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Organization: Defenders of Widlife Title: Southwest Program Director

Comments:

Thank you for the opportunity to comment on the Taos Ski Valley Improvements #61390 ("Project"), located in the Carson National Forest.

The following comments are submitted on behalf of Defenders of Wildlife. Defenders of Wildlife is a national, nonprofit membership organization dedicated to the protection of all native animals and plants in their natural communities. Defenders is committed to protecting wild lands and wildlife in New Mexico and has 22,328 members and supporters in New Mexico.

Given the extensive nature of the Project and the significant impacts it will have on the forest, wildlife, and the quality of the human environment, an Environmental Assessment is not an adequate analysis of the impacts. Thus, we urge the Forest Service to prepare an Environmental Impact Statement ("EIS") before proceeding with the Project.

The Pacific Marten (Martes Caurina) is dependent on old growth spruce-fir forest, and the complex and messy structure of dead and down trees that give us subnivean (under snow) access to our preferred rodent prey (voles). The Taos Ski Area and surrounding lands provides this kind of habitat. Defenders is concerned that the Project will further impact any remaining marten or their habitat. The Pacific Marten is a Species of Greatest Conservation Need (SGCN) in New Mexico and listed as threatened by the state.

When the Special Use Permit (SUP) was granted by the Carson National Forest, it was for an alpine ski area, not a massive year round development on and adjacent to the permit area, with the intention of bringing in many thousands of people. The continued expansion has been piecemeal over many years. There has been no comprehensive or cumulative assessment of the impacts to the area in the piecemeal Environmental Assessments (EAs) developed by the Carson. It is long past time for a thorough EIS of the full impacts to this area, including cumulative impacts.

Thank you.