



May 31, 2020

Joshua Hall
Ecosystem Staff Officer
11 Forest Lane
Santa Fe, NM 87501

Dear Joshua:

On behalf of Sipapu Ski and Summer Resort, we would like to provide the following comments on the *Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project*. We understand that the proposed action includes restoration activities that could occur on the Carson National Forest. As a permittee of the Carson National Forest, operating on lands designated by the Forest Plan as *Management Area 16 – Recreation Sites: Ski Areas* and in close proximity to *Management Area 14 – Riparian Areas*, we feel it is pertinent to be involved in the environmental review process.

Overall, we support improvements to riparian health and are interested in extending our partnership to these projects when it is possible and appropriate. With that being said, we feel that restoration projects should not supersede the direction of *Management Area 16*, which is to, “Administer the existing ski areas in accordance with the direction in the Master Development Plan for each area.” We believe that the EA supports this point as page 12 of the EA states, “Proposed riparian, wetland, and associated upland and aquatic restoration described below would be consistent with the forest plans.” We understand this to mean that the direction to provide developed recreation within our Management Area would not be superseded by restoration activities that may not be able to coexist with existing ski area infrastructure and operations.

In addition, we would like to recognize the proximity of our permit area to the Rio Pueblo and *Management Area 14* that surrounds this waterway. This river provides a variety of social and environmental benefits to the area and we support potential projects to improve the condition of this river. However, as discussed above, we feel that restoration projects that occur in this Management Area should not supersede or prevent the development of projects in our primary Management Area, *Management Area 16*. Recreational projects within our permit boundary as well as restoration projects within *Management Area 14* may both influence the condition of the Rio Pueblo and we feel that these projects need to be completed collaboratively and not designed to preclude the development of one another. Given adequate environmental analysis and proper project design, we believe both types of projects can be completed successfully.

Further, the flexible toolbox approach outlined on page 17 of the EA document seems to suggest that there is an opportunity to modify project design as warranted by site specific conditions. Just as projects would be modified to address listed species habitat, we request that developed recreation resources within our permit area be considered in a similar manner. In-depth studies of lands within the SUP area that have been completed over the years could provide an excellent resource to identify and inform the consideration of areas for treatment. We are interested in supporting implementation of these projects in conjunction with ski area development projects where they can coexist.

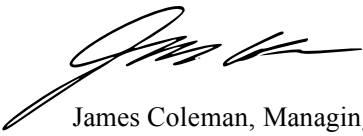
Lastly, we request that the analysis of recreation resources acknowledge ski areas. This could occur within the *Recreation and Congressionally Designated Areas* section of *Chapter 3 – Affected Environment and Environmental Consequences*, which describes different forms of developed recreation. Page 81 of the EA states, “The Carson National Forest has a variety of developed recreation facilities, including campgrounds, picnic areas, interpretative sites, fishing



piers, overlooks, and trailheads.” Despite being one of the more prominent forms of developed recreation on the Carson National Forest, we note that ski areas are not explicitly mentioned. Based on the effects to recreation resources, described on page 93 of the EA, we hope that a collaborative partnership would allow us to minimize impacts to our operation. Specifically, this could include taking on projects during off-seasons, reducing the need for closures outside of normal construction seasons, and avoid implementing projects that would hinder future ski area projects and operations as described in our Master Development Plan and annual operating plans.

We are grateful for our partnership with the Carson National Forest and hope that you will consider these comments as part of your environmental review of the *Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project*.

Sincerely,



James Coleman, Managing Partner
Mountain Capital Partners

