



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION  
Cordova Office

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April 12, 2021

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

Sent via email: [cnfheli@usda.gov](mailto:cnfheli@usda.gov)

Attn.: Comments regarding Cordova Ranger District Guided Helicopter Skiing Project

Dear Mr. Namitz,

The Alaska Department of Fish and Game (ADF&G) reviewed the scoping notice prepared by the Forest Service (Service) for the Cordova Ranger District Guided Helicopter Skiing Project and appreciates the opportunity to offer comments and provide support of preparation of the Service's Environmental Assessment (EA). We understand that the project proposes to issue special use permits for guided helicopter skiing (heli-skiing) activities over 590,000 acres of land in the Chugach Mountain Range, within the Cordova Ranger District. We appreciate the Service's stipulations requiring helicopters in flight maintain a 1,500-foot minimum vertical distance and a ½ mile minimum landing distance from all observed wildlife.

ADF&G requests that the EA include a statement fully recognizing ADF&G's authority to manage fish and wildlife on all lands in Alaska regardless of ownership, unless specifically superseded by federal law and how that management overlays with the Service's land management responsibilities. We also request the EA include a commitment to cooperate as outlined in the Master Memorandum of Understanding between the Service and ADF&G.

While helicopter-based tourism (primarily heli-skiing) can provide a sustainable and renewable economic opportunity of a public resource, the Service must thoroughly consider its potential impacts. We believe previous approaches to analyzing goat habitat were inadequate for permitting needs. Although heli-skiing can occur in areas that overlap bear (*Ursus americanus* and *Ursus arctos*) denning habitat, impacts on and interactions with bears are typically rare during the timeline of interest. Mountain goats (*Oreamnos americanus*) however, are often present in areas pursued for heli-skiing and concerns about the influences recreational helicopter supported activities may have on goat populations have been expressed in public comments on this project as well as in other areas of the State.

The following comments rely on the guidelines of the Northern Wild Sheep and Goat Council (NWSGC) Position Statement on Commercial and Recreational Disturbance of Mountain Goats: Recommendations for Management. These recommendations are vetted by goat and sheep biologists from all over North America that study the species intensively. It is our professional assessment this information serves as the best source of information for best practices.

We appreciate that the Scoping Notice includes an objective to identify and document important mountain goat winter habitat. We concur it is important to understand potential negative effects heli-skiing can have on mountain goats. Mountain goats are an important species to the ecosystem and the people that reside in Game Management Unit 6. They have also been identified in the State's Prince William Sound Land Management Plan as an important species. They are the only native ungulate in the area and were historically used for food, clothing, and tools. The proposed expanded permitting area includes the three most important goat hunting areas for residents of Unit 6 (RG230, RG231, and RG232). These areas are also accessed by a wide variety of users for many purposes on and off trails, many who value the opportunity to see goats while doing so.

It will be important for the EA to detail how the winter habitat data will be collected and used to inform permitting and management decisions. We recommend a monitoring program be developed to collect data with sufficient resolution to guide future actions. While there are areas that are important primarily to goats and others primarily to humans, the areas that are important to both are of greatest interest to the management of both the wildlife and the user activity. Focusing research on these areas will greatly reduce the scope of research and therefore its cost. To identify these areas, goat surveys or collaring studies should focus on areas with high anticipated use and disregard those that are not anticipated to be utilized. NWSGC recommends human activity be managed to limit negative user group-goat interactions in winter range areas and spring kidding areas and prescribes a 1.5-2km distance from these areas. The NWSGC recommends the following guidelines:

"Monitoring and assessment of mountain goat demography, including population abundance, composition and distribution, at appropriate spatial and temporal scales is critical and represents an important pre-condition for all permitted disturbance-related activities. Rigorous sampling designs, including monitoring areas pre- and post-activity with spatial control areas when possible, should be implemented. Monitoring programs should also include collecting relevant ecological covariate data to improve inference and ensure assessment of disturbance effects are not confounded by other factors."

Studies have consistently documented short-term behavioral responses of goats to helicopters (Côté 1996, Frid 2003, Gordon 2003, Cadsand 2012, Goldstein et al. 2005, Côté et al. 2013). Documented responses to helicopters include reduced foraging, increased movement, increased energy expenditure, and spatial displacement (Foster and Rahe 1983, Côté 1996, Goldstein et al. 2005, Cadsand 2012, Côté et al. 2013, Richard and Côté 2016, White and Gregovich 2017). In addition to these overt stress responses, physiological impacts can be experienced, negatively affecting immune response and reproduction (MacArthur et al. 1982, Stemp 1983, Harlow et al. 1986, Chabot 1991, Downs et al. 2018, Dulude-de Broin et al. 2020). These studies indicate helicopters can negatively impact mountain goat survival. Of ultimate concern is whether any of these potential impacts could result in population declines. For these reasons, it is necessary to understand the potential as well as realized impacts of helicopter-based tourism on goat populations.

Areas that are important to mountain goats have not been delineated in Game Management Unit 6. ADF&G conducts aerial surveys of mountain goats in late summer to monitor populations and to set harvest quotas. From this work, we know that sightability can be poor even when color contrast is ideal and when goats are at higher elevations (summer range) where they are not concealed by timber. To date, the Service has only conducted surveys in winter consisting of minimum counts conducted without replicates or sightability

assessment. These surveys neither truly delineated winter habitat nor estimated the population. Late spring kidding areas have not been identified. Without identification, kidding areas would be devoid of appropriate protections and subject to deleterious effects of potential commercial activity. Mid-late May is assumed to be the kidding period, but some areas of British Columbia have documented kidding in late April (NWSGC 2020) indicating potential overlap with late winter early spring helicopter-based tourism that overlaps with active goat habitat. The NWSGC recommends mapping mountain goat habitat to identify appropriate exclusion zones with particular focus on winter range and kidding areas. These data could be acquired using GPS collars to address sightability, weather challenges, and aircraft limitations.

It is also important for the Service to identify areas of interest to heli-skiers. We recommend past use patterns be compiled and analyzed in the EA to anticipate areas of future use and include areas of high density use or proposed use. These areas could be identified using resource selection function analyses with validation from potential operators. The EA should address the cumulative effects of numerous operators and activities. These studies can provide the necessary data to actively manage tourism activities to reduce negative impacts on goat populations. For example, areas with low goat use could be managed for higher levels of tourism activity whereas critical high use goat habitat could be managed for little to no user activity.

We request the Service continue to work cooperatively with ADF&G to:

- Identify goat habitat and its level of importance;
- Evaluate commercial flight routes and distance guidelines that provide separation from sensitive goat areas where necessary; and
- Monitor helicopter activity and goat populations to gain additional understanding of the relationship between any disturbance caused by helicopters.

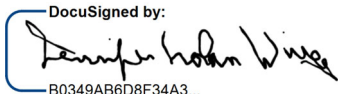
We also request that:

- The Service provide ADF&G copies of results of all monitoring information collected in regard to this project, as well as maps prepared to identify mountain goat habitat and exclusion zones, particularly winter range and kidding areas;
- State and private lands be identified in the EA, so the public can clearly see the land ownership patterns;
- The Service take steps to ensure reasonable management efforts to minimize user conflicts and confusion; and
- The Service include an analysis, prepared in accordance with ANILCA Section 810, evaluating the effects the project may have on subsistence uses and needs of both state and federally qualified subsistence users.

The State appreciates the opportunity to offer initial scoping comments for the Cordova Ranger District Guided Helicopter Skiing Project and the discussions your biologists have been having with our area staff. We cannot stress enough the importance of close and consistent coordination throughout all phases of the planning process in order to answer questions and facilitate resolution of issues as early as possible. With adequate planning, managers can provide opportunities for recreation while minimizing impacts on goat populations. ADFG is a natural partner for the collection of these data. Please continue to communicate about opportunities to collaborate and pool resources.

Should you have any questions or concerns, please feel free to contact me or Charlotte Westing, ADF&G Prince William Sound Area Wildlife Biologist (907-424-3215, [charlotte.westing@alaska.gov](mailto:charlotte.westing@alaska.gov)) at your earliest convenience.

Sincerely,

DocuSigned by:  
  
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Jennifer Nolan Wing

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