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Title:

Comments: I submit this comment as a member of the Taos and Taos Ski Valley community, as a parciente (a member of the Acequia del Sur del Canon), a skier and mountain enthusiast, and as part of the Sangre de Cristo ecosystem. I acknowledge the role of Taos Ski Valley: as an unparalleled place of beauty, recreation and spirituality; as a vital part of the economy of this region and my family; and a newer aspect of the community and area culture.

I remind Taos Ski Valley, Inc. (TSVI) that they have asserted a particular position as a B Corporation to act in all ways as part of an "inclusive, equitable and regenerative economy." They must heed the diverse voices of this community and respect a multiplicity of perspectives, not only their own. It is notable that the Master Plan (MP) lacks any alternatives for the proposed projects. This comment concludes with suggestions for compromises that would repair any rift between TSVI and the community.

TSV Environmental Assessment

The Environmental Assessment (EA) provided by Rocky Mountain Ecology LLC on behalf of Taos Ski Valley, Inc. provides insufficient evidence to negate the need for an Environmental Impact Statement (EIS). The environmental assessment contains outdated sources, scant research into current data and trends, and the use of regulatory guidelines that are unavailable as a part of the EA. Beyond that, the Master Plan provides no alternative means to achieve TSVI's stated needs. This section will analyze the "Soil and Watershed Report," which is relevant to the most critical negative impacts that could occur due to the MP. It's imperative that the Forest Service and TSVI complete all aspects of an EIS.

The Soil and Watershed Report

The sourced material for the Soil and Watershed Report has dates ranging from 1986 to 2022, with the median year 2004. The escalating impacts of climate change over the last decade mean that this two to three decades' old statistical information is largely inaccurate. Table 1. Project Element Disturbance Areas lacks a measure by which one can fully understand the significance of the Permanent and Temporary Disturbance figures. While DEVRES is cited, this document is not available source material. In addition, the following link leads to a dead end. <http://www.fs.fed.us/biology/resources/pubs/watershed/FSNationalCoreBMPsApril2012.pdf>

Of particular concern is the obsolete "Final Approved Total Maximum Daily Load (TMDL) for the Rio Hondo. (South Fork Rio Hondo to Lake Fork Creek)," 2005. The EA is negligent in its assessment of the impact of the Master Plan on the river and watershed, given that this is the primary evidence provided by the EA to justify the lack of need for an EIS. This source is 18 years past its prime. Accurate numbers for the approved total maximum daily load water, current and projected, is critical to supporting the EA. Lacking this, an EIS is required.

Water Quality

Given the significance of the Rio Hondo to the surrounding watershed, any activities in its immediate proximity will have an impact, both temporary and permanent. Again, there has been no Environmental Impact assessment to determine how detrimental they might be on flora, fauna, or the local and downstream communities. How will the ecosystem be affected by a gondola, a water tank and pump house?

The gondola parallels and in some places will pass through the river corridor. Given the fragility of this high desert alpine environment, the gondola could destroy habitat, affect water quality and create a permanent

disturbance for wildlife. Even without a frame of reference, the Gondola project would have an exponential impact on temporary and permanent disturbances along the river. In addition, centuries-old acequia culture will be affected by both the quantity and quality of the Rio Hondo's flows. Beyond that, the Rio Hondo is a tributary to the Rio Grande within the Rio Grande del Norte National Monument.

Water Capacity

There is a significant need for water infrastructure upgrades. There was a failure in the entirety of the Village of Taos Ski Valley and Taos Ski Valley's water system during March 2023. Even a temporary loss of water impacts the community, including area workers at both resort and local businesses, homeowners and recreational visitors. Left unaddressed, the weaknesses in the system will likely be exacerbated, especially given the known and unforeseen consequences of climate change. New restaurants and hotels - such as the soon to be constructed St. Bernard Hotel - demand increased water use. Taos Ski Valley must commit to repair the water infrastructure and improve it to address the increased demand their Master Plan will cause.

Wilderness Access

The Kachina Basin area of Taos Ski Valley is a gateway to the Wheeler Peak Wilderness. The Wilderness Act of 1964 designates land "for the permanent good of the whole people," and that it be maintained "unimpaired for future use and enjoyment" of said wilderness. TSV's MP aims to "increase non-vehicular transportation between the Frontside and Kachina Basin base areas." However, they do not disclose how the road may or may not be restricted, which in turn could limit access to Wheeler Peak Wilderness. They do not have the right to do this.

New Restaurants

Taos Ski Valley already has the Phoenix, which was a restaurant and now is an exclusive for-hire event facility. Creating a new restaurant in the Chair 7 area disturbs a large swath of land and creates increased infrastructure and resource needs, in particular water and wastewater. Relocating the Whistlestop does more of the same.

Lifts

As a ski area, there is an obvious need to update ski lift infrastructure. Replacing lifts 2 and 8 is reasonable.

Nordic and Snowshoe Trails

This would provide a low-impact recreation opportunity for outdoor enjoyment, after an EIS proves they would not have a negative impact.

Alternatives to the Master Plan

1. Complete an EIS.
2. Repair and upgrade water infrastructure for the resort.
3. Replace Chair lifts 2 and 8.
4. Do not build a gondola. Explore alternative transportation, such as shuttles, to reduce traffic.
5. Reassess water tank and booster house after an EIS.
6. Reinstate the Phoenix as a restaurant.
7. Remodel or replace the Whistlestop at its current location.
8. Do not build a restaurant at Chair 7.
9. Build nordic and snowshoe trails after EIS approval.
10. Extend the Chair 4/Williams Lake connector trail after EIS approval.