

February 17, 2005

Denton Hamby
BLM Glenallen office
PO Box 147
Glenallen, AK 99588

Dear Mr. Hamby,

Thank you for allowing us to comment on the application by ERA Aviation for a proposed heli dog-mushing tours on the upper Nenana Glacier. We appreciate the opportunity supply information and voice concern.

Denali Citizens Council (DCC) was founded in Cantwell in 1974 by local residents and Park employees. Today, we work to promote the natural integrity of Denali Park and Preserve and surrounding environs. We work to engage citizens in the public process and encourage public participation in important decisions concerning Denali and the surrounding community.

Denali National Park and Preserve, because of its magnificent wildlife and its one very large mountain, will remain a prime tourist destination for years to come. The Yanert River valley is not part of the national park, but has management guidelines under DNR's Tanana Basin Area Plan. The Plan has designated two primary management values for this area: recreation and wildlife habitat. According to the Plan, the Yanert valley has high recreation value for hunting, hiking, skiing, dog mushing and kayaking. It states "these areas should remain in natural condition for maximum enjoyment of their recreational values." The upper Yanert is listed as "critical habitat for moose, Dall sheep and peregrine falcon."

According to records, ERA Aviation has been doing helicopter tours in the Yanert valley area for a little over 10 years. They also do tours over Denali National Park. From our research, we realize that ERA has a clean record with the Forest Service with their tour operation in Juneau. We also can appreciate the fact that this company has assisted in emergency medical evacuations in the Denali's backcountry and surrounding areas. Their willingness in these matters has always been appreciated and we presume that lives have been saved due to their expediency. Most agree that heli-tours are a unique and interesting visitor service in the Denali area.

However, we have several concerns about this application:

Safety - These heli-tours exist in other areas of Alaska. Heli-mushing in other areas of the state is on tidewater glaciers. The Nenana/Yanert is not a tidewater glacier and its movements are different from those in SE Alaska. Experience on nearby Denali has shown that crevasses expand and collapse by mid July and it is not safe for fixed wing aircraft to land on the glaciers. Rotor wing aircraft are different and have a different footprint on the glacier than do fixed wing, but it is still a safety concern.

Impacts on natural sounds - The Yanert valley area is the area that will be used to access the camp site. This has been a non motorized hunting area since 1973. Although it has known small amounts of fixed wing flight noise for a number of years, until 1992, there wasn't a large amount of traffic overhead.

Surveys have demonstrated that helicopters are more annoying to people than equivalent sound levels from fixed wing aircraft. The thumping associated with the helicopter rotors are more noticeable at lower sound levels. The NPS sound technician, Shan Burson, (now working on sound studies in Grand Tetons) who studied soundscape in Denali, estimates ambient sound levels in the Yanert Valley at 20dBA. A helicopter flying within 8 miles in calm weather would likely be audible. That would mean that during these times, there wouldn't be a place in the Yanert drainage where helicopters wouldn't be audible.¹

FAA does not regulate helicopters in the backcountry, but elevations of 2000 ft. above ground and cliff level have been suggested. These suggestions are difficult, if not impossible, to enforce in the field.

Socio-economic impacts - A number of area residents are greatly concerned that their way of life will change with issuance of this permit. ERA's announced plan to set up their staging area and sling loading operation near milepost 228 Parks Highway brought concern, and dismay, to some people. Ownership of this specific area is unclear, although it appears to belong to Ahtna Corporation and is also the traditional access to the Yanert River valley. Horse packers, backpackers, hikers and others use this area to access the non-motorized area to the east of the Highway.

There is a potential for too many conflicts here. The flight path would be very close to a cluster of homes. There are approximately 80 homes within a 3 mile radius. Most are occupied in summer. The rotary winged craft would be slinging 55 gallon drums over an area used from August 10 through September by horse packers and hunters. This area is only 1 mile south of a busy summertime airstrip. Hauling waste and trash in and out of an area used by people and horses during hunting season puts everyone in jeopardy of injury. Wherever this slinging activity takes place needs

close scrutiny, whether it be Denali Highway, the 45 mile haul to Healy or some other location.

Environmental Health impacts - There is only one sewage treatment facility in the Borough. It is currently at capacity. The Borough is looking at its options with Village Safewater. There are options, but the Borough needs breathing room as well as the money to expand. There have been land swaps and the sewage facility now has the land to expand, just not the money. All liquid waste from the glacier will be supposedly transported to this facility. How will this particular activity impact the burden? Sixty sled dogs produce approximately 80 lbs. of waste a day plus waste produced by those living on the glacier caring for the dogs. Is this a negligible amount or significant to the sewage facility?

Dog care and health requirements. Dogs have physical concerns when living on glaciers all summer. Foot injuries arise because the dogs are running on a mixture of ice and snow; eye problems occur because of glare. The extent of dog injuries during a season on a cirque glacier is unknown at this time. We ask BLM to scrutinize this.

Critical Wildlife impacts - Over the years, some wildlife studies in the Yanert have been completed. Wolf, caribou and moose studies have shown that Park animals truly do not know boundaries. The Park moose biologist has said unequivocally that moose wander to and from the Yanert into the Park. His collared moose have been found in the Yanert River valley.²

There is a concern that these flights are scheduled to start during the height of lambing season. Since there are not many studies done on how rotary wing aircraft (212 Bell and A-Stars) impact sheep (ewes in particular), there is a concern that a stray helicopter that goes to take a close look at nursery groups may be causing harm. ADF&G biologist Steve Arthur, at a recent meeting, expressed concern about the affects of noise on ewes and lambs, especially during the lambing season.

Cumulative impacts – We might agree that one or two helicopter tours may not impact a band of sheep or a single moose. In 1984, heli tours started in Juneau. There were approximately 600 landings (about half the amount proposed for the Nenana Glacier). By 1999, there were at least 16,000 landings.³ A 100-day season would mean 160 landings a day, which should be completely unacceptable in any situation involving impacts to land and wilderness. What is ERA's business plan for the future?

Considering the level of impact from this activity, the need for baseline data on wildlife populations in the Yanert and the variety of agencies and constituent groups involved, BLM should perform an Environmental Impact Statement on this application. We do not know the impacts that have occurred due to activity the past 10 years. An EIS is preferable to an EA because it will:

- Require a more complete description of the entire affected environment (which includes water, lands and wildlife under the jurisdiction of several agencies)
- Provide for more detailed consideration of critical wildlife studies and impacts
- Promote greater interagency consultation in preparing the document (especially considering that the ultimate ownership of the application area is unclear at this time)
- Require greater public involvement and comment
- Provide a more complete description of cumulative impacts in a variety of areas

One of Alaska's biggest industries is tourism and Denali survives primarily on its visitors. Because there is so much pressure on the Park itself, tourism is now spreading to outlying areas where user conflicts are more frequent.

Dog mushing on a glacier all summer is one issue. The intrusion of rotary aircraft over a non motorized hunting, fishing, hiking, backpacking area is another. We hope that BLM will take into account the various entities involved and the impacts not only on the glacier, but to guides, hunters, local residents, wildlife and soundscape.

We request that the BLM provide a range of alternatives in the EIS. We ask that the EIS include a legally sufficient analysis of the direct, indirect and cumulative impacts of ERA's proposed operations, that thoroughly considers impacts to wildlife, users and neighboring communities.

Thank you for taking our comments into consideration. If you would like to discuss our comments, please call us at 907-683-3396.

Sincerely

Sue Deyoe, Community Organizer
for the DCC Board of Directors

PO Box 78
Denali Park, AK 99755
907-683-3396
www.denalicitizens.org

cc: Rep. David Guttenberg
Senator Ralph Seekins
Hal Meyer, DNR

Bibliography

¹ Shan Burson, National Park Service sound technician, Grand Teton National Park, Moose, WY 83012 shan_burson@nps.gov

² Vic VanBallenberge, Denali National Park moose biologist, vicvanb@alaska.net

³ Tongass Forest Service website: www.fs.fed.us/r10/tongass/forest_facts/faqs/heli.shtml

Other information:

www.csmonitor.com/2003/0902/p03s01-ussc.html

www.flightseeingtours.com/denali.asp (ERA advertises the return trip flying over Polychrome Pass into Denali National Park)

NWSGC Position Statement on Helicopter-supported Recreation and Mountain Goats (attached)

Citations With Abstracts (attached)

Recommended Land Use Guidelines for Mountain Goat & Bighorn Sheep Ranges in Alberta (attached)

National Soundscape Program Center, 1201 Oakridge Dr. #200, Fort Collins, CO 80524