

STATE OF ALASKA

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GOVERNOR

ANILCA IMPLEMENTATION PROGRAM

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August 4, 2006

Dennis E. Bschor, Regional Forester
USDA Forest Service
Alaska Regional Office
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Bschor:

The State of Alaska reviewed the Draft Environmental Impact Statement (DEIS) for Helicopter Access to Conduct Forest Inventory and Analysis (FIA) in Wilderness in the Alaska Region. With the exception of a response to the Coastal Zone Management Act Negative Determination, which will be addressed separately by the Office of Project Management and Permitting, the following represents the consolidated views of state resource agencies.

The State appreciates the Service's recognition that safe access for field crews is one of the most important considerations in conducting the FIA inventory. We also agree helicopter access, through a limited number of landings, is the only reasonable way to accomplish most surveys described in the DEIS. In Alaska, many wilderness areas are difficult and hazardous for field crews to access. The State conducts many research projects and management activities in Service administered Wilderness areas and encounters many of the same challenges in accessing similar difficult and hazardous areas.

Wilderness Character

Impacts from helicopter landings on wilderness character are generally minor and short-term, primarily associated with the sight and sound of the helicopter, which could detract from some visitor's appreciation of wilderness. However, conducting the same research project without the use of helicopters can cause more impacts as it would substantially lengthen the on-the-ground field time with associated trails, campsites, noise, etc. Since helicopter access is short-term, it typically causes less impact on wilderness character than other methods of access in remote areas.

Wildlife

Similar to the impacts on wilderness character, wildlife responses to helicopter overflights and landings are usually minor and short-term. We agree the predominate factors influencing impacts on wildlife are duration and frequency of the activity. Interestingly, the effects on wildlife of both helicopters and hiking/camping are similar, per encounter, as they generally result in short-term disturbances and energetic costs, and do not result in long-term habitat abandonment. The possibility of long-term habituation associated with helicopter access is also negligible because the use is limited in duration and frequency. We therefore agree that the additional field time necessary to access plots by foot would likely increase the probability of encounters with wildlife; and especially for bears, increase the potential to disrupt feeding activities or cause negative encounters, which could result in injury or death to humans, the animals, or both.

Employee Safety

Safety of employees is of paramount concern in all field operations. Working in remote areas is inherently more dangerous than in more developed or accessible areas. Slips, trips, and falls are more likely during longer trips on foot carrying heavy packs. There is also increased danger associated with traveling and working in water in hip boots or waders where slips and falls can result in hypothermia and drowning. Boating accidents are more likely when traveling long distances up small, uncharted rivers. Potential for air accidents increases with fixed-wing aircraft as they are more limited by flight speed and visibility requirements than helicopters. The incidence of potential negative bear encounters is also greater when long periods of time are spent near salmon spawning areas and other concentrated food sources, particularly at overnight camps where cooking and food storage takes place.

The text on Page 3-51 makes a very good point that injuries in remote areas can become particularly serious because of the delay in reaching medical facilities. A nearby helicopter with an experienced pilot familiar with the area can quickly provide an emergency evacuation if necessary.

Subsistence

There is no reference to subsistence activities in the document and an ANILCA Section 810 evaluation is not included, therefore we assume that subsistence is not a relevant issue. If subsistence uses are not occurring in the affected areas, we request the Service insert a statement to that effect into the final EIS. Alternatively, if subsistence activities do occur in any or all of the affected areas, we recommend the final EIS include the required ANILCA Section 810 evaluation.

Without helicopters, many of the wilderness areas referenced in the DEIS are essentially inaccessible and as such, the objectives of the forest inventory and analysis project cannot reasonably be met. We therefore support the Service in its effort to authorize helicopters to access remote areas as a means to both limit impacts to wilderness character and wildlife, and to protect the health and safety of field crews.

Mr. Dennis Bschor
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Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', with a long horizontal flourish extending to the right.

Susan E. Magee
ANILCA Project Coordinator

cc: US Forest Service Ecosystem Planning Staff
Sally Gibert, ANILCA Program Coordinator