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First name: Phaedra
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Organization:
Title:
Comments: Phaedra Greenwood: Taos Ski Valley Gondola and Other Improvements Project Objection

December 16, 2024

USDA Forest Service
Attn: Michiko Martin, Regional Forester, Objection Reviewing Officer
333 Broadway Blvd SE
Albuquerque, NM, 87102

Submitted via email to: objections-southwestern-regional-office@usda.gov

Re: Objection regarding Taos Ski Valley, Gondola And Other Improvements Projects

Regional Forester Martin,

The following objection is submitted on behalf of myself, Phaedra Greenwood.

This Objection is filed pursuant to, and in compliance with, 36 C.F.R.Part 218, Subparts A and B. I have previously filed timely, specific and substantive written comments in accordance with 36 C.F.R. 218(a).As required by 36 C.F.R. § 218.8(d), Objector provides the following information:

1.

The name and contact information for the Objector is listed below:
Phaedra Greenwood
PO Box 388, Arroyo Hondo, NM 87513
pgreenwood478@gmail.com
575-776-2634

3. Phaedra Greenwood is the Lead and only Objector for purposes of communication regarding the Objection.

Greenwood: Taos Ski Valley Gondola and Other Improvements Project Objection

4. The project that is subject to this Objection is "Taos Ski Valley, Gondola And Other Improvements Projects". The Responsible Official is James Duran, Forest Supervisor, Carson National Forest. The National Forest on which the Proposed Project will be Implemented is: Carson National Forest, Questa Ranger District

5. Objector submitted timely, specific, and substantive comments during the Public Comment Period on May 21, 2023 and during the scoping period in May 2022. All points and issues raised in this objection refer to issues raised in those comments or are related to new information. Attached hereto are prior comments and I incorporate their arguments and information by reference.

For over fifty years I have enjoyed a quiet rural life in Arroyo Hondo beside the Rio Hondo. I own a house and a few acres of irrigated land with water rights. Back in the 80s I was secretary for the Committee to Save the Rio Hondo. We had a seat at the table with Taos Ski Valley, negotiated the design of a new sewage treatment plant and the conditions and restrictions of the TSV Master Plan with Carson National Forest. I am a parciente and Commissioner/Secretary on Acequia de Atalaya. I am also a working member of the DISES research group from NMSU and part of the Taos Valley Watershed Management team. I grow fruit trees: apples, apricots, plums and peaches; also flowers, spices, tomatoes and hay. I make part of my living as a writer and videographer. I've published seven books including Beside the Rio Hondo from Sunstone Press; many of my community videos are available on YouTube where I have 300+ subscribers. Over the years, as a free lance writer and journalist for Enchantment Magazine and the Taos News, I have won a number of awards including the Katherine Anne Porter Award, the 1995 PEN New Mexico Award, and in 2000 the E.H. Shaffer Award for Best Column and Best Review from the Taos News. In 2021 I was a finalist for the Eric Hoffer Award for Hydroglyphics: Reflections on the Sacred: Poems by Shawn Nevins, Photos by Phaedra Greenwood about the geometry of water.

THE GOOD NEWS

The good news is, after two serious breaks in the sewage pipes that shut down the Village of Taos Ski Valley and TSV twice last ski season, VTSV has dug up and replaced the broken pipes and installed water use meters, which should improve the situation. Rio Hondo testing that is ongoing with the DISES group (NMSU) New Mexico Water Resources Research Institute, and Amigos Bravos shows that key contaminants are under control in the Rio Hondo. But a lot of non-point source pollution goes unmeasured and unchecked. With exacerbated climate change and more construction planned for Taos Ski Valley and the Village of Taos Ski Valley, the health of the river is threatened.

ALGAE AND SEDIMENT

Examining the river bottom in Arroyo Hondo, which I do every day, I have noticed that the rocks are unusually mossy and filamentous algae (SEE PHOTOS) continues to spread, not just in the Acequia Madre, but also over the dam itself at the head of the river as it enters the Arroyo Hondo valley. (See photo). Torrential rains and flash floods over the summer have flushed vast amounts of sediment down from the hillsides in Valdez and Hondo that settled in the riverbed. Ongoing construction, soil disturbance and runoff from new construction at TSV and VTSV would contribute to even more non-point source pollution.

SKI FLUOROWAXES AND PFAS (polyfluoroalkyl substances)

The water in the Rio Hondo tests clean on normal standards. But something that is not being tested may be slowly killing our river. According to an article in the Salt Lake Tribune, "Ski wax contaminated Park City's aquifers with 'forever chemicals.' It could cost millions to clean up," recent studies show that fluorowaxes used on the bottom of skis, should also be of concern. (See: https://www.sltrib.com/news/environment/2024/04/15/skis-snow-forever-chemicals-water/ ).
The article says, "In January a peer-reviewed study that appeared in the journal Environmental Science: Processes & Impacts revealed elevated levels of PFAS connected to ski wax in the soil and snow melt at recreational ski areas … While the European Union banned some fluorowaxes in 2020 and U.S. Ski and Snowboard banned them for its events starting in 2021-22, FIS's ban only fully took hold this season … Muller said the lack of regulations explains why they're being found at elevated levels at places where races aren't common. 'I don't see an issue with beginners,' she said. 'But if you're good at skiing and you take your skis to be serviced, they can wax your skis and use fluorinated ski waxes.' This seemed to take several Utah resorts contacted by The Tribune by surprise. That includes several in Big and Little Cottonwood Canyons whose runoff is a major source of water for much of the Salt Lake Valley. Most said they believed the Environmental Protection

Agency had banned fluorowaxes, 'But that is not the case,' said an EPA spokesperson Jeffrey Landis."
The chemicals in fluorowaxes sink into the snowmelt and soil, then seep into the waterways, where - especially if they contain fluorine - they can cause severe health issues such as cancer, infertility and kidney and thyroid problems.
The article continues: " … eliminating PFAS on the mountain is a Sisyphean endeavor … On Wednesday, the EPA issued its first regulations on PFAS in drinking water … All water providers will have no more than three years to comply with the new standards."
The possibility of ski fluoro toxic-wax to see if fluorowaxes can be detected in VTSV's drinking water and in the Rio Hondo, especially at the headwaters in Taos Ski Valley, in samples from both above and below the sewage treatment plant is only one good reason a complete EIS should be done.

THE GONDOLA AND LIFT 7 RESTAURANT

Ongoing construction, soil disturbance and runoff from new construction at TSV and VTSV would contribute to even more non-point source pollution. Traffic and non-point source contamination should be evaluated for the proposed new restaurant at the top of Lift 7. Will the Lift 7 restaurant have a septic tank at that elevation, in an area where the soil is thin and rocky? All the food and garbage will have to be transported over adjacent roads in both summer and winter, leading to more erosion and runoff possibly exacerbated by torrential rains which have become more common.
The construction of a long gondola with towers that would require trenching and thousands of pounds of cement would be a huge disturbance so close to the Lake Fork of the Rio Hondo which would definitely impact our river. I have seen no mitigation measures in the EA on how they will handle the sewage or garbage for a new restaurant. Are they planning to use the gondola after sunset to "move" skiers up to the restaurant? Is the gondola just another step toward massive construction in the Kachina Basin?
Also, there have been no reports of traffic studies. Intrigued by Rick Bellis' claim that the Twining Road is so narrow in places only one car can pass, that the restaurants are overcrowded, on Taos Community Weekend, December 14-15, we drove up all the way from the Village of Taos Ski Valley to the William's Lake Trailhead parking lot and on to the bottom of Lift 4. We passed less than five cars and there was no place where the road was so narrow that two cars couldn't pass. Tomorrow we will post the video of our drive on YouTube where you can check it out for yourself. The parking lot at Lift 4 had only 18 cars. (SEE https://youtu.be/6PkyO-t-A9c ).
In the VTSV the Ski Valley shuttles were running and hundreds of cars were parked in the usual parking lots. Our traffic study suggests that the newly widened road is just fine and right now parking is plentiful. I agree with Jon Klingel who says, "The Ski Area has multiple restaurants close to the lifts and slopes; additional facilities are not needed. Action Requested: Deny the request to build additional restaurants. Suggest refurbishing the existing Whistlestop facility and/or pump up the Phoenix. Cancel some of these projects and take additional time to study the potential effects of the others in detail."

Remedy: No Action. Please conduct a full Environmental Impact Statement for these projects using a company that does not specifically favor the ski industry.

CLIMATE CHANGE

This summer in New Mexico was hotter and drier than ever. Irrigation was limited because water was low. Now and then torrential rains and flash flooding spilled over the Madre to flood houses and fields with sand and a thick layer of clay that, for some parcientes, hindered irrigation and took days and heaps of dollars to remove. Climate change continues to accelerate. Case in point, as of today, (12-15-24) TSV, with an average yearly snowfall of 170 inches, now has only has on 17 inches inches of snow mid mountain, and 18% of their runs open. Snowmaking takes more water, releases it into the wind and onto the surface where the sun can melt it more easily. With these mild temperatures, snowmaking will not help with spring runoff. This is the first winter I've known in 50 years where TSV had so little snow at the start the season.

According to the World Meteorological Organization (WMO) accelerating climate change puts pressure on food production and delivery, especially in vulnerable regions, and undermines food security and nutrition (https://wmo.int/topics/drought ). Ocean warming rates have been particularly strong in the past two decades. Ocean heat content in 2023 was the highest on record; in 2024 it has continued at comparable levels. From 2005 to 2023, the ocean absorbed on average approximately 3.1 million terawatt-hours (TWh) of heat each year. This is more than 18 times the world's energy consumption in 2023 and is contributing to the ongoing decline of the glaciers in the Arctic and Antarctic.

"The record-breaking rainfall and flooding, rapidly intensifying tropical cyclones, deadly heat, relentless drought and raging wildfires … in different parts of the world this year are unfortunately our new reality and a foretaste of our future," said WMO Secretary-General Celeste Saulo. "We urgently need to reduce greenhouse gas emissions and strengthen our monitoring and understanding of our changing climate." WMO officials are now talking about establishing early warning systems.

For all of us here in the parched Southwest, the most dramatic threat is wildfire. But underlying that is a larger, hidden threat of diminished acequias, polluted streams, drying up wells and sinking aquifers, which we are fully aware of because they are being carefully measured.

THREATENED AND ENDANGERED WILDLIFE

As I said before, the Draft EA offers no information on the impact on wildlife of the 2021 blowdown of 300 acres, especially the sensitive marten, the boreal owl, the goshawk and ptarmigan other species that once lived there. Developers chase off the wildlife and then say there is nothing there?

An EIS should address the Cumulative Impact of catastrophic blowdown, the loss of shade, natural habitat and damage to the watershed. The damage that was caused, in part, by the same heavy machinery that cut, peeled and removed the shattered trees from the roads and hillsides. The Soil and Water Specialist Report only addresses water issues and private land in the Canyon, not the impact that catastrophic clean-up, burning of slash piles and new development is likely to have in the neighboring Wheeler Peak Wilderness, and along the Rio Hondo from Lake Fork to Valdez and the confluence of the Rio Grande.

As for the sensitive marten, field researcher Brian Long reports that he made surveys and did radio tracking of three martens around TSV from 1997-2002, then continued from 2005 to the present in Northern New Mexico. (See his marten photo). He says the solitary marten range is about one square mile. "Almost before I was aware that the Pacific marten existed in northern New Mexico, I found a road-killed one near the Forest service cabin in 1995." (Close to Cuchilla campground.) So you can't simply dismiss the impact on the marten by saying it only exists in spruce-fir. Brian pointed out that quiet islands are becoming more and more rare as Ski Valley traffic increases and speeds up. I agree when he remarks, "I strongly object to the finding of 'No significant Impact' by the District Ranger and Carson National Forest Supervisor. Significant impacts are felt every day when dozens of workers speed up the canyon to their jobs at the Ski Area or the village of Taos Ski Valley. The daily carnage of wildlife is just one of the significant impacts caused by the ongoing destruction of this unique watershed. I have never seen the local or state police attempt to control this daily wildlife menace, and I have seen no traffic studies."

Like us, wild creatures have a right to live in peace and quiet. To enjoy clean water and clean air. I agree with the provision in Project Design Criteria that says: "To mitigate impacts to the soundscape of the WPW in the evening, construction and heavy equipment use shall be limited to daylight hours." I think this should also apply to the gondola. Park it at sunset. Let the wildlife breathe in the evening quiet. Threatened and sensitive wildlife deserve their own study.

Remedy: No Action. An EIS please.

WHERE THE EA FAILED

I agree with Kevin Bersell, Friends of the Rio Hondo, when he states in his recent objections that the EA "failed to

consider or investigate water pollution resulting from the foreseeable restoration of a restaurant on the slopes, the installation of a mega-gondola, and the subsequent and cumulative development in the Kachina Basin and in Twining."

A SEAT AT THE TABLE

CNF guidelines are clear about social justice for minorities, about really hearing us, giving us a seat at the table where we hope to negotiate an agreement on possible remedies for ecological survival. Sadly, this is not what happens in a rigid objection process like this one which sloughs off the burden of doing the research that should have been done by CNF and lays that burden on the public.
"No issues were found," says the EA. How is this possible when 636 concerned citizens did the research, jumped through all the hoops like professional acrobats and presented a wide variety of articulate objections that they dutifully submitted in May? For us nothing has been resolved. There needs to be respect on both sides. Let's work towards that. Climate change is not going to go away. In the end, Mama Nature always wins. Survival is about water, connection and cooperation.

Again, I agree with Bersell when he writes:

The waters of the Rio Hondo are important for cultural and traditional needs as well as for subsistence practices and economic support of rural historic communities. Historically the residents of Rio Hondo communities held the lands in the upper Rio Hondo in common. They used the canyon to pasture their animals, as a source of firewood, to forage for food and medicinal plants, for hunting, for religious practices, and, of course, as a source of potable water. While the proposed projects may directly affect the waters of the Rio Hondo the proposal makes no provisions for ensuring that the water is of high quality, and is available in sustainable amounts. A more reasonable plan would include provisions for continuously and openly, measuring and monitoring the quantity and quality of water in the Rio Hondo as well as cooperatively managing the flow of the river. It is reasonably foreseeable that the lack of consideration of the Rio Hondo communities' needs may result in Rio Hondo water being unavailable and/or unacceptable for use. These immediate Environmental Justice concerns are bounded by the historical injustices visited upon the Rio Hondo communities.

Objection: The EA doesn't acknowledge the downstream communities and acequias as stakeholders in TSVI's or TSV's pollution prevention plans.

Remedy: No Action

I do agree with the idea of a design plan that would "mitigate erosion and sedimentation into the Lake Fork Creek and Rio Hondo. As the EA says, "Sediment wattles and drainage systems shall be implemented during construction of projects."
Some of our experts would like to be part of that process.

Suggested Remedy: Include community and acequia leadership in defining and reviewing the Stormwater Pollution Prevention Plan. Or No Action.

There is a limit to growth. We have reached that limit. I would advise CNF to look more closely at the broader issues of increased development in our watershed. To walk a mile along the acequia. Have an apricot. A tomato. Sit beside the Rio Hondo. Listen with the heart. Choose the remedy of "No Action" followed by a full and sincere Environmental Impact Study. We deserve it. You need it. So does TSV. It's your job to protect "the land of many uses," to consider the overall cumulative impact of further development on historic downstream communities that are trying to grow some food. When those eighteen wheelers stop rolling in, our efforts may be appreciated.

Thanks for your time and attention.

Respectfully,

Phaedra Greenwood