

**To: Town of Taos, Armstrong Engineers, and Taos communities**  
**For: Oct 20, 2022, Regular AAB Meeting**  
**From: Report provided by AAB Members**  
**Subject to: Approval, Denial and/or Revision by the AAB**

**The objective of this report from the AAB is to communicate about the comments, questions, and concerns from Taos community members about the 2022 TAMP, to Armstrong Engineers and the Town of Taos. This report is an evaluation of TAMP-CDL, written comments, as well as questions, comments and concerns verbally communicated to AAB members.**

The AAB serves the Town of Taos and Taos Community members ONLY in an advisory capacity, and does not have the authority to approve, deny or revise the 2022 TAMP, any Airport projects, or funding.

**The Town of Taos Airport Advisory Board’s understanding of the Process for the potential approval, denial or revision of the 2022 TAMP – as stated and described in an AAB public meeting by Mayor Maestas is as follows:**

1. Release of the 2022 TAMP to the Public
2. Request Public comments Re: the TAMP
3. AAB provide a report to the Town and Armstrong Re: TAMP Public comments and make recommendations for Public Forums
4. Public Forums – TBA
5. 2<sup>nd</sup> Public Comment period with or without a potential survey after Public Forums -TBA
6. AAB compiles their recommendations based on public comments, 2022 TAMP related Public Forum presentations and information, and votes to send or not send their recommendations and the 2022 TAMP to the Mayor and Town Council – TBA
7. The **Mayor and Town Council** vote to approve, deny or revise the 2022 TAMP - TBA

**TAMP COMMENT DATA LOG REPORT – TAMP-CDL**  
**Data Entries from 7/9 – 9/12/2022**

<b>Description</b>	<b>Number</b>
Total number of <b>TAMP-Comment Data Log</b> Entries to: <a href="mailto:airportadvisoryboard@taosgov.com">airportadvisoryboard@taosgov.com</a>	368
For TAMP as written	34.5
Against TAMP as written	319
EIS or a need for a Supplemental EIS and or need to protect the environment	129
Concerns and Impact Complaints Re: Noise, Air, Light & Water pollution, and lack of adequate impact mitigation solutions and operations management. Also the need to prioritize environmental justice and transitional funding for climate change preparedness.	227
Other counted in the total w/o for or against are: second comments by same person, comments specific to Hangers and leases, Green corridor, NO TSV, comment to disqualify specific comments, historic background, put TAMP up for a vote	14.5
Additional comment info counted as 1 entry Against TAMP as written but substantiates the Election Campaign Survey listing the Airport as least important priority to Taos communities as 100+ participants in the Survey, See Town’s 3.23.2022 Survey: <a href="https://www.taosgov.com/DocumentCenter/View/3316/Taos-Comprehensive-Plan---Appendix-2022-03-23-PDF">https://www.taosgov.com/DocumentCenter/View/3316/Taos-Comprehensive-Plan---Appendix-2022-03-23-PDF</a>	

The majority of the Taos Community's comments indicate **disapproval** of the 2022 TAMP as it is written to increase Airport infrastructure and airport traffic. Community comments also indicate that the 2022 TAMP would like Taos Communities to approve and reward one of the largest industrial public infrastructures the Town owns, **without responsibility for the presently occurring and long-term mitigation of harmful aircraft impacts on the Taos Environment, Residents health, and Culture.**

### Part 1: Focusing and Clarifying TAMP information

**Due to the lack of community support for an increase in aircraft traffic that would support an increase in airport infrastructure; Armstrong Engineers, the Town of Taos, and TSVH need to substantiate, educate and/or revise the TAMP by providing the following information:**

- I. Bolded and noted in the TAMP-CDL: are TAMP cited and long letters. Answer the Specific questions, comments and concerns in the TAMP cited or long letters of comment. Armstrong **need note** that some of these comments were sent as attachments to comment emails and omitted from the Town's printing of these comments.
  - a. For Example: The letter from Taos Pueblo Environmental Program Manager Miguel Vigil. Long comment letters from Green, Kagel, and Luckey that may specifically cite and quote the TAMP, identify errors and/or omissions and Bain's comments that substantiate the work community members achieved in agreement to limit Taos Airport uses for military tactical training in Taos County, which is not included in the TAMP.
  - b. The Taos Community's perspective sees that the Airport currently has approx. 45 local pilots that include flight instruction and tourism and 2 Jets that primarily serve TSVH-Town partnership. Taos Communities question if it is more important to the Town of Taos to prioritize the financial and infrastructure subsidy interests of approx. 50 persons, over the Quality of Life of approximately 34,000 local residents, the Watershed, Sky and Ecosystem from which All Life thrives – and is a primary reason tourists visit?
- II. **9/22 AAB Meeting: The AAB unanimously voted for keeping comments open for Taos Pueblo. Ensure that Taos Pueblo comments and concerns are addressed. Read Attached:**
  - a) Taos Pueblo Governor Clyde M. Romero and War Chief Fred L. Romero, Working Paper 1. Working Paper1 lists 7 critical omissions in the TAMP, but the list is not an exhaustive list. Not all stipulations of the 2012 MOA have been implemented, **and quote "...ensure provisions stipulated in the MOA are being done before proceeding with improvements that will increase air traffic and the associated adverse effects on Taos Pueblo."**
  - b) Correspondence between Taos Pueblo and Senator Udall's office in 2014 regarding the 2012 MOA and proposed legislation.
  - c) Read the 2012 MOA (the Town of Taos has this in their records)
  - d) **Taos Pueblo Survey includes 5 Major Taos Pueblo Concerns and Pueblo Community comments clearly state opposition to all or any increase in commercial airport activity and expansion**, concerns regarding the lack of Environmental impact mitigation and protections in the TAMP and the potential need to update, revise or continue bringing the 2012 MOA and potential legislation current by working with Taos Pueblo. Taos Pueblo Environmental Program Manager Miguel Vigil, specifically states that the 2012 MOA between Taos Pueblo and all parties was applicable to the 2012 runway project not future projects.

<b>Read full text of Taos Pueblo Survey, Five Concerns are summarized herein as:</b>
2012 EIS is outdated and needs updated information for a 2022 TAMP
2012 MOA noise monitoring systems are now outdated
No Environmental Protections and Pollution Mitigation Plan is in the 2022 TAMP
the 2022 TAMP has No Plan for Air & Water Pollution contaminating the Aquifer from airport operations, chemicals used for de-icing, potential Fuel Spills etc
2022 TAMP EIS focused on current operations not impacts from Part 121, 135 [nor 139]

- III. **Substantiate in writing from the EPA if the FEIS being used for the 2022 TAMP:**
- a. Identifies and shows Taos Pueblo lands and the High Flight Impact Corridor(s) on a map.
  - b. What criteria would trigger the need for a supplemental EIS?
- IV. **Substantiate in writing from the FAA: True or False? Is any AMP *required* to include increasing infrastructure development of an airport for the purpose of inviting and encouraging increased private, commercial and military uses *to continue* to receive FAA and/or State subsidy funding?**
- V. **Proposed TAMP Public Forum Booths:**
- Taos community member’s verbal communications to AAB members have stated: **Taos locals require that their specific questions and concerns are answered, and the Public Forums are not a PR event.** Some Taos community members are opposed to break out booths and prefer all experts and official representatives are present to provide information and answer questions.
- Both written TAMP comments and verbal comments indicate the Taos Community needs information in the following key focus areas:
- 1. Infrastructure**
  - 2. Economic Impacts: Town Airport Partnerships, Jobs and Revenues,**
  - 3. Environmental Impact Mitigation, and**
  - 4. Vital Emergency Services**
- Can the Armstrong public forums begin with a presentation summarizing the TAMP based on current demand and realistic projected growth?
  - The TAMP summary should reflect the owner \* of the airport's current positions and expectations relevant to airport expansion. \* Mayor, Councilors and Town Manager.
  - Will all proposed information categories be included in the Public Forums and include representatives from Armstrong, Taos Pueblo, the Town of Taos, and the AAB?
  - Will the mayor and town council members be available for questioning at the public forums?
  - Will a complete binder be available at the Armstrong public forum so community members can identify the date and content of their submitted input?
  - Will a Survey log for the public be developed and made available, specific to each information category or a general all-purpose one?

**Part 2 - Proposed Public Forum key focus areas:**

**1.TAMP Infrastructure:**

- Can the 2022-TAMP be approved by the FAA incrementally?
- Could a 5-year plan be approved based on current demand at the airport?

- Could a maintenance plan for current infrastructure be a 20-year plan?
- Because there is no current demand for a regional carrier, can the TAMP include a projected build-out of hangers which would encompass all corporate, private and general aviation aircraft presently on the hanger waiting list?
- Because there are presently other airport terminals in the US under the 10,000 sq ft plot plan will the TAMP include an assurance the present preferred terminal design will not include TSA, baggage screening, and terminal building additions at a later date?

**Include answering Public Comments, Questions & Concerns with clarifications and descriptions of:**

**Option 1: What are the current infrastructure assets? What will remain?**

**What condition are the assets in? What is the life span of a hanger?**

Maintain current infrastructure for Emergency Services. Depending on ability to financially sustain itself without increasing impacts on communities, maintain or eliminate current limited commercial services and local pilot use. What projects are currently being done? Are current projects only for maintenance or is it providing infrastructure for Option 2?

**Option 2: Future airport assets or airport facilities to be constructed.** Increase in Infrastructure to accommodate what types of aircraft? number of hangers? increase in commercial services and projected revenue analysis Town would accrue by this investment with FAA, State subsidy grants and Town/TSVH/County subsidy funding. What would Armstrong consider an exceptional projected air fleet mix from the perspective of noise and pollution based on current demand and 5-year projected growth?

**Option 3:** Same info as 2 and what infrastructure does Taos Airport need to build for a 139 \* approval? For example: Water and sewer, on premise Fire Station, fencing, land acquisition? **Can the TAMP be approved by the FAA without including the infrastructure build out for a 121, 135 and 139 ?**

**Re: 9/27 Town Council mtg comment that Airport Projects & Plan have already been grandfathered in by the 2022 administration and therefore does not need any recommendation from the AAB.** Clarify what Infrastructure, pending contracts and MOAs that are part of or not included in the TAMP and are and are not grandfathered in by the current administration, to diffuse confusion or the perception that public concerns about the 2022 TAMP are being incrementally approved, despite public objection to airport expansion. Such as:

- a. Terminal Bldg., New Hangers and Parking Apron: Public articles reported Town received anywhere from 4M to 12.8 M? from the State, FAA? Just clarify in writing for public record.
- b. Is the New Terminal replacing the old terminal, and what will happen to the old terminal bldg.?
- c. – How many current hangers, how many new hanger(s) are being built and who are they for?
- d. Has the Town of Taos and TSVH MOA TT-19-85 et al and has ii. Noise and other environmental analysis in accordance with the EPA been grandfathered, updated or amended? What analysis has been performed between 2015 and 2022? By whom? Provide the documentation and analysis.

e. Re: Town of Taos and TSVH MOA TT-19-193. Community members have been told that the terminal bldg. used by Taos Air is owned by TSVH, however this agreement states the Town owns the building. Was the Town Taos Air terminal building sold to TSVH? When?

This agreement also states the terms of Marketing agreements – if there has been an amendment to this agreement or a new one, the Taos community wants to know due to public meetings for recent increase in Marketing subsidy requests and allocations by the Town and County to or for Taos Air marketing purposes.

Has the current administration grandfathered, amended or changed TT-19-193?

f. Has the 2010 Town Resolution 10-49 been grandfathered, amended or updated? When?

g. Has the current administration grandfathered or initiated any annexation, or purchase plans, contracts or agreements between El Prado Water and Sanitation district, investors and/or landowners for Airport Terminal water and sewer, and a Fire Station located near or adjacent to the current Airport property? Would bringing water to the Airport ALSO prioritize sewer for decreasing septic contamination in El Prado area neighborhoods and still allow these neighborhoods to keep their water rights for home and agricultural purposes? Is the Plan to build a Fire Station and training center near the Airport, so that in the future it can be annexed or purchased into the Airport lands to reach a designation 139?

**2.Economic Impacts: Town and TSVH Taos Air partnership:** Many community members do not know how airports **make revenues, are financed and funded**. Taos Air has said it is not making a profit. Explain financial subsidies and infrastructure that Taos Air and Taos Airport need for the Town and TSVH's Taos Air to break even. How many flights per day, per week, annually to break even with 25-30 passengers? Can Taos Air substantiate it has passenger waiting lists and needs to increase travel days per week, month, year? Are flight tickets priced without needing to be subsidized by the FAA, Town or County?

For Example:

From the FAA: "While the income from the FAA and state is substantial it doesn't begin to pay for the total cost of running the airport. **The rest of the funding comes from revenue that the airport generates itself [ and/or local GRT?]**. This includes income from fees and rents charged to airlines, restaurants, [**hanger leases?**] rental car companies, gift shops, etc. Airports generate revenue from **landing fees and terminal leases**, concessions (e.g., parking fees), **departure taxes and passenger facility charges**, and other sources (e.g., advertising and fuel sales).

**Airports and Airlines are heavily subsidized by the US Fed and State govts.** The IRS describes Airport taxes to fund construction, maintenance & administration as "user fees" that do not flow back to the general treasury."

- **Does a new Terminal Building vs the old building give the Town of Taos more authority over operations and management? Yes, No and why?**
- **Does a new Terminal Building and Hanger (s) vs the old buildings provide more revenues to the Town of Taos? Yes, no, and why?**
- **Economic Impact – explain how the TAMP is going to help the Town of Taos and the county with jobs, revenue, etc.? What are those jobs?**
- **Under what provisions and circumstances could a charter air service fly directly to an international airport?**
- **Under what provisions and circumstances could a private or corporate jet fly directly to an international airport?**

### **3.Environmental Impact Mitigation – provide information about:**

- \* Can a noise mitigation plan be developed using designated flight paths and headings over least populated areas around the airport?
- \* Has a land compatibility map been developed showing the least impacted populated areas near the airport?
- \* Has the FAA completed their 24-hour noise contour DNL average study? And during peak aircraft activity? DNL is the Day-Night Average Sound Level. DNL is a **metric that reflects a person's cumulative exposure to sound over a 24-hour period.**
- \* What conditions would trigger an Environmental Impact Study Re-Evaluation?
- \* Will the Town of Taos and the FAA mitigate noise, air, beacon light, UFP pollution and implement pollution, no-fly and no-low-fly reporting processes for both Taos Pueblo and County?
- \* Will the Town of Taos provide a proposed long term Operations Pollution Mitigation Management Plan and include potential jobs and airport funding that would be needed for mitigation for Taos Pueblo, Blue Lake Wilderness Area, Taos Pueblo Rio Grande Track A, the Rio Grande, Identified High Impact flight corridors, Rio Grande del Norte National Monument and the proposed historic protection of Las Comunidades del Valle de los Ranchos?
- \* What are the limitations of what the owner of the airport can include in the TAMP to help alleviate some of the environmental concerns of the community?
- \* Are there current negotiations between FAA, Taos Pueblo and Town of Taos regarding proposed flight path changes?
- \* Invite or include an IAD zoom presentation about the 2022 ALL Pueblo No-Fly No-Low Fly MOA to explain how this MOA and it's reporting process is relevant or irrelevant to Taos Airport operations, management and the 2012 MOA
- \* Demonstrate how Free flight tracking apps could assist community members in identifying aircraft.

### **Substantiate in writing to clarify or correct varying or conflicting verbal statements by Town employees and are some reasons for the Town of Taos govt to state their position on Airport matters in the TAMP.**

Re: Noise Monitoring systems. The 2012 FAA, NMDOT, et all and Taos Pueblo MOA states: "A passive monitoring System ...to track flights over Taos Pueblo World Heritage site and Blue Lake Wilderness Area, and reporting of periodic radar data of overflights over Rio Grande Gorge in the Pueblo's Tract A area"

The Town received funding for the equipment and monitoring only for a 3-year period, from the FAA and NMDOT grants. At best this provided monitoring from 2012-2015 and a reporting process of violations for Taos Pueblo. Clarify Town of Taos employee statements:

- a. Town of Taos completed their 2.5-year requirement to perform any noise and aircraft violation monitoring
- b. The FAA is monitoring, but there is an additional year (to 2023?) to complete for a 5-year monitoring period and then there will be data results
- c. Monitors have been placed only at Angel Fire and Taos Airports to monitor Taos Pueblo protected airspace. How do monitors placed miles away from a protected location accurately determine noise impacts occurring *within* a protected area?
- d. The Town of Taos, has no responsibility for noise, low fly, no fly monitoring and pollution mitigation – flight path recommendations are only voluntary, nor does a

Municipal govt have a responsibility to work with Taos Pueblo on local, state and federal levels to achieve legislative protections.

**In the last 10 years:** has the Town developed a reporting process for County low fly and noise complaints? What is it? Has the Town of Taos and FAA worked with Taos Pueblo on impact mitigation and protection legislation? And does it include criteria for mitigation in local and/or non-resident hanger or parking and use agreements?

- If monitoring is taking place, will the data be averaged vs real time impact incident spikes?
- Weather caused noise increase spikes?
- Weather causes that sustain and keep aircraft and UFP pollution in Taos Valley?
- And, if airspace highways are like “public automobile highways” are there any consequences for driving without a muffler or an aircraft ID number which is like an auto license plate, while invading residential privacy, repeated and targeted low-fly over specific residents’ homes, neighborhoods, ag and livestock, in nature habitats or rafting on the Rio Grande?

#### **4. Emergency Services**

**Are medical aircraft services being proposed and considered by Holy Cross Hospital, Town of Taos and County?**

- a. Town and County community members report a remarkable sharp increase in Medivac services in 2021-2022. These flights are both small jet and helicopter. Some of the medivac jet flights come in from out of state. How do Town Airport revenues benefit? What additional Infrastructure may be necessary? Why is there now more dependance on medivac services vs hiring and keeping local medical professionals?
- b. It is substantiated that the most impacted by airport noise, air, and light pollution, are the most vulnerable to sleep disruption, increases in respiratory, cognitive, emotional and physical illnesses and the health care costs associated to pollution impacts. What portion of airport profits need to be set aside for impacted families?
- c. Are there unmet needs that Fire and Rescue Emergency Services have?

The AAB respectfully requests on behalf of all Taos Communities that this report be responded to verbally for the sight impaired, and in writing for the hearing impaired, to mitigate misunderstandings, misinformation and strive for transparency, a collective truth, and to achieve an equitable outcome that is relational with Grand Mother Earth, is symbiotic and just, and where the Indigenous Nation of Taos Pueblo and local communities may achieve responsible stewardship of the Sky with the understanding that when Grand Mother Earth is well, we her children and All Life are well.

Thank you for your sacred time and attention to these matters.