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Organization:

Title:

Comments: Good morning,

I am submitting these comments to the draft EA for Taos Ski Valley Gondola and Other Improvements.

Scope is unclear or not well defined - Location of proposed elements of the project (gondola, lifts, trails, tank, pipeline, restaurant, etc.) are not clearly defined. Being generally within the existing SUP area and adjacent non-NFS lands does not provide clarity for the affected environment and conclusions of potential consequences. Additional construction roads for the trails are mentioned, but not disclosed as to where.

Lift 7 restaurant - Is the potential well needed for the restaurant an existing well that is already permitted for use by TSV? If a new well, this needs to be identified in the EA. Where would the potential pipelines be located?

Whistlestop cafe - Footprint location and disclosure of layout for a new cafe is not clear in the only map at the back of the document.

Lift 4 hiking trail - The need for the new trail is confusing. It is described as a new trail to be located alongside the existing trail, intended to relieve pressure off the existing trail, and complement activities at TSV that are approved but not implemented. This should be explained a bit more. How does this new trail fit into the overall purpose and need? The purpose and need talk about consolidating recreational activities, and this is an expansion of recreational activities. In the Alternatives Considered but Eliminated, the trail is described as a way to avoid impacts to Taos Pueblo lands. This sounds like a mitigation rather than a proposal.

Snowmaking - How does the proposal for ongoing snowmaking or "efficient" snowmaking contribute or mitigate issues related to climate change and reduced natural snowfall? Why continue snowmaking with decreased precipitation and more draw on the watershed? Is water use accounted for when water is used for snowmaking and later water is consumed for fire response? What are the impacts of both?

Recreation beyond the TSV SUP area - Is TSV and its SUP area a high use destination? If mitigations are difficult for the FS to implement and there aren't resources to regulate the use, is that an impact that cannot be mitigated? If the proposed action is anticipated to increase the recreation on NFS lands, then the mitigations for high use destinations need to accommodate the impacts of increased use. The statement that the proposed action is not expected to burden the FS ability to manage recreation resources is contradictory to the previous statement that mitigations are difficult for the FS to implement and regulate the land use. Which is it?

Environmental Justice - How does the proposed action take into consideration potential disportionate impacts overlapping with socioecomics as described in EO 14008? Additionally, how does the proposed action take into consideration disproportionate impacts regarding equity and serving minority and low income populations in the surrounding communities? There is no analysis in this EA to identify where these populations are or how potential impacts are evaluated and measured. The analysis has not defined the region analyzed, where populations reside, percentage of populations in these communities that are minority and/or low-income, or how EJ impacts were identified. This is not evidence that there are no impacts regarding EJ.

Socioeconomics - If TSV is a primary economic driver for the county, then the socioeconomic impacts of its operation need to be accounted for with regard to the proposal. There is no analysis in this EA describing how TSV contributes to the existing socioeconomic conditions of the surrounding region. Additionally, the analysis does not address if this proposal, including the SUP, has potential impacts regarding equity as defined in EO

13985. Does the proposed action provide economic equity to underserved communities?

Climate Change and EO 13990 - The EA does not describe impacts regarding climate change or the impacts that the proposal may or may not have regarding reduced precipitation. The efficiency in snowmaking is described as needed because of reduced precipitation, but no analysis of precipitation and climate change is included in the analysis pertaining to EO 13990.

Thank you for consideration of my comments.

David