

Data Submitted (UTC 11): 9/1/2026 1:54:34 PM

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Organization:

Title:

Comments: Dear Madam, dear Sir,

I am writing to submit formal comment in opposition to the proposed Ski Santa Fe Snowmaking Modernization Project as described in the Environmental Assessment (EA) currently open for public review. While I recognize the economic importance of Ski Santa Fe to the local community, I have serious concerns about the ecological costs of this proposal and believe the Forest Service should not approve it as currently designed.

1) The inalienable rights of wild animals

Above all, I ask the Forest Service to recognize what should be the central consideration in this decision: the wild animals who inhabit this mountain are sentient beings, capable of suffering, fear, and attachment to place, and that sentience grounds an inalienable right of their own - the right to a habitat left undisturbed by human expansion. Every additional acre of snowmaking infrastructure, every new pipeline corridor, every reshaped ski run pushed further up the mountain is another acre taken from creatures who have no voice in this process and no claim on this land other than the fact that it is, and has always been, their home. National Forest System land is not simply a resource bank for commercial recreation; it is habitat, and the animals who depend on it have a fundamental interest in its integrity that does not diminish because it is inconvenient to a ski area's business plan. A regulatory process built entirely around economic and recreational "purpose and need" statements, with wildlife treated as a secondary impact to be mitigated rather than a primary right to be respected, gets the moral order backwards. I urge the Forest Service to treat the preservation of undisturbed wild habitat not as one factor to be weighed against snowmaking capacity, but as the threshold question the project must answer before any expansion is permitted.

2) Water use in an increasingly water-scarce region

The construction of a new water tank and the expansion of snowmaking infrastructure will substantially increase water withdrawals in the upper Santa Fe River watershed. Northern New Mexico is already experiencing chronic drought, declining snowpack, and increasing competition for water among municipal, agricultural, and ecological users. Diverting additional water to artificial snow production - a use that is itself a response to warming winters and unreliable natural snowfall - runs directly counter to sound water stewardship in a basin under mounting climate stress. The EA should be required to disclose, in detail, the source, volume, and seasonal timing of the water to be withdrawn, and to fully analyze cumulative effects on downstream flows, municipal water supply, and instream flows needed to sustain aquatic and riparian habitat.

3) Impacts on national forest land and habitat

Expanding and extending snowmaking infrastructure "up the mountain," combined with terrain reconfiguration on the Sunrise Ski Run, will require ground disturbance, vegetation removal, and new permanent infrastructure within a National Forest System special use permit area. This area supports montane forest habitat that is already fragmented by existing ski development. The EA should fully evaluate impacts to soil stability, erosion, sensitive plant communities, and wildlife - including any threatened, endangered, or sensitive species and their habitat connectivity - rather than treating the project as a simple infrastructure upgrade within an already-developed footprint.

4) Climate context undermines the project's rationale

Investing in expanded snowmaking infrastructure to compensate for unreliable natural snow is a short-term response to a long-term problem. As regional temperatures continue to rise, snowmaking will require ever-greater water and energy inputs to produce diminishing returns, while further straining an already-limited water supply. Public land management decisions should not lock in decades of increased water and energy consumption to prop up a use that climate trends increasingly disfavor. The Forest Service should require a full accounting of the energy demand, greenhouse gas implications, and long-term water sustainability of the proposed system before approving it.

5) Inadequate consideration of alternatives

I am concerned that the EA does not appear to adequately analyze a reasonable range of alternatives, including a no-action alternative, a scaled-down snowmaking footprint, or water-efficiency measures that could reduce withdrawal volumes. The Forest Service has an obligation under the National Environmental Policy Act to seriously consider alternatives that would achieve the project's stated purpose with substantially less environmental impact.

6) Timing of the administrative review process

I also note the uncertainty created by the pending proposed amendment to 36 CFR § 218. Given that this project's administrative review process may shift depending on the timing of the final rule, I urge the Forest Service to ensure that the public is given full and fair opportunity - under whichever process ultimately applies - to object to and seek review of the final decision.

For the reasons above, I respectfully request that the Forest Service:

Deny approval of the project as proposed, or

Require a full Environmental Impact Statement rather than an Environmental Assessment, given the potential for significant cumulative water and habitat impacts, and

At minimum, require substantially more detailed disclosure and mitigation regarding water withdrawal volumes, habitat impacts, and climate-related energy and water demand before any decision is made.

Thank you for considering these comments as part of the public record for this project.

Yours sincerely,