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Comments: James Duran, Forest Supervisor

Carson National Forest, SW Region 3

c/o Paul Schilke, Winter Sports Coordinator

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

Much more readable format - .docx attachment

May 22, 2023

Re: Taos Ski Valley Gondola and Other Improvements #61390

Dear Supervisor Duran,

Thank you for the public outreach you have performed around the Taos Ski Valley (TSV) Gondola and Other Improvements Environmental Assessment. Since 1882, the Sierra Club has worked ceaselessly to explore, enjoy and protect the planet. The Rio Grande Chapter has 3,000 members in Northern New Mexico, and 10,000 in the Region.

From what we have learned about this Environmental Assessment, we see some major areas of concern in both the planned development and public engagement process. The following is a summary of those concerns.

1)Process- Meetings: Despite knowing about the decades long concerns the community has about the ski valley's growth, the Forest Service chose not to provide any public meetings in the form of listening sessions. The two open house meetings that were provided are useful for people to ask questions, but the community also needs to feel heard. The Forest Service should provide at least two more meetings where organized public comments are allowed and Forest Service staff take notes on the concerns.

2)Process- No Action Alternative: There is only one alternative considered in this EA, the proposed action. They do not analyze the alternative of No Action. Page 12 explains other alternatives that were considered and ruled out but the No Action alternative is not analyzed at all. According to the USDA: "The no-action alternative must be considered in every EA and EIS, as well as all EE documentation." Source: USDA Natural Resources Conservation service: <https://directives.sc.egov.usda.gov/viewerFS.aspx?hid=21289>

3)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.

4)Wildlife: There are six critical species that are known to be in trouble, threatened or endangered, that aren't mentioned, or analyzed in the EA. Of the spruce-fir habitat birds known from Taos County, 75 are covered by the Migratory Bird Treaty Act (MBTA), but only five are addressed in the EA. Of the 11 species of birds known from Taos County and known to use alpine tundra, 10 are covered by the MBTA. Only one is discussed in the EA. This is a totally inadequate analysis of concerns to wildlife. Please refer to Jon Klingel's extensive discussion on this subject in his letter of March 22 directed to your attention. A major concern that is essential to consider in any plans that occur in high-altitude developments is that a drying environment will force many species up in elevation to find suitable habitat. This will put further pressure on wildlife that currently depend on spruce-fir habitat. How do you intend to address this?

5)Under the Forest and Shrub Riparian section on page two of the Soil and Watershed Specialist Report, it says that fuel wood cutting will be done in a way that promotes large woody material recruitment. This is important for wildlife but we are skeptical this will be done based on past behavior by TSV following the large wind storm of

winter 21/22. All large woody material was removed. We suggest the Forest Service educate TSV management on the importance of this practice to decrease erosion and promote wildlife such as martens.

6)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. Much of this is addressed in the EA and we encourage TSV to take erosion control seriously during construction. There is no mention of green infrastructure or 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.

7)Lift 7 Restaurant: Sierra Club 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 EA does not 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 also does not address if the TSV Waste Water treatment Plan is equipped to process the increased water and sewage. 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. Sierra Club has substantial concerns about the water quality impacts of this project and questions whether a large-scale development at this proposed location is appropriate.

8)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.

9)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. 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.

10)Nordic and Snowshoe Trails: The EA states that these trails are only intended for winter use. How with TSV keep people from using them in the summer?

11)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. We suggest analyzing the amount of sediment already entering into the Rio Hondo by Ski Valley operations each year and then measuring sediment loading periodically during construction.

12)Consumptive Use of Water: You note that TSV has the rights to consume up to 20AF/year of water. The timing of when you store this water in the proposed five million gallon storage tank can be critical. If in a year when there is ample snow, much of this storage could occur during the spring runoff season. In a particularly dry

late spring/ summer season, some of this stored water should be used as the primary source of water for the businesses and residents of the upper valley. A framework and guidelines should be established in discussion with the downstream acequias on how to address even more severely dry years. TSV should not count on always using the full 20AF.

13)Non-Consumptive Use of Water: The process of melting snow results in surface runoff, soil wetting, and recharge of the aquifer. An unfortunate side effect of spring winds is that much of the moisture in the snow can be lost thru sublimation. I did not see an analysis of the history nor projected effects of sublimation. The removal of trees in the past to provide ski runs clearly has exposed more snow to wind, and thus increased sublimation. Higher spring winds are projected to be a given with climate change.

In conclusion, we ask that the Forest Service and TSV Inc respond to our letter and address as many of these questions as possible. We also ask that FS and TSV consider the following actions that can be taken:

- 1) Provide two more public meetings hosted as Listening Sessions;
- 2) Further address the feasibility of building a new lift 7 restaurant when the ability to drill a well is unknown and piping or driving water and sewage could have detrimental environmental effects.
- 3) Hiring a contractor to sample water quality a few times during construction and especially after a large rainfall to inform construction modifications that may be needed to minimize sediment flowing into Lake Fork Creek and the Hondo.
- 4) Prioritize road improvements and installing a traffic control system on Twining Road in conjunction with the construction of the gondola.

Sincerely,

John R. Buchser

(signature)

Chair, Northern Group

Rio Grande Chapter of the Sierra Club

(attachment: docx format of this letter)