as development projects are implemented.

Thank you again for the opportunity to comment.

Sincerely,

Toner Mitchell

Trout Unlimited
New Mexico Public Lands Coordinator