March 28, 2021

Crystal Powel, District Ranger

Sandia Ranger District

Cibola National Forest

Re: Proposed Sandia Peak Ski Area Mountain Coaster

Central New Mexico Audubon Society (CNMAS) offers the following input for your consideration when reviewing the proposal.

We are concerned about the proposed location and operation schedule of the Sandia Peak Ski Area Mountain Coaster. The location as planned near the upper tram terminal is located in spruce-fir habitat and is extremely close to the edge of the wilderness area. The proposed site falls within critical habitat for the Flammulated Owl (*Psiloscops flammeolus*), protected under the Migratory Bird Treaty Act, is listed as a Species of Conservation Concern by the New Mexico Avian Partners, and is listed on Appendix E of the Revised Land Management Plan – Cibola National Forest, Mountain Ranger Districts (page 255) as a Forest Service Region 3 Sensitive species. Given the habits of these owls and their reliance on auditory communications, we can assume negative effects on these birds’ breeding success in the proposed site.

Another raptor potentially impacted by the proposed location of the mountain coaster is the Northern Goshawk (*Accipiter gentilis*), also protected under the Migratory Bird Treaty Act, a USFS Region 3 Sensitive species, a BLM Sensitive species, a NM former Species of Greatest Conservation Need, and a USFWS Species of Concern (BISON search March 2021). The Cibola National Forest has been monitoring this species and identifying its nesting locations in the Sandia Mountains for several years. Last summer one of Central New Mexico Audubon Society's past board members observed a young Northern Goshawk on four different occasions in the vicinity of the proposed Mountain Coaster. These observations were reported to the Sandia Ranger District Wildlife Biologist. Her predecessor had been looking for a nest in this general location, but had not been able to find it. The presence of the mountain coaster would be very disruptive to the nesting of this species.

The mountain ridge tops and high elevation forests are also crucial breeding habitat for several migratory species, including Virginia’s warbler (*Leiothlypis virginiae*), MacGillivray’s warbler (*Geothlypis tolmiei*), and Yellow-rumped warbler (*Setophaga coronate*), Cordilleran flycatcher (*Empidonax occidentalis*) and Dusky flycatcher (*Empidonax oberholseri*), and are important stopovers for other species of concern during spring and fall migrations.

As community members of Albuquerque, we want to support and encourage projects that may boost local economic growth. As an alternative, we recommend siting the coaster near the base of the ski lifts, which would have fewer negative impacts on sensitive birds and habitats. The lower elevation base area is mixed conifer forest that has already suffered loss due to the tussock moth infestation, and therefore does not provide optimal nesting habitat.

While the window for construction has to take advantage of good weather, the months of April – September would have negative impacts on bird species. Mid-April through mid-July is the breeding period for most species and should be avoided if at all possible. Construction noise has been associated with declining bird densities, prompting concern that many species may be excluded from suitable habitat as a result of ecological sensitivities or intolerance to noise (Frances et al. 2009). A plethora of studies links noise alone to a reduction in nesting species richness, which ultimately leads to different avian communities. (Frances et al. 2009)

Understanding the migratory, breeding, and wintering behavior of birds is incredibly complicated. The scientific community is still only scratching the surface of understanding the interconnectedness of organisms in a region such as the Sandia Mountains. We know even less about the anthropogenic effects on these populations. It is imperative that the risks to the bird populations and the Sandia Mountain environment be measured through an **in-depth** environmental impact study before any construction or decision on the “Alpine Coaster” begins.

Birds mean business. More than 45 million Americans watch birds, according to a 2016 study by the US Fish and Wildlife Service. A 2012 New Mexico Audubon study found that bird-watching contributes over $500 million to the New Mexico economy each year. The Cornell Laboratory of Ornithology eBird database identifies 17 birding hotspots along the Sandia Crest Highway (NM 536) that attract birding tourists from around the world, including the ski area itself. Given the growing popularity of birding and its growing importance to the New Mexico economy, Central New Mexico Audubon would be pleased to work with Sandia Peak Ski and Tramway management on how to incorporate birding tourism into its recreational offerings in a way that will benefit the company, eco-tourists, and the birds.

In conclusion, CNMAS opposes the construction and operation of the Sandia Ski Area alpine coaster at the currently proposed location near the Tram Terminal and during sensitive species’ breeding season.

Thank you for your consideration of this information.

Cordially,

Perrianne Houghton,

President, Central New Mexico Audubon Society

**Literature Cited**

Francis, Clinton D., Ortega, Catherine P., Cruz, Alexander.2009. Noise Pollution Changes Avian Communities and Species Interactions. Current Biology. Volume 19, Issue 16, Pages 1415-1419.

Biota Information System of New Mexico (BISON) - [www.bison-m.org/booklet.aspx?SpeciesID=040610](http://www.bison-m.org/booklet.aspx?SpeciesID=040610) (last updated 6/2/2020)