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Title:

Comments: We are the Commissioners of the Acequia de San Antonio located in Valdez and a subdivision of the State. As the first community downstream from Taos Ski Valley we have a keen interest in the ongoing water and sewage problems in Taos Ski Valley. What happens in the Ski Valley flows downstream to our village.

Perhaps you are unaware of the water and sewage issues in Taos Ski Valley. Briefly, the Village of Taos Ski Valley has had problems with their watersystem for years. Up to 75% of the water that they pump is lost due to the failure of components of the system. These malfunctions have created doubt that the water system as it currently exists can support additional development. The Village acknowledged the system's shortcomings in their 2021 Water Master Plan:

"If no improvements are made to the distribution system to reduce line losses, then it will be impossible to demonstrate that water will be available for any future development[hellip]"

This prediction has come true. The Village recently approved a permit for the building of a new hotel in the Ski Valley but with the condition that the Village could not guarantee water service. The Council anticipates that it may take up to 3 years for sufficient water to be available for the new hotel.

Recently the Village has had two serious leaks in their system which forced them to shut off water to the residents and business of the Ski Valley. In both cases the water was out for days.

Most immediately, we are currently at the beginning of wildfire season. As we write this letter the National Weather Service has issued a Red Flag Warning (severe wildfire warning) for our area. We are highly concerned that the lack of water in the Ski Valley may compromise firefighting efforts in the event a wildfire breaks out there. Given the history of the water system in the Ski Valley, these conditions are likely to repeat themselves in the future. A wildfire in the Ski Valley would irreparably harm the headwaters of the Rio Hondo.

The Village operated wastewater treatment system has also had ongoing operational issues. Issues with the current system have been ongoing for years and have resulted in the release of contaminants into the Rio Hondo.

Malfunctioning water and wastewater systems impact the Rio Hondo by reducing the amount of water available

in the stream and by increasing the likelihood that the water will be affected by pollutants. In either case, water in Valdez may be compromised.

Thankfully, the Village and TSVI have a plan to address the current issues and there is funding available to implement that plan. But the two water emergencies this ski season aren't the primary issue that concerns us. They are only the latest in a series of ongoing problems. The primary issue are the unresolved challenges facing the Village of Taos Ski Valley as it seeks to provide the basic services needed to support the Village and Resort. The Village seems overcome by these issues and unable to properly support and manage the systems as evidenced by their failure to resolve these critical issues for a period of years.

In recent media communications Taos Ski Valley Inc. tries to create some space between themselves and the infrastructure issues by placing the responsibility for the current water outage on the Village. However, there is significant overlap between the Village and TSVI. Historically the Village and TSVI have acted in concert. Chris Stagg has served two terms as Mayor and multiple terms as a Village Councilor while simultaneously serving as the Vice President of TSVI. TSVI receives special consideration on the Impact Fees it pays to the Village, receiving a substantial discount on those fees. TSVI has further demonstrated its unusually close relationship with the Village by recently committing \$1.5M for repair of the water system. Given this overlap we find it difficult to separate TSVI from the operations of the Village.

Additional development, like that proposed in the Gondola and Other Improvements Project will only place further stress on these already broken systems. We are aware that Taos Ski Valley Inc. claims that the Gondola and Other Improvements Project will not increase the number of skiers at the Ski Valley. We disagree and believe that the Gondola and Other Improvements Project will increase visitation to the Ski Valley as it is tied to larger development efforts on the mountain, primarily the development of the Kachina Basin. As evidence we will simply reference Taos Ski Valley Inc.'s plans for the Kachina Basin. We further point out that the proposed Gondola is meant to carry up to 1,800 people per hour into the Kachina Basin all the year round, a very significant increase over current visitation levels.

It is the Forest Service's responsibility to consider the cumulative, foreseeable impacts projects on Forest Service land will have on the human environment regardless of who is responsible for those impacts. We believe negative impacts of development on the mountain are not only foreseeable but are already evident. Therefore we are asking the Forest Service to place a moratorium on the approval of any further development on the mountain until Taos Ski Valley Inc. and the Village of Taos Ski Valley have resolved all of these issues and can prove that they can support further development with basic necessities such as water and sewage service.

Water is becoming increasingly scarce. Here in Valdez, our lives depend on the water, it irrigates our lands and fills our wells. The proposed development at the ski valley would increase water use and in turn, threaten the livelihood of the communities who live downstream, communities who have been here long before the ski valley.