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Comments: I am a member of several coalitions that have monitored, analyzed, and appealed (in 1995) the Sipapu Master Development Plan EIS that was never implemented because of egregious errors in the NEPA process. The EIS was pulled because of the Forest Service's failure to adequately consult with Picuris Pueblo on cultural issues. The EIS also failed to adequately ensure that the ski resort had legitimate water rights; the owners were denied their transfer application from agricultural to commercial water right use as it was determined that they had forfeited their water rights in the 1960s. The EIS also failed to adequately analyze the cumulative impacts on not only Picuris Pueblo but the downstream water rights of the acequia communities of the Rio Pueblo.

Now we've received the scoping letter regarding the Taos Ski Valley Master Plan Development that proposes to conduct an EA, not an EIS, for a ski area development that in many ways replicates the issues raised in Sipapu's plan: water rights, water quality, and the cumulative impacts on the downstream Rio Hondo traditional acequia communities. The Rio Hondo, which supplies the acequia water, has its headwaters at the heart of the proposed developments at Lake Fork in the Kachina Basin. The water rights acquired by the Twining Water and Sanitation District that were transferred to the Taos Ski Valley Village all originated as acequia water rights. While the scoping letter claims that these 200 cfs diversion rights will not be increased to underwrite the TSV expansion, we have no assurance that this is the case. The scoping letter also fails to acknowledge the 218 cfs of water rights of TSV Sanitation. All of the planned developments are an attempt to attract more skiers to a more sophisticated resort that will be forced to maintain ski conditions in a diminishing environment where increased snow making will be imperative.

Just as Sipapu was able to expand its facilities without approval of the master plan, by incremental expansion within its permitted boundary, so has TVS. From its original Blake family European style ski resort it has expanded its residential and commercial capacities to replicate an Aspen or Vail that serve only the wealthy and attract many more out of state skiers. Approval of the Taos Airport for jet landings only serves to increase a population that flies into Taos and heads directly to TSV. This kind of development doesn't contribute to the town of Taos; it only works to create a self contained entity in the Taos Ski Valley.

The cumulative impacts upon the downstream traditional acequia communities is already evident by the degraded condition of the Rio Hondo. Is an EA going to be able to fully analyze the potential impacts on both surface and groundwater resources in the valley and in downstream communities?

The U.S.F.S. has a poor record regarding the NEPA process for ski area expansions. Numerous appeals and lawsuits have been filed for Sipapu, Wolf Creek, Snowbowl, and numerous other Colorado ski resorts. The FS seems to take the position that ski area development is good for the overall economy and for the agency's increased reliance on recreational development. This comes at the expense of the natural resources that are sacrificed for high-impact recreation and fails to acknowledge the socio-economics of land based communities that fail to thrive.

I'm a hiker, backpacker, cross-country skier, and downhill skier who has explored every inch of the Taos Ski Valley area for 30 years(although I don't downhill ski there as I can't afford it). I wrote a guidebook to the Wheeler Peak and Columbine-Hondo wilderness areas. I've witnessed the slow decline of valued wildlife habitat, opportunities for solitude, and the decline of a valued and varied recreational experience (a Nordic ski area does not provide the kind of experience that one has on cross-country or back country skis). The Taos Master Development Plan obviously continues that trajectory. It will soon be an experience for only the rich.

