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August 22, 2021

Steve Namitz, District Ranger
Cordova Ranger District
P.O. Box 280, 612 Second St.
Cordova, AK 99574

Re: Cordova Ranger District Guided Helicopter Skiing Draft Environmental
Assessment

Dear District Ranger Namitz,

Thank you for completing the draft environmental assessment for the Cordova Ranger District Guided Helicopter Skiing Project and thank you for considering some of the concerns that were raised in the initial scoping period. I appreciate the efforts of the local Forest Service to create this draft environmental assessment, but disagree with some of the findings and conclusions in the assessment. This draft environmental assessment omits several important impacts of the proposed project, and wrongfully minimizes all of the studied impacts. A thorough revision of the environmental assessment is necessary and must take into account the following:

1.) Omission of the impact of helicopter noise on local residences:

40 CFR §1508.1(1) states that environmental effects include aesthetic, social and health effects on the human environment. The proposed permitting of up to 2900 client days of helicopter flights from three selected businesses using the Cordova Municipal Airport as a staging area for take off and landing has the potential to create substantial helicopter flight noise for over 200 local residences in the City of Cordova, particularly along Lake Avenue, Le Fevre, Power Creek Road and the Copper River Highway. This impact cannot simply be ignored in the environmental assessment.

Furthermore, the project map included in the environmental assessment incorrectly shows the Cordova Municipal Airport at Mile 13 Copper River Highway, which is the location of "Mudhole" Smith Airport. This error on the map makes the flight paths appear to avoid densely populated areas around the head of Lake Eyak. The map needs to be edited to accurately show the location of the staging area and the flight paths that would create significant noise disturbance to local residences. The final environmental assessment must consider this issue.

2.) Finding of “no cumulative effects” and “minor effects” to denning brown bears and wolverines:

The increasing popularity of motorized “snow bikes” for wintertime recreation has entirely changed the map of what is accessible to motorized vehicles in the winter. Much of zones 10, 11 and 12 is now accessible to fast and loud motorized traffic. Snow bike tracks can be seen all the way to the peaks of mountains in these zones. The finding in the report that brown bear and wolverine dens are “outside of most human activity areas” is therefore incorrect, particularly for zones 10, 11 and 12. Cumulative effects to denning brown bears and wolverines from both helicopter and motorized “snow bike” disturbance must be considered.

Also, because the helicopters used for heli-skiing have limited seating and ski-storage available, heli-ski businesses rely on multiple back and forth flights to the same areas in order to shuttle their clients up the mountain. It is therefore reasonable to assume that should a brown bear or wolverine den be located within the flight path of a heli-ski operation, it will be flown over *repeatedly*. Once a brown bear or wolverine has established its wintertime den it can no longer move and the effects of repeated disturbance from helicopter noise will become cumulative. The limited availability of scientific research on the cumulative effect of aircraft noise on denning animals cannot be used as a reason to minimize this impact.

The environmental assessment on page 18 states that for both brown bears and wolverines, helicopter noise can cause significantly increased stress levels, including “stress that could lead to den abandonment, displacement, disruption to foraging or traveling patterns, and overall demographic changes”. Reliance on adaptive management strategies for protecting these two species is insufficient since dens are very difficult to spot from the air. Consistent with the facts outlined in the environmental assessment, the level of the effects on brown bears and wolverines therefore must be raised higher than “minor”.

3.) Finding of “no cumulative effects”, and “minor effects” on mountain goats:

As explained in point 2, there is increasing pressure on mountain goats from motorized recreation and it cannot be assumed that there are no cumulative effects. The conclusion of “minor effects” relies mostly on helicopter flight altitude as a mitigation measure, which is both unreliable and unrealistic.

The draft environmental assessment unequivocally finds that mountain goats are very sensitive to helicopter disturbance. The chosen mitigation method therefore is to create goat habitat exclusion areas and maintain helicopter flights at more than 1500ft above those areas, which in some places would require flying at over 3000 ft altitude.

This method is flawed because it relies on the goodwill of the pilots to fly at altitudes that will require longer flight times, more fuel, greater exposure to icing and potential limited visibility from clouds. It is in the best interest of the pilots and the heli-ski operations that employ them, to shuttle their clients as rapidly and safely to the skiing areas as possible. This will put continuing pressure on helicopters to fly

closer to mountain goat habitat than 1500 ft and enforcement of flight altitude violations will be nearly impossible.

Therefore, a realistic assessment of the impact of helicopter flights over goat habitat would conclude that at least part of the time, helicopters will be flying within 1500 ft. For this reason, the impact must be classified as greater than "minor".

4.) Impacts on backcountry users from funneling helicopter flights through the Scott River and Sheridan River valleys:

Both alternatives 1 and 2 rely on helicopter flight paths through the Scott River and Sheridan River drainages. These are *heavily* used areas for local backcountry users, particularly the area around Sheridan glacier. The draft environmental assessment's assertion that "any effects from helicopter activities specifically in these concentrated winter recreation areas are expected to be temporary and intermittent" (p.23), is simply not true. As stated earlier, the helicopters used by heli-ski operations can only seat a limited number of clients and therefore will need to conduct repeated flights to the same areas. The best days for flying heli-ski clients will also be the best days for winter recreation by local residents.

Good winter weather is rare in Cordova and many residents recreate outside regardless of what day of the week it is. A large part of the town is self employed, and others will actively change their work schedules to make it outside on choice sunny days. Therefore, limiting helicopter flights to week days only is not a viable mitigation method. In some winters, good opportunities for winter recreation are limited to a handful of days. Therefore, the draft environmental assessment's statement that "opportunities for solitude and isolation will be available when heli-ski operations are not occurring" will sound cynical to many residents of Cordova.

Conclusion:

All four points raised in this comment demonstrate that the draft environmental assessment wrongfully minimizes the environmental impacts of the proposed project. By omitting direct and cumulative effects, as well as labeling effects as "minor", which most careful observers would classify as "moderate" or even "high", the report repeatedly downplays the environmental impact of the project. Furthermore, mislabeling of airports on the map create a more benign appearance of the proposed flight activities. A careful revision of this report is necessary to satisfy the requirements of the NEPA process.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Carrel", with a long, sweeping horizontal line extending to the right.

Marc Carrel

8/22/21