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Comments: Robert W. Campbell, Ph.D

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Cordova Ranger District

P.O. Box 280, 612 Second Street

Cordova, AK 99574

Via email to: cnfheli@usda.gov

Re: Cordova Guided Heli-Ski Project

To Whom it Concerns:

I am a resident of Cordova, Alaska and an enthusiastic user of the Chugach National Forest. I have read the scoping proposal for the Cordova Ranger District Guided Helicopter Skiing proposal in detail, and as a recreational and subsistence user of the backcountry and a working environmental and earth scientist I have a number of comments on the scoping proposal, I will elaborate below in roughly the order they appear in the proposal.

Comments on the proposed action:

On the use of remote mobile and fixed fuel caches: There are a number of crucial details on the location and design of the fuel caches that must be elaborated. Given that the entirety of the proposed area is directly upstream of numerous pristine watersheds and listed anadromous steams, the risks associated with those caches seem unreasonably high to me. In the event that they are deployed the standard for those caches must be extremely high. Locations must be specified, hazards identified, and spill prevention, response and reporting protocols must be established. Residents of Prince William Sound are all too familiar with the costs of sloppy transport of petroleum. Given that the proposed area is a 501b ANILCA area where "the conservation of fish and wildlife and their habitat shall be the primary purpose", this is a crucial element.

On service days: I have not been able to learn how many service days are currently permitted, nor have I been able to view the existing permits. The scoping period is not long enough for the FOIA request necessary to obtain that information- I requested it from the project manager, but was not able to obtain it in time. I would suggest that "the Forest Service would start each permit with a lower number of client days than is requested by service providers" is not an adequate standard for choosing the appropriate number of service days. It would perhaps be better judged by the impacts expected from a given level of service days, there are any number of ways to objectively assess that.

On the key indicators:

1. Important mountain goat winter habitat: Having spoken with the Cordova District Ranger and local ADF&G wildlife biologist it appears to me that the winter habitat of goats in the proposed area is essentially unknown at this point, having received very little study. Some basic surveys have been done, but the results are again not publically available. A number of the subareas in the proposal (10-13 as far as I am aware, perhaps others) are areas where autumn goat hunts occur. Winters are an energetic bottleneck for goats (e.g. Parker et al., 2009), and so wintertime disturbance following the hunting seasons can be expected to adversely impact goat populations. Most of the currently permitted areas are high alpine and arguably not prime goat habitat (though I am yet to see the data that indicates this and would like to see it). Expanding the permitted area to lower elevations (subareas 9-13 particularly) will surely increase human-goat encounters and potentially reduce winter foraging opportunities, to the detriment of goat populations.

These potential impacts will need to be formally assessed prior to expanding heli-ski activities in the proposed area. Ideally that assessment should be peer-reviewed and publicly available. I point to the excellent study of White and Gregovich (2018) which specifically addresses the management of heli-skiing activities in a not-unsimilar region and provides a template of how to properly address the issue.

Again, because this is a 501b ANILCA area the protection of wildlife is extremely important.

2. Reported conflicts between user groups: As a self-powered backcountry splitboarder that makes use of boat and snowmobile accessible terrain in the proposed area, the potential for helicopters dropping groups of skiers above me is much more personal than a "conflict". Beyond the annoyance of having a group heli-dropped above oneself, the potential for a life threatening avalanche being set from above is a grave and dire danger. Stipulations to not ski above observed groups are simply not enough when lives are at stake, most self powered users in the area operate in small groups and may be difficult to notice from a helicopter operating >1500' AGL. It is my preference to keep heliski and other users separate as much as possible to reduce those risks. Given that subareas 10-13 are already used by self powered users, I suggest that those areas not be opened up to heliski access.

3. Impacts to scenic resources: Although not mentioned in the scoping proposal, I argue that the proposed activities will conflict with the scenic integrity objectives of the Forest Plan (FW-SCEN-S). The entirety of the proposed project area is classified as "Very High" in the Forest Plan, and regular use by several helicopter operators transporting numerous people per day to the peaks in view of the general public will reduce the wilderness nature and unspoiled scenery of the proposed area (again, particularly in subareas 10-13)

On the Need for the Proposal:

The scoping proposal states "This action is needed to address increased demand for guided helicopter skiing opportunities". I am curious to know how the demand has been measured, and note that the local heliski operator seemed to do very well without any access to the National Forest at all, selling out their available beds almost every year. It does not appear a valid assumption that heliski operators have been limited by the terrain that has been available to them up to now.

On the proposed permit stipulations:

I have commented above on the need for stringent stipulations about the transport and storage of petroleum products.

Wildlife: Wildlife sightings to date are not publicly available and of dubious value. It must be recognized that

operators are not incentivized to report their observations and other data should used to assess distributions. Compliance to the wildlife stipulations is and will continue to be impossible to assess.

The Northern Wild Sheep and Goat Council has released a position paper on the state of research and recommendations on disturbances by recreational activities on mountain goats (NWSGC, 2020), and I strongly recommend that those recommendations be adopted (e.g. a 1.5-2km setback for helicopters). There is also a position paper on helicopter supported recreation specifically (NWSGC, 2004).

Monitoring: I am confused about the permit stipulation for avoiding goat habitat in December, surely goat habitat should be avoided for the entirety of the operations, it is also unclear how potential habitat will be identified.

Flight track logs and wildlife observations are essentially secret at this point and should be made publically available, as should logs of landings diverted due to wildlife sightings. Having been unable to view these reports to date I am uncertain that they even exist. Wildlife observations obviously should not be pinpointed to a specific location but rather abstracted (attributed to a statistical subarea, I suggest USGS watershed HUCs). This information is not proprietary, the current operators communicate their intended locations to each other every day, and there is a stipulation for a Multi-Operator Communications and Dispute Resolution Plan is included in the scoping proposal. There is no reason why that information should be kept secret, and it's unavailability makes one suspect that something is being hidden. Further, it is in the operator's best interests to show that they are abiding by the stipulations.

Thank you for the opportunity to comment, I will watch for updates to this project.

Regards,

Robert Campbell

Literature cited:

Northern Wild Sheep and Goat Council. 2004. Northern Wild Sheep and Goat Council position statement on helicopter-supported recreation and mountain goats. http://www.nwsgc.org/StatementMountainGoats.pdf

Northern Wild Sheep and Goat Council. 2020. Northern Wild Sheep and Goat Council position statement on commercial and recreational disturbance of mountain goats: recommendations for management. Proceedings of the Biennial Symposium of the Northern Wild Sheep and Goat Council, 22: 1-15. http://www.nwsgc.org/2020-NWSGC-Position-Statement.pdf

Parker, K. L., P. S. Barboza, and M. P. Gillingham. 2009. Nutrition integrates environmental responses of ungulates. Functional Ecology 23:57-69.

White, K.S. and D. Gregovich. 2018. Mountain Goat Resource Selection in the Haines-Skagway Area: Implications for Helicopter Skiing Management. Wildlife Research Report ADF&G/DWC/WRR-2018-2, Alaska Department of Fish and Game. http://www.adfg.alaska.gov/index.cfm?adfg=librarypublications.wildlifepublicationsdetails&pubidentifier=7057