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Comments: These are comments regarding Fire Risk as mentioned in the Taos Ski Valley Draft EA. Images are included in the attached document. Thank you.

FIRE RISK.?

The Calf Canyon / Hermit Peak fire remains on everyone's mind. Gratefully it did not reach Taos Ski Valley and the communities on the Rio Hondo, and thanks to the hard work of all the fire crews, the fire was contained at Highway 518.

Given drought and climate change, the next fire may reach TVS. It is probably not if, but when. The Ski Valley and the downstream communities should all have a shared plan in place. ?

, A map of a mountain

Description automatically generated with low confidence?

The location of the five-gallon water tank would be one element of such a plan. It is not clear from the draft proposal that the preparers consulted experts in the field of wildland firefighting. Therefore I asked for the opinion of one of the fire incident commanders from last year's Calf Canyon fire.?

For the given location designated on the map (bottom of Lift 2)The following should be considered according to his analysis:?

Approach and departure and where the bucket would go if there is a mishap and the pilot has to "punch the bucket" (drop it) you want to consider it will land somewhere not occupied by people or important assets.? ?

The higher the elevation, the more work it requires the helicopter to do to lift the same load. On the other hand, it is easier to go downhill with a full load than uphill, so it is a bit of a balance. ?

Regarding tree removal, I would want an exit path and you absolutely do not want the helicopter to have to go up over timber or terrain close to the dipsite on either side. That just adds to the potential for error and really bad days. ?

If?considering how the water may be used for all types of firefighting it gets more complicated.? But, generally I would be considering the following:?

If the water will be plumbed to a location where fire apparatus can be filled, the plumbing should not be able to be damaged by falling trees, etc.? ?

The water pressure at the fill outlet should be reduced to a level that regular fire hoses can handle.?

Valves and other appliances should be of the type that they cannot be closed quickly and cause water hammering.?

There should be a well-designed traffic pattern for apparatus that does not require backing up. ?

If there are hard-plumbed sprinklers to protect structures, then the system should be designed to allow for sprinkler use, water filling or both ?

Efforts should be biased towards 1) helping suppress fires when they are small, and 2) protecting everything that needs to be protected to maintain the ski resorts functionality after the fire.? That is a longer conversation but one that certainly needs to be had ahead of time, so you do not squander precious time in the moment. ?

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?Note: The incident commander wrote, "This is a longer conversation that certainly need to be had..."?The Forest Service, TSV inc. & Village, and the public should all be having the discussion about fire suppression right now.?So far as the current version of the TSV Draft EA is concerned, there is no such conversation. A well thought out plan should include a thorough discussion of fire and drought. Such a plan could save lives, homes, millions of dollars and irreparable damage to the watershed. The location and accessibility of water is critical to such a plan. Rather than optimizing the water tank's location for snow blowing, TVS should consider overall fire suppression goals. i.e., water systems should be used to protect structures, instead of trees. ?

The following 2020,

SOURCE WATER PROTECTION PLAN for Village of Taos Ski Valley Region

PWS #NM 3533329

states:

The ratings of 5.0 and 3.6 are some of the highest scores in the table and are meant to be driver's for TSV's priorities. However, the TSV Draft EA does not adequately address this need. Fire suppression is treated as an afterthought or add-on. I know we can, working together, create a better plan.

(<https://www.vtsv.org/source-water-protection-plan-to-be-considered-for-adoption-june-1-2020/>)