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First name: Gail

Last name: Russell

Organization:

Title:

Comments: Gail Russell: 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, Gail Russell.

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:

The name and contact information for the Objector is listed below:

Gail Russell

P.O. Box 467

Arroyo Hondo, NM 87513

575-770-1507

gailmtnlight@gmail.com

Gail Russell is the Lead and only Objector for purposes of communication regarding the Objection.

Russell: Taos Ski Valley Gondola and Other Improvements Project Objection

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

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.

I am an artist living in the same house in Arroyo Hondo since 1978. I am a member of the Atalaya Acequia Association. I maintain a garden and many fruit trees.

Objections: Water Tank and Booster Station

Water tank and booster Station- they say they will be Diverting water from the Rio Hondo in the Spring.. We begin irrigating in the early Spring.

Water Usage: The Final EA proposes a strategy to ensure the water tank is full at the end of the ski season:

"Specifically, TSV could divert water from the Rio Hondo in early spring when runoff is high" and goes on to say "Additionally, the water would not be diverted from the Rio Hondo during Acequia irrigation season (summer) as this does not coincide with periods of snowmaking at TSV or the spring diversion to fill the tank for the summer" This strategy is uninformed and contrary to the needs and traditional practices of the acequia systems. The irrigation season begins in early spring when runoff is high and continues through the fall. If TSVI follows this strategy, despite its assurances to the contrary, it will directly conflict with the needs of the downstream water users. If the Forest Service had meaningfully consulted with the Rio Hondo acequias and ditches it would have had this information prior to preparing the Final EA.

In addition the earlier spring melt, caused by climate change acknowledged in the Final EA, will move the irrigation season earlier in the year and make what was historically a short overlap between ski season and irrigation season into a much longer time period.

The Final EA fails in its duty to identify the non-snow making, non-firefighting uses of the water and how the Water Tank will contribute to those uses. Non-snow making, non-firefighting uses have the potential to increase water usage above the current level. In the February 2022 Taos Region Clean Energy Transportation & Recreation Corridor presentation to the Taos County Planning Board³, the Water Tank project was identified as an "economic resiliency and emergency fire suppression" project. The Final EA fails to identify those economic resiliency uses and their compatibility with the Forest Plan and the Special Use Permit. I raised these issues in my comments on the Draft EA but the Final EA does not address them.

Suggested Remedy: Consult with acequia and ditch leadership on how best to time and manage water diversions from the Rio Hondo watershed. Include that input into an Environmental Impact Statement

I agree with Phaedra Greenwood in her comments about the gondola and restaurant We don't need another restaurant up there or a gondola to get to it.

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.

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,

Gail Russell