

Prince William Sound Audubon Society

April 10, 2021

Re: Cordova Guided Heli-Ski Project

To: Cordova Ranger District, Chugach National Forest

I am writing to you on behalf of the Prince William Sound Audubon Society, an organization for which I currently serve as President. Prince William Sound Audubon Society is based in Cordova and represents a membership from Cordova, Valdez, and Whittier. Both our mission and Audubon Alaska's mission are to conserve Alaska's natural ecosystems focusing on birds, other wildlife, and their habitats for the benefit and enjoyment of current and future generations.

We have reviewed the scoping document for Cordova Guided Helicopter Skiing Project. We are concerned that much of the proposed area overlaps with the special 501(b) Copper River Delta Geographic Area of the Chugach National Forest that ANILCA legally directs the Forest Service to administer and manage for the conservation of fish and wildlife species and their habitat. In particular, we are concerned with disturbance to wildlife populations that will occur with the proposed flight path to the permit area that would go from the City of Cordova Airport, over Eyak Lake and through the "gap", to the Copper River Highway (an officially designated U.S. Scenic Byway), and in and around the Scott and Sheridan River Valleys on the north side of the Highway (areas 10, 11, and 12 on the scoping document map).

For example, Eyak Lake, especially the southeast side of Eyak Lake at Cordova's "gap" is an important wildlife area for Trumpeter Swans and other waterfowl throughout winter until the wetlands on the Delta melt – which may not occur until mid to late April. In addition, when migrating through the Copper River Delta, Sandhill Cranes migrate along the southern face of the Chugach Mountains during April and May. We are also concerned that helicopter flight noise and groups of skiers will disrupt wildlife that is foraging, resting and in some species hibernating. For example, a peer-reviewed study by the Alaska Department of Fish and Game (Crupi, Gregovich & White 2020) documented evidence of late season den abandonment by brown bears in southeast Alaska due to disturbance from helicopter skiing.

Areas 10, 11, and 12 that border the Copper River Highway provide local residents with their primary access to recreational and wildlife viewing opportunities throughout the year. The noise from helicopter flights and groups of skiers over the proposed 5 month period (December through April) each year would severely impact the both the quality and quantity of both recreational and wildlife viewing opportunities. Given the importance of these areas for wildlife, Prince William Sound Audubon Society would request that the Forest Service not expand the flight path for helicopter skiing, but instead keep the existing helicopter flight path from Orca Lodge to Nelson Bay and the Rude River drainage as it does not impact the areas 10, 11, and most of area 12. We also request that the Forest Service only consider for potential helicopter skiing areas the Tasnuna River drainage and those areas currently in use. Finally, we request that the proposed use season be shortened to February and March to mitigate impacts to wildlife.

We appreciate the opportunity to provide our comments.

Sincerely yours,



Mary Anne Bishop, Ph.D.
President, Prince William Sound Audubon Society

For the birds