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First name: Stormy

Last name: Haught

Organization:

Title:

Comments: I support heliski tourism and any attempts to diversify Cordova's economy. By all accounts, the applicant and existing operators are dedicated to the best interest of Cordova and to the incredible natural resources in this area. My comments are in no way intended to reflect negatively on the permit applicant or existing operations. However, I do have concerns regarding this proposal and think modifications to the current proposal would result in more responsible and sustainable resource management.

Several studies have documented negative effects of helicopter flights on mountain goat groups (e.g. Côté 1996) and mountain goats do not seem to habituate to helicopter activity (Côté et al. 2013). The proposed project area includes considerable mountain goat habitat as well as several state registration and federal subsistence hunt areas important for mountain goat hunting. Mountain goat viewing is also a popular attraction in the areas north of the Copper River Highway. Heliski activity may overlap in time and area with periods and habitats critical to mountain goat survival and reproduction in this region.

Existing documentation of winter distribution and kidding areas of mountain goats in currently permitted heliski areas, as well as in the proposed expansion areas is extremely limited. However, from personal observation (documentation available upon request) some locations within the proposed expansion areas, even in the immediate vicinity of Cordova, are high density winter goat habitats. If there are locations within the proposed expansion area that are not likely to be utilized for heliskiing-associated activities, the proposal and associated maps should be modified to include only areas likely to be utilized for the proposed activities.

The proposed permit stipulations are not protective of mountain goats during critical periods (winter and kidding). The proposed stipulations leave the responsibility to avoid mountain goat disturbance solely to the operators. While I have no doubt that the operators and permit applicant are responsible stewards, the proposed stipulations are not protective for two reasons. First, mountain goats can be exceedingly difficult to see, particularly in winter, even for trained observers. Second, the primary concern of pilots, flight crew, guides, and clients during heliskiing activities, is, and should be, safety. Pilots have their hands full safely conducting flight operations in a high-risk and high-consequence environment. Likewise, guides and any additional crew, are constantly assessing snow and site conditions to manage risk to skiers and conduct operations as safely as possible in incredibly complex mountainous terrain.

The idea that these crews can also devote adequate attention to detecting animals that can be difficult to see, even on targeted aerial surveys by trained observers, does not seem realistic.

A better approach to responsibly managing these resources is to modify this proposal to better define areas likely to be used for heliskiing activity and exclude from the permit areas that will not be used for heliskiing activity. Once defined, scientifically defensible information on the distribution of mountain goat winter and kidding habitats in areas likely to be used for heliskiing activities should be collected (through survey and/or modeling efforts). Locations that are important to mountain goats during these critical periods should simply be avoided. This is an excellent opportunity for federal and state agencies (and potentially the permit holder/applicant as well) to collaborate to improve our understanding of mountain goat distribution in these areas and to manage these important land and wildlife resources in a more responsible and sustainable manner.