



May 31, 2018

Bonnie Million, Field Manager
Bureau of Land Management
Anchorage Field Office
4700 BLM Road
Anchorage, AK 99507

Dear Ms. Million:

The State of Alaska reviewed the news release and other materials provided at the open houses held in April, which indicate the Bureau of Land Management (BLM) is re-opening the planning process for the Haines Block Amendment to the Ring of Fire Resource Management Plan after being placed on hold in 2014 following the release of the Draft Environmental Impact Statement (DEIS). The State submitted comments on June 22, 2009 at scoping and on the DEIS on March 14, 2013, which are incorporated herein by reference. The following supplement the previously submitted comments and represent the consolidated views of state resource agencies.

To aid understanding of the potential effects on wildlife resources in the planning area, the Alaska Department of Fish and Game (ADF&G) shared GIS layers depicting modeled high value winter mountain goat habitat and brown bear denning habitat with BLM and the Haines Borough. ADF&G also provided a research report, which directly addresses the implications of mountain goat resource selection for helicopter skiing management in the Haines–Skagway area (White and Gregovich, 2018).

Mountain Goats

Heli-skiing activities can displace mountain goats from preferred wintering habitat during a time when goats are physically and nutritionally stressed (Côté 1996, Hurley 2004, Côté 2013). One study found that mountain goats will avoid areas where back country skiing occurs, even when access is non-motorized (Richard and Côté 2015). Disturbance from heli-skiing is believed to disproportionately affect pregnant females and kids. During winter when access to food is limited by snow pregnant females have the added energetic burden of supporting growing fetuses, and growing kids also have high energetic demands. Disturbance can displace goats from favored habitat resulting in goats expending energy on vigilance and locomotion, often through deep snow, and limit the population through declining reproduction and survival.

According to the Northern Wild Sheep and Goat Council (NWSGC) helicopter and industrial activity up to 2,000 m away have been documented to disturb mountain goats. The NWSGC recommends that helicopter activity be kept at least 1,500 m away from occupied/suspected nursery groups or important winter range (Côté et al. 1996, Hurley 2004, Cadsand 2012, Côté et al. 2013). Results of research conducted in northern Lynn Canal indicate that industrial activity should be avoided within an 1,800 m buffer around mountain goat winter habitat (White and Gregovich 2017).

Brown Bears

Heli-skiing activity also has the potential to disturb denning brown bears and wolverines. A study on Admiralty and Chichagof Islands found that bears denned at elevations ranging from sea level to 1,190 m (mean 604 m) and researchers noted that aircraft traffic may lower the suitability of brown bear denning habitat (Schoen et al. 1986). Disturbance during the denning period can cause den abandonment, which increases energy expenditure and reduces cub survival (Linnell 2000).

Wolverines

Wolverines naturally occur at low densities and are prized fur and trophy animals. In Alaska wolverines are born between February and April. Natal dens are usually in snow caves at elevations ranging from 300m to 1,250 m (Magoun & Copeland 1998). Human disturbance has been documented to result in den abandonment (Copeland 1996).

ADF&G Modeling and Recommendations

ADF&G has developed habitat selection models for wintering mountain goats and denning brown bears using data collected in the Haines area (Crupi unpublished data; White and Gregovich 2018). Those models predict the likelihood of goats and bears using specific locations based on habitat features and allow ADF&G to produce maps showing where high quality wintering or denning habitat is located within the planning area. Using those maps and consistent with research on the distance at which heli-skiing disturbs wintering mountain goats, we recommend a minimum 1,500 m buffer around modeled high-quality mountain goat wintering habitat and high-quality brown bear denning habitat within the Haines Planning area. We request that BLM retain the current Monitoring and Control Area which will provide a comparison area for ongoing research.

To fully understand the potential effects of heli-skiing on wildlife and to develop appropriate mitigation measures, it is important to accurately characterize the extent of valuable wildlife habitat and landscape features favored for heli-skiing. White and Gregovich (2018) point out that elsewhere in North America partnerships between backcountry users and government agencies have facilitated detailed mapping of areas used by wildlife and recreationalists, and more informed management decisions (Adrus 2005, Cadsand 2012, Olson et al. 2017, Squires et al. 2018).

ADF&G provided BLM with GIS layers showing the distribution of modeled high-quality winter mountain goat and brown bear denning habitat. However, without knowledge of landscape features favored by the heli-skiing industry the degree to which winter mountain goat habitat and heli-skiing habitat overlap remains unknown, and ways of mitigating effects of heli-skiing on wildlife cannot be formulated. We encourage BLM to work with heli-skiing operators to collect data on specific locations of ski-runs, landing zones, and flight paths to learn about the true extent of overlap between heli-skiing and important wildlife habitat and to inform mitigation measures.

Mineral Resource Assessments and Geologic Mapping

As discussed in the State's comments on the DEIS, the Alaska Department of Natural Resources, Division of Geological & Geophysical Surveys (DNR/DGGS) has a future need to conduct mineral resource assessments and geologic mapping in most BLM-managed lands in the Haines planning area, as well as helicopter-supported geophysical surveys, geological mapping, and geochemical sampling on state lands. The DEIS did not distinguish between limitations that apply to heli-skiing and other activities that utilize helicopters. Therefore, we are concerned proposed limitations in the DEIS would directly

affect these types of activities. See March 14, 2013 comments for additional details. We request the revised DEIS distinguish between the effects of different activities involving helicopter use. For example, the administrative activities conducted by DGGs are distinctly different from recreational activities that involve helicopter use and would not likely occur during the winter season. A helicopter-supported geophysical survey would only need to occur once over the area of interest. We also request shape files of the area where the BLM is considering applying proposed limitations to helicopter use.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions or for follow-up discussions with state staff.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', written in a cursive style.

Susan Magee
ANILCA Program Coordinator

cc: Bruce Lorenger, BLM Anchorage Field Office