

Tania Harrison
P.O. Box 931
Cordova, AK 99574
907-205-7802

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 the opportunity to comment on the draft environmental assessment for the Cordova Ranger District Guided Helicopter Skiing Project. The draft environmental assessment minimizes the impacts and does not adequately consider several key elements, chiefly noise disturbance, effects on wildlife, and conflicts with back-country users.

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. 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. If this is to be the loading zone, then the proposal should be changed to ensure that helicopters are restricted to only using Orca or Mudhole Smith Airport.

Due to the terrain in the proposed heli-area, little is known about the exact locations of bear or wolverine dens. 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. Cumulative effects to denning brown bears and wolverines from both helicopter and motorized "snow bike" disturbance must be considered. Heli-ski businesses do multiple flights per day shuttling clients. 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.

Additionally, 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”.

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. 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. Therefore, the draft environmental assessment’s statement that “opportunities for solitude and isolation will be available when heli-ski operations are not occurring” is not true. Additionally, the safety of back-country users was not adequately addressed. A large group of heli-skiers descending a slope could be extremely hazardous to a person skinning up, unaware. There are no sound mitigation measures in place to ensure the safety of backcountry users.

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 and the effects on local residents. A careful revision of this report is necessary to satisfy the requirements of the NEPA process.

Sincerely,

A handwritten signature in black ink that reads "Tania Harrison". The script is fluid and cursive, with a large initial 'T' and a long, sweeping underline.

Tania Harrison