

Data Submitted (UTC 11): 4/12/2021 1:58:49 AM

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Comments: First and foremost, I find this proposal to be very vague and expanded areas, many and quite large, makes this a very slippery slope for the community of Cordova, who are mostly unaware what is happening. We do not have enough information to manage impacts this proposal could have on the community. Cordova and PNH have coexisted thus so far with limited conflicts because for the most part they are out of sight out of mind and have been respectful to local concerns. This might not be true of new operators and increased permitted access to new areas proximal to town.

I am a resident of Cordova and an avid winter backcountry user. The quiet winters of Cordova is what attracted me to this place I have called home for over 20 years.

Impact of sound is complicated. I have attached an excerpt on impact of sound from a report on helicopter activities in Alaska. To sum it up, helicopter noise is a greater annoyance to people as well as wildlife than other noises at the same level. Annoyance is amplified if perception of activity is negative. Once again, the benefits of PNH are that they are based out at Orca and primarily uses the Rude River as their flight path. So, we rarely see or hear them from town and I Please remove units 10, 11 and 12 in this proposal think many of us want this to continue. I strongly object to Heli ski operations to be based out of the City of Cordova Airport, too many residential areas would be impacted and area is heavily used for local recreation on Eyak Lake.

I spend much time in the Power Creek/Surprise Valley. There is a USFS recreational cabin and is used by locals frequently throughout the winter. On those days PNH bumps over the Alice May Cutoff Trail and flies over the valley floor to access Sheridan and Scott Glacier areas, the noise is significant. There can be multiple flights throughout the day. Otherwise, it is a very quiet valley, as it is a designated a non-motorized area. I have never formally complained but those days we overlap I do curse them! I'm sure the goats do too, as I see them frequently back there especially on the south facing slope above the cutoff where they are bumping over the ridge. Choose our battles. PNH has responded to other local concerns for the most part respectfully. They had a learning curve in their beginnings though. They landed on local peaks where local users frequented on state lands where technically it was legal but not ethical. When confronted with community complaints and a courtesy call from the State, they respectfully ceased activities.

Local user safety is also a concern. I spent a winter in Valdez many years ago when Heli-ski operations were ramping up, it was a bit of a wild west show with little oversight. My friends and I experienced many conflicts that winter compromising our safety and of course the quietude we were there to enjoy. One such occasion, I was nearly to the summit after a long day of hiking, when I was swept off my feet when a sluff triggered by a skier above me was dropped off by helicopter. And then another skier and another and so on and the fresh snow was gone. Not only did I not get my fresh turns, my safety was compromised and easily could have resulted in injury or loss of life. Their response; we didn't see you!! Or did you choose not to see me, it was a beautiful line, was it not? Knowing and controlling, as much as humanely possible, what is above you while traveling in avalanche terrain is crucial.

Winter backcountry users have been steadily increasing in Cordova, both motorized and non-motorized. Increase users means increase conflicts and safety is compromised. Winter recreation requires a large safety margin due to avalanche hazards. How your actions impact others amplify when traveling in avalanche terrain. I think we can take preventative actions and not be reactionary and keep local mountains for local use.

There is endless terrain in the Chugach a helicopter can access. For residents of Cordova, we can only access such a small percentage of our forest whether that is human powered or motorized. I strongly urge the forest

service to keep local mountains Heli-ski free which is all areas Cordovans can access in 1 day time from any road for local recreation and hunting. Please remove units 10, 11 and 12 in this proposal and/or units should be sub-divided and northern parts of these units could be considered. In order to do so, wildlife habitat use needs to be better understood. Avoidance of wildlife habitat should also be a priority. Winters can be long and weather violent, making over-wintering habitat crucial to survival and any added stress could negatively affect wildlife populations. Not only goats, but hibernating bears, wolverines, and all else that makes this place whole and what Cordovans rely on for their way of life and subsistence needs. The coastal front range and slopes along the Copper River are important habitat areas to protect.

Stipulations in the permit for wildlife and local use conflict mitigation all relies on good faith and is based solely on human observation and is not data driven. Human observation is susceptible to tunnel vision. A man sees what he wants to see and disregards the rest. Pilot concerns are flight concerns, safety, navigation, weather etc. The guide is looking at snow quality, snow safety, skiable lines, not to mention the underlying pressure of high paying clients to have their moment. One could require a dedicated observer on each flight, such as the marine mammal observing program but you would lose a paying seat. Better yet, obtain a better understanding of wildlife use and avoid.

At the very least, I reiterate, remove units 10, 11 and 12 in this proposal for the expansion. But I strongly urge you to go back to the drawing board and hold public hearings with all interested parties including all neighboring landowners represented. A consensus could be reached among the concerned and a more detailed and conscientious proposal drafted.

Thank you for your consideration,
Kirsti Jurica