

Appendix A – Scoping Comments/Government Letters

Scoping

NEPA requires that the public and other agencies be involved in federal agency decision-making. An important part of this process is scoping. CEQ regulations refer to scoping as a process to determine the scope of the issues to be addressed in an EIS and to identify the significant issues related to a proposed action (40 CFR 1501.7). The major steps in the scoping process for this EIS included:

- The project was listed in the Chugach National Forest schedule of proposed NEPA projects in January of 2003. This list is sent to approximately 300 people.
- A Notice of Intent to prepare an EIS was published in the Federal Register on May 15, 2003 (Volume 68, Number 94).
- Four public scoping meetings were held at Girdwood, Seward, Moose Pass and Hope.
- A notice describing the proposal, outlining the NEPA review process, and inviting comment was distributed to media outlets, agencies, groups, and individuals on October 31, 2002. The Districts received 221 comment letters or e-mails from federal and state agencies (3 letters/e-mails), organizations (14 letters/e-mails), and individuals (204 letters/e-mails).
- An interactive data base was developed.
- The Forest Service interdisciplinary team internally reviewed the proposal and scoping comments.

As a result of the scoping process, three significant issues were identified (see Chapter 1).

Alternatives

Based on the preliminary issues, the Interdisciplinary Team developed five alternatives to the proposed action submitted by CPG. These alternatives include the “No Action” alternative as required by NEPA (1502.14(d)). These alternatives were sent to interested parties for review. Four public meetings to review the proposed alternatives were held at Girdwood, Seward, Moose Pass and Hope. Fifty written responses were received.

Methods for Classifying Comments

Comments have been received in two categories: (1) scoping comments regarding Proposals 1 and 2 and (2) comments regarding the range of alternatives. Comments were read and categorized in the following manner:

1. All comments were electronically scanned.
2. Comments were separated depending on whether the comment was in response to proposals or alternatives.
3. Comments outside the scoping dates of October 31, 2002 through December 6, 2002 for comments relating to the proposal and the dates of May 15, 2003 through June 6,

- 2003 for comments relating to the alternatives were not included.
4. Comments within the scoping periods were read to determine the scope and the significant issues to be analyzed.
 5. Comments were indexed and categorized in a database according to the significant issues (wildlife, recreational conflict, impacts to communities, and other issues) to be analyzed.
 6. Access reports were run to define the scope and significant issues.
 7. An index was created listing all comments received within the scoping periods.

Examples of the reports used by the interdisciplinary team to review scoping and alternative comments were included in the DEIS.

Government Letters

The following letters in response to the Draft EIS were received from government agencies:

U.S. Environmental Protection Agency
U.S. Department of Interior
Alaska Department of Transportation and Public Facilities
Kenai Borough

94



KENAI PENINSULA BOROUGH

144 N. BINKLEY • SOLDOTNA, ALASKA • 99669-7599
BUSINESS (907) 262-4441 FAX (907)262-1892

**DALE BAGLEY
MAYOR**

March 1, 2004

RECEIVED

3/4/04

L. McCall

Chugach National Forest
Glacier Ranger District
PO Box 129
Girdwood, Alaska 99587

Attention: Teresa Paquet, Interdisciplinary Team Leader

RE: Draft Environmental Impact Statement for Commercially Guided Helicopter Skiing on the Kenai Peninsula

Dear Ms. Paquet:

Kenai Peninsula Borough (KPB) Coastal District staff reviewed the referenced proposals for consistency with KPB Coastal Management Program enforceable policies. The proposed project area is located within the Chugach National Forest, from south of Kenai Lake to north of Turnagain Arm.

As a result of commercially guided helicopter operations, wildlife will experience aircraft encounters, and likely human presence. En route flight activity will result in helicopters passing by wildlife and their habitats. Helicopter operations such as landing and taking off will also likely affect wildlife in some manner. En route flight routes can affect mountain goats, brown bear, black bear, wolves, moose, and raptors, depending on time of year, time of day and location. Effects of noise and visual impacts on wildlife from helicopters, or other human activities may be mitigated somewhat with adequate distances and buffer areas. The Kenai Peninsula Borough Coastal District encourages the Chugach National Forest evaluate habitat exposure on an annual basis in order to ascertain effects over the course of time. Future management decisions ought to account for the best available information concerning resident species of animals and birds. The operator(s) might assist the USFS by keeping records of wildlife sightings, with notations.

Mountain goats and sheep may be particularly affected by aircraft operations during dispersal to high quality birthing and foraging areas in the spring, and later in forage areas. Effects of stress may not be immediately apparent on a given population, but later increases in mortality could reflect stresses associated with project activities. Also, it is known that predator access to goat carcasses from accidental falls and avalanches as well as winter starvation is a critical element in early spring food sources for wolverines and bears, and later in the year by eagles and hawks. Reduction of localized goat/sheep



abundance or carrion may have effects on the population success of these birds and animals.

Affects or the perceived threat can be minimized by distance, minimized duration of exposure, and predictable patterns of activity with avoidance of critical life cycle periods and habitats. Noise impacts at landing areas can be minimized if aircraft landing areas are located away from critical habitats including forage and rock habitats, known denning areas.

These comments are consistent with Kenai Peninsula Borough Enforceable Policies

2.6 Mitigation, 2.7 Cumulative Impacts, 12.9 Bald Eagles and Nest Sites

Thank you for the opportunity to comment.

Sincerely,



Daniel Bevington
Coastal District Coordinator

cc: CNF/GRD, Ms. Paquet (Applicant)
(Electronic only):
Karlee Gaskill, DNR
Lee McKinley, DNR
Stewart Seaberg, DNR
Robin Willis, DF&G
Fran Roche, DEC
Maureen de Zeeuw, USFWS
Cynthia Zuelow-Osborne, OPMP
Holly Babcock, Kenai River Center



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126



ER04/0058

March 17, 2004

Ms. Teresa Paquet
Interdisciplinary Team Leader
Glacier Range District
U.S. Forest Service
P.O. Box 129
Girdwood, AK 99587

Dear Ms. Paquet:

The Department of the Interior has reviewed the Helicopter Skiing on the Kenai Peninsula Draft Environmental Impact Statement (EIS), dated January 15, 2004. We have no comments to offer at this time.

Thank you for the opportunity to comment.

Sincerely,

Pamela Bergmann
Regional Environmental Officer - Alaska



92

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

APR 09 2004

Reply To
Attn Of: ECO-088

Ref: 03-042-DHS

Teresa Paquet
Glacier Ranger District
P.O. Box 129
Girdwood, AK 99587

Dear Ms. Paquet:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Commercially Guided Helicopter Skiing on the Kenai Peninsula** (CEQ #040022) in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The draft EIS examines a no action and five (5) action alternatives, which analyze the impacts of various levels of use by Chugach Helicopter Guides (CPG) operation in the Chugach National Forest. Alternative 1 is the No Action Alternative, Alternative 2 is the Proposed Action, Alternative 3 is the agency Preferred Alternative and reduces recreation conflicts and impacts on communities, Alternative 4 is the current permit level of use, Alternative 5 minimizes recreation conflicts, and Alternative 9 reflects the level of use from 2000-2002.

We have rated the Preferred Alternative LO (Lack of Objections). As proposed, we do not foresee the likelihood of significant environmental impacts with the Preferred Alternative that would cause us to raise objections. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

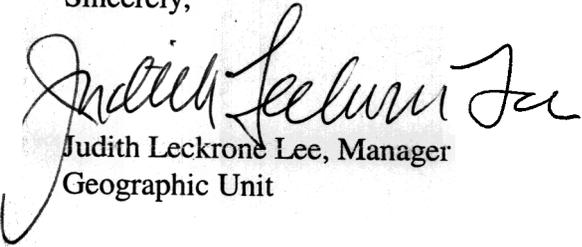
The EIS identifies issues with conflicts between backcountry skiers and helicopter guided skiers, impacts to communities, and to wildlife from noise and increased recreation. EPA, however, believes that the Preferred Alternative is designed to mitigate these impacts while providing recreational opportunities in accordance with the goals of the Revised Land and Resource Management Plan for the Chugach National Forest (USDA-Forest Service 2002a) (Revised Forest Plan) as discussed in the EIS.

The EIS discusses no-fly zones that would be included in CPG's five (5) year permit to reduce conflicts and impacts to wildlife. The EIS also discusses ongoing monitoring to assess the presence and impacts to wildlife. EPA supports these measures and recommends that information collected during monitoring aid in management and permitting decisions to reduce conflicts between recreation and wildlife.

EPA recommends including a broader scale map of the region in Alaska where the Chugach National Forest is located. EPA also recommends including any reasonably foreseeable actions in the EIS analysis. This analysis will provide the reviewer with an understanding of recreation or other pressures on the area that could have cumulative environmental impacts.

Thank you for the opportunity to review this draft EIS. If you would like to discuss this letter, please contact Lynne McWhorter at (206) 553-0205.

Sincerely,



Judith Leckrone Lee, Manager
Geographic Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987

93

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

4111 AVIATION AVENUE
P.O. BOX 196900
ANCHORAGE, ALASKA 99519-6900
(907) 269-0520 (FAX 269-0521)
(TTY 269-0473)

CENTRAL REGION - PLANNING

February 27, 2004

RE: Commercially Guided Helicopter
Skiing on the Kenai Peninsula Draft EIS
Chugach National Forest

Ms. Teresa Paquet, Interdisciplinary Team Leader:
Glacier Ranger District,
P.O. Box 129
Girdwood, AK 99587-0129

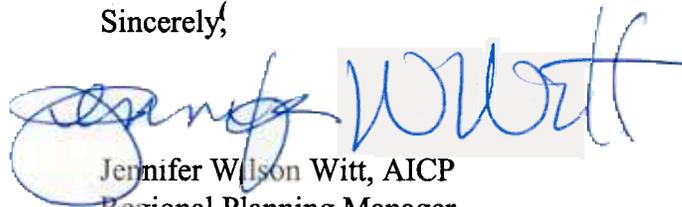
Dear Ms. Paquet:

Thank you for the opportunity to comment on the Commercially Guided Helicopter Skiing on the Kenai Peninsula Draft Environmental Impact Statement. The Alaska Department of Transportation and Public Facilities requests that the applicant be informed that permits must be attained directly from the Department prior to any operations occurring on state owned rights-of-way. Permit applications are available at our web site, www.dot.state.ak.us/permits or by calling (907) 269-0700.

In the proposed action, the applicant plans to use public rights-of-way at Kern Creek, Ingram Creek, and Mile 12.4 on the Seward Highway. This is a major highway on the National Highway System and designated as an All American Road. Both designations draw visitors year round to travel the highway and helicopter operations near or in the rights-of-way will require careful review and consideration to make sure all statutes and regulations are complied with. There are regulations that do not allow permits to be issued for fueling facilities within the right-of-way and there are numerous other requirements for permit review and issuance.

The Department's point of contact for this area is Rex Young, Area Planner, at 269-0507 or Rex_Young@dot.state.ak.us. Again, thank you for the opportunity to comment.

Sincerely,



Jennifer Wilson Witt, AICP
Regional Planning Manager

RY/eh

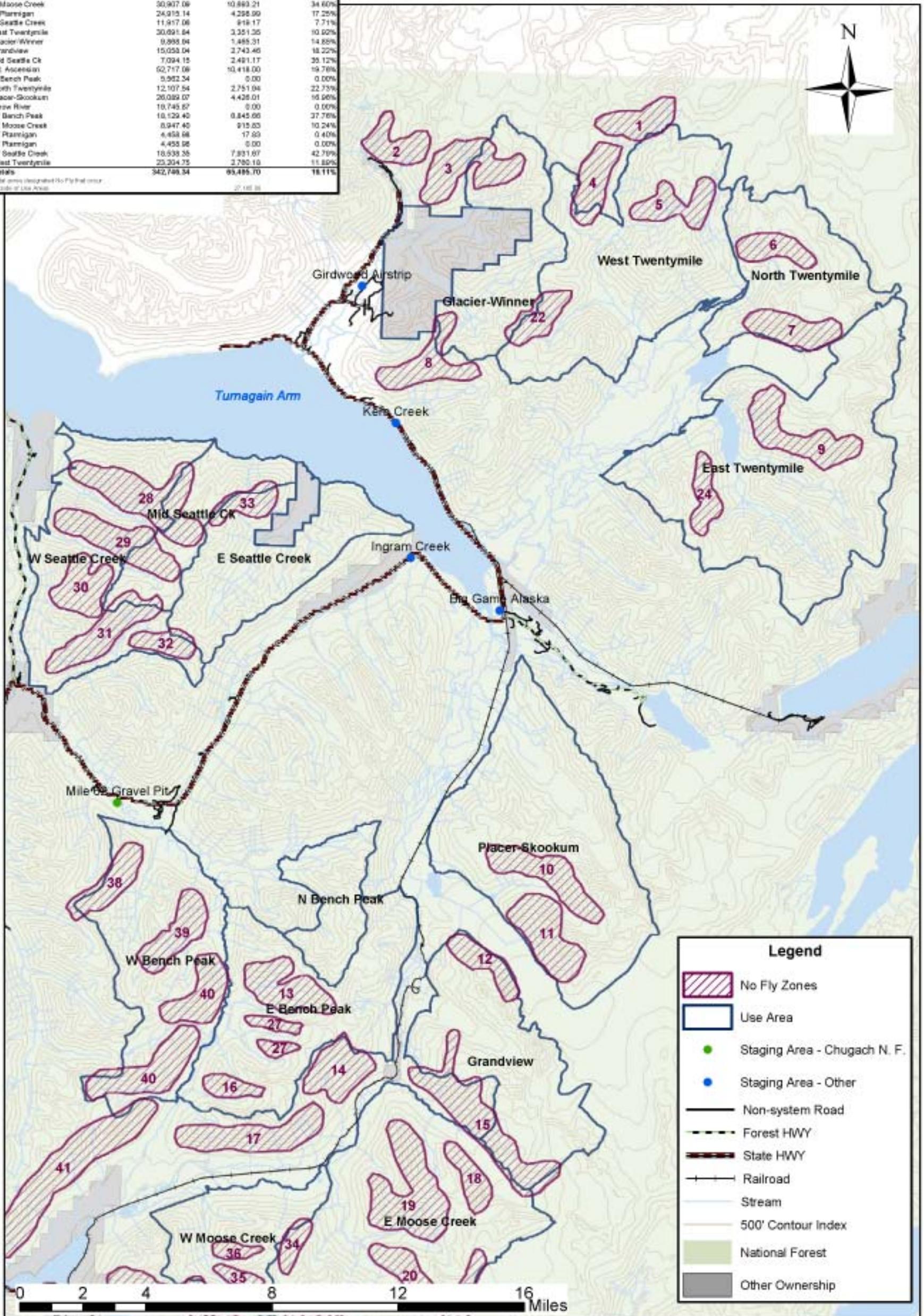
cc: Dave Heier, PM & PA Supervisor, Right of Way
Kim Rice, P.E., Preliminary Design & Environmental Supervisor, PD&E
William R. Strickler, P.E., Chief, Traffic Safety & Utilities, Central Region



No-Fly Zones, Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest (Map 1 of 2)



Use Area	Total Use Area acres	Acres Designated as No Fly	Percent of area designated No Fly
E Bench Peak	18,334.30	3,454.43	18.84%
E Moose Creek	30,907.09	10,893.21	34.60%
E Plannigan	24,915.14	4,295.99	17.25%
E Seattle Creek	11,917.06	918.17	7.71%
East Twentymile	30,691.84	3,351.35	10.92%
Glacier-Winner	9,895.94	1,485.31	14.89%
Grandview	15,053.04	2,743.46	18.22%
Mid Seattle Ck	7,094.15	2,491.17	35.12%
Mt. Ascension	62,717.09	10,418.00	16.76%
N Bench Peak	5,952.34	0.00	0.00%
North Twentymile	12,107.84	2,751.04	22.73%
Placer-Skookum	20,089.07	4,426.01	22.03%
Stave River	10,745.87	0.00	0.00%
W Bench Peak	10,129.40	0,845.66	8.35%
W Moose Creek	8,947.40	915.83	10.24%
W Plannigan	4,453.98	17.93	0.40%
W Plannigan	4,453.98	0.00	0.00%
W Seattle Creek	18,533.35	7,931.67	42.79%
West Twentymile	23,204.75	3,780.16	16.29%
Totals	342,748.34	65,495.70	19.11%

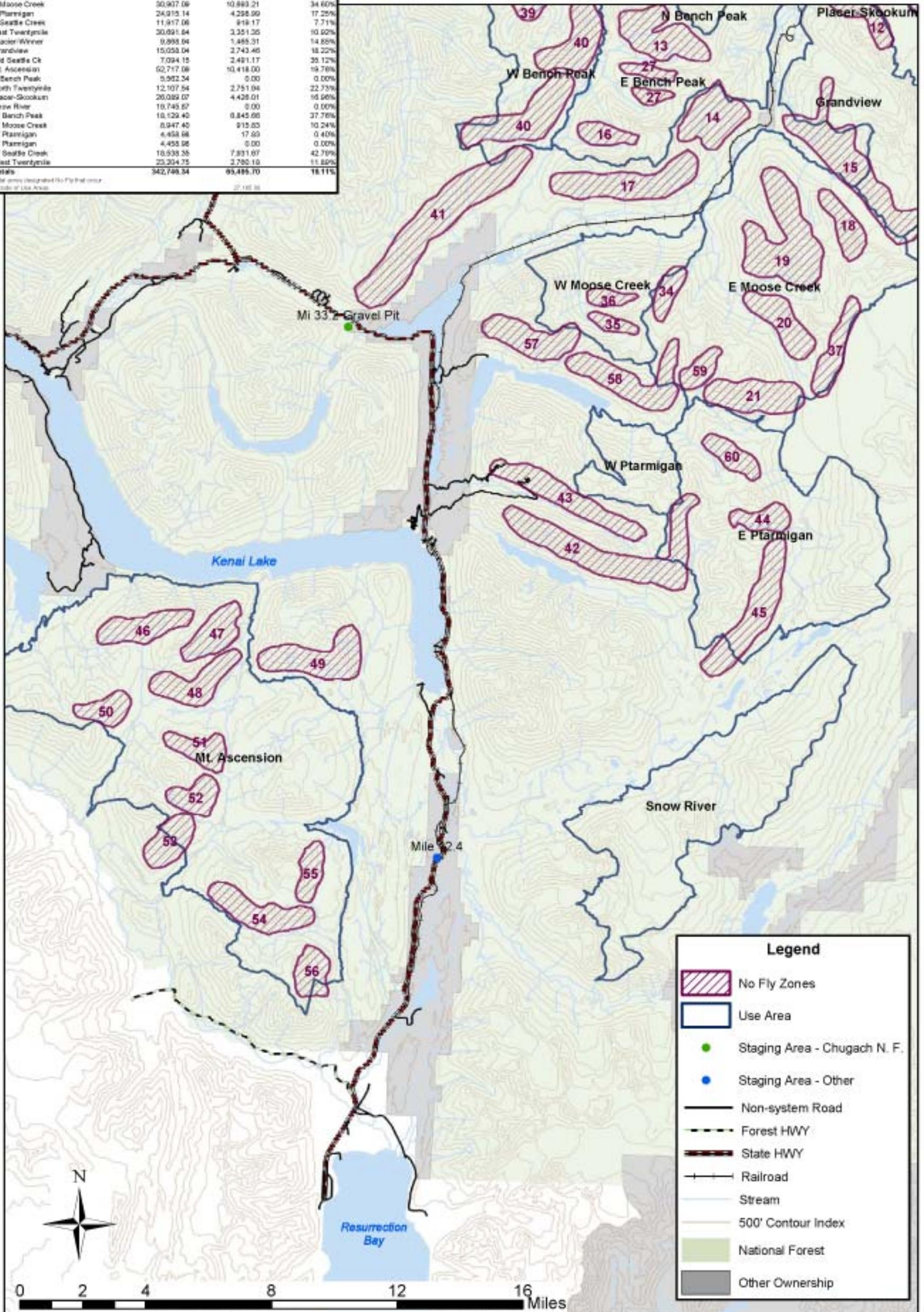




No-Fly Zones, Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest (Map 2 of 2)



Use Area	Total Use Area acres	Acres Designated as No Fly	Percent of area designated No Fly
E Bench Peak	18,334.30	3,454.43	18.84%
E Moose Creek	30,907.09	10,893.21	34.60%
E Ptarmigan	24,915.14	4,288.99	17.25%
E Seattle Creek	11,917.06	918.17	7.71%
East Twenty Mile	30,691.84	3,351.35	10.92%
Slater-Winner	9,893.04	1,485.31	14.88%
Grandview	15,053.04	2,743.46	18.22%
Mid Seattle Ck	7,094.15	2,481.17	35.12%
Mt. Ascension	62,717.09	10,418.00	16.70%
N Bench Peak	5,922.34	0.00	0.00%
North Twenty Mile	12,107.54	2,751.04	22.73%
Placer-Skokorum	26,089.07	4,426.01	16.96%
Snow River	19,745.87	0.00	0.00%
W Bench Peak	10,129.40	0,845.66	8.35%
W Moose Creek	8,947.40	915.83	10.24%
W Ptarmigan	4,458.98	17.93	0.40%
W Seattle Creek	4,458.98	0.00	0.00%
West Twenty Mile	18,533.35	7,931.67	42.79%
Totals	342,748.34	65,485.70	19.11%



Appendix C – Biological Evaluation for Threatened, Endangered or Sensitive Species

I. Wildlife Biological Evaluation

CHUGACH NATIONAL FOREST - Biological Evaluation

Date: 7 August, 2003

Project Name: Chugach Powder Guides: 5-Year Permit for Heli-skiing

District: Seward and Glacier Ranger Districts

Project Type: Recreational permit

Location: Seward and Glacier Districts.

Project Actions: 13 zones totaling 342,700 acres on the Glacier and Seward Ranger Districts. The season of use would be from approximately December 15 through April 20. Three helicopters would be used and 2,400 client days would be utilized.

Vegetation/Habitat Type: Heli-skiing areas are primarily alpine, rock, snow, and ice.

I. Prior Biological Evaluation				No	Yes
Prior Project BE: Sensitive Plants	Date:	9-14-1999			X
Prior Project BE: Wildlife	Date:	9-17-1999			X
II. Species and/or Habitat				No	Yes
2. Previous Species Observation				X	
3. Federally Listed Species Present				X	
4. Habitat For Federally Listed Species Present				X	
5. Sensitive Species Present				X	
6. Habitat For Sensitive Species Present				X	
III. Analysis of Effects				No	Yes
1. Significant Habitat Alteration				X	
2. Effects Outside Project Area					X
3. Cumulative Effects on Listed Species or Habitat				X	
4. Cumulative Effects on Sensitive Species or Habitat				X	
IV. Determination of Effects				No	Yes
1. No Affect Threatened, Endangered, or Proposed Species					X
2. May Affect Threatened, Endangered, or Proposed Species				X	
3. May Affect Individual Sensitive Species				X	
4. May Affect Sensitive Species' Population Viability				X	
V. Consultation Requirements				No	Yes
1. Formal Consultation Required				X	
2. Additional Informal Consultation Required				X	

Based on the findings above and the size and effect of the proposed project, a detailed biological evaluation and further consultation are not required.

Affected Environment

Habitat

- Helicopter flights occur over a wide variety of habitat types. Drop off and heli-skiing primarily occurs above tree line in alpine, rock and snow areas, and on or adjacent to glaciers. The flight path to access various permit units may occur over all types of habitats, including forested, riparian, and coastal areas. The proposed project operations are not expected to encounter several of the species of concern listed in Table 2.

Wildlife

- The **Dusky Canada Geese (*Branta canadensis occidentalis*)** is a Region 10 sensitive species. The breeding distribution is restricted primarily to the Copper River Delta (Campbell et al. 1990). It winters primarily in the Willamette Valley in Oregon, and along the Columbia River in Washington (Cornely et al. 1988, Bartonek et al. 1971). The Dusky Canada goose does not occur in the project area. *Determination of Effect: no adverse impacts to Dusky Canada geese are anticipated.*
- The **Humpback Whale (*Megaptera novaeangliae*)** is an endangered species that occurs in all oceans of the world. Humpback whales do not occur in the permit area. *Determination of Effect: no adverse impacts to humpback whales are anticipated.*
- The **Steller's Sea Lion (*Eumetopias jubatus*)** is a threatened species with centers of abundance and distribution in the Gulf of Alaska and Aleutian Islands. The Steller's sea lion does not occur in the permit area. *Determination of Effect: no adverse impacts to Steller's sea lions are anticipated.*
- **Trumpeter Swans (*Cygnus buccinator*)** are a Region 10 sensitive species. Trumpeter swans transit the Chugach National Forest during spring and fall migrations. They commonly nest on the Copper River Delta wetlands and are known to nest at Ingram pond (between Ingram Creek and Placer River). Trumpeter swans do not occur within the project area during the proposed operating season. *Determination of Effect: no adverse impacts to trumpeter swans are anticipated.*
- **Black oystercatchers (*Haematopus bachmani*)** occur on the CNF in Prince William Sound. Black Oystercatchers are unlikely to be found within the permit area or under the helicopter flight path. *Determination of Effect: no adverse impacts to black oystercatchers are anticipated.*
- The **Montague Island Tundra Vole** and **Montague Island Hoary Marmot** are endemic to Montague Island, and are not known to occur on the Kenai Peninsula. *Determination of Effect: no adverse impacts to Montague Island mammals are anticipated.*
- **Steller's Eiders** do not breed on the Chugach National Forest. They may winter on the south end of the Kenai Peninsula, but not on the Seward Ranger District (personal communication with Bill Shuster, Seward Ranger District Resource Staff Officer). *Determination of Effect: no adverse impacts to Steller's eiders are anticipated.*
- The **Sitka black-tailed deer (*Odocoileus hemionus sitkensis*)** is native to the wet coastal rain forests of Southeast Alaska and north-coastal British Columbia. Established populations now also exist near Yakutat, in Prince William Sound, and on Kodiak and Afognak islands. They use alpine and needle leaf habitat during the summer, and old-growth forest below 800 feet elevation during the winter. Loss of winter habitat would be the biggest risk to the Sitka black-tailed deer. Currently the population in Prince William Sound is considered to be at a moderate to high density. In 2003, several were seen as far west as Anchorage. On occasion, individuals in Seward have reported seeing deer along Nash Road, and as far north as Tern Lake. *Determination of Effect: no adverse impacts to Sitka black-tailed deer are anticipated.*
- The **Osprey (*Pandion haliaeetus*)** is a Region 10 sensitive species. The osprey is widely distributed across much of Alaska south of the Brooks Range, but localized in the vicinity of

lakes, large rivers, and coastal bays. Osprey are rare to uncommon throughout Alaska (Palmer 1988) and may only occur within the project area during spring and fall migrations; they are not considered to be winter residents. *Determination of Effect: no adverse impacts to Osprey are anticipated.*

- The **Peale's peregrine falcon** is a Region 10 sensitive species. The Peale's peregrine falcon nests in Alaska along the Pacific coast from southeastern Alaska through the Gulf of Alaska and west to the end of the Aleutian Islands. Nesting habitat in Alaska includes ledges of vertical rocky cliffs in the vicinity of seabird colonies (Gabrielson and Lincoln 1959). There are no known nest sites within the project area. The Peale's peregrine falcon winters from the Queen Charlotte Islands and southwestern British Columbia, south along the coasts of Washington, Oregon, and California rarely to northern Baja California. Peale's peregrine falcons do not occur within the project area during the proposed operating season. *Determination of Effect: no adverse impacts to Peale's peregrine falcon are anticipated.*

Discussion of Cumulative Effects

- This project will not cause short or long-term changes to sensitive wildlife habitat as a direct result of the helicopter landings, recreational activities, and overflights associated with this project.
- There should be no adverse cumulative effects on endangered, threatened, or sensitive species due to the absence of direct habitat modification by any helicopter landings or ski activities.

Mitigating measures required for all alternatives

- Helicopter flights will be required to maintain a 1,500 feet vertical and horizontal clearance from whales, sea lions and other marine mammals.
- If any previously undiscovered endangered, threatened or sensitive species are encountered during the implementation of this project, notify the Forest Wildlife Ecologist for consultation and recommendation of appropriate mitigating measures to be enacted.

Conclusion

- The proposed action is not likely to have an adverse effect on vertebrate endangered, threatened or endangered species or their habitats.
- The proposed action should have no impact on sensitive species or their habitats.

II. Biological Evaluation For Sensitive Plants

Pre-Field Review Worksheet for Sensitive Plants - USDA Forest Service, Alaska Region

PROJECT NAME: Commercially Guided Helicopter Skiing

PROJECT DESCRIPTION: A typical day would include dropping clients off on ridge tops, picking them up at the bottom of the runs. They leave the current area once the entire run is tracked, or weather and/or snow conditions indicate time to move on. Number of lands in one area depends on number of clients and number of runs taken. Up to 3 helicopters would be used. The only staging area on National Forest is Mile 62 Gravel Pit, near Granite Creek Campground. Use includes: fuel truck on site, fueling, and loading and unloading clients. No storage will occur. Snow plowing would occur, some done by proponent, most done by DOT or GRD. The season would run from approximately 12/15 – 4/20. The entire project area would be covered in snow and ice during that period.

The proponents will have 1 or 2 cleanup days during the summer. This will involve helicopter landing and cleanup of poles and other debris left at the site.

LOCATION: Glacier/Winner Creek; West, North, and East Twentymile; Placer/Skookum; Grandview; Bench Peak West, North and South; Seattle Creek West, Middle and East; Moose Creek and Moose Creek West; Ptarmigan and Ptarmigan West; Snow River; and Mount Ascension.

SENSITIVE PLANTS KNOWN: Check maps (GIS or hand-made), contact the Regional Botanist, Forest/District Ecologist, and check AKNHP records. Document sources of information. Record the plant's location or distance from the project area:

Species:

Location:

Date of records search:

SENSITIVE PLANT HABITAT & SENSITIVE PLANTS SUSPECTED:

A) Obtain habitat information from people familiar with the project area, project proponent, GIS (e.g. soil map units, timber types, channel type covers) aerial photo interpretation, and/or site visits. Highlight or underline methods used.

Highlight or underline the following habitats that are likely to occur in the project area:

coniferous forest, deciduous forest, mixed conifer/deciduous forest, dwarf tree forest, forest edge, tall shrublands, low shrublands, rocky areas, rock outcrops, ridgetops, cliffs, serpentine, calcareous areas, gravel, scree, talus, boulder fields, seeps, wet areas, riparian areas (give channel type, if known), streambanks, waterfalls, lake margins, ponds, shallow freshwater, marshes, swamps, estuaries, sphagnum bogs, fens, heath, subalpine meadows, alpine, area dominated by moss or lichen, dry meadows, moist-wet meadows, upper beach meadows, grasslands, maritime beaches, sandy areas, other (describe here)

B) Using your knowledge of sensitive plant habitat needs, or any other sources, indicate the plants (R-10 sensitive plants listed below) suspected that correspond to the above habitats (highlight or underline them below):

<i>Aphragmus eschscholtzianus</i>	<i>Papaver alboroseum</i>
<i>Arnica lessingii</i> ssp. <i>norbergii</i>	<i>Platanthera gracilis</i>
<i>Botrychium tunux</i>	<i>Poa laxiflora</i>
<i>Botrychium yaaxudakeit</i>	<i>Puccinellia glabra</i>
<i>Carex lenticularis</i> var. <i>dolia</i>	<i>Puccinellia kamtschatica</i>
<i>Cirsium edule</i>	<i>Hymenophyllum wrightii</i>
<i>Draba kanaanaskis</i>	<i>Romanzoffia unalaschcensis</i>
<i>Glyceria leptostachya</i>	<i>Senecio moresbiensis</i>
<i>Isoetes truncata</i>	<i>Stellaria ruscifolia</i> ssp. <i>aleutica</i>
<i>Ligusticum calderi</i>	

DETERMINATIONS POSSIBLE PRIOR TO FIELD SURVEY

1) Does the evidence indicate that no sensitive plants or possible habitat exists within the project area (e.g. parking lot)?

- YES.** Explain exactly why (insert here) and sign and date this document. BE is complete.
 NO. Go on to question 2.

2) Based on knowledge of the proposed project and the species involved, can a "no impact" statement be made?

- YES.** Explain exactly why and sign and date this document. BE is complete.

The proposed activity would occur over snow and ice covered surfaces. Snow and ice cover would protect all potential sensitive plants and habitats from proposed activities. The proposed cleanup of debris during the summer would also have no impact on any sensitive species or habitat because no ground disturbance is anticipated with these activities.

- NO.** Go on to question 3.

3) Based on knowledge of the project and the species involved, can a statement be made that "implementation of the proposed project, including mitigation measures, would not contribute to a loss of viability of the species or cause the species to move toward federal listing?"

- YES.** Explain exactly why (insert here) and explain the mitigation measures that are part of the proposed project.
 Sign and date this document. BE is complete.

CANNOT BE DETERMINED WITH AVAILABLE INFORMATION. Go to the Field Reconnaissance step of

the BE process. Make survey recommendations (insert here), check one of the boxes below, sign and date this document.

Field surveys are recommended to be performed during the following months in order to identify all of the species indicated above that could potentially occur within the project area. Document using personal knowledge and the "identifiable times" table in BE appendices to determine which months are ideal for surveys (insert here):

Field surveys are not recommended for the following reasons: (insert here)

Prepared By: /s/ Betty Charnon

Date: 7/8/03

Reviewed By: /s/ Robert L. DeVelice

Date: 7/17/03

Appendix D - Winter Use Figures from Observations at Winter Access Points on Glacier and Seward Ranger Districts

Glacier Ranger District (12/4/1999 through 4/13/2003)

Access Point	Average Use per Weekend Day (# of vehicles)		Highest use per weekend day (# of vehicles)	
	Motorized	Non-motorized	Motorized	Non-motorized
Twentymile	3	<1	14	4
Placer River	9	<1	35	7
Ingram Drainage	<1	10	5	35
Turnagain Pass	32	14	128	40
Johnson Pass North	7	5	15	7

This data is based on observations of vehicles parked at the access point. A complete compilation of winter use access counts is available on request from the Glacier Ranger District.

Seward Ranger District (12/1/1999 through 4/8/2002)

Access Point	Average Use per Weekend Day (in # of people)		Highest use per weekend day (in # of people)	
	Motorized	Non-motorized	Motorized	Non-motorized
Moose Pass Community	4	0	20	0
Johnson Pass South Trailhead	2	< 1	6	4
Snow River	< 1	3	4	6
Bear Creek	2	3	19	10
Lost Lake Trailhead	24	< 1	56	6
Primrose Creek Trailhead	13	< 1	30	1
Snug Harbor Road	24	< 1	56	6

This data is based on observations of people at the trailhead (getting ready to leave or coming back from their trip) and vehicle counts with a base assumption of a certain number of people per the type of vehicle parked at the access point (i.e. number of snowmachines able to fit on one trailer, size of vehicle, etc.) A complete compilation of winter use access counts is available on request from the Seward Ranger District.

Appendix E

Potential User Conflict Level by Heli-skiing Unit and Alternative

Heli-skiing Unit	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Alternative 9
Glacier-Winner	None	Low	Low	Low	Low	Low
West Twentymile	None	Low	Low	Low	Low	Low
North Twentymile	None	Low	Low	Low	Low	Low
East Twentymile	None	Low	Low	Low	Low	Low
West Seattle Creek	None	Moderate	None	None	None	None
Mid Seattle Creek	None	Moderate	Low (Fri-Sun) None (Mon-Thur)	None	Low	None
East Seattle Creek	None	Moderate	Low (Fri-Sun) None (Mon-Thur)	None	None	None
Grandview	None	Low	Low	Low	Low	Low
Placer-Skookum	None	Moderate Low after March 31				
West Bench Peak	None	High	Moderate	Moderate	Low	Low
North Bench Peak	None	Low	Low	Low	Low	Low
East Bench Peak	None	Low	Low	Low	Low	Low
West Ptarmigan/ East Ptarmigan	None	Low	Low	None	Low	None
West Moose Crk/ East Moose Crk	None	Low	Low	None	Low	None
Snow River	None	Low	Low	None	Low	None
Mt. Ascension	None	Low	Low	None	Low	None

How to use this rating system:

- 1) Each proposed heli-skiing unit listed in the table starts with a high potential user conflict.
- 2) If the three items under part (A) don't fit the situation within the unit then look at the items listed under (B)
- 3) If one or more of those items fits the unit (i.e., lower number of non-motorized users using area) then the rating would be dropped to a Moderate rating.
- 4) If the items under (B) don't fit, look under Part (C). If any of these items fit better, the rating may be lowered further to a Low rating.
- 5) Look at Part D. These items contribute to a rating of no user conflicts (None)

(A) Factors contributing to a high potential user conflict

- Non-motorized users use the area consistently in relatively large numbers that increases the odds that some will see or hear a helicopter or cross paths with heli-skiers using the same slope or unit at the same time.
- Heli-skiing activities may occur any day of the week in the unit and is a core heli-skiing unit.
- The flight path from a heli-staging area to a heli-skiing unit crosses or follows the access route where non-motorized users are traveling to unit.

(B) Factors which may **change a high potential user conflict to a moderate potential conflict**

- Lower numbers of non-motorized users in area lowering odds of seeing or hearing helicopter or interacting with heli-skiers on same slope at the same time.
- Timing restriction limiting heli-skiing use or heli-skiing unit is an exploratory unit

(C) Factors which may **change a high or moderate potential to a low potential**

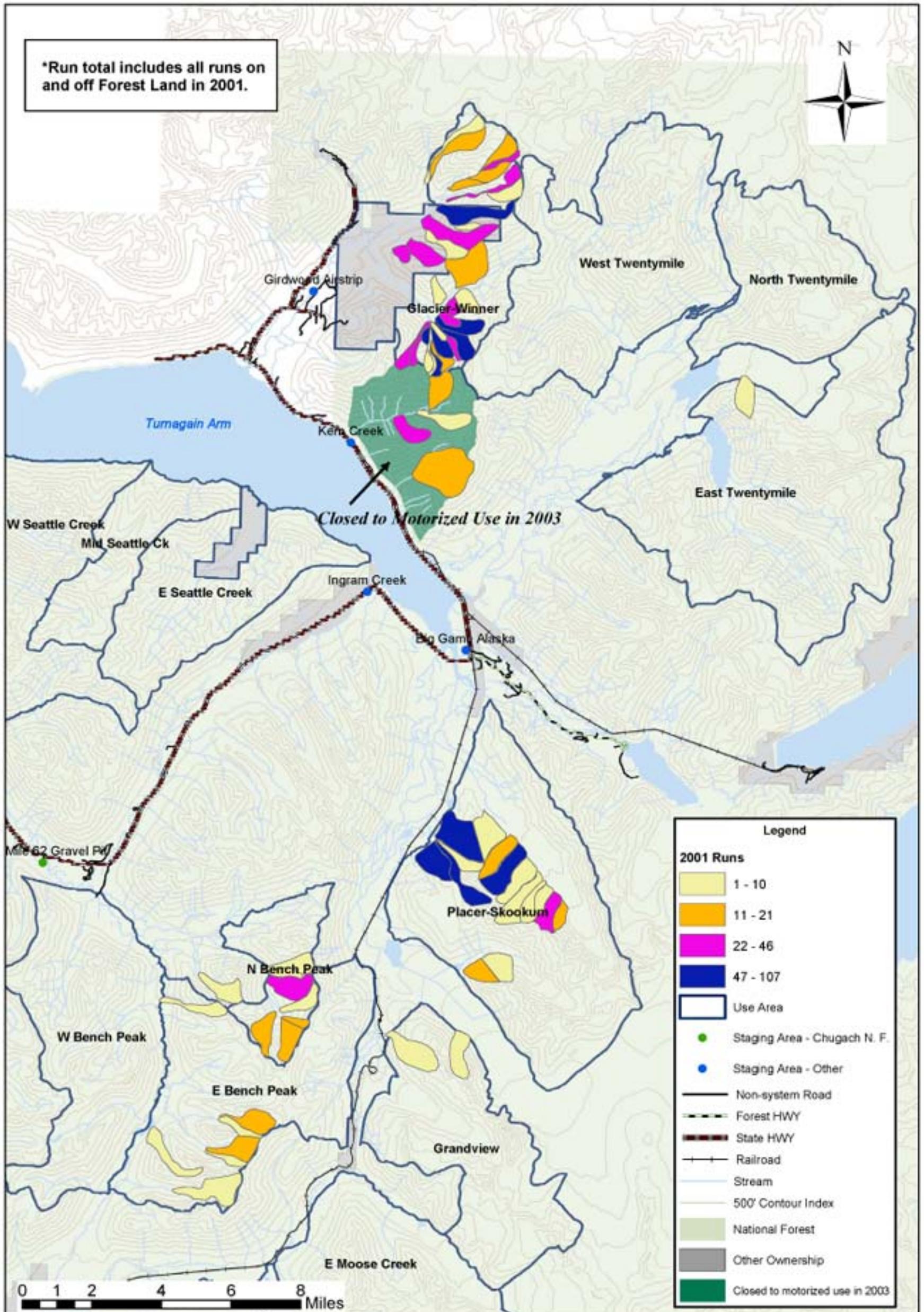
- Very few non-motorized users in an area to chance seeing or hearing helicopter or interacting with heli-skiers on same slope
- Timing restriction exists limiting heli-skiing use to Monday through Thursday or heli-skiing unit is an exploratory unit
- Heli-skiing will not take place in unit but non-motorized users may still hear or see helicopter traveling to other units.

(D) Factors which contribute to no user conflicts

- Heli-skiing will not take place in unit.
- Non-motorized users will not see or hear helicopters on their way to unit.

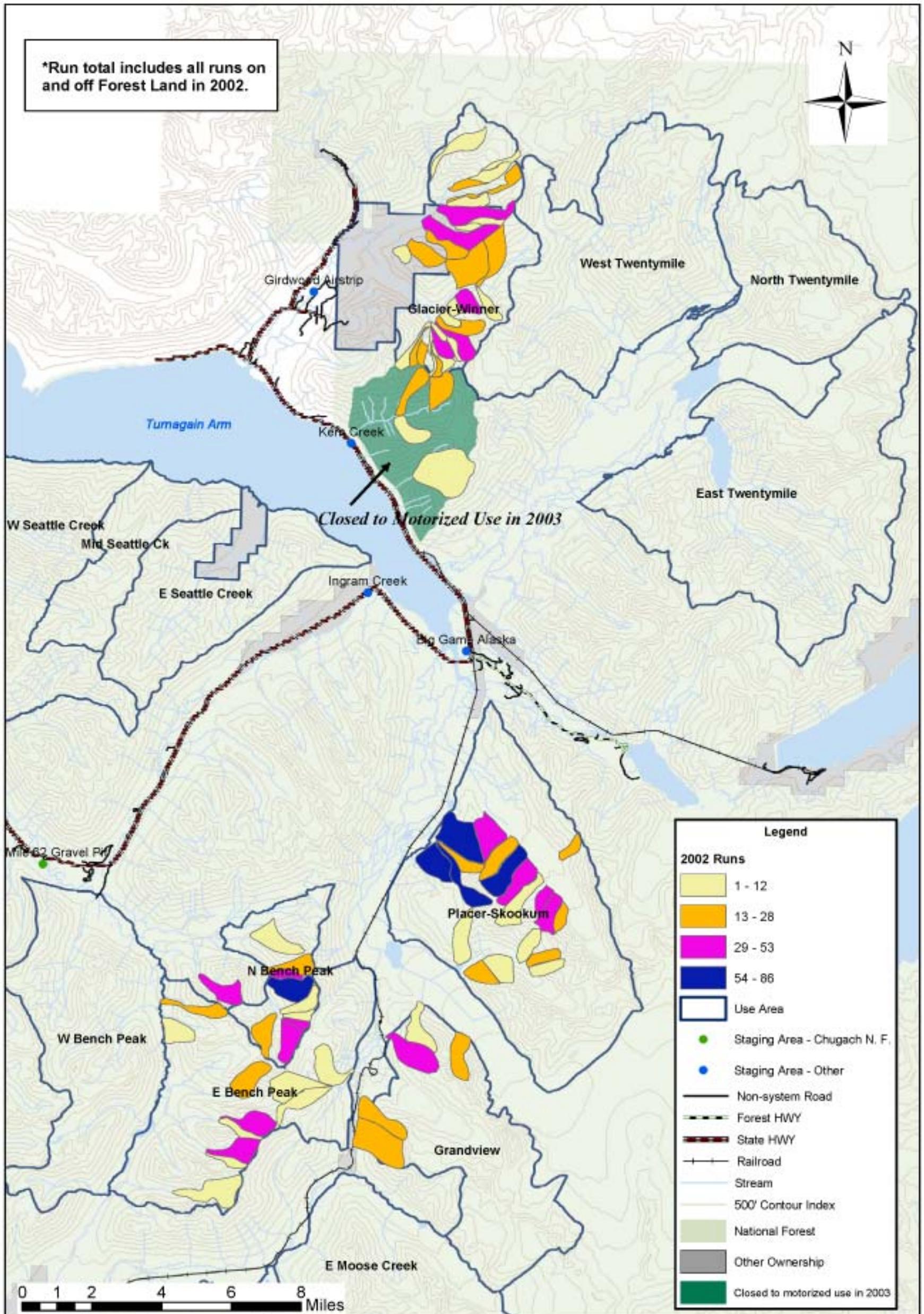


2001 Ski Run Use (total runs = 1480*) Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest



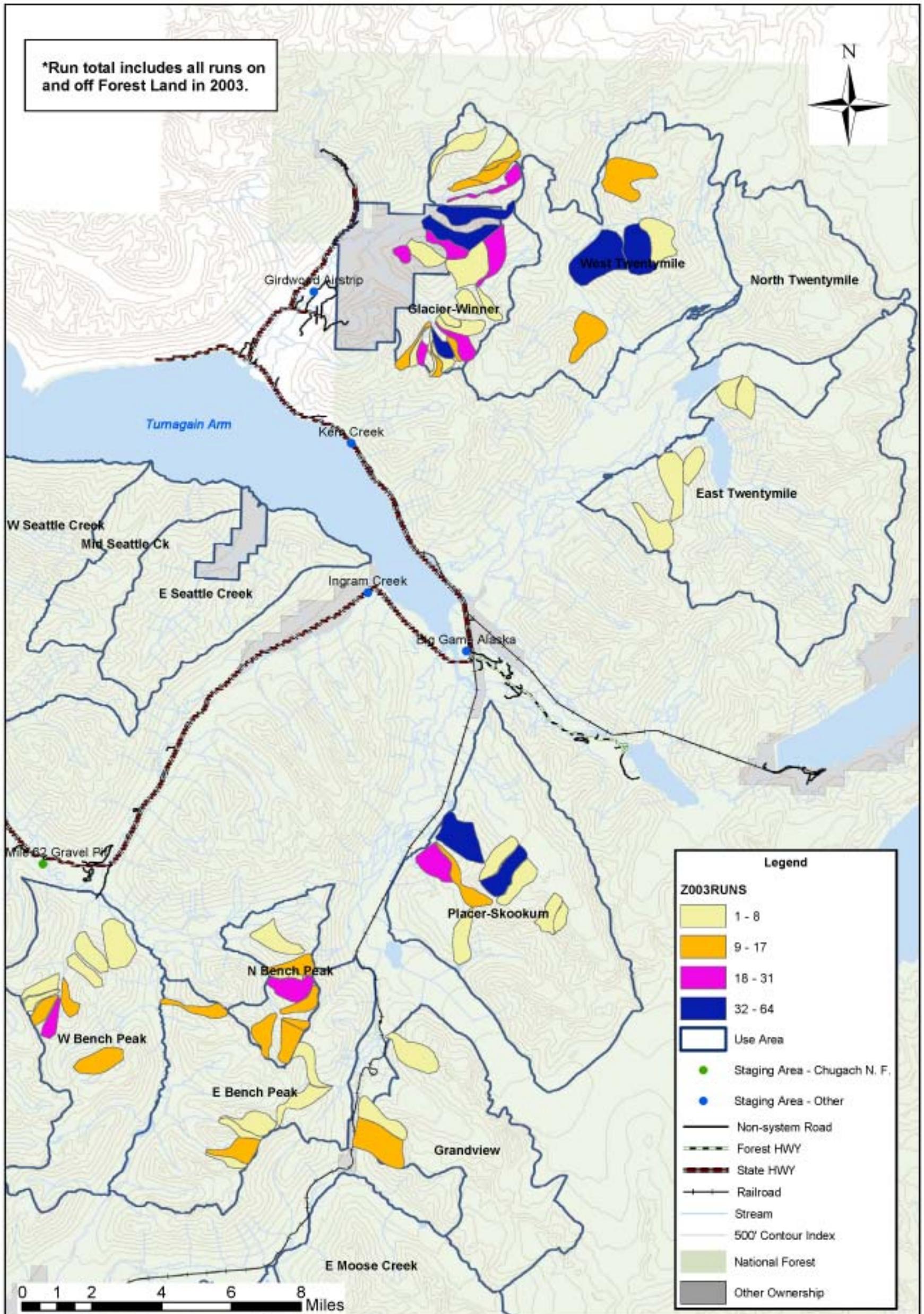


2002 Ski Run Use (total runs = 1688*) Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest



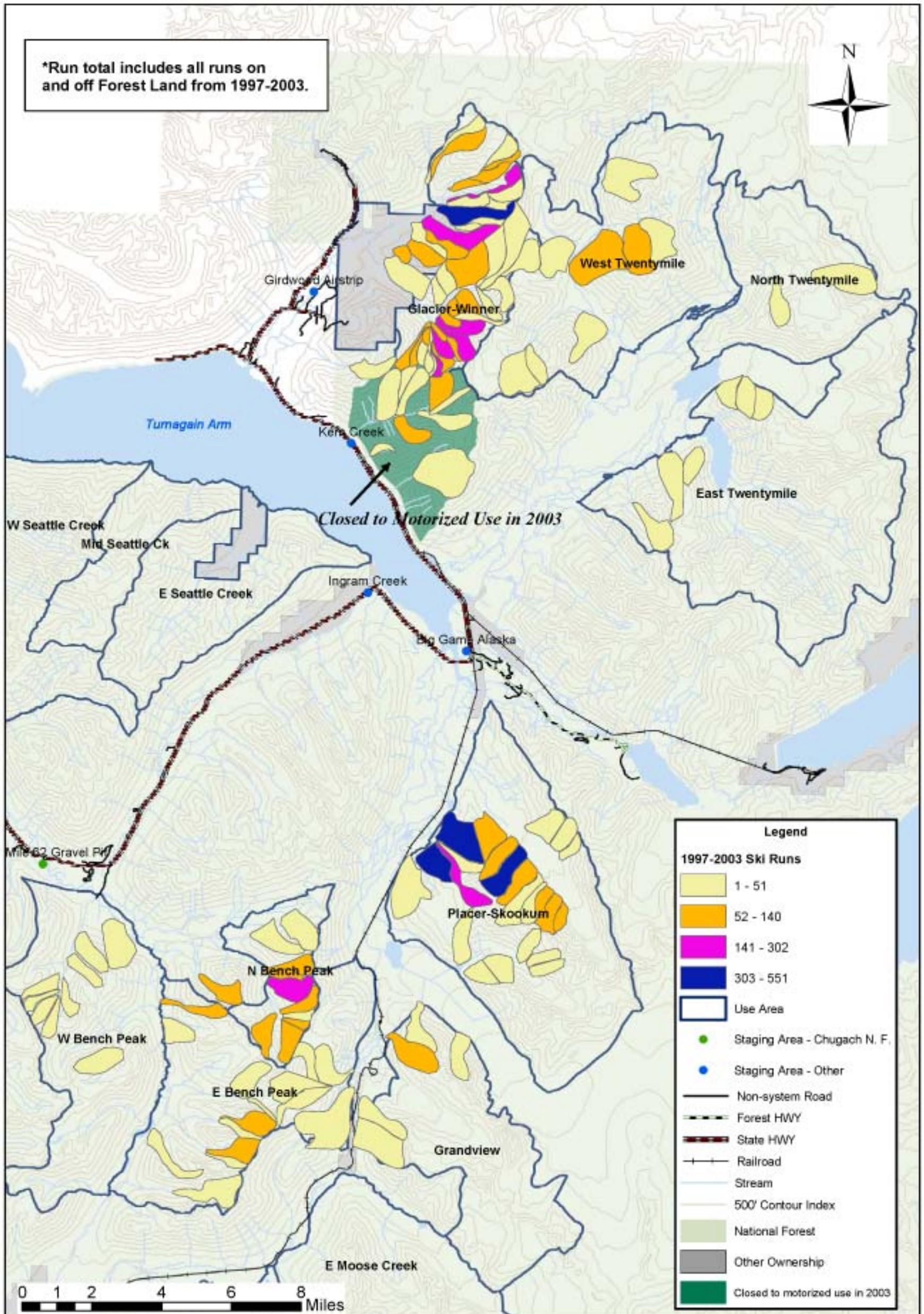


2003 Ski Run Use (total runs = 952*) Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest





1997-2003 Ski Run Use (total runs = 8424*) Commercially Guided Heli-skiing Kenai Peninsula, Chugach National Forest



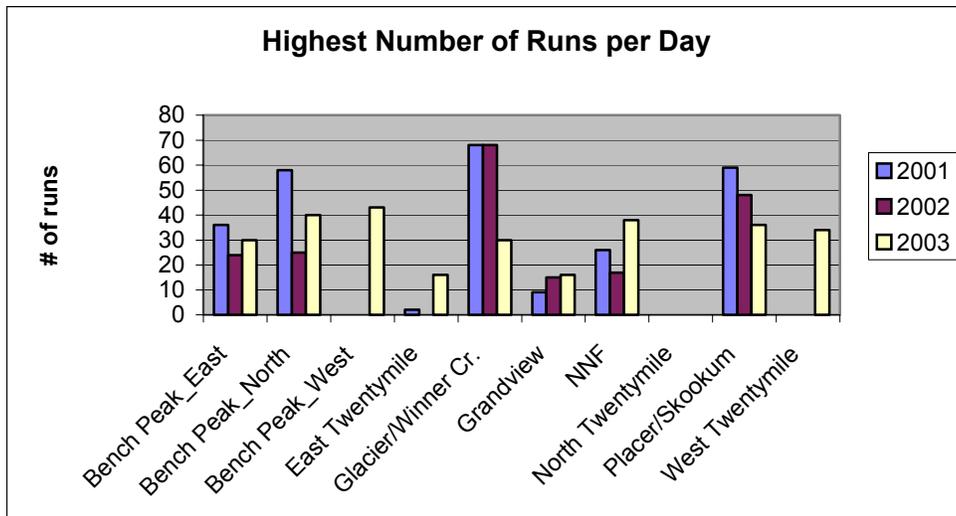
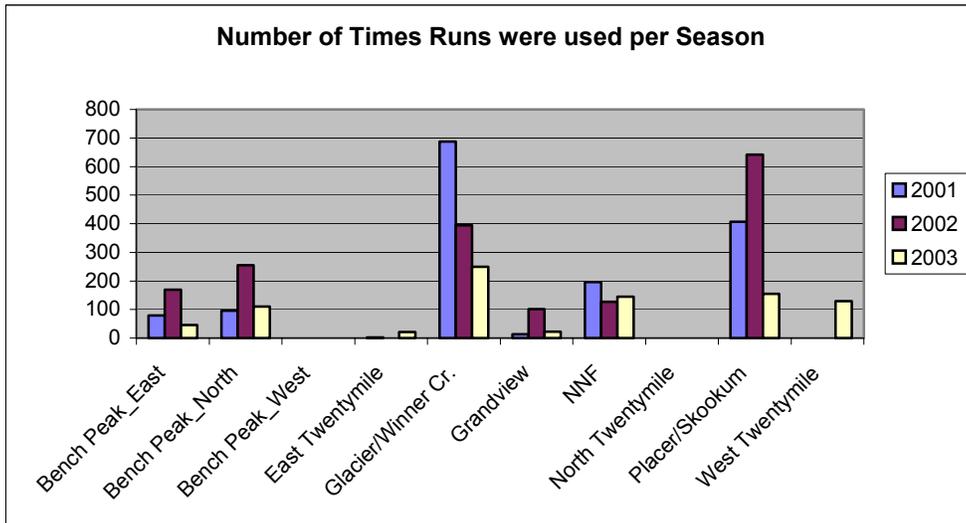
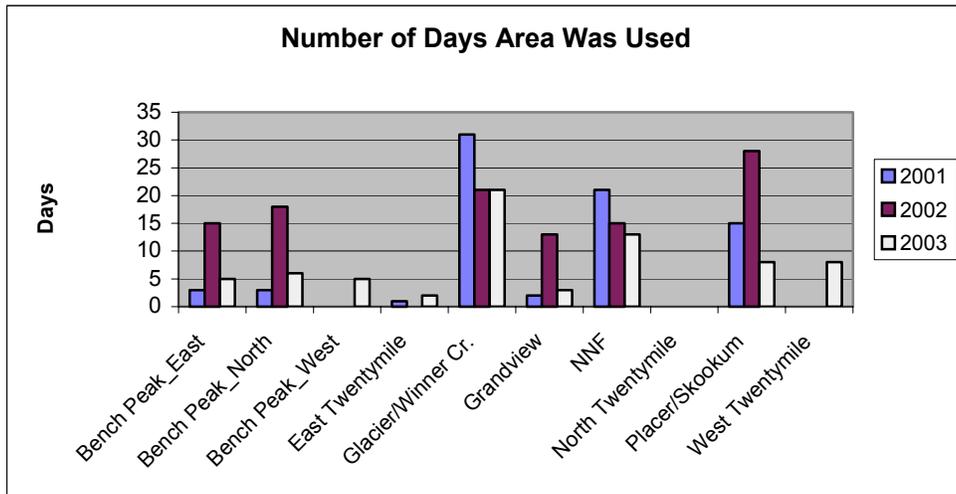
Appendix G-1 – Summary of Chugach Powder Guides Use Figures from 2001 through 2003.

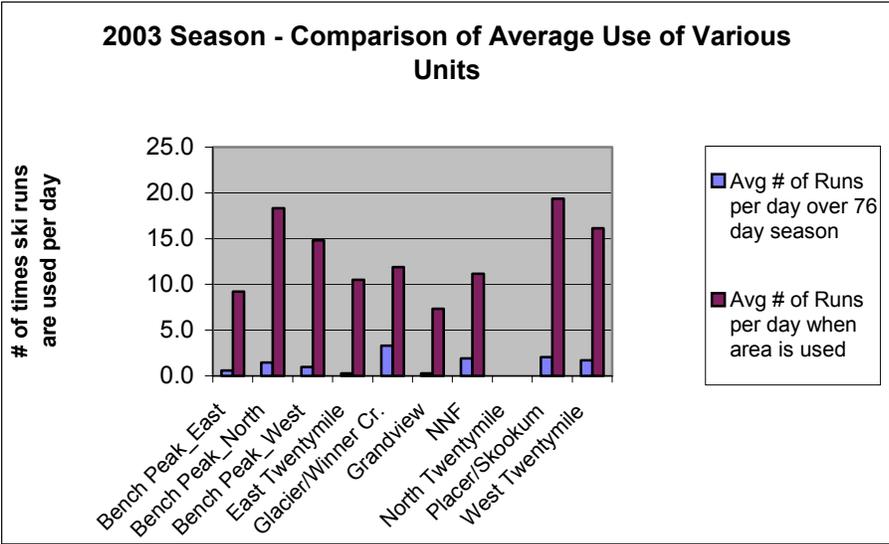
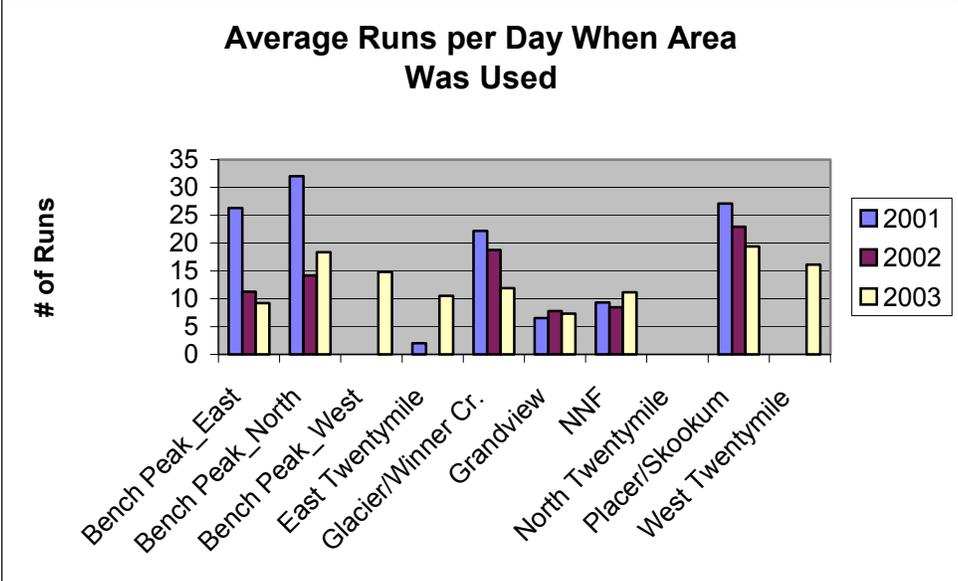
	2001					2002					2003				
	# of days area was used	# of times runs in area used per season	Highest # of runs per day	Lowest number of runs per day (>0)	Avg runs per day used	# of days area was used	# of times runs in area used per season	Highest # of runs per day	Lowest number of runs per day (>0)	Avg runs per day used	# of days area was used	# of times runs in area used per season	Highest # of runs per day	Lowest number of runs per day (>0)	Avg runs per day used
Bench Peak_East	3	79	36	16	26	15	169	24	2	11	5	46	30	3	9
Bench Peak_North	3	96	58	15	32	18	255	25	5	14	6	110	40	5	18
Bench Peak_West	NP*	NP	NP	NP	NP	NP	NP	NP	NP	NP	5	74	43	2	15
East Twentymile	1	2	2	2	2	NP	NP	NP	NP	NP	2	21	16	5	11
Glacier/Winner Cr.	31	687	68	3	22	21	394	68	2	19	21	250	30	2	12
Grandview	2	13	9	4	7	13	101	15	2	8	3	22	16	2	7
NNF**	21	196	26	2	9	15	127	17	2	8	13	145	38	3	11
North Twentymile	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	0	0	0	0	0
Placer/Skookum	15	407	59	4	27	28	642	48	2	23	8	155	36	5	19
West Twentymile	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	8	129	34	1	16
Totals		1480					1688					952			

* NP - Not permitted in this area

** NNF – Non-National Forest

Appendix G-2 Summary of Chugach Powder Guides Use Figures from 2001 through 2003.





Appendix H - Detailed Recreation Effects Analysis

The analysis below is organized by alternative. The effects of heli-skiing on all areas are shown under Alternative 2. The remaining alternatives show only those effects that are different from those in Alternative 2.

Alternative 1 (No Action - No permit issued)

Heli-skiing opportunities

This alternative would eliminate any opportunities for heli-skiing opportunities on the Kenai Peninsula geographic portion of the Chugach National Forest (including the area around the community of Girdwood). These opportunities would still be available on other portions of the Chugach National Forest near Valdez.

User Conflicts

This alternative would eliminate existing levels of users conflicts between backcountry skiers/snowboarders/snowshoers and commercially guided heli-skiers in the Bench Peak area and would eliminate any potential for conflicts in additional areas.

Alternative 2 (Chugach Powder Guides Proposal - Modified)

Heli-skiing opportunities

This alternative would make the maximum opportunities available to members of the public who wish to participate in heli-skiing activities in regards to varying terrain, elevation, and snow conditions and area. The units that would be permitted cover 338,200 acres of National Forest between the Seward Ranger District and the Glacier Ranger District. A timing restriction on one of the units would reduce the number of acres available for heli-skiing on Friday through Sunday to 320,100. New areas would be available for those clients who are returning. The proponent has stated that many of the clients are return customers. A total of 2,400 client days would be permitted with 1,800 client days for core areas and 600 client days for exploratory areas.

User Conflicts

This alternative would have the highest potential for user conflicts because of the total number of client days that would be permitted and because of the large area under permit. Below is a discussion of the type of recreation use each area receives in the winter and the expected level of conflict between heli-skiing users and backcountry non-motorized users.

Glacier – Winner Creek

There are two access points for these areas; both are located in Girdwood on private land. They are the Alyeska Prince Hotel parking lot, located at the end of Arlberg Road, and Crow Creek Mine, which is located off Crow Creek Road.

From the hotel lot, the vast majority of the backcountry users utilize nearby Moose Meadows' groomed ski trails and/or CPG's groomed cat track which leads to CPG's State permitted use areas. Permission to access the units from Crow Creek Mine is obtained from the owner by only a few backcountry users each year. There is no vehicle count for these areas. As low numbers of non-motorized users reach the proposed heli-skiing units, the probability of user conflict is low.

Potential User Conflict Level – Low

Mitigation Measures

1) Maintain CPG skiing call-in hotline, so that users know where and when CPG will be operating.

West Twentymile

There are three access points for this area, Alyeska Prince Hotel parking lot, Crow Creek Mine, and Twentymile. As no vehicle counts are done for the hotel and mine, only Twentymile is shown on maps in FEIS - Chapter 3 (Map 3-5A and B). Below is a table that shows the winter use count data showing the amount and type of winter use that this area might receive. Some of the users may not go into the West Twentymile unit when traveling from these access points. Some may not reach the unit and others may travel to other locations.

Access Point	Average use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Twentymile	3 vehicles	<1 vehicles	14 vehicles	4 vehicles

The numbers show the total average and total highest use for four access points within the Twentymile area. The four access points are Twentymile Sub Station, Twentymile Arm, Twentymile Inland and Train Station Switchyard (see Chapter 3 (Map 3-5A and B.). The distance motorized and non-motorized users would travel to reach the heli-skiing unit is a minimum of 8.5 miles from the highway. The Revised Forest Plan identified a winter motorized corridor that runs alongside of the river. It is 100 yards wide and 4 miles long, starting at the highway and ending at approximately the confluence of Twentymile and Glacier Rivers. The purpose of this corridor was to provide an area strictly for backcountry non-motorized users. It is estimated that few non-motorized skiers actually make it past the 4 mile mark and on into the West Twentymile unit. Therefore the likelihood of user conflicts is low.

The level of user conflicts could rise in the future if a proposal is submitted from and a permit is issued to the Alaska Wilderness and Mountain Hut Association to operate in the area.

Mitigation Measures

1) Restrict CPG’s operations to certain days of the week in the East Seattle Creek unit, which is closest to the highway.

West Seattle Creek (Mt. Alpenglow)

The main access point for the Mt Alpenglow area is near the mouth of the Sixmile Creek near the small community of Sunrise. There is no plowed parking there in the winter therefore there is no winter vehicle/people count for this area. Per conversation with several local Hope residents, a small number of local backcountry skiers use this area for winter recreation. The access to the unit is across Sixmile Creek and is very dependent on ice conditions on the river and it is reported that some have traveled across the river via a cable at mile 7 of the Hope Highway. The tree on the east side of the creek that the cable was secured to has blown down this past year so this route may not be available presently.

All elements of user conflict may arise for this area. Due to the fact that low numbers of non-motorized users reach the area where heli-skiing is proposed, the likelihood of user conflict occurring in this area of Seattle Creek is low.

Potential User Conflict Level – Low

Mitigation Measures

1) Restrict CPG’s operations to certain days of the week in the area closest to the community of Sunrise on Mount Alpenglow.

Placer-Skookum

There are six access points for this unit which are grouped under Placer River and are shown on a map in FEIS - Chapter 3 (Map 3-5A and B) and listed in Appendix D. The table below shows the winter use count data. Some of the users may not go into the Placer-Skookum unit when traveling from these access points. Some may not reach the unit and others may travel to other locations.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Placer River	9 vehicles	<1 vehicles	35 vehicles	7 vehicles

This table shows that the access point is more heavily used by motorized recreation users than non-motorized users. The winter use count data indicates that the non-motorized users access the unit from just one of the Placer River access points, the Portage Train WC. The distance they would travel to reach the heli-skiing unit from this point is a minimum of 6 miles from the highway. During the spring months when conditions are favorable, local skate skiers and

other non-motorized users utilize the Skookum Glacier area. This was identified during the forest planning process and as a result, the Revised Forest Plan closes this area to motorized use (including helicopters) after March 31. The flight path to the Placer-Skookum, Grandview, and potentially the east Moose Creek units from Big Game and Girdwood helicopter staging areas follows the non-motorized access route to Skookum Glacier. Placer-Skookum unit is one of two units that have received the heaviest use by CPG. CPG used ski runs in this unit an average of 400 times during a season (average from 2001-2003). The three-year average for the greatest number of times ski runs were used in a single day is 47. All elements of potential user conflict exist for this unit, but because lower numbers of non-motorized users utilize the whole unit the potential is at the moderate level, until April 1 at which it changes to the low level.

Potential User Conflict Level – Moderate,
Low after March 31.

Mitigation Measures

1) CPG would continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

Grandview

There are two access points for these areas, which are Placer River and Moose Pass, and are shown on maps in FEIS - Chapter 3 (Map 3-5A and B). Below is a table that shows the winter use count data showing the amount and type of winter use that this area might receive. Some of the users may not go into the Grandview unit when traveling from these access points. Some may not reach the unit and others may travel to other locations.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Placer River	9 vehicles	<1 vehicles	35 vehicles	7 vehicles
Moose Pass	4 people	0 people	20 people	0 people

This table shows that all of the backcountry non-motorized users originate from the Placer River access point. The distance motorized and non-motorized users would travel to reach the heli-skiing unit is between 10 and 13 miles from Placer River access point and a minimum of 14 miles from the community of Moose Pass. Due to the distance from the highway to the proposed heli-skiing unit, few if any backcountry non-motorized users would reach the unit.

The level of user conflicts could rise when the Nordic Ski Train recreation event takes place in the Grandview area. Typically this occurs on two weekend days during the spring months.

Potential User Conflict Level – Low

Mitigation Measures

1) Restrict CPG’s activities for a period of time before and during the Nordic Ski Train event to help ensure good snow conditions for Ski Train participants.

East Bench Peak/West Bench Peak/North Bench Peak

There are three main access points for these areas. These are the community of Moose Pass, Johnson Pass South Trailhead and Johnson Pass North Trailhead and are shown on maps in FEIS - Chapter 3 (Map 3-5A and B). Below is a table that shows the winter use count data showing the amount and type of winter use that this area might receive. Some of the users may not go into the East Bench Peak or West Bench Peak units when traveling from these access points. Some may not reach the unit and others may travel to other locations.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Moose Pass	4 people	0 people	20 people	0 people
Johnson Pass South	2 people	< 1 person	6 people	4 people
Johnson Pass North	6 vehicles	5 vehicles	16 vehicles	15 vehicles

This table shows that most of the backcountry non-motorized users originate from the Johnson Pass North Trailhead. The distance they would travel to reach the heli-skiing unit is between 1 mile and 6 miles from the highway. This is the least distance from the highway of any of the units proposed for heli-skiing. There is a higher likelihood of user conflict in the West Bench Peak unit because of the short distance of travel and the presence of backcountry non-motorized users using the area. CPG has used these three units in varying amounts in 2001-2003. In 2001, CPG used Bench Peak North and Bench Peak East (Bench Peak West was not permitted for 2001) only three days but during those days of use, CPG used runs an average of 32 and 26 times respectively. For 2002 and 2003, these areas were used a greater number of days but with less intensity during those days. (See Appendix G for more detailed information).

The Center Creek and Bench Creek drainages also serve as a flight corridor for flights for heli-skiing from the proposed staging area at the mile 62 gravel pit. The combination of noise disturbance from frequent landings and take-offs and both user groups using the same terrain increases the likelihood of conflict arising. The expected level of conflict with backcountry users would be high in West Bench Peak. The East Bench Peak and North Bench Peak units would

have a low level of user conflict due to the distance away from the highway and lack of overnight accommodations.

The level of user conflicts could rise in the future if backcountry cabins are installed along Johnson Pass Trail. This development would encourage an increase in length and duration of non-motorized user trips.

Potential User Conflict Level – West Bench Peak - High
 East Bench Peak - Low
 North Bench Peak - Low

Mitigation Measures

- 1) Restrict CPG’s operations to certain days of the week in the area closest to the highway (Bench Peak unit from ridge north of Groundhog creek to Granite Creek campground area.)
- 2) CGP continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

East Moose Creek/West Moose Creek

There is one main access point for this area and it is the community of Moose Pass. It is shown on a map in on maps in FEIS - Chapter 3 (Map 3-5A and B). Below is a table that shows the amount and type of winter use this area might receive.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Moose Pass	4 people	0 people	20 people	0 people

This table shows that motorized recreationists use this access point predominately. Most users, however, do not actually travel into the Moose Creek Units but adjacent to them on their way to Trail Glacier and other glacier to the east of these units. There may be an occasional local resident who uses a snow machine to access the Moose Creek drainage for backcountry skiing but this use currently is estimated to be very low.

These units would have a very low level of user conflict due to the distance away from the highway and lack of non-motorized backcountry skiing use. However, the Alaska Mountain and Wilderness Huts Association has given the Forest Service a proposal for a Hut-to-Hut system. This proposal may include the Mills Creek/Johnson Pass drainages. While the main part of the use of these huts would be in the summer months, the proponents anticipate the spring skiing season to be popular. This is also when the CPG’s operations may utilize these drainages. John Wolfe of the Huts Association sent in comments with concerns about noise disturbance to hut users, “competition” for the first “tracks”, the

notion that skiers using skins to climb are “cheated” when others gain the top with no personal effort, drainages are open for motorized use. The Hut-to-Hut proposal is still at the early stages of review prior to acceptance and commencement of environmental analysis. This proposal may or may not be built within these drainages.

Potential User Conflict Level – West Moose Creek – Low
 East Moose Creek – Low

Mitigation Measures – None

Snow River/East Ptarmigan and West Ptarmigan

The main access point for the Snow River area is a highway pullout at mile 13 of the Seward Highway. A secondary access point is near Bear Lake just north of Seward. These are shown on maps in FEIS - Chapter 3 (Map 3-5A and B). Motorized users access the Ptarmigan units from the Moose Pass community. The numbers for this use is shown above for the Moose Creek units. Very few people use the Ptarmigan Creek Trailhead to access the Ptarmigan area because of the high potential for avalanches in the Ptarmigan Lake area.

Below is a table that shows the winter use count data showing the type of winter use that this area might receive. Like the Bench Peak units some users who use these access points may or may not travel into the proposed heli-skiing unit.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Snow River	< 1 person	3 people	4 people	6 people
Bear Creek	2 people	3 people	19 people	10 people

This table shows that both motorized and non-motorized users utilize these access points. Winter travelers would need to travel at least 4 miles from the highway from the Snow River access point and approximately 8 miles from the Bear Creek access point to reach the closest part of the Snow River proposed heli-skiing unit. Most winter travel occurs along the south fork of Snow River that lays to the south of the Snow River unit. Currently very little winter travel occurs in the lower reaches of the north fork of Snow River, as the terrain is very rough and the river ice treacherous for crossing. The only element of the user conflict that may arise for this area is noise disturbance if the flight path of the helicopters covers areas where non-motorized users are recreating closer to the highway. Due to the fact that very limited non-motorized users reach the area where heli-skiing is proposed, the likelihood of user conflict occurring in the Snow River unit is low.

Winter access into the Ptarmigan units is generally from the community of Moose Pass. People park at the community hall or the Methodist Church parking lot and travel by snow machine across Upper Trail Lake, northeast along Trail Creek, south east on Trail Glacier and then drop south on Snow Glacier and into Paradise Valley. The snow conditions have to be right (depth and hard pack) for riders to get into this valley. They intersect the East Ptarmigan unit along the eastern edge of it. Very few non-motorized users travel into the Ptarmigan units from Moose Pass or Ptarmigan Creek Trailhead.

The Alaska Mountain and Wilderness Huts Association has given the Forest Service a proposal for a Hut-to-Hut system to be built within these drainages. However this proposal may be modified to change the location to the Mills Creek/Johnson Pass drainages. While the main part of the use of these huts would be in the summer months, the proponents anticipate the spring skiing season to be popular. This is also when the CPG's operations may utilize these drainages. John Wolfe of the Huts Association sent in comments with concerns about noise disturbance to hut users, "competition" for the first "tracks", the notion that skiers using skins to climb are "cheated" when others gain the top with no personal effort, drainages are open for motorized use. The Hut-to-Hut proposal is still at the early stages of review prior to acceptance and commencement of environmental analysis. This proposal may or may not be built within these drainages.

Potential User Conflict Level – Low.

Mitigation Measures

1) CPG will not fly along the South Fork of Snow River drainage to reduce potential conflicts with non-motorized users. CPG will minimize the number of crossings of the drainage to access Mile 12.4 staging area and these crossing will occur as close to confluence of the South Fork and North Fork of Snow River and highway as possible.

Mt. Ascension

There are three access points for this area. These are Lost Lake Trailhead and Primrose Creek Trailhead north of Seward and Snug Harbor road south of Cooper Landing. These are shown on maps in FEIS - Chapter 3 (Map 3-5A and B). This area is one of the most heavily used areas for motorized recreation on the Seward Ranger District. During the Forest Plan Revision process, many members of the non-motorized recreation community expressed frustration at being "pushed" out of this area due to the heavy snowmachine use. Below are the use figures from these three access points.

Access Point	Average Use per weekend day		Highest use per weekend day	
	Motorized	Non-motorized	Motorized	Non-motorized
Lost Lake Trailhead	24 people	<1 person	56 people	6 people
Primrose Creek Trailhead	13 people	<1 person	30 people	1 person
Snug Harbor Road	28 people	0 people	93 people	0 people

This table shows that all access points are more heavily used by motorized recreation users than non-motorized users. Scoping comments generated from public response to the heli-skiing proposal indicated that some non-motorized users still use this Mt. Ascension area and would be impacted by heli-skiing activities (Pfeiffenberger, 2002). There is a Forest Service public use cabin available for overnight recreation users located about 2 ½ miles from the Lost Lake Trailhead and about 11 ½ miles from the Primrose Creek Trailhead. The vicinity of the cabin to the Mt. Ascension heli-skiing unit could increase the number of overnight non-motorized users who may be impacted by heli-skiing activities. Through conversation with backcountry non-motorized enthusiasts who ski this area, they will also ski the area after the motorized vehicle goes into effect on May 1. This use would not be impacted by heli-skiing as the permitted activities would cease at the end of April.

The Forest Service received a proposal for a yurt to be built in the Cooper Lake area of the Mount Ascension unit. The proponent would like to offer guided backcountry skiing opportunities in the bowl south of Cooper Lake and then have clients stay in the night in the yurt. The proponent, Alec Lamberson, said he has spoken with Dave Hamre of CPG about working together to minimize conflicts if the yurt proposal is accepted, approved and authorized.

Potential User Conflict Level - Low

Mitigation Measures

- 1) If the Cooper Lake Yurt proposal is accepted, approved, and authorized, encourage CPG and the Alaska Mountain Yurt permit holders to work together to minimize the user conflicts that may arise in the skiing season.

Alternative 3 Modified (Reduced Recreation Conflicts – Community Impacts)

This alternative is different from Alternative 2 in the following ways:

Client days for exploratory unit are reduced to 400.

No heli-skiing use in these units:

- West Seattle Creek
- West Moose Creek
- West Ptarmigan Creek

Timing restriction of no heli-skiing on Friday, Saturday, Sunday in this unit:

- West Bench Peak

Timing restriction of no heli-skiing on Mon through Thursday in these units:

- Mid Seattle Creek
- East Seattle Creek

Heli-skiing Opportunities

This alternative would have the same number of client days available for skiing as Alternative 2 but 200 less client days in the exploratory areas. Some areas would be eliminated (31,900 acres) or have a timing restriction. The area that would be permitted for Monday through Thursday covers 19,000 acres of National Forest and the acreage available for heli-skiing on Friday, Saturday, and Sunday covers 18,000 acres. New areas would be available for those clients who are returning. The proponent has stated that many of the clients are return customers. A total of 2,200 client days would be permitted with 1,800 for core areas and 400 client days for exploratory areas.

User Conflicts

East Bench Peak/West Bench Peak/North Bench Peak

West Bench Peak has a timing restriction where heli-skiing activities are only allowed Monday through Thursday. This restriction would allow backcountry non-motorized users to recreate in the units closest to the road without some of the elements of user conflict (sense of fairness, safety, litter) with heli-skiing activities. However, the helicopter staging area would still be used at Mile 62 and the Bench Creek and Center Creek drainages would still be used for a flight corridor to reach the remainder of the Bench Peak units and potentially the Grandview and Place-Skookum units for heli-skiing activities. The noise disturbance may still cause potential for user conflict along the non-motorized access route into West Bench Peak and North Bench Peak.

Potential User Conflict Level – West Bench Peak - Moderate
East Bench Peak - Low

North Bench Peak - Low

Mitigation Measures

1) CGP continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

East and Mid Seattle Creek

East Seattle Creek and Mid Seattle Creek have a timing restriction where heli-skiing activities are only allowed Friday through Sunday. This restriction would allow backcountry non-motorized users to recreate in the units closest to the road without some of the elements of user conflict (sense of fairness, safety, litter) with heli-skiing activities and at times when current snowmachine use is lower. On the days when CPG could fly into East of Mid Seattle, the helicopter staging areas could be Kern Creek or Ingram Creek. The noise disturbance from the use of Ingram Creek may still cause potential for user conflict along the non-motorized access route into Pyramid and Wolverine Area

Potential User Conflict Level – East Seattle Creek – Moderate (Fri-Sun)
None (Mon-Thu)

Mid Seattle Creek – Moderate (Fri-Sun)
None (Mon-Thu)

Mitigation Measures

1) CGP continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

West Seattle Creek (Mt. Alpenglow)

This unit would not be included for heli-skiing activities and there would be no need for helicopter flights to some near this area to reach other units. Therefore this area would have no potential for user conflicts.

Potential User Conflict Level – None

Mitigation Measures

None

Alternative 4 (Maintain 2003 Permitted Level of Activity)

This alternative replicates what Chugach Powder Guides have been permitted for the 2003 skiing season. It differs from Alternative 2 in the following ways:

No heli-skiing use in these units:

- West, Mid and East Seattle Creek
- East Moose Creek and West Moose Creek
- East Ptarmigan Creek and West Ptarmigan Creek

- Snow River
- Mt. Ascension

Timing restriction of no heli-skiing on Friday, Saturday and Sunday in this unit:

- West Bench Peak

Heli-skiing opportunities

This alternative would make available some opportunities for heli-skiing equivalent to or greater than what has been permitted in the past several years. Many of the areas requested by Chugach Powder Guides would not be permitted in this alternative and there is a timing restriction on one area. The area that would be permitted for heli-skiing activities on Monday through Thursday would cover 159,100 acres of National Forest and the acreage available on Friday through Sunday would be 141,000 acres. There would be no new areas available for those clients who are returning but they may be able to ski different terrain in the same units pending weather and snow conditions. The proponent has stated that many of the clients are return customers. A total of 1,200 client days would be permitted in core units only.

User Conflicts

East Bench Peak/West Bench Peak/North Bench Peak

West Bench Peak would have a timing restriction where heli-skiing activities are only allowed Monday through Thursday. This restriction would allow backcountry non-motorized users to recreate in the units closest to the road without some of the elements of user conflict (sense of fairness, safety, litter) with heli-skiing activities. However, the helicopter staging area would still be used at Mile 62 and Bench Peak and Center Creek drainages would still be used for a flight corridor to reach the remainder of the East Bench Peak and North Bench Peak area and potentially the Grandview and Placer-Skookum units for heli-skiing activities. The noise disturbance may still cause potential for user conflict along the non-motorized access route into West Bench Peak and North Bench Peak.

Potential User Conflict Level – West Bench Peak - Moderate
East Bench Peak - Low
North Bench Peak - Low

Mitigation Measures

1) CGP shall continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

East Moose Creek/West Moose Creek

These units would not be permitted for heli-skiing activities and there would be no associated helicopter noise with heli-skiing activities near these units. These units would have no potential for user conflict.

Potential User Conflict Level – West Moose Creek – None
East Moose Creek – None

Mitigation Measures
None

Snow River/East Ptarmigan and West Ptarmigan

These units would not be permitted for heli-skiing activities and there would be no associated helicopter noise with heli-skiing activities near these units. These units would have no potential for user conflict.

Potential User Conflict Level – None.

Mitigation Measures
None

Mt. Ascension

These units would not be permitted for heli-skiing activities and there would be no associated helicopter noise with heli-skiing activities near these units. These units would have no potential for user conflict.

Potential User Conflict Level – None.

Mitigation Measures
None

East Seattle Creek/Mid Seattle Creek/West Seattle Creek (Mt. Alpenglow)

This unit would not be included for heli-skiing activities and there would be no need for helicopter flights to some near this area to reach other units. Therefore this area would have no potential for user conflicts.

Potential User Conflict Level – None

Mitigation Measures
None

Alternative 5 (Minimize Recreation Conflicts)

This alternative is different from Alternative 2 in the following ways:

No heli-skiing use in these units:

- West and East Seattle Creek
- West and North Bench Peak
- West Moose Creek West

- West Ptarmigan
- Mt. Ascension

There are no timing restrictions in any other unit.

Heli-skiing opportunities

This alternative would have a reduced number of client days available for heli-skiing compared to Alternative 2 and some areas would be eliminated. The units that would be permitted cover 231,400 acres of National Forest. New areas would be available for those clients who are returning. The proponent has stated that many of the clients are return customers. A total of 1,800 client days would be permitted in with 1,500 client days for core areas and 300 client days for exploratory areas.

User Conflicts

East Bench Peak/West Bench Peak/North Bench Peak

West Bench Peak and North Bench Peak would not be permitted for heli-skiing but East Bench Peak would be permitted. This would allow backcountry non-motorized users to recreate in the units closest to the road without some of the elements of user conflict (sense of fairness, safety, litter) with heli-skiing activities. However, the helicopter staging area would still be used at Mile 62 and the Bench Creek and Center Creek drainages would still be used for a flight corridor to reach the remainder of the Bench Peak area and potentially the Grandview and Placer-Skookum units for heli-skiing activities. The noise disturbance may still cause potential for user conflict along the non-motorized access route into West Bench Peak and North Bench Peak.

Potential User Conflict Level – West Bench Peak - Low
 East Bench Peak - Low
 North Bench Peak - Low

Mitigation Measures

1) CGP would continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

East Moose Creek/West Moose Creek

The user conflicts would be the same as Alternative 3.

Potential User Conflict Level – West Moose Creek – Low
 East Moose Creek – Low

Mitigation Measures

None

East Seattle Creek

This unit would not be included for heli-skiing activities however there still could be some disturbance to recreation users in this area due to the helicopter activity in the adjoining unit of Mid Seattle Creek. Therefore this area would have low potential for user conflicts.

Potential User Conflict Level – Low

Mitigation Measures

1) CGP would continue to keep skiing call-in hotline updated on locations they plan to ski that day or a day in advance.

West Seattle Creek (Mt. Alpenglou)

This unit would not be included for heli-skiing activities and there would be no need for helicopter flights to come near this area to reach other units. Therefore, this area would have no potential for user conflicts.

Potential User Conflict Level – None

Mitigation Measures

None

Snow River/East Ptarmigan

The effects would be the same as Alternative 2.

West Ptarmigan and Mt. Ascension

These units would not be permitted for heli-skiing activities and there would be no associated helicopter noise with heli-skiing activities near these units. These units would have no potential for user conflict.

Potential User Conflict Level – None.

Mitigation Measures

None

Alternative 9 (Reflects 2000 – 2002 Level of Use)

This alternative is different from Alternative 2 in the following ways:

No heli-skiing use in these units:

- East Twentymile
- West, Mid and East Seattle
- West Bench Peak
- West and East Moose Creek

- West and East Ptarmigan
- Snow River
- Mt. Ascension

There are no timing restrictions in any unit.

Heli-skiing opportunities

This alternative would have less client days available for heli-skiing than in Alternative 2 and some areas are omitted. The units that would be permitted cover 104,700 acres of National Forest. No new areas would be available for those clients who are returning. A total of 800 client days would be permitted. This alternative is similar to CPG's permitted use prior to 2003.

User Conflicts

East Twentymile

This unit would not be permitted for heli-skiing and therefore there would be no potential for conflict with heli-skiing.

Potential User Conflict Level – East Twentymile – Low

Mitigation Measures

None

West Bench Peak/North Bench Peak/East Bench Peak

West Bench Peak would not be permitted for heli-skiing but East Bench Peak and North Bench Peak would be permitted. This would allow backcountry non-motorized users to recreate in the units closest to the road without some of the elements of user conflict (sense of fairness, safety, litter) with heli-skiing activities. However, the helicopter staging area would still be used at Mile 62 and the Bench Creek and Center Creek drainages would still be used for a flight corridor to reach the East Bench Peak area and potentially the Grandview and Placer-Skookum units for heli-skiing activities. The noise disturbance may still cause potential for user conflict along the non-motorized access route into West Bench Peak and North Bench Peak. The total number of days that would be permitted is lower which may lower the overall use of these units during the season.

Potential User Conflict Level – West Bench Peak – Low
 North Bench Peak – Low
 East Bench Peak - Low

West, Mid and East Seattle Creek/West and East Moose Creek /West and East Ptarmigan/Snow River/Mt. Ascension

These units would not be permitted for heli-skiing activities and there would be no associated helicopter noise with heli-skiing activities near these units. These units would have no potential for user conflict.

Potential User Conflict Level - None

Mitigation Measures

None