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First name: Rob

Last name: McCormack

Organization:

Title:

Comments: Re: Taos Ski Valley Improvements #61390: Comment for Scoping Period for Taos Ski Valley Gondola and Other Improvements

Dear Mr. Duran and Mr. Schilke,

My name is Rob McCormack and I am a resident of Valdez, New Mexico in the Rio Hondo watershed. I am an avid outdoorsman who greatly values Carson National Forest and the Forest's adjacent lands for fly fishing, hiking, bird watching, foraging, hunting, rafting, and skiing (both backcountry and as a Taos Ski Valley season pass holder). I also greatly value the history, our local cultures, and traditional ways of life in Valdez and surrounding communities. I am also a Board member with our local Trout Unlimited Chapter: Enchanted Circle Trout Unlimited. I am concerned that Taos Ski Valley proposed development and improvement projects, outlined for scoping in the April 1, 2022 notice from Carson National Forest, will have negative ecological, social, and environmental impacts.

As a whole and independently the projects proposed by Taos Ski Valley Inc. will negatively impact the Wheeler Peak Wilderness Area, the Columbine Hondo Wilderness Area, and the Carson National Forest and adjacent public lands. I am also concerned that the projects will negatively impact the Rio Hondo Watershed as a whole: and my family, friends, the local communities, plants, and animals who rely on it. I respectfully request the Carson National Forest and its contractors to study, provide data, and analyze the following potential ecological, social, and environmental impacts in an Environmental Impact Statement (EIS) for the proposed projects:

Construction of a Gondola: The construction of a Gondola adjacent to, and at points directly on, the Lake Fork of the Rio Hondo is proposed within a riparian area and floodplain. The construction: removal of trees, building of lift towers, excavation and grading will disturb vegetation, disturb solids, add sediment loading to the Lake Fork and downstream, and increase erosion within the stream and adjacent to it. Floodplains are a key component in areas adjacent to streams and rivers: riparian areas. The Draft Environmental Impact Statement for the Carson National Forest Draft Land Management Plan: Species and Habitat Connectivity Crosswalks emphasizes that the disturbance of floodplains from 'excessive human uses' causes compounding negative impacts 'to terrestrial species dependent upon wet soil conditions and vegetation, as well as aquatic species within the stream and river systems.' Additionally, '34 percent of at-risk species may be impacted by disconnected floodplains on the forest, these occur in all vegetation types with riparian areas.' Of particular interest to me is the persistence and survival of the watershed's trout populations, particularly the native Rio Grande cutthroat trout, in the wake of the proposed development. Action requested: A complete analysis, within an EIS, is requested to comprehensively evaluate the direct, indirect, and cumulative impacts of the proposed developments on riparian areas, water quality, vegetation, terrestrial species, aquatic species, at risk species, and especially the trout.

In addition to water quality impacts resulting from Gondola construction I am concerned about potential limits to recreational access as a result of the Gondola's construction. How will access to the Williams Peak Wilderness and Columbine Hondo Wilderness areas be affected by construction along Twining Road and once completed will there still be available access to our public lands beyond Kachina Basin? Further, the Gondola will terminate less than half a mile from the Wheeler Peak Wilderness Boundary. I am concerned that the construction and later operation of the Gondola will negatively impact the wilderness characteristics of the Wheeler Peak Wilderness. The gondola infrastructure will likely be easily visible from areas with high scenic integrity. Additional noise (during construction and after), traffic, and impact to night skies will impact the stillness, viewshed, ecology refuge, and darkness of the Wheeler Peak and Columbine-Hondo Wildernesses. Action Requested: A complete analysis, within an EIS, is requested to comprehensively evaluate the direct, indirect, and cumulative impacts of the proposed developments on wilderness characteristics of Wheeler Peak Wilderness, including but not limited to its stillness, ecology refuge, and darkness. Additionally, I also request that potential impact to access to public lands before, during, and after construction be completely evaluated, including access during all seasons.

Finally, increasing on mountain amenities, lifts, and other features should increase demand for recreational visits. It is documented that increased recreation, and recreational footprint, decreases wildlife habitat - specifically bighorn sheep, mule deer, and elk- all of which currently inhabit the areas planned for development and adjacent. Action Requested: A complete analysis, within an EIS, is requested to comprehensively evaluate the direct, indirect, and cumulative impacts of the proposed developments on wildlife populations in the immediate area and adjacent.

Water Tank and Booster Station: Construction of a new water tank and booster station is proposed in the scoping. In an era of increased drought, I am concerned on the availability of water as well as impact of water withdrawals on the health of the Lake Fork and Rio Hondo downstream. Further, how, when, where and at what rate water is diverted can have negative impacts on stream health and in particular interest to me: trout life history and irrigation success. Action Requested: A complete analysis, within an EIS, is requested to comprehensively evaluate, account, and determine Taos Ski Valley Inc.'s water rights. Additionally, in light of continued drought, analysis should demonstrate that Taos Ski Valley Inc.'s water rights will be available in future years, before construction of the new water system should proceed. Further, conduct a complete analysis of the impact of water withdrawals: how, when, where and at what rate water is diverted, on the health of the Lake Fork and Rio Hondo downstream. Finally, a complete analysis of impacts of withdrawals on trout life history as well as irrigation success on acequias downstream.

Nordic and Snowshoe Trails: To be located adjacent to the Rio Hondo, special concern must be considered for construction, just like the Gondola, on disturbance of riparian areas and adjacent. Removal of trees, construction of new building(s), excavation and grading will disturb vegetation, disturb soils, and can add sediment loading to the Rio Hondo. All these potential impacts negatively affect the water quality and ecological integrity of the Rio Hondo. Action Requested: A complete analysis, within an EIS, is requested to comprehensively evaluate the direct, indirect, and cumulative impacts of the proposed developments on riparian areas, water quality, vegetation, terrestrial species, aquatic species, the trout, and especially at risk species. A site specific analysis and plan be developed that addresses the direct and indirect impacts of the Nordic and Snowshoe Trails center on aquatic habitat, especially trout, and overall water quality and quantity in the Rio Hondo. Water and soil analysis should be conducted to establish baseline conditions with which future sampling data can be compared. In the event that new wells are drilled and/or additional water uses are added, water use and consumption must be reconciled with TSV's water rights. Further, with beaver in the immediate area: existing beaver structures should be left in place: as their ponds moderate stream temperatures during summer and provide critical wintering habitat for trout.

Lift Replacement: Lifts #2 and #8 are planned in the scoping for replacement. To replace the lifts- it will require excavating the old lift towers, removing the debris, filling in the holes and then digging new holes for the replacement towers - activity that requires significant ground disturbance. Action Requested: Consider reusing the current lift towers, do complete analysis on whether, or not, the current towers could be reused. For construction: Soil retention, reseeding, and other best practices must be implemented to minimize erosion and sediment transport. Soil analysis should be conducted to establish baseline conditions with which future sampling data can be compared.

Additional On Mountain Dining: 11,000 square feet of new development is proposed in high mountain environments. As a skier at Taos it does not seem like these are necessary additions: There are currently three under utilized dining spaces: Phoenix (indoor unused), Whistle Stop (not regularly used), and Martini Tree (used only for occasional special events). Like the Gondola, Nordic Center, and new lifts; construction will disturb the soil, likely increase runoff and erosion and impact the Rio Hondo Watershed. Additional on mountain development will also affect wildlife populations, potentially including species of concern. To any extent that new facilities might impair watershed quality - this is of particular concern with the construction of new dining facilities with bathrooms - or tax TSV's water and sewage treatment capacity, I am concerned about possible contamination of surface and groundwater water supplies and negative impacts on trout populations and water users downstream. Finally, there is the possibility of on-mountain buildings and facilities being visible from the Wheeler Peak Wilderness. Action Requested: Taos Ski Valley provide additional evidence for need to add additional dining in light of three currently underused facilities. Taos Ski Valley consider refurbishing existing facilities, with in the same footprint, instead of building new facilities. Visual impact of new buildings to Wheeler

Peak Wilderness should be analyzed. A complete analysis, within an EIS, is requested to comprehensively evaluate the direct, indirect, and cumulative impacts of the proposed developments on wildlife populations in the immediate area and adjacent. A site specific analysis and plan be developed that addresses the direct and indirect impacts of each building on sediment loading, soil retention, reseeding, and erosion. Should construction proceed, soil analysis should be conducted to establish baseline conditions with which future sampling data can be compared. In the event that new wells are drilled and/or additional water uses are added, water use and consumption must be reconciled with TSV's water rights.

As proposed the development at Taos Ski Valley will negatively impact the Wheeler Peak Wilderness Area, the Columbine Hondo Wilderness Area, and the Carson National Forest and adjacent public lands; as well as the Rio Hondo Watershed and its communities. Considering my concerns outlined above, I encourage the Forest Service and its contractors to conduct a comprehensive analysis and identify and evaluate a reasonable range of alternatives that meet the purpose and need for the Proposed Action in an EIS. An EIS should conduct a comprehensive analysis of any and all direct impacts, indirect impacts, and cumulative effects that would result from implementing the Proposed Actions by Taos Ski Valley. I forward to reviewing the Draft EIS. Thank you for your attention.

Sincerely,

Rob McCormack