

Your Community Voice in the Carson

Re: Draft E.A. for Taos Ski Valley
Gondola and Other Improvements



James Duran - Supervisor
c/o Paul Schilke - Winter Sports Coordinator
Carson National Forest -
Quartz Ranger District
PO Box 110
Quartz, N.M. 87556

Carson Forest Watch

Box 15 Llano, NM • 87543 •
(505) 587-2848

on behalf of Carson Forest Watch, the following are
comments for the Draft E.A. for Taos Ski Valley Gondola
& other improvements:

- 1) The lack of range of alternatives, esp. an alternative that
does not propose a base to base gondola is a concern. The
Rationale that other alternatives would not meet the purpose
& need was not adequate.
- 2) Other alternatives that lessen the impact of any development
on the Rio Hondo and Spruce-fir habitat should have been
developed & analyzed.
- 3) The wildlife section does not adequately address impacts
of the proposed developments on species of concern that
were not included in the Final Species of Conservation
Concern Report (SCC) in the Forest Plan. This is a significant
failure in the wildlife report. Compliance with the Forest
Plan SCC list & Report does not excuse the Forest Service
from its responsibility under other laws and regulations. →

"We abuse land
because we
regard it as a
commodity
belonging to us.
When we see
land as a
community to
which we belong,
we will begin to
use it with love
and respect."

— Aldo Leopold

A Sand County
Alumnus

- 4) There are numerous wildlife species that depend upon Spruce-fir habitat & alpine habitat that are New Mexico State-listed Threatened or Endangered, OR are of conservation concern and considered "impaired" in New Mexico, including The U.N.M. Heritage Program.
- 5) There is no rationale given for the failure of the Wildlife Section or Biological Assessment to discuss the effects of this project upon species such as pine marten, willow Ptarmigan, Pika, Boreal Owl, Canada Lynx, and many other species dependent on Spruce-fir & alpine ecosystems.
- 6) Just because the Carson failed to include these species in their final S.C.C. Report or Forest Plan, does not excuse the agency from protecting these species or their habitat. The Forest Plan is not the only legal authority that addresses or manages for wildlife and numerous other regulations & guidelines require the Forest Service to protect & manage for wildlife and insure its actions will not threaten the viability of these species or their forest habitat.
- 7) The TACS Silv Valley and adjacent Spruce-fir forest contain some of the ~~only~~ ^{only} documented pine marten remaining in New Mexico and surveys have verified this. The N.M. Dept. of Game & Fish has also conducted surveys & documented Ptarmigan within the TSV area, and again - this area contains one of only a few known populations of TACS species in New Mexico & the Southern Sangre de Cristo Range.
- 8) The failure to analyze impacts of this development on these species violates several Forest Service regulations and must be corrected. The developments being proposed at TSV are likely to threaten the remaining population of pine marten & Ptarmigan, both directly and indirectly. Loss of habitat, human disturbance, noise, fragmentation, etc. from the development at TSV, both short term and long term threatens the survival of these animals.
-

9) There needs to be a new wildlife section prepared for the TSV Development Plan and address the full impacts from the proposed gondola & other "improvements" upon all wildlife that depends on Spruce-Fir and Alpine habitat.

10) The other major flaw in the Draft E.A. concerns Cumulative Impacts. The Cumulative Effects analysis improperly narrows its focus to only the area of TSV that is included in a development proposal. This violates the CFR Regulations guiding how

The agency addresses Cumulative Effects. In addition to the Special Use Permit area of TSV - The Forest Service must look cumulatively at adjacent forest areas, especially the Wheeler Peak & Columbine-Hondo wilderness areas. That is the whole purpose of a Cumulative effects analysis under NEPA.

11) The Draft E.A. for this project is legally required to disclose how the proposed developments & habitat impacts & disturbance, degradation & fragmentation will affect adjacent areas of Carson Forest, not only the small area that was looked at in the Draft E.A. for TSV.

12) By taking such a narrow view, the Forest Service avoids disclosure of the true effect of this project upon all forest resources, esp. Resources of concern, such as the Rio Hondo watershed, the wilderness areas, wildlife of concern such as pine marten & Ptarmigan, etc., etc.

13) The Forest Service must prepare a new Cumulative Effects Analysis to comply with NEPA and fully analyze the impacts & effects of the developments being proposed at TSV beyond only the trails & gondola & lifts, etc. being proposed.

14) We failed to find a legal Rationale for BOTH the Wildlife Section and the Cumulative Effects Section not addressing adequately the impacts of the Proposed developments OR taking the Required "hard look" that NEPA requires upon forest resources from the effects of these developments & loss of habitat.

15) Please address the above issues and Remedy these violations of NEPA by withdrawing the Draft E.A. and preparing adequate Wildlife and Cumulative Effects Analyses.

Thank you,
Sincerely,

Joanne Berke
for Carson Forest Watch

Please note that The Designation in the ²⁰²² Forest Plan as a Winter and Summer Resort Management Area does not excuse the Forest Service from compliance with NEPA and fully addressing the impacts from this proposal upon all forest Resources affected by this Project.

*S. Beede for
Alison Townsend*

10.00010
Limo, NM 87540

RECEIVED
QUESTA RANGER DISTRICT

District Ranger
Assist. FMO
Wildlife Staff
Resource Assit.

Range Staff
Rec. Staff
BMA File
Customer Svs. Rep.

Attn: Paul Schalle

87556-011010



*Janees Dugan - Supervisor
of Paul Schalle - Winter Sports Coordinator
Queta Ranger District
PO Box 110
Queta, N.M. 87556*

ALBUQUERQUE NM 870
6 APR 2023 PM 3 L

