

Data Submitted (UTC 11): 5/4/2022 12:00:00 PM

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Comments: I am an emeritus professor of forest and fire ecology from the University of California Los Angeles. My research specialty has been the dynamics of western forest, especially ponderosa pine and mixed conifer forests of the mountains of New Mexico. I was also for years engaged with the Collaborative Forest Restoration Program in New Mexico, and worked with community groups throughout New Mexico on making local forest safer from wildfire, including projects on the Carson National Forest.

I would like to comment on the appropriateness of expanding the developed area of the Taos Ski Valley facilities. Spruce-fir forest type is extremely stressed under the current climate condition. The devastating fires we are now seeing in northern New Mexico are a testament to the increasing conditions of higher than normal temperature and extreme long-term drought. Those two factors are only predicted to worsen in the near-term.

This forest type in New Mexico is predicted to shrink in the future. Of course, clearly, the opportunities for skiing in the state's mountains is also predicted to shrink. Natural snow is less likely to fall under climate heating conditions, and snow-making machines require significant amounts of water. This water is going to be urgently needed for users downstream in the coming years, as drought continues. Which is a more rational use of water in New Mexico, residential use by communities that have been here for centuries, or a larger skiing facility for the wealthy, most out-of-staters.

It is hard to see how the expansion would serve any sensible values. It would be bad for local communities, and bad for the forest itself and its dependent wildlife populations.

Please require a full Environmental Impact Statement. This is simply too large a project, with too many long-term, irreversible effects[mdash]most importantly since it involves a large consumptive use of water, the state's most crucial natural resource.

Another issue[mdash]a highly pertinent issue[mdash]is the potential for a major wildfire that could sweep across the ski facility and the surrounding forest. We need only look at the sky at the moment to see the urgency of considering this proposed expansion in the context of the new normal fire regime in New Mexico.

The Carson National Forest has been too hasty in considering the impacts of this ski valley expansion. The evaluative process, and the Carson National Forest, need to take a step back and conduct a more in-depth analysis of this project.

The obvious public concern about the project is based on justifiable concerns about the spruce-fir forests, water use, and the potential for severe wildfire. The public deserves an adequate evaluation and an EIS process.

Thank you for the opportunity to comment on this process.

Dr. Melissa Savage

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