

Prince William Sound Audubon Society

August 22, 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 Cordova Ranger District Guided Helicopter Skiing Draft Environmental Assessment (EA). Prince William Sound Audubon Society finds that **Alternative Two, with the addition of our recommended modifications, is the preferred alternative.**

Below we outline our concerns about some of the document's findings as well as our concerns specific to Alternative Two. We also provide our suggested modifications to Alternative Two.

Concerns and suggested modifications:

Effects to Wildlife

- Mountain Goat Wintering Habitat. This draft EA includes identifying Goat Avoidance Areas where heli-ski activities would not be authorized. As part of the Adaptive Management Approach, some mountain goat winter habitat areas previously identified during 2003-2009 winter surveys will be permitted for skiing but will be surveyed and potentially included as goat avoidance areas in the future should aerial surveys determine these areas should be designated part of the Goat Avoidance Area.

Prince William Sound Audubon believes that this is a backwards approach and unjustifiably puts the burden of proof on the mountain goats instead of the heli-ski operations! **Prince William Sound Audubon recommends that mountain goat wintering areas identified during the 2003-2009 surveys and shown as "Priority Survey Areas" be designated Goat Avoidance Areas until surveys show that they are not important winter habitat areas and that heli-skiing would be an acceptable use.**

- Brown Bear Denning. Page 14 of the draft EA states that, "On the Cordova Ranger District, **brown bear dens have not been recorded to date**", yet in the EA Determination section that follows it states that, "Bear dens are located outside of most human activity areas and thus there will be no cumulative effects for this project..... the project will have **minor effects** on brown bears and their habitats for all alternatives based.

Prince William Sound Audubon is concerned that there is absolutely no field data on brown bear denning, and yet the draft EA declares without any proof that there will be no cumulative effects and/or there will be minor effects. A more realistic assessment should be provided.

For the birds.....

- Other Wildlife Species. There is no documentation provided to justify the statement on page 10 that, “Alternatives 1 and 2 were determined to have negligible effects on the remaining species” – which included bald eagle, peregrine falcon, goshawk, osprey, trumpeter swan, seabird rookeries and migratory birds.”

Prince William Sound recommends that Eyak Lake should be off-limits for all guided helicopter skiing traffic. Eyak Lake, especially the southeast end of Eyak Lake at Cordova’s “gap” is an important wildlife area as well as a popular public wildlife viewing area throughout winter. This area is critical wintering habitat for several hundred Trumpeter Swans as well as other waterfowl until the wetlands on the Delta melt – which may not occur until mid to late April. In addition, PWS Audubon recommends that the timing of Sandhill Crane migration be taken into when issuing the permit. Sandhill Cranes migrating through the Copper River Delta migrate along the southern face of the Chugach Mountains during April and May.

Noise Disturbance & Noise Pollution

- Proposed Flight Paths shown on draft EA maps: PWS Audubon believes that that the proposed flight path from Orca Lodge over the lake and down the Copper River Highway is unnecessary, will NOT minimize disturbance to city residents, and goes against various statements throughout the draft EA. Specifically, page 26 of the Draft EA states, “To the extent possible, limit and consolidate flight operations to minimize the extent and duration of the effects during heli-ski activities.” Similarly, Appendix B on Special Use Permit Stipulations on page B-2 states, “Flight paths shall avoid flying directly over the city of Cordova, residential areas, or Power Creek Winter Recreation Area.Standard flight paths from City of Cordova Airport are over the lake and through the “gap” at the east end of the lake, to minimize disturbance to the City of Cordova and residential areas.”

Prince William Sound Audubon recommends modifying the flight paths so that there are two allowed flight paths, neither of which fly over Lake Eyak, “the gap” nor down the Copper River Highway from the Eyak River Bridge to the M. “Mudhole” Smith Airport. Cordovans have lived with a heli-ski operation for 20 years and have hardly been aware of its presence because of its location at the end of the Orca Road and flight paths heading to the north. And importantly, Eyak Lake is an important winter recreation area for non-motorized sports including cross-country skiing, ice skaters, snow shoeing, people walking and running along Power Creek Road, and the wildlife viewing at the “gap”.

We recommend the relative absence of helicopter noise in and around town and residential areas be continued by preserving the existing flight path for helicopters flying from Orca Lodge to Nelson Bay and the Rude River drainage and from there the path can continue to permitted lands to the east so that the flight path does not impact the areas 10, 11, and most of area 12 and totally avoids Eyak Lake area. We recommend a second flight path for helicopters flying from the M. “Mudhole” Smith Airport at Mile 13 that goes north to the proposed Alternative Two heliskiing areas and avoids following the highway and totally avoids Eyak Lake.

These two recommended flight paths are more direct, minimize disturbance to both Cordova residents and other recreationalists on the Delta, and avoid impacting both wintering waterfowl and public wildlife viewing in the “gap” area. These flight paths also minimize noise pollution to the many local Cordovans that regularly drive the Copper River Highway (**an officially designated U.S. Scenic Byway**) for both wildlife viewing and the various other recreational opportunities.

Finally, we would like to point out that **all the maps in the assessment have incorrectly labeled the airport**. Specifically, the state-owned, Merle “Mudhole” Smith Airport is incorrectly labeled as the “Cordova Municipal Airport”. Instead, the “Cordova Municipal Airport” (state-owned) is situated on the far west end of Eyak Lake. Please correct the maps throughout the assessment.

We want to emphasize to you that we are a local, grass-roots organization. We are very much concerned over the future direction of Forest Service management of Heli-skiing on the Cordova Ranger District of the Chugach National Forest, and we urge you to incorporate our proposed revisions and recommendations.

Thank you very much for the opportunity to submit our comments for the draft environmental assessment. We appreciate the hard work of the Forest Service in making this a public process.

Respectfully,

A handwritten signature in cursive script that reads "Mary Anne Bishop". The ink is dark and the signature is fluid, with a large initial 'M' and 'A'.

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