



August 2025

Thompson Pass and Valdez Guided Helicopter Skiing

PRELIMINARY Environmental Assessment

DOI-BLM-AK-A020-2024-0007-EA

Applicants:

Alaska Backcountry Guides-AA-097296

Black Ops Valdez-AA-093344

Majestic Heli-ski-AA-093893

Pulseline Adventure-AA-097293

Silverton Mountain Guides-AA-0926683

Valdez Heli Ski Guides-AA-081350

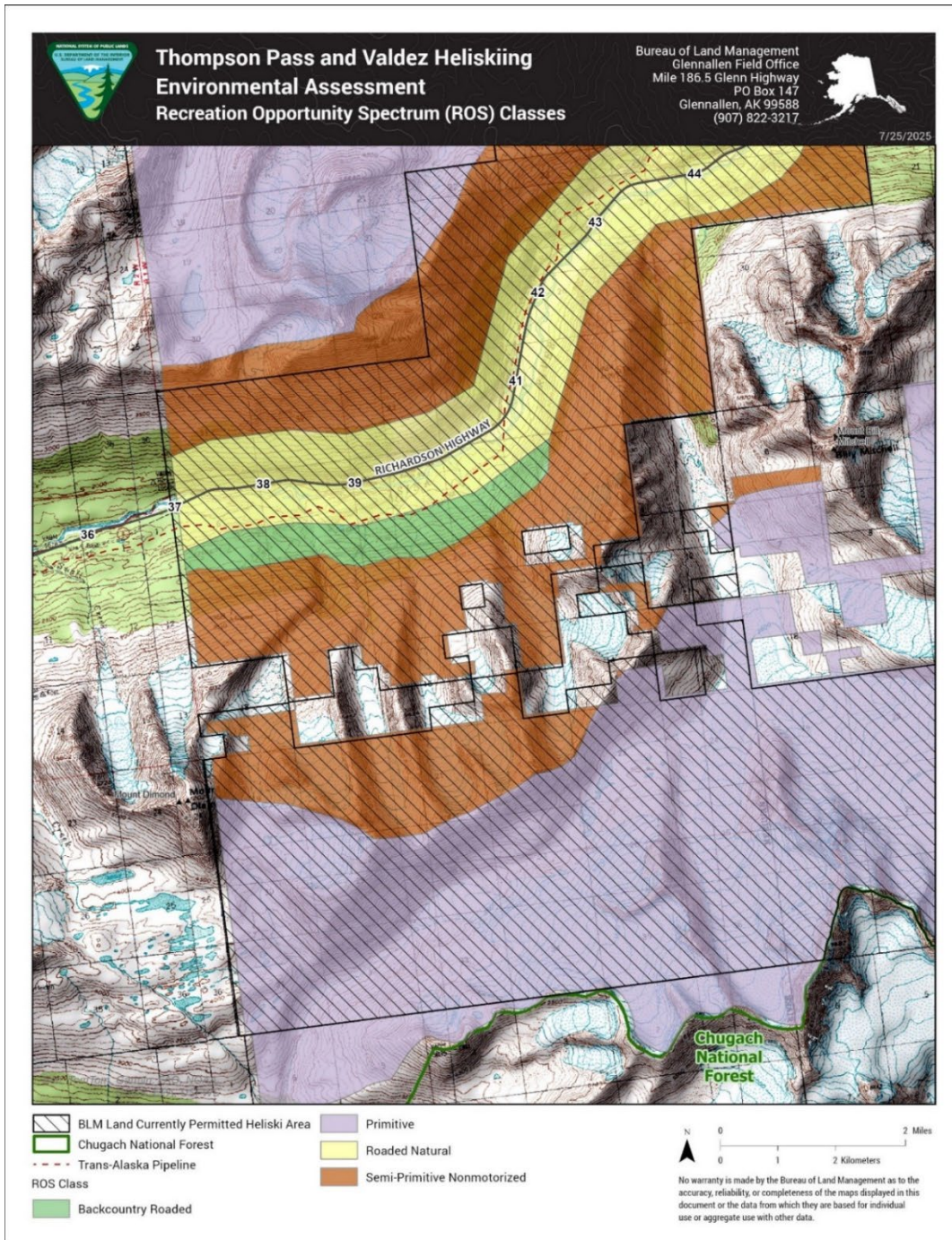


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CHAPTER 1. INTRODUCTION

1.1. Background

Thompson Pass (hereafter referred to as the ‘Valdez area’) is considered a world-class venue for guided helicopter skiing. The Bureau of Land Management has issued Special Recreation Permits (SRP’s) for this activity since the early 1990’s. Over the past three decades popularity and use of the area has increased for both guided helicopter skiing and overall recreation use. The increase of popularity by varying recreation groups and interests has led to user conflicts on BLM lands associated with Trans Alaska Pipeline Systems (TAPS) access points and mileposts 37-42 of the Richardson Highway. In May of 2025 the existing five SRP’s in the Valdez area expired. This EA will examine alternatives considering the issuance of up to eight total SRP’s in the Valdez area for a period of 10 years spanning January 2026-April 2035 and disclose associated impacts related to the permitted actions. It will also examine issues raised during public scoping. Many of the lands under BLM administration are encumbered by pending selections by the State of Alaska and/or Alaska Native corporations and may in the future be transferred to those entities. (APPENDIX C MAP 2: Thompson Pass and Valdez Heli-ski Project Area with Native and State-Selected Lands Indicated).

1.1.1. Heli-ski Access and Operations

This section discusses how helicopter-assisted guided skiing and snowboarding (hereafter referred to as “heli-ski”) companies access and operate on BLM-managed public lands in the Valdez area. Three of the six operators also have permits that authorize them to provide heli-skiing on the adjacent Chugach National Forest lands (500,000 acres). All six operators also have permits that authorize them to provide heli-skiing on the adjacent State of Alaska lands (391,000 acres).

The BLM considers authorization of Special Recreation Permits (SRPs) annually. BLM opened an SRP application window between October 1 and December 31, 2024, allowing heli-ski operators to apply to operate on the Valdez area BLM-managed public lands for the next 10-year period from January 2026 to April 2035. BLM received six SRP applications requesting to conduct commercial heli-ski operations on the BLM managed public Valdez area. The six applicants are: Alaska Backcountry Guides (ABG), Black Ops Valdez (BOV), Majestic Heli-ski (MHS), Pulseline Adventure (PA), Silverton Mountain Guides (SMG), and Valdez Heli Ski Guides (VHSG).

Operators applying for permit renewal would be approved to operate in the Valdez area for a ten-year period from January 2026 – April 2035 during the annual heli-ski operating season (January 15 – May 15) with the option for renewal pending permit requirements are met annually. New operators submitting applications for a new permit will be granted a one-year permit with the option for renewal through April 2035, pending permit requirements are met annually. New operators would, under this EA, be subject to the same permit cycle ending in April 2035, regardless of when their application was submitted.

The BLM managed public lands available for heli-skiing comprise over 160,000 acres in the Valdez and Thompson Pass areas (APPENDIX C MAP 1: Thompson Pass and Valdez Heli-ski Project Area). However, not all this acreage is desirable for heli-ski operations, as the terrain

must be specifically suitable for safe, enjoyable ski conditions. In addition 28,300 acres are closed to heli-ski operations for wildlife considerations.

1.1.2. Historical Operator Authorizations

The history of operations in the Valdez area is provided below for all companies that have had permits to provide heli-ski services in the past.

Up to five Heli-operators have been permitted to operate on BLM administered lands annually since 2001. Since the early 1990s, interest and demand for helicopter supported skiing in the Valdez area has grown. Originally it comprised comparatively modest operations originating from the Worthington Glacier airstrip which primarily used adjacent lands under the management of the State of Alaska. As popularity for winter sports increased, new operators explored other locations along the Richardson Highway corridor to allow for access to more challenging and diverse terrain with less vulnerability to adverse weather conditions.

1.1.3. Annual Permit Renewals

As part of normal SRP operations to maintain good standing and to continue to have permits renewed, an operator must annually submit the following to BLM:

Prior to each operating season:

1. Operators must pay minimum use fee (amount established by BLM every 3 years).
2. Operators must submit proof of liability insurance.
3. Operators must submit an operations and safety plan.
4. Operators must sign additional Stipulations pertaining to operations area.
5. Operators must submit an Alaska Business License.
6. Operators and Authorized Officer must sign form 2930-2 Special Recreation Permit and associated Terms and Conditions.

Post (after) each operating season:

1. Operators must submit a post-use report within 30 days of operating season, including flight path and landing locations on BLM-managed lands.
2. Operators must pay an annual use fee (calculated based on operating time spent on BLM land).
3. Operators must have had no violations of Terms and Conditions of SRP or Stipulations for operations area.

If all the above conditions are met, SRPs may be reauthorized annually. If any of the above conditions are not met, the Authorized Officer (generally the Field Office Manager) may at his or her discretion suspend the annual authorization of an SRP or put the operator on a probationary status.

Additionally, an Authorized Officer may use their discretion to suspend annual authorization of an SRP for situations beyond these conditions being met. Typical situations may include noncompliance with permit stipulations, compromise of public or user safety, concern for specific wildlife populations, or other environmental concerns.

1.1.4. Current Operator Applicants

Heli-ski operators who have previously held permits in the Valdez area include the following four operators:

1.1.4.1. The following operators seek to renew their operations:

1. Alaska Backcountry Guides: Based in Valdez, AK, is operating under a BLM SRP that was first authorized in 2023 and expires in May 2025.
2. Black Ops Valdez: Based in Valdez, AK, is operating under a BLM SRP that was first authorized in 2021 and expires in May 2025.
3. Pulseline Adventure: Based in Pocatello, ID but operating in Valdez, is operating under a BLM SRP that was first authorized in 2023 and expires in May 2025. Also operates under a BLM SRP for the Chugach/Stairsteps region that expires in 2027.
4. Valdez Heli Ski Guides: Based on Thompson Pass, near Valdez, is operating under a BLM SRP that was first authorized in 2020 and expires in May 2025.

1.1.4.2. The following are new operators seeking permits to operate in the Valdez area:

1. Majestic Heli-ski: Based in Sutton, AK, is operating under a BLM SRP for the Chugach/Stairsteps region that was first authorized in 2023 and expires in May 2032. Not currently permitted in the Valdez area.
2. Silverton Mountain Guides: Based in Palmer, AK, is operating under a BLM SRP for the Chugach/Stairsteps region that was first authorized in 2023 and expires in May 2032. Not currently permitted in the Valdez area.

1.1.4.3. This Programmatic EA will assess permitting up to an additional two operators in the Valdez Area for a total of eight SRP's.

This EA will assess the impacts of not only the six current applicants but expand the EA programmatically to include an impact assessment for two more heli-ski operators (total of 8 operators) for the 2026 – 2035 period. This EA will also discuss best management practices to minimize impacts of up to 8 heli-ski operators and address public concerns. The following would be the total potential operators for the next ten-year operation period, from 2026 – 2035:

1. Alaska Backcountry Guides
2. Black Ops Valdez
3. Pulseline Adventure
4. Valdez Heli-ski Guides

5. Majestic Heli-ski
6. Silverton Mountain Guides
7. Future operator 1, TBD
8. Future operator 2, TBD

1.2. Purpose and Need

Providing recreation opportunities is a key part of the Bureau of Land Management's mission. Although many visitors possess the necessary knowledge, skills, and equipment to enjoy the BLM lands, others may not have the capability to participate in an activity on their own. There is a need to determine if heli-ski services should be authorized on BLM managed lands and if so what limitations or mitigations should accompany the permitted activity.

The need for the action is to respond in a timely and consistent manner to applications for commercial heli-skiing as directed by the FLPMA, 43 U.S.C. 1701 et seq. and 43 CFR 2930. The FLPMA establishes outdoor recreation as one of the principal uses of public lands, and directs the Secretary of the Interior to regulate, through permits or other instruments, the use of public lands. 43 CFR 2930 outlines the federal regulations the BLM is required to follow regarding permits for recreation on public lands, including permits for commercial operators.

In this case, BLM is considering a ten-year authorization from 2026 - 2035 for the six applicants that have applied during the SRP application window and allowing for two additional future applications and operators. The purpose of this action is to help BLM meet management objectives, protect recreational and natural resources, and provide for the health and safety of visitors.

1.3. Decision to be Made

Based on the analysis contained in this EA, the BLM will decide whether to approve or deny the proposed action or one of the alternatives and if so, under what terms and conditions. The Authorized Officer is the responsible official who will decide one of the following:

- To approve the proposed action or one of the alternatives with relevant and applicable design features as submitted;
- To approve the proposed action with additional mitigation added;
- To analyze the effects of the proposed action in an EIS if a finding of no significant impact (FONSI) can't be reached; or
- To deny the proposed action

The BLM has discretion over whether to issue SRPs. Pursuant to 43 CFR § 2932.26, the BLM's decision will be based on the following factors to the extent that they are relevant:

- (a) Conformance with laws and land use plans,
- (b) Public safety,

- (c) Conflicts with other uses,
- (d) Resource protection,
- (e) The public interest served,
- (f) Whether the existing applicant has complied with the terms of their permit or other authorization from BLM and other agencies, and
- (g) Such other information that BLM finds appropriate.

1.4. Land Use Plan Conformance

The 2007 East Alaska Resource Management Plan (EARMP) Record of Decision (ROD) provides the overall long-term management direction for lands encompassed by the proposed project (BLM 2007). The Proposed Action and alternatives are in conformance with the EARMP/ROD.

- M. Recreation
 - M-1 Goal: Manage recreation to maintain a diversity of recreational opportunities.
 - M-2.4: Tiekel Area Allocations:

This area consists predominantly of State-selected lands, although there is some Native-selected land as well. This section describes two management scenarios: interim describes management of State- and Native-selected lands in the area until conveyance occurs, and long-term describes management of the lands if they are retained in long-term Federal ownership.

Interim Management (Tiekel Area)

Under interim management, only the unencumbered BLM lands in the Tiekel corridor would be designated as a Special Recreation Management Area (SRMA). Objectives would be to manage for roaded natural, semi-primitive non-motorized, and semi-primitive motorized recreation experiences within the corridor. OHVs would be “limited” to designated trails on unencumbered BLM lands. Implementation-level considerations would include maintenance of specific trails as non-motorized (including snowmachines), construction of both non-motorized and motorized trail loops, and vehicle class restrictions (such as weight limitations) on specific trails. Where these designations affect trails on State-selected lands, the BLM would work with the State of Alaska on designations. Existing withdrawals against mineral leasing and locatable mineral entry within the transportation and utility corridor would remain in place. This area would be considered a priority area for forest management. This SRMA would not preclude timber management activities, but proposed timber sales would consider impacts to recreational facilities, experiences, and viewsheds. Temporary roads utilized for forestry access may be considered for retention if they are within areas managed for a roaded natural recreation experience. This SRMA is within the transportation and utility corridor; this would remain the area’s primary purpose.

Visitor use limits would be determined for helicopter-supported commercial uses, consistent with existing ROS classes. Recreational facilities would include updating and development of selected trailheads, construction of one wayside, and consideration of a bike trail utilizing the old Richardson Highway. The Egan cabin would be considered for public use.

Long-term Management (Tiekel Area)

If large contiguous blocks within this area are retained in Federal ownership, they would be considered for inclusion into the SRMA, with objectives (for lands outside the transportation and utility corridor) emphasizing maintenance of primitive and semi-primitive recreation. OHVs would be “limited” to designated trails, with some trails designated non-motorized (including snowmachines). If contiguous blocks are retained in the southern portion of the Tonsina sub-unit, they would be closed year-round to all motor vehicles, including helicopter-supported recreational activities. Within the entire SRMA, minimal or no development will be considered at trailheads that access areas managed for a primitive or semi-primitive recreation experience. Existing withdrawals associated with the transportation and utility corridor would be maintained, but other areas would be open to leasable and locatable mineral entry. Public use cabins would be considered, and visitor use limits for commercial heli-ski operations would be established based on maintenance of existing ROS classes. Consideration would be given to not authorizing heli-skiing in some areas managed for a primitive recreation experience.

- M-2.6: Other Area Allocations Extensive Recreation Management Area (ERMA): Areas outside those identified above would be managed as Extensive Recreation Management Areas, with recreation management based on maintenance of existing ROS classes in the areas. Inventory and monitoring could occur, and standards may be identified for trail density in these areas based on monitoring and inventory information. Some education/interpretation at trailheads may occur, particularly at 17(b) easement trailheads within these areas.
- M-3: Management Actions: Authorize special recreation permits in accordance with Special Recreation Permit Handbook 2930-1. Manage special recreation permits in accordance with Federal regulations, special stipulations, and established terms and conditions.

1.5. Scoping and Issues

The BLM uses a scoping process to identify potential significant issues in preparation for impact analysis. The principal goals of scoping are to identify issues, concerns, and potential impacts requiring detailed analysis. Both internal and external scoping are summarized in further detail in Chapter 4. Both internal and external generated issues resulting from scoping are captured in this section. The external public scoping summary report is available in APPENDIX B: External Scoping Summary Report.

A formal external scoping public meeting was held on March 14, 2024, in Valdez, AK, for BLM to share information about the EA process and gather comments from both heli-ski operators and other user groups. The project was posted on the National NEPA Project Register, and a 30-day public comment period was opened starting on March 14, 2024. A full summary of the public scoping process can be found in APPENDIX B: External Scoping Summary Report. The scoping report was also published on the National NEPA Project Register on November 18, 2024. Internal BLM scoping initiated in January 2025 with the interdisciplinary team.

Other Concerns from Scoping

Each comment received during scoping was considered a potential issue. Where possible, suggestions about the project were incorporated into the design of the alternatives. Some concerns and suggestions were beyond the scope of this project. Others are addressed through project design features including standard special recreation use permit terms and conditions.

The following two tables list the issues that were carried forward for further analysis in this EA (Chapter 3) as well as those issues which were not carried forward. Issues not analyzed in further detail are disclosed with rationale provided for why they were not carried forward.

1.5.1. Issues Analyzed in Detail

Following the IDT process and scoping period one issue was identified and used to formulate a reasonable range of alternatives. Table 1 summarizes issues analyzed in this EA. The detailed analysis of each issue carried forward can be found in CHAPTER 3.

Table 1. Issues Analyzed in Detail.

RESOURCE AND ISSUE #	ISSUE STATEMENT
Recreation Issue # 1 (Public Scoping): User Conflicts	How would issuing up to eight commercial heli-ski SRPs affect backcountry recreational users in the 40-mile and pipeline access road areas specifically?

1.5.2. Issues not Analyzed in Further Detail

Table 2 summarizes issues that were identified by external or internal scoping but were not carried forward for detailed analysis, and discloses the rationale for not further discussing in this EA.

Table 2. Issues Not Analyzed in Further Detail.

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
Public Scoping Issue: Duration of Permits and Number of Permits Authorized	Issuing SRPs is an annual and discretionary BLM action and while this EA may analyze the issuance of up to eight permits through 2035, each permit depends on operator compliance

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
<p>How well is BLM able to assess impacts for the entire permit duration (10 years)? Should the duration of permits be shortened to better analyze cumulative effects of operations? Would the issuance of fewer than – six (up to eight) - authorized heli-ski permits have less overall impact and should the number authorized be reduced?</p>	<p>with terms and conditions of the permit. BLM may choose to not authorize all eight permits and assessment will be made on a case-by-case basis. BLM can reevaluate cumulative impacts annually and move forward with additional reauthorizations, or not, accordingly.</p> <p>The Authorized Officer may modify, suspend or terminate an SRP or annual reauthorization, if necessary, to protect public resources, health, safety, and the environment, or because of non-compliance with permit stipulations. The Authorized Officer may also adjust permit terms, conditions, and stipulations as necessary to address issues that may come up in the future or to provide protection to public resources, health, safety, and the environment (43 CFR § 2932.56).</p>
<p>Public Scoping Issue: Waste Management</p> <p>Would the issuance of up to eight SRPs have effects related to human waste or physical trash on the landscape?</p>	<p>Stipulation 17 addresses management of human waste. Project Design Feature #5 (Section 2.2.5) addresses hazardous and solid waste management.</p>
<p>Public Scoping Issue: Number of Helicopters Used</p> <p>Should heli-ski operators have limits on the number of helicopters they can fly?</p>	<p>All operators originate flights from private or state lands and may fly to and operate on BLM, State, or Forest Service lands as permits allow. The Federal Aviation Administration (FAA) is responsible for regulating and managing navigable airspace in the United States. While the BLM may limit the number of permits, duration of permits, or issuance of permits, on BLM lands considerations of capping the number of helicopters would not take place until an implementation level planning effort begins. This may occur once land conveyances are complete and in cooperation with other permitting agencies. If limits are not supported or agreed to by other permitting agencies the number of helicopters in use would likely remain unchanged.</p>
<p>Public Scoping Issue: Flight Path Data</p>	<p>For more than 10 years, permittees have been required to sign a stipulation (Section 2.2.5 Stipulation 14) requiring the sharing of flight</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
<p>Should daily flight information and use areas be provided to BLM?</p>	<p>tracking and landing data from the entirety of each operating season with the BLM. This has been a conditional requirement for permit authorization and will not change for this next permit authorization cycle.</p> <p>Permittees are required to submit a post-season report including all flight track data and landing locations to BLM within 30 days of the end of the season. Incursions or noncompliance with permit terms can result in suspension or cancellation of a permit at BLM Authorized Officer's discretion. Due to the proprietary nature of this data, BLM is restricted from sharing this with the public unless prior authorization from the permittees is obtained.</p>
<p>Public Scoping Issue: Non-motorized Backcountry Recreationist – Heli-ski Safety</p> <p>Would the issuance of up to eight SRPs affect safety between human powered recreationists and heli-ski operations?</p>	<p>Project Design Feature 7 (Section 2.2.5) addressing user spacing requirements eliminates this impact. Operators will maintain a 2500 feet horizontal/vertical distance from all other user groups.</p> <p>Project Design Feature? 9 (Section 2.2.5) requires operators to prepare an operations and safety plan for BLM review, including avalanche safety of clients and other backcountry users, helicopter safety, emergency rescue, and guide requirements.</p>
<p>Public Scoping Issue: Effect on Solitude</p> <p>Would the issuance of up to eight SRPs affect solitude for users?</p>	<p>The Tielke SRMA is within the transportation and utility corridor which remains the area's primary purpose (East AK ROD pg. 37). As such the project area is not managed for solitude experiences. Further helicopter-supported recreation activities are temporary in nature, limited to specific seasons of operations, and only evident in a specific time and place of short duration. These activities have no effect on the landscape, result in no ground disturbing activities, and are neither pervasive nor omnipresent.</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
<p data-bbox="277 436 683 506">Public Scoping Issue: Limit on Untracked Terrain</p> <p data-bbox="217 527 743 674">Would the issuance of up to eight SRPs affect the limited resource of pristine and untracked ski terrain that is preferred by non-heli-ski user groups?</p>	<p data-bbox="784 296 1409 764">In the Valdez area, there are vast amounts of skiable terrain managed by BLM, the US Forest Service, and the State of Alaska totaling nearly one million acres. Access to untracked terrain is variable and dependent upon an array of factors including snow cover, weather, availability of ambient light, and means of transportation. The issuance of SRP's would not reduce the availability of skiable terrain and Project Design Feature 7 (Section 2.2.5) requires Heli-ski operators to avoid terrain already in use by other user groups, thereby spreading out total usage over a larger area.</p>
<p data-bbox="217 993 743 1062">Public Scoping Issue: Motorized Users - Heli-ski Conflicts</p> <p data-bbox="224 1083 737 1230">How would the issuance of up to eight SRPs affect user conflicts between motorized (snowmachine) recreationists and heli-ski operations?</p>	<p data-bbox="784 842 1403 1094">As snowmachine technology advances, motorized users are able to access more and more terrain that was previously available only to aircraft-supported recreation. Snowmachine users, however, still only access terrain from the road system. This limits the acreage to which snowmachines can access BLM-managed land.</p> <p data-bbox="784 1115 1403 1325">Furthermore, on lands accessible to snowmachines, heli-ski operators are required to follow Project Design Feature 7 (Section 2.2.5) regarding user group spacing. Operators will maintain a 2500 feet horizontal/vertical distance from all other user groups.</p>
<p data-bbox="253 1413 711 1482">Public Scoping Issue: Noise Levels Experienced by Other Users</p> <p data-bbox="224 1503 740 1608">How would the issuance of up to eight SRPs affect the noise levels encountered by other users?</p>	<p data-bbox="784 1409 1409 1619">Whether the BLM chooses to issue the SRP's or not the same activities occur on adjacent State of Alaska and Chugach National Forest lands. Regardless of where the activity is authorized, the same noise levels will exist as operators fly over and through BLM lands.</p>
<p data-bbox="266 1692 698 1761">Public Scoping Issue: Helicopter Emissions</p> <p data-bbox="217 1782 743 1887">How would issuing up to ten commercial heli-ski SRPs affect air quality and greenhouse gas emissions?</p>	<p data-bbox="784 1661 1403 1871">Concerns were expressed about greenhouse gas (GHG) emissions associated with helicopter use for heli-skiing and their contribution to climate change were not carried forward for detailed analysis in this Environmental Assessment for the following reasons:</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
	<p>1. Minimal Emissions Contribution from Proposed Action: The scale and frequency of helicopter operations under the proposed permit are limited and highly localized. As such, any GHG emissions resulting from the action would represent a negligible fraction of regional or national totals. The proposed action does not represent a significant source of emissions when evaluated in the context of global climate change drivers.</p> <p>2. No Reasonably Foreseeable, Site-Specific Climate Impacts: While climate change may influence regional snowpack, wildlife distribution, and long-term ecosystem trends, the emissions from this action are not expected to cause or measurably influence those outcomes. There is no scientifically demonstrable causal link between the incremental emissions from heli-skiing and specific changes in local climate or winter conditions that could inform decision-making at this scale.</p> <p>3. Compliance with CEQ and Legal Guidance: In accordance with the Council on Environmental Quality (CEQ) guidance and relevant case law, NEPA analyses are not required to quantify or speculate on climate impacts when the emissions are minimal, and the effect is not decision relevant. The CEQ encourages agencies to focus their analysis proportionally on actions with meaningful emissions or climate effects, which is not the case here.</p> <p>4. Air Quality Not Significantly Affected: Emissions associated with helicopter use do not exceed any thresholds that would trigger additional air quality review under the Clean Air Act or state regulations. Flight operations are limited in duration and occur in remote, high-elevation areas, where there are no sensitive receptors. Therefore, the action is not expected to result in adverse effects on local or regional air quality.</p> <p>Based on the above, the BLM has determined that GHG emissions and climate change impacts are not substantial enough to warrant detailed analysis in this EA. These factors, while globally</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
	important, are not expected to result in measurable environmental consequences within the context of this site-specific, seasonal recreational activity.
<p>Internal Scoping Issue: Abandoned Mine Lands</p> <p>Would the issuance of up to eight SRPs have any associated abandoned mine lands considerations in the proposed area?</p>	<p>Known Abandoned Mine Land (AML) features exist in T8S R4W, Sections 2 and 9. Small adit (tunnel) and small pits will not pose hazards during winter operations due to snow cover.</p>
<p>Internal Scoping Issue: Minerals and Mining</p> <p>Would the issuance of up to eight SRPs have any associated considerations for minerals or mining in the proposed area?</p>	<p>Not present. No active Federal mining claims exist in the proposed operational area. Active Federal mining claims would not necessarily preclude winter recreational use, are not present and therefore are excluded from further analysis.</p>
<p>Internal Scoping Issue: Lands and Realty</p> <p>Would the issuance of up to eight SRPs have any associated Lands and Realty authorization considerations in the proposed area?</p>	<p>Not present. The Lands and Realty Specialist reviewed land status, Rights of Ways, Lands selected for conveyance, among other reviews of lands and determined that no lands and realty conflict of interest would occur with the authorization of the proposed activity. The proposed action, therefore, would have no impact upon other lands and realty authorizations in the proposed project area.</p>
<p>Internal Scoping Issue: Fish Species and Habitat</p> <p>Would the issuance of up to eight SRPs have any associated effects to fish species or habitat? Would there be presence of hazardous materials to consider impacts for?</p>	<p>No anadromous or resident fish species have been documented to in the occur within the area of proposed activities. If there are fish in the proposed area, the activities will occur during winter months when the streams are snow covered and frozen; therefore, there would be no impact to fisheries resources from heli-skiing activities.</p>
<p>Internal Scoping Issue: Riparian Habitat</p> <p>Would the issuance of up to eight SRPs have any associated effects to riparian habitat?</p>	<p>The proposed action occurs during winter months when the vegetation is snow covered and frozen. There would be no impact to riparian vegetative resources from the proposed activities.</p>
<p>Internal Scoping Issue: Cultural Resources</p>	<p>This action will take place on steep, mountainous terrain with no known cultural resources, will not result in any surface disturbance and will occur on snow covered surfaces. Additionally,</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
<p>Would the issuance of up to eight SRPs have any associated effects to cultural resources?</p>	<p>consultation was conducted with Chugach Alaska Corporation in April 2023, which did not identify any cultural resource concerns. It will therefore have no anticipated effect on known cultural resources. According to the <u>Protocol for Managing Cultural Resources on Lands administered by the Bureau of Land Management in Alaska, between the Bureau of Land Management and the State Historic Preservation Officer</u>, signed February 5th, 2014, this undertaking is not subject to further Section 106 review (Appendix 2: Categories One and Three). The project will involve less than one square meter of ground disturbance and will take place on slopes greater than 30 degrees. Under the terms of that agreement, no additional consultation with the Alaska State Historic Preservation Officer is required for this undertaking.</p>
<p>Internal Scoping Issue: Paleontological Resources</p> <p>Would the issuance of up to eight SRPs have any associated effects to paleontological resources?</p>	<p>The mountains in the project area are mainly made up of sedimentary and metamorphosed, sedimentary strata of the Upper Cretaceous aged, Chugach flysch (USGS 2024). This includes the Valdez Group, which contains locally metamorphosed amphibolite facies as well as graywacke and siltstone. These strata have a Potential Fossil Yield Classification (PFYC) of 3, which is moderate or unknown fossil potential. However, the strata are highly metamorphosed, decreasing the odds of finding unmodified, significant fossils. Additionally, this project involves no surface disturbance. This undertaking is therefore unlikely to have any effect on any fossils present.</p>
<p>Internal Scoping Issue: Vegetation and Forestry Resources</p> <p>Would the issuance of up to eight SRPs have any associated effects to vegetation and forestry resources?</p>	<p>No impacts to vegetation would occur due to the action occurring in rocky, snow-covered terrain above tree line.</p>
<p>Internal Scoping Issue: Visual Resource Management</p>	<p>BLM includes four Visual Resource Management (VRM) inventory classifications in the East Alaska Resource Management Plan</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
<p>Would the issuance of up to eight SRPs have any associated effects to Visual Resource Management (VRM)?</p>	<p>(EARMP) for managing scenic values. Most of the proposed project area is within Class IV which allows for “major modification of the existing character of the landscape.” Heli-skiing would not change the character of the landscape and is therefore consistent with this VRM rating. Physical evidence such as tracks in the snow go away when the snow melts or new snow is deposited.</p>
<p>Internal Scoping Issue: Hydrological Resources</p> <p>Would the issuance of up to eight SRPs have any associated hydrological effects?</p>	<p>Along with baseflow, the mountain snowpack provides water to many streams within and surrounding the proposed project area. Activities outlined in the proposed project area will have no direct impact on water resources. In addition, according to the ADNR Water Estates database, there are no ground or surface water rights within this area so there will be no impact to water availability. Water quality was considered as pertaining to refueling of helicopters but within the design features in Section 2.2.6, Design Feature 5 requires all helicopter refueling will occur on designated areas not on BLM land.</p>
<p>Internal Scoping Issue: Travel Management</p> <p>Would the issuance of up to eight SRPs have any associated effects to Travel Management?</p>	<p>The Proposed Action is comprised solely of aerial operations. No overland motorized travel or transit is included within the Proposed Action and all activities take place when the landscape is snow covered and frozen. There are no effects from the action to travel management or the overall trail system.</p>
<p>Internal Scoping Issue: Fire and Fuels</p> <p>Would the issuance of up to eight SRPs have any associated effects to fire and/or fuels in the proposed area?</p>	<p>All fuels within the project area will be covered in snow, making wildfire risk from any source, including the proposed action, extremely low.,</p>
<p>Internal Scoping Issue: Wildlife—Mountain Goat Reproduction</p> <p>Would the issuance of up to eight SRPs have any associated effects upon mountain goat reproduction?</p>	<p>Due to Section 2.2.6 Project Design Feature 1, there will be no effect to mountain goat reproduction and therefore, no need to further analyze the impacts to mountain goat reproduction.</p> <p>This PDF is effective because restricting the heli-ski season to January 1 – April 30th removes this aerial disturbance during the late October – early</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
	<p>December mating season and provides nannies sufficient time to select parturition habitat prior to the kidding season. A season end-date of April 30th ensures heli-ski operations will not displace nannies prior to parturition in mid-May nor disturb nannies with young kids in nursery habitat. (ADFG Mountain Goat).</p> <p>This PDF is demonstrated as implementable both technologically and economically as these season dates are consistent with BLM heli-ski permit seasons over the past 20 years (BLM 2005, BLM 2010, BLM 2015).</p>
<p>Internal Scoping Issue: Wildlife—Mountain Goat and Dall Sheep Populations</p> <p>Would the issuance of up to eight SRPs have any associated effects to mountain goat and Dall sheep?</p>	<p>Due to Section 2.2.5 Project Design Feature 2, there will be no adverse or cumulative effects to mountain goats and Dall sheep and therefore, no need to further analyze impacts. The PDF has been demonstrated effective as a horizontal distance of ½ mile (805 meters) and vertical distance of 1,500 feet (457 meters) is within recommended aerial distances for managing helicopter recreation (BLM 2005, BLM 2007, Northern Wild Sheep and Goat Council 2020.), and critical winter habitat for goats and sheep is excluded from the areas where heli-ski operations would be authorized (Charlotte Westing ADFG, personal communication, 02/25/2025).</p>
<p>Internal Scoping Issue: Wildlife—Bear and Wolverine Populations</p> <p>Would the issuance of up to eight SRPs have any associated effects to bears and wolverines?</p>	<p>Due to Project Design Feature 2, permitted operators shall not land in proximity to known wildlife occurrences, including bears, wolverines, and other wildlife species and this mitigates the concern over effects to bear or wolverines.</p>
<p>Internal Scoping Issue: Wildlife—Moose Populations</p> <p>Would the issuance of up to eight SRPs have any associated effects to moose?</p>	<p>This action will take place primarily on steep mountainous terrain. Moose utilize low-lying riparian habitat at lower elevations in terrain not suitable for heli-skiing. Additionally, due to Project Design Feature 2 operators will maintain ½ mile horizontal and 1,500 feet vertical distance</p>

ISSUE STATEMENT	RATIONALE FOR NOT FURTHER ANALYZING IN DETAIL IN THE EA*
	from all wildlife. While this action is not within defined moose winter range, these distance requirements are greater than those required for activities in defined moose winter range (BLM 2007). Moose are present in the project area but will not be impacted to the degree that detailed further analysis is required due to terrain utilized in this action and Project Design Feature 2.
<p>Internal Scoping Issue: Wildlife—Raptor Populations</p> <p>Would the issuance of up to eight SRPs have any associated effects to raptors?</p>	Due to Project Design Feature 3 activities should avoid any known raptor nests. Further, most proposed areas for heli-ski activities do not provide suitable nesting substrate or habitat for raptor species, including Bald and Golden eagles.
<p>Internal Scoping Issue: Wildlife—Threatened and Endangered Species</p> <p>Would the issuance of up to eight SRPs have any associated effects to threatened, endangered, or sensitive status species?</p>	Not present. No threatened or endangered species are present in the project area.

*Supporting documentation for these statements are included in the project record.

CHAPTER 2. ALTERNATIVES

This chapter describes the alternatives that will be analyzed in Chapter 3, as well as alternatives that were considered but eliminated from detailed analysis. This chapter contains 3 alternatives including a No Action Alternative, the Proposed Action, and an action alternative with a two day per week flight restriction in the 40-mile and pipeline access area of the Richardson Highway. One alternative was considered but eliminated from detailed analysis and disclosed in section 2.5.

2.1. Alternative A. No Action Alternative

The No Action Alternative would not authorize up to eight future heli-ski SRP's within the decision for this EA. Future permits would be considered on a case-by-case basis, with no caps on the number of permits, with additional or subsequent NEPA as necessary.

2.2. Alternative B. Proposed Action: The BLM would approve up to eight commercial heli-ski SRPs for a term of up to ten years (January 2026 - April 30, 2035).

2.2.1. Proposed Authorizations and Operators

The BLM has received six applications from heli-ski operators for the Valdez area. The applicants are listed in Section 1.1.4 Current Operator Applicants. This alternative would issue commercial SRPs for the six applicants for a ten-year period from January 2026 - April 30, 2035, subject to design features, permit terms and conditions, and area stipulations. This alternative would also allow authorization for two additional operators to be granted SRPs to operate in the same area, during the same ten-year term, subject to the same design features, terms and conditions, and stipulations as the original six.

2.2.2. Proposed Timeline

The proposed operating season would be seven days a week, from January 1 – April 30 annually, starting in January 2026 and ending in May 2035.

2.2.3. Proposed Activity Locations

Operators would be authorized to provide commercial heli-ski operations on approximately 133,800 acres, which excludes 28,300 acres for wildlife closure (see Section 2.5.1 and MAP 1: Thompson Pass and Valdez Heli-ski Project Area):

$$\begin{array}{r} 162,100 \text{ total possible BLM managed public acres} \\ - 28,300 \text{ wildlife closure acres} \\ \hline 133,800 \text{ total acres authorized to operate} \end{array}$$

2.2.4. Proposed Activity Description

Permitted operators provide guided ski and snowboard experiences in the remote mountainous terrain surrounding Valdez and Thompson Pass. Permittees utilize rotor wing aircraft (helicopters) to provide transportation to the higher terrain for participants and guides. Once offloading is completed, aircraft take off and land again at the bottom of the run area to pick up skiers and snowboarders, repeating this process time- and weather-permitting throughout the day. Generally, operators provide both single day and multi-day trips, however, overnight lodging is not provided on BLM-managed land. The reported heli-ski client to guide ratio is 4:1. Due to helicopter capacity, the maximum ratio is 5:1. The number of runs per day depends on weather conditions, skill and stamina of the clients, and characteristics of the selected runs. For operators that use a multi-day “package” approach, 6-10 runs of about an hour in length is typical. Clients typically pay for a package that includes a certain number of Hobbs hours or flight hours (time aircraft is in operation as measured by a Hobbs meter, which measures total engine running time). Operators have historically made between 2 and 12 runs per day on BLM managed public lands. Adverse weather conditions result in a significant number of “no ski” days during the approximately 120-day long season between January and May.

2.2.5. Project Design Features

Project design features refer to specific elements incorporated into a project to mitigate potential environmental impacts and enhance the project's overall sustainability. These are included to minimize adverse effects on the environment.

Commercial heli-ski operators would be required to adhere to the following permit terms and stipulations that help minimize resource impacts of the authorized activity, encourage best practices, ensure consistency with nearby State of Alaska and Chugach National Forest authorized permits for the same activity, and ensure adherence to federal, state, and local laws. The complete list of all permit stipulations all Glennallen Field Office commercial operators are required to adhere to can be found in APPENDIX A: Mitigation Measures, Best Management Practices (BMPs), and/or Stipulations for authorizations.

1. *Wildlife*. Operators agree to limit operations on all BLM land to the period of time between January 1 and April 30 annually. Goat kidding starts at the latest in mid-May but can occur earlier. This temporal limitation will mitigate displacement of goats during the time of the year important for reproduction.
2. *Wildlife*. Operators agree to maintain, during flight, a one-half mile horizontal and 1,500-foot vertical distance from all known denning sites and wildlife (including, but not limited to: mountain goats, Dall sheep, moose, bears, and wolverines) during flight. Heli-ski operations, unless for emergency purposes, are not permitted in important mountain goat wintering habitat, as identified based on ADF&G maps, or other appropriate data. Operators agree that helicopter landings may not occur in the vicinity of known wildlife. If any wildlife is spotted at an intended landing site, a different landing site must be chosen so as not to displace the animal(s).
3. *Wildlife*. Operators agree that aircraft associated with permitted activities shall maintain a minimum vertical distance of 1000 feet above ground level (AGL) within one-half mile of raptor nests between April 1 and August 31.
4. *Wildlife*. Permittees must report all wildlife sightings (number of individual wildlife, species if known, precise location, and date/s observed) and any observed denning sites to the Glennallen Field Office with their post use report.
5. *Hazardous and Solid Waste*. Operators agree to use biodegradable roll flagging tape and alder wands for markers signifying landing zones. If nonbiodegradable flagging, wands and other markers are used, operators agree to remove markers from BLM land at earliest time practicable. Waste left by clients shall be removed daily. Operators agree to adhere to leave no trace principles on BLM land. This will mitigate visual impacts of flagging and the presence of solid waste on other user groups.
6. *Hazardous and Solid Waste*. Operators agree that no refueling shall occur on BLM land. This will mitigate the risk of fuels released to the environment or waterways on BLM land.
7. *Recreation*. Operators agree during flight to maintain a 2500-foot vertical and horizontal distance from all other user groups as weather and ceilings allow. If a user group is

spotted traveling uphill OR downhill from a selected landing site or objective, a different landing site must be chosen to avoid the already-present user group. Operators agree, to the best of their aircrafts' capabilities given weather and terrain, to avoid flying over the fall line of other user groups present on the ground.

8. *Recreation.* BLM may, on a discretionary and annual basis, require one all-area operators meeting prior to and/or after each operating season to discuss conflict, mitigation practices, changes to land status, wildlife concerns, or other reasons. BLM may request a representative from each heli-ski operator to be present in person and will provide a virtual attendance option if necessary.
9. *Health and Safety.* Permittees must submit an Operations and Safety Plan for BLM review. This plan will include:
 - a. Avalanche safety addressing client safety and the safety of other users in the area,
 - b. Helicopter/aircraft safety,
 - c. Emergency rescue, and
 - d. Guide requirements.
10. All helicopter skiing permittees are required to participate in a communication plan that is approved by BLM. A goal of the communications plan will be to ensure close communication and cooperation between all helicopter skiing permittees to avoid unsafe operations such as multiple operators competing for the same run and dropping in on other users. The emphasis will be on safety and communication prior to departing for the day and while operating in the mountains. The communications plan shall be drafted and agreed upon by all helicopter skiing permittees operating on the BLM managed lands approved in the SRP. The communications plan may be revised annually as needed but must be approved by all helicopter skiing permittees before approval by the BLM
11. BLM reserves the right to schedule mandatory pre or post season meetings to discuss any issues or items associated with this permit. Each permittee (or an authorized representative) shall be expected to attend and participate in these meetings.
12. Explosives for avalanche mitigation are prohibited.
13. Heli-ski operators and/or guides shall use GPS equipment and maps to ensure that permitted activities are occurring within permitted areas on BLM managed lands.
14. All aircraft shall be equipped with satellite/GPS transponders with web-based flight tracking capability. The flight following system must have the ability to view both live and historic flight data for the duration of the permitted use. The permittee must submit flight data to BLM for periods of authorized use as well as provide full access to the flight tracking system and historic data, including log-in information if requested.
15. Any spill of petroleum products shall be reported and cleaned up in accordance with the rules and regulations established by the Alaska Department of Environmental Conservation and the Environmental Protection Agency. All costs incurred in reporting the spill and cleanup is

the responsibility of the party responsible for the spill. Fuel storage is not authorized on BLM lands.

16. All helicopter skiing operations must occur between sunrise and sunset.
17. To prevent the concentration of human waste by regular use of ski runs and to promote responsible disposal of human waste within a unique natural area, the use of a portable restroom is required for the duration of each excursion. We suggest using lightweight, compact, chemical-free units with disposable landfill-approved biodegradable bags, e.g., “Wag Bags, Restop.”
18. Disturbing archaeological or historical sites, including graves, telegraph lines and poles as well as remains of cabins or other structures is prohibited. There must be no collection of artifacts whatsoever. Also, the collection of vertebrate fossils, including mammoth and mastodon bones, tusks etc., is strictly prohibited. If heritage or paleontological resources are encountered on BLM managed lands during the permitted activities, then these items must be respectfully left in their locations and the Glennallen Field Office’s Cultural Resource staff must be notified with the precise location and date encountered.
19. Fees must be paid no later than the due date on the bill. Late payment of fees will reflect negatively in the permittee’s performance evaluation and may result in the SRP being placed on probation, suspension or terminated and/or late fees assessed.
20. Commercial filming may be authorized in conjunction with this permit only when the activity takes place at the same time, location, and in association with your activities permitted under this SRP. In this instance, both the SRP fee and commercial filming fee will be charged and submitted to the BLM.
21. Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the federal land by other users. The United States reserves the right to use any part of the area for any purpose.
22. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
23. No snowcat trail construction or brushing is authorized.
24. Maps distributed annually to the helicopter skiing operators are not to be reproduced without express written permission from the Glennallen Field Office Field Manager.

2.3. Alternative C. Two Day Per Week Restriction in 40-mile Richardson Highway Area

Alternative C was developed to mitigate an issue that was raised in external scoping. These alternative addresses user conflict in the road-accessible area adjacent to the Richardson Highway corridor between 37-mile and 42-mile (referred to as 40-mile area). Alternative C is the same as the Proposed Alternative except: Two days per week (Tuesdays and Sundays), operators would be restricted from heli-ski operations within the 5,900-acre 40-mile area. (Map 3 Thompson Pass Proposed Restricted Area)

Alternative C would include the following stipulations in addition to those included in Alternative B:

- Helicopters cannot land in the indicated area on Tuesdays and Sundays except in emergencies or life or death situations.
- Helicopters can land in any other permitted area on Tuesdays and Sundays.
- The indicated area is open to helicopter landings on all other days of the week.
- Guided clients cannot ski through the area on closure days.
- Commercial operations can still occur in this area on foot, snowmachine, or other non-helicopter? motorized means on closure days.

2.4. Comparison of Alternatives

The following table offers a visual and analytical representation of the comparison of alternatives.

Describe Indicator and quantify if possible (otherwise qualitatively describe)	Alternative A: No Action Alternative	Alternative B: Proposed Action	Alternative C: Two Day Per Week Restriction
Acres available for heli-skiing operations	133,800	133,800	127,900 2 days/week 133,800 5 days/week
Acres available for non-heli-skiing opportunities	162,100	162,100	162,100
Acres available for opportunities that are closed to heli-skiing 2 days per week	0	0	5,900
Days of operations	7 days per week, January 1 – April 30	7 days per week, January 1 – April 30	Helicopter operations 5 days per week on 133,800 acres Helicopter operations 2 days per week on 127,900 acres January 1 – April 30
Special wildlife habitat (wintering, kidding, rearing, ...) acres closed or limited	28,300	28,300	28,300

2.5. Alternatives Considered but Eliminated from Detailed Analysis

2.5.1. Opening of Wildlife Closure Areas

During the scoping period of this proposal, some operators requested that the BLM consider removing current wildlife closure areas as part of future permit authorizations. These non-permitted areas were established to protect areas identified as critical winter habitats for mountain goats. Protection of wildlife, including game species like mountain goats and their important habitat is a goal of the 2007 East Alaska Approved RMP (EARMP). The BLM did review the extent of these “closed areas” and consulted with Alaska Department of Fish and Game, as required by the 2007 EARMP, to confirm that these areas still retained important value for wintering mountain goats (Charlotte Westing ADFG, personal communication, 02/25/2025 and ADFG 2023 survey memo). The BLM has concluded that these areas remain important wintering habitat for mountain goats and that these specific populations provide an important hunting opportunity for locals. As such, the BLM has not considered an alternative to include access to these areas in future permit authorizations.

CHAPTER 3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

3.1. Scope of Analysis

The geographic scope of analysis includes the BLM managed lands adjacent to the Richardson highway corridor and TAPS within the Thompson Pass region in the Chugach Mountains. It also includes lands surrounding the city of Valdez that offer quality heli-ski terrain. (MAP 1: Thompson Pass and Valdez Heli-ski Project Area)

Access to some BLM land in the Valdez area is limited due to its remote nature, while other BLM land is directly road-accessible from the Richardson Highway. Heli-skiing is one of the most efficient methods to access remote ski terrain. Heli-skiing also increases user safety with clients following experienced guides, pilots, and professional operators who are intimately familiar with the terrain and conditions.

This EA analyzes the potential resource impacts of authorizing up to eight heli-ski operators on BLM land in the Valdez area. The operations would be limited temporally to daytime hours and between January 1 – April 30 annually.

3.1.1. Reasonably Foreseeable Environmental Trends

The BLM acknowledges the increased demand for commercial winter recreation activities in the Thompson Pass and Valdez area. As noted in the Statewide Comprehensive Outdoor Recreation Plan (SCORP), “Alaska tops the only four states in the U.S. where growth in outdoor recreation GDP increased while statewide GDP decreased between 2012 and 2017. Alaska saw a nine percent drop in statewide GDP and a 19 percent increase in outdoor recreation” (SCORP, 2023). This includes motorized and non-motorized guided backcountry ski and mountaineering trips, avalanche and guide safety educational courses, fixed-wing aircraft assisted winter recreation, and other uses. Employment in the outdoor recreation sector in Alaska increased 14% from 2021-2022, further demonstrating the continued growth and opportunity in recreation related fields (US Bureau of Economic Analysis 2023 Alaska Specific Webinar). BLM anticipates that there will be increased numbers of permit applications for these types of operations over the next

ten years, on the same land currently available to heli-skiing and other recreation opportunities. Some of these commercial activities may contribute to the same impacts as helicopter skiing, including reduction in terrain available for an untracked experience, increased noise, increased human waste, and user conflicts in higher-use zones. Development of technologies is also expected to help disperse overall use in the area which can reduce user conflict and crowding.

3.2. Issue: Recreation User Conflicts

How would issuing up to eight commercial heli-ski SRPs affect backcountry recreational users in the 40-mile area?

3.2.1. Methodology and Assumptions

This section covers the methodology and assumptions used to analyze the effect of how authorizing up to eight commercial heli-ski SRPs affects user conflicts in the 40-mile area specifically. The EARMF clearly distinguished management scenarios based on interim and long-term management within the project area, based on the completion of conveyances to the State of Alaska, Native Corporations, and other entitled entities. For purposes of this analysis management direction under the interim scenario is utilized as described on section 1.4 of this EA.

Heli-ski operations would be authorized on 133,800 acres of BLM land in the Valdez and Thompson Pass area excluding the 28,300 acres closed to helicopter operations for wildlife habitat. Public scoping indicated that most recreation user conflicts occurred in the road-accessible terrain in the 40-Mile area, more specifically the corridor between Milepost 37 and Milepost 55. This road-accessible terrain has been indicated by the public as the location of most user conflicts between recreational and heli-ski user groups. Due to the more remote nature of the terrain farther from the highway, we assume that fewer recreational user groups will be accessing this terrain, while more heli-ski user groups are able to access this terrain. This distance separation of private user vs. heli-ski user groups lessens the likelihood of conflict in this more remote terrain.

The recreation issue raised concerning this project is incorporated. They are largely qualitative concerns associated with backcountry recreation opportunities and experiences of quality of experience and low densities of visitors. Varying expectations associated with these indicators make quantifiable measurements difficult although no less important than indicators identified in other resource areas.

Each year the snow conditions and weather determine the number of recreation users that use areas. Therefore, each year the level of conflict that could occur may vary greatly. The greatest level of conflict would potentially occur on days when the weather is clear and there is adequate snow and cooler temperatures that create ideal conditions for both heli-skiers and backcountry skiers and both user groups are in the area at the same time.

3.2.2. Affected Environment

3.2.2.1 Historic Recreational Use

Heli-ski activities have occurred within this area since the early 1990's. Prior to that, backcountry skiing was pioneered by bush plane pilots transporting skiers to previously inaccessible terrain. The sparsely populated area of private lands near Stuart Creek along with a few out of area users also contributed to some of the first backcountry users of the area. BLM has consistently permitted up to 5 heli-ski operators over the past 30 years. One or two non-motorized commercial SRP operators also utilize the area each year.

3.2.2.2 Present condition of the user conflicts in the 40-mile area

On average from 2019-2024 the BLM received approximately three reports regarding user conflicts between private recreationists and helicopter operators in this area each year. User conflict has grown since the 1990's due to the increase in use of the area, continued development of private lands at Stuart Creek, advances in ski technology, outdoor equipment, gear, and clothing. The proximity of the area to Valdez and the Alaska road system also makes it a convenient location to access a road accessible ski location with backcountry attributes.

Backcountry skiers perceive that their recreational experience is greatly diminished by heli-skiers being dropped in an area they have spent considerable time reaching. Project-specific design features, which include proposed permit stipulations to avoid popular winter recreation areas are considered part of the alternatives and this analysis assumes they will be incorporated.

3.2.2.3 Relevant effects from reasonably foreseeable actions in the 40-mile area.

Continued growth of winter recreation activities in the area is expected. The continuation of commercial heli-ski operations will result in ongoing user conflict between helicopter based and non-helicopter-based recreation activities. Emerging technologies in equipment and gear will also help to spread users out, thereby reducing some effects resulting from user concentration and providing more opportunities and skiable terrain for users not utilizing helicopters as a primary means of transport.

3.2.2.4 Recreational Opportunity Spectrum (ROS)

The ROS is a traditional planning and management framework the BLM uses to guide and direct recreation inventory, evaluation, management, planning, and decision making on BLM managed public lands. ROS classes were tailored within the EARMP to fit the physical, social, and operational components and settings of recreation resources, user activities, and means of access accessible within the boundaries of the GFO. The existing ROS class within the 40-mile area in the Tielke SRMA is classified as Back Country Roaded, Roaded Natural, and Semi-Primitive Non-Motorized (APPENDIX C MAP 4: Thompson Pass Recreation Opportunity Spectrum (ROS) Classes). The table below describes these 3 ROS classes as defined in the East Alaska RMP final EIS (Pg 202).

ROS Class	ROS Description
Back Country Roaded	Characterized by a generally natural environment with moderate evidence of the sights and sounds of humans. Resource modification and utilization practices are evident. Access is generally via four-wheel drive vehicles and concentration of users is higher than primitive classes. Uses near the Trans Alaska Pipeline may be restricted. Sights and sounds of the highway system may be evident

Roaded Natural	Characterized by a generally natural environment with moderate evidence of the sights and sounds of humans. Resource modification and utilization practices are evident. Access is generally via conventional motorized vehicles and concentration of users is low to moderate. Sights and sounds of the road system are evident and traffic levels are highly variable
Semi Primitive Non-Motorized	Characterized by a predominantly unmodified natural environment of moderate to large size that is more accessible than an area classified as primitive and is free of motorized trails and roads. Concentration of users is low, but there is often evidence of other users. Sights and sounds of the road system are more prevalent than in primitive class, but less than roaded natural or backcountry roaded.

*It is important to note neither class eliminates or preclude motorized activities or access except for the Semi Primitive Non-Motorized ROS which should be free of motorized trails and roads.

3.2.3. Environmental Effects

This section includes the issues that have been identified for detailed analysis because the impacts of Alternatives B and C may be related to potential significance or the ability to meet the need of the project. The following issue was identified and analyzed to determine the potential for significance:

Issue: Effects of guided helicopter skiing activities on other backcountry recreation users in the 40-mile area.

This issue identifies concerns about the potential for user conflicts from heli-ski activities occurring in the same areas as other backcountry recreation activities within a concentrated area.

3.2.3.1. *Effects of Alternative A – No Action*

Summary of Alternative A Impacts

The Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14d) require that a "no action" alternative be analyzed in every EA. This alternative represents the pre-existing condition against which the other alternatives are compared. Regardless of future approval of BLM permits, the operators would still fly over and through BLM lands to utilize nearby State of Alaska and Chugach National Forest lands which they are also permitted to operate on. This alternative would not issue new BLM special recreation use permits (SRPs) for commercial helicopter guided skiing for the project area at this time.

Adverse effects to backcountry users under this alternative consist of qualitative measures such as proximity to sight and sound of helicopters, declining user experience relating to a competing use, and reduction in access to and amounts of untracked snow.

In contrast, some backcountry users may benefit from using the services of commercial helicopter guided operators and may ski in the same areas that they have previously accessed via human power or snowmachine.

In this scenario consideration of future permits would occur on a case-by-case basis. The effects of commercial heli-ski operations on backcountry users would still occur, though possibly to a lesser extent than the current scenario, dependent upon the number of permits issued in the future or exclusion of use in the 40-mile area. If no permits were issued, there would be a reduction in conflicts affecting backcountry recreation users in the 40-mile area. If future permits were considered on a case-by-case basis and authorized with no other mitigations, the effects to backcountry recreation users in the 40-mile area would occur at present levels.

Indirect effects related to impacts of sight, noise, and perceptions of helicopters in general would continue to occur at the same levels as currently occurring within this alternative. Operators would still fly over and through BLM lands regardless of the future issuance of BLM permits or not. Operators must maintain and conduct a consistent number of flights and landings to remain profitable and their flight paths, landing areas (outside of BLM lands), and base of operations are all in proximity to BLM lands.

If 5 permits were issued in the future on a case-by-case basis, effects to the ROS would remain unchanged within this alternative. It is expected that commercial heli-ski use would occur at historic levels with some evidence of other users and some social impacts evident.

If more than 5 permits were issued in the future on a case-by-case basis effects to the ROS could occur depending on the concentration of use and number of operators within the area. While it is not feasible, due to FAA regulations and safety measures, that all 8 operators would conduct activities at the same time within the 40-mile area, increasing the overall number of operators would promote more consistent use. Impacts related to an increase of evidence of other users and increased social impacts and encounters can be expected.

Short term beneficial effects of this alternative (if permits are issued in the future) consist of meeting desired public demand for commercial services, increased seasonal economic expenditures to local communities, availability of helicopters and/or trained personnel in case of emergency within the project area, and status quo or increased winter use of the project area via additional permits above historic trends. Short term adverse effects of this alternative (if permits are not issued in the future) consist of failing to meet desired public demand for commercial services, decreased seasonal economic expenditures to local communities, reduced availability of helicopters and/or trained personnel in case of emergency within the project area, and a reduction in winter use of the project area.

If permits are issued in the future, beneficial long-term effects include opportunities to maintain and grow commercial businesses, enhanced knowledge of ski terrain and

environment, and enhanced access to public lands. If permits are not issued in the future, long term adverse effects include a reduction in commercial business opportunities, reduction of access to public lands, and a likely increase of use by non-heli-ski users within the area.

3.2.3.2. Effects of Alternative B – Proposed Action

Summary of Alternative B Impacts

This section discloses the environmental effects of Alternative B, the Proposed Action on backcountry recreation users in the 40-mile area. Adverse effects to backcountry users consist of qualitative measures such as proximity to sight and sound of helicopters, declining user experience relating to competing use, and reduction in access to and amounts of untracked snow. In contrast some backcountry users may benefit from using the services of commercial helicopter guided operators and may ski in the same areas that they have previously accessed via human power or snowmachine.

This alternative would have a greater degree of effect upon backcountry recreation users in the 40-mile area than alternatives A or C. The alternative allows for a maximum of 8 SRP's for commercial heli-ski operations in the project area. Currently 5 SRP's are available for commercial heli-ski operations in the project area. This alternative represents a 60% increase of use for commercial heli-ski operations which would lead to more conflict in the 40-mile area. On average from 2019-2024 the BLM received approximately three reports regarding user conflicts between private recreationists and helicopter operators in the 40-mile area each year. Assuming a 60% increase of SRP's in the project area, it can be expected that the 40-mile area would receive more consistent use. Reported complaints can be expected to occur 5 to 6 times each year and lead to increased conflicts overall.

Adverse effects to the ROS would impact concentration of users within in this alternative. While it is not feasible, due to FAA regulations and safety measures, that all 8 operators would conduct activities at the same time within the 40-mile area increasing the overall number of operators would promote more consistent use. Impacts related to an increase of evidence of other users and increased social impacts and encounters can be expected.

Short term beneficial effects of this alternative include increased seasonal economic expenditures within local communities during non-tourism season boosting use of lodging and hospitality, availability of helicopters and/or trained personnel in case of emergency within the project area, and increased winter use of the area via additional permits above historic trends. Long term beneficial effects include increased opportunities to maintain and grow commercial businesses, enhanced knowledge of ski terrain and environment, greater access to public lands, and user displacement of non-heli-ski users seeking other suitable terrain.

3.2.3.3. *Effects of Alternative C – Two Day Per Week Restriction in 40-mile Richardson Highway Area and Pipeline Road Access area*

Summary of Alternative C impacts

Within this alternative, a two-day-per-week restriction would occur on commercial heli-ski operations in the 40-mile area. (Reference Map 3 Thompson Pass Proposed Restricted Area). Implementation of a two-day-per-week restriction would occur on Tuesdays and Sundays. During these days heli-ski operators would not be allowed to operate in this 5,900-acre area.

The typical commercial heli-ski season runs from January 1st through April 30th. This allows for a 120-day season. By limiting the use of commercial heli ski operations, this alternative would result in an approximate 26% reduction of helicopter use days on BLM lands. This would increase the opportunity for backcountry users to access untracked snow. An additional beneficial effect would be that conflicts regarding subjective impacts from sight and sounds of helicopters and competing use would also be reduced within the immediate area.

Commercial heli-ski operators and clients would lose approximately 32 days of use per season in a traditional heli-ski area under this alternative. Operators would continue to fly but would have to do so on other BLM lands or under other permits (State of Alaska, Chugach National Forest) on these days. Therefore, impacts regarding sight, sound, and proximity of flights near this area, but not immediately in, would still occur, though to a lesser extent than Alternatives A and B.

Adverse effects to the ROS would be non-existent or enhanced within this alternative. A 2 day per week closure would reduce user concentration and social impacts. Commercial heli-ski use would occur at lower levels than historic patterns in the 40-mile area (26% reduction) however, evidence of other users and some social impacts can still be expected due to a 5 day per week operating allowance.

Short term adverse effects of this alternative consist of status quo or slight reduction in seasonal economic expenditures to local communities, a reduction in availability of helicopters and/or trained personnel (for 2 days per week) in case of emergency within the project area, and decreased competition among backcountry users seeking untracked powder in comparison to other alternatives. Long term beneficial effects consist of continued ability to maintain and grow commercial businesses, enhanced knowledge of ski terrain and environment, greater access to public lands, and reduced user displacement of non-heli-ski users seeking suitable terrain.

3.2.3.4. *Cumulative Effects Common to All Alternatives*

Increased participation and interest in winter outdoor recreation such as skiing, snowmachining, heli-skiing, and other winter recreation activities continue to bring visitors to the project area. BLM has heard some anecdotal reports of non-motorized backcountry users experiencing crowding and a changing recreation experience in areas that had been favorite skiing and snowboarding areas. With advances and innovation in gear, equipment, and clothing non-motorized users are starting to expand and go farther from the Richardson Highway corridor and farther up valley bottoms to seek other winter recreation areas that are less crowded. Non-motorized users also have a sense of being pushed out of some areas by snowmachine

enthusiasts. Authorizing additional commercial operators without consideration of enhanced mitigations and stipulations would increase these perceptions and conflicts.

Operators would still fly over and through BLM lands regardless of the future issuance of BLM permits or not. Operators must maintain and conduct a certain number of flights and landings to remain profitable and their flight paths, landing areas (outside of BLM lands), and base of operations are all in proximity to BLM lands.

Under all alternatives it is also possible that some backcountry users may utilize the services of commercial helicopter guided operators and may ski in the same areas that they have previously accessed via human power or snowmachine. Backcountry users may also access, ski, and recreate, in the 40-mile area and other BLM lands prior to January 1st and after April 30th. Utilizing these timeframes results in a helicopter free environment, decreased conflict and competition for terrain, reduced proximity to sight and sound of helicopters, and increases opportunity for access to untracked snow.

CHAPTER 4. PUBLIC INVOLVEMENT, CONSULTATION AND COORDINATION

4.1. Public Involvement

This section describes how and when the BLM engaged the general public as well as the State of Alaska and local Native Corporations throughout the EA process. BLM conducted external and internal scoping and consulted with state and native agencies.

4.1.1. Scoping

This section describes external and internal scoping. Due to the controversial nature of the project and issues raised over the last few decades by the public, BLM opted to conduct extensive external scoping. Issues were solicited so that BLM could get a better idea of what the public and area operators were experiencing. The public was offered the chance to raise concerns about user conflicts, wildlife, local environment, effects on the economy, and other issues that BLM may not have been aware of. The intention of this EA is to respond to the issues raised and move forward with them in mind.

4.1.1.1. External Scoping

A summary of External Scoping can be found in APPENDIX B: External Scoping Summary Report.

On March 14th, 2024, BLM started a 30-day external scoping period to gather public input on current heli-ski operations and permitting practices. Scoping and public awareness efforts consisted of the following:

- News Release
 - A news release was published on February 28th, 2024, requesting public input. The release contained information about the public meeting in Valdez and how to provide input on the BLM National NEPA Register Project Website.

- Five related news articles were published in local and state newspapers about the project and scoping opportunities.
- Social Media
 - On March 13th, 2024, BLM posted a social media message requesting public input, with information about the public meeting in Valdez and how to register comments on the BLM National NEPA Register project website.
- BLM National NEPA Register Project Website
 - BLM maintains the BLM National NEPA Register project website with project information, description, milestones, maps, and the ability to submit comments on the project. The link to the project website is <https://eplanning.blm.gov/eplanning-ui/project/2031076/510>
- Posters
 - Flyers and posters were posted in public places in Valdez to inform users of the SRP application window, eventual draft EA, scoping period, and upcoming public meeting.
- Public Meeting
 - On March 14th, 2024, BLM conducted a Public Scoping Meeting at the Valdez Civic Center. There were 31 attendees. The BLM presented a slide show with information about SRP applications, the Public Scoping portion of the EA process, the East Alaska Resource Management Plan, and current operating practices. There was then a question-and-answer session, in which BLM mostly answered questions that related to current heli-ski operations and the development of the EA regarding the next 10 years of heli-skiing in the Thompson Pass, Tiekel Pass, and Valdez areas. The public was encouraged to provide input on issues through the BLM National NEPA Register. BLM also offered each attendee a printed project summary and paper comment form. BLM provided maps of the area in question, and asked attendees to place pins on areas they use to recreate personally or commercially.
- Written Comments
 - BLM solicited scoping input from the public through the BLM National NEPA Register website, email, and mail.
 - The scoping period was open for 30 days from March 14 to April 12, 2024. The BLM received 79 comments. 59 comments were submitted on the BLM National NEPA Register project website, 16 comments were submitted via email, and 3 comments were submitted via the postal service.

4.1.1.2. Internal Scoping

The BLM met internally beginning in January 2025 and throughout the initial drafting of the EA to discuss potential issues that might occur with authorization of the proposed action. Each resource specialist considered issues related to their area of expertise and included or removed them from further detailed analysis as outlined in Section 1.5.

4.1.2. Preliminary EA Public Comment

This Preliminary EA will be released for an associated 30-day public comment period. Public comment will be accepted in writing on the BLM National NEPA Register project website, by email, or written mail. There will be no public meetings held.

BLM will review comments on this Preliminary EA prior to releasing and signing the Final EA and Decision Record.

Notification of the opportunity to review and comment on this Preliminary EA will be provided by:

- BLM Media Release
- Social media; BLM Alaska posting
- Emails to Stakeholder user group list
- Formal Letters to Chugach Alaska Corporation, State of Alaska, and Chugach National Forest

4.1.3. Changes from Preliminary to Final

After the Preliminary EA comment period closes and with the release of the Final EA, this section will either be revised to include a summary of the comment received on the Preliminary EA or a separate comment summary report will be created. The BLM will summarize substantive comments and respond or indicate how they were addressed and either provide (1) an indication as to how the EA is changed and include the change made in the document, or (2) an explanation as to why the comment did not warrant a change to the document. If there are no significant impacts a Finding of No Significant Impact (FONSI) and a decision record (DR) is signed to approve the Final EA. All documents are published on the same project page on the BLM National NEPA Register.

4.2. Consultation and Coordination

4.2.1. Consultation with the General Public

The public was offered the chance to provide input during scoping and during the Preliminary EA comment period, both hosted on the BLM National NEPA Project Register. Consultation with the general public is summarized in Section 4.1 and APPENDIX B: External Scoping Summary Report.

4.2.2. State Agencies Consulted

The State of Alaska was notified for ANILCA Section 906K concurrence on the state selected BLM lands in the project area.

4.2.3. Native Corporations Consulted

Chugach Corporation was consulted on April 11, 2023. The corporation was informed of the upcoming EA. There were questions about operations on Native Corporation-selected lands. The corporation was informed that while the selected land is BLM-managed, operations would be permitted under heli-ski SRPs. Once conveyance of the selected land to Native Corporation has occurred, the land would no longer be available for heli-ski use under the BLM permits. Operators are provided each season with an updated map including any changes in land status from prior years. Chugach Corporation had no more questions.

CHAPTER 5.

5.1. List of Preparers

Table 3: List of Preparers.

Name	Title	Area of Responsibility
John Jangala	Archeologist	Cultural
Tessa Wittman	Wildlife Biologist through February, 2025	Subsistence/Wildlife
Caroline Ketron	Anthropologist	Tribal Coordination
Tim Sundlov	Fish Biologist	Fisheries/Riparian
Justin Burrows	Geologist	Hazardous Materials/Abandoned Mine Lands/Mineral Resources
Mike Sondergaard	Hydrologist	Hydrology
Connie Craft	Realty Specialist	Realty
Rhonda Williams	Realty Specialist	Realty
Denton Hamby	Outdoor Recreation Planner	Recreation – Wild and Scenic Rivers/Visual Resource Management
McKenzie Huso	Outdoor Recreation Planner	Recreation – Special Recreation Permits
Cory Larson	Outdoor Recreation Planner	Recreation – Travel Management

Name	Title	Area of Responsibility
Tim Skiba	Forester	Vegetation/Forestry
Heath Morgan	Wildland Firefighter (Fuels)	Fire/Fuels
Jorjena Barringer	Planning and Environmental Coordinator	NEPA/Planning
Scott Claggett	Public Affairs Specialist	Public Affairs
Leah Komp	GIS Specialist	GIS
Jacob Masterfield	Assistant Field Manager – Recreation and Realty	
Neil Perry	Assistant Field Manager – Resources	
Alysia Hancock	Field Manager through April 2025.	

5.2. References

- Alaska Department of Fish and Game. Mountain Goat (*Oreamnos americanus*) Species Profile. Accessed at: <https://www.adfg.alaska.gov/index.cfm?adfg=goat.main> on January 29, 2025.
- Alaska Division of Parks and Outdoor Recreation. (2023). Alaska Statewide Comprehensive Outdoor Recreation Plan 2023-2027.
- Alaska Outdoor Alliance.Org, US Bureau of Economic Analysis 2023 Alaska Specific Webinar
- BLM. 2005. Environmental Assessment for Commercially Guided Helicopter Skiing and Associated Commercial Filming/Photography in the Thompson Pass Area and Surrounding Bureau of Land Management Administered Public Lands. AK-050-EA-05-02.
- BLM. 2007. East Alaska Resource Management Plan and Final Environmental Impact Statement, Volume 1. Signed September 7, 2007. DOI-BLM-AK-A020-2006-0001-RMP-EIS
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- BLM. 2010. Documentation of NEPA Adequacy (DNA) Helicopter Supported Recreation and Commercial Filming within the Thompson Pass Area. DOI-BLM-AK-A020-2010-0002-DNA.
- BLM. 2015. Documentation of NEPA Adequacy (DNA) Helicopter Supported Special Recreation Permit (2015). DOI-BLM-AK-A020-2015-00
- Goldstein, M. I., A. J. Poe, E. Cooper, D. Youkey, B. A. Brown, and T. L. McDonald. 2005. Mountain goat response to helicopter overflights in Alaska. *Wildlife Society Bulletin*, 33(2) 688-699.
- U.S. Geological Survey. 2025. Mineral Resources Online Spatial Data: Alaska. Accessed at: https://mrdata.usgs.gov/sim3340/show-sim3340.php?seq=B082&src=VA002_2700 on January 24, 2025.
- USDA 2022. Alaska Region/ Chugach National Forest, Cordova Ranger District Guided Helicopter Skiing, Environmental Assessment September 2021

APPENDICES [ON A NEW PAGE]

APPENDIX A: Mitigation Measures, Best Management Practices (BMPs), and/or Stipulations for authorizations

This appendix captures into one easily accessible location, the additional measures needed to mitigate the potential effects of the action. Everything captured here would be required as part of the eventual BLM authorization for the action. The contents in the appendix are organized by the Issues analyzed in Chapter 3 and come from:

- Resource Management Plan – level standard stipulations for actions that occur within the RMP Planning area.
- Required compliance with State or Federal law
- Required National or State level Bureau of Land Management policy, directives, or memoranda
- Required State or Federal law

Stipulations Specific to Thompson Pass and Valdez Guided Helicopter Skiing Environmental Assessment DOI-BLM-AK-A020-2024-0007-EA

1. *Wildlife*. Operators agree to limit operations on all BLM land to the period of time between January 1 and April 30 annually. Goat kidding starts at the latest in mid-May but can occur earlier. This temporal limitation will mitigate displacement of goats during the time of the year important for reproduction.
2. *Wildlife*. Operators agree to maintain, during flight, a one-half mile horizontal and 1,500-foot vertical distance from all known denning sites and wildlife (including, but not limited to: mountain goats, Dall sheep, moose, bears, and wolverines) during flight. Heliski operations, unless for emergency purposes, are not permitted in important mountain goat wintering habitat, as identified based on ADF&G maps, or other appropriate data. Operators agree that helicopter landings may not occur in the vicinity of known wildlife. If any wildlife is spotted at an intended landing site, a different landing site must be chosen so as not to displace the animal(s).
3. *Wildlife*. Operators agree that aircraft associated with permitted activities shall maintain a minimum vertical distance of 1000 feet above ground level (AGL) within one-half mile of raptor nests between April 1 and August 31.
4. *Wildlife*. Permittees must report all wildlife sightings (number of individual wildlife, species if known, precise location, and date/s observed) and any observed denning sites to the Glennallen Field Office with their post use report.
5. *Hazardous and Solid Waste*. Operators agree to use biodegradable roll flagging tape and alder wands for markers signifying landing zones. If nonbiodegradable flagging, wands and other markers are used, operators agree to remove markers from BLM land at earliest time practicable. Waste left by clients shall be removed daily. Operators agree to adhere to leave no trace principles on BLM land. This will mitigate visual impacts of flagging and presence of solid waste on other user groups.

6. *Hazardous and Solid Waste.* Operators agree that no refueling shall occur on BLM land. This will mitigate the risk of fuels released to the environment or waterways on BLM land.
7. *Recreation.* Operators agree during flight to maintain a 2500-foot vertical and horizontal distance from all other user groups as weather and ceilings allow. If a user group is spotted traveling uphill OR downhill from a selected landing site or objective, a different landing site must be chosen so as to avoid the already-present user group. Operators agree, to the best of their aircrafts' capabilities given weather and terrain, to avoid flying over the fall line of other user groups present on the ground.
8. *Recreation.* BLM may, on a discretionary and annual basis, require one all-area operators meeting prior to and/or after each operating season to discuss conflict, mitigation practices, changes to land status, wildlife concerns, or other reasons. BLM may request a representative from each heli-ski operator to be present in person and will provide a virtual attendance option if necessary.
9. *Health and Safety.* Permittees must submit an Operations and Safety Plan for BLM review. This plan will include:
 - a. Avalanche safety addressing client safety and the safety of other users in the area,
 - b. Helicopter/aircraft safety,
 - c. Emergency rescue, and
 - d. Guide requirements.
10. All helicopter skiing permittees are required to participate in a communication plan that is approved by the BLM. A goal of the communications plan will be to ensure close communication and cooperation between all helicopter skiing permittees to avoid unsafe operations such as multiple operators competing for the same run and dropping in on other users. The emphasis will be on safety and communication prior to departing for the day and while operating in the mountains. The communications plan shall be drafted and agreed upon by all helicopter skiing permittees operating in the BLM managed lands approved in the SRP. The communications plan may be revised annually as needed but must be approved by all helicopter skiing permittees before approval by the BLM
11. The BLM reserves the right to schedule mandatory pre or post season meetings to discuss any issues or items associated with this permit. Each permittee (or an authorized representative) shall be expected to attend and participate in these meetings.
12. Explosives for avalanche mitigation are prohibited.
13. Heli-ski operators and/or guides shall use GPS equipment and maps to ensure that permitted activities are occurring within permitted areas on BLM managed lands.
14. All aircraft shall be equipped with satellite/GPS transponders with web-based flight tracking capability. The flight following system must have the ability to view both live and historic flight data for the duration of the permitted use. The permittee must submit flight data to

BLM for periods of authorized use as well as provide full access to the flight tracking system and historic data, including log-in information if requested.

15. Any spill of petroleum products shall be reported and cleaned up in accordance with the rules and regulations established by the Alaska Department of Environmental Conservation and the Environmental Protection Agency. All costs incurred in reporting the spill and cleanup is the responsibility of the party responsible for the spill. Fuel storage is not authorized on BLM lands.
16. All helicopter skiing operations must occur between sunrise and sunset.
17. To prevent the concentration of human waste by regular use of ski runs and to promote responsible disposal of human waste within a unique natural area, the use of a portable restroom is required for the duration of each excursion. We suggest using lightweight, compact, chemical-free units with disposable landfill-approved biodegradable bags, e.g., “Wag Bags, Restop.”
18. Disturbing archaeological or historical sites, including graves, telegraph lines and poles as well as remains of cabins or other structures is prohibited. There must be no collection of artifacts whatsoever. Also, the collection of vertebrate fossils, including mammoth and mastodon bones, tusks etc., is strictly prohibited. If heritage or paleontological resources are encountered on BLM managed lands during the permitted activities, then these items must be respectfully left in their locations and the Glennallen Field Office’s Cultural Resource staff must be notified with the precise location and date encountered.
19. Fees must be paid no later than the due date on the bill. Late payment of fees will reflect negatively in the permittee’s performance evaluation and may result in the SRP being placed on probation, suspension or terminated and/or late fees assessed.
20. Commercial filming may be authorized in conjunction with this permit only when the activity takes place at the same time, location, and in association with your activities permitted under this SRP. In this instance, both the SRP fee and commercial filming fee will be charged and submitted to the BLM.
21. Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the federal land by other users. The United States reserves the right to use any part of the area for any purpose.
22. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
23. No snowcat trail construction or brushing is authorized.
24. Maps distributed annually to the helicopter skiing operators are not to be reproduced without express written permission from the Glennallen Field Office Field Manager.

Applicable Required Operating Procedures from the EARMF

ROP-F&W-b-5. In critical Dall sheep and mountain goat habitat, helicopters used in support of permitted activities will maintain one-half mile horizontal and 1500-foot vertical distance from

goats and sheep. Helicopter landings, unless for emergency purposes, are not permitted in Dall sheep or goat critical ranges, as identified based on ADF&G maps and refined by monitoring.

ROP-F&W-c-1. The planning area may now or hereafter contain plants or animals (or their habitats) identified as threatened, endangered or Sensitive Status Species. The BLM may recommend modifications to proposals to further its conservation and management objective to avoid any BLM-approved activity that will contribute to a need to list such a species or their habitat. The BLM may require modifications to or disapprove proposed activities that are likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. The BLM will not approve any ground-disturbing activities that may affect any such species or critical habitat until the BLM completes its obligations under applicable requirements of the ESA, including completion of any required procedures for conference or consultation. (ROP-F&W-c-1) EARMF

ROP-Cultural-a-2. For other non-oil and gas permitted activities, cultural resource protections and conservation will be consistent with a) Sections 106, 110, and 101d of the Historic Preservation Act, b) procedures under BLM's 1997 Programmatic Agreement for Section 106 compliance, and c) the BLM's 1998 Implementing Protocol in Alaska between the BLM and the Alaska State Historic Preservation Officer.

General Terms and Permit Stipulations for SRP's

- A. Compliance with laws, regulations, and other legal requirements.** The Permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the Special Recreation Permit (SRP). The Permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses, certifications, or registrations. The Permittee shall ensure compliance with these requirements by all agents of the Permittee and by all clients, customers, participants, and spectators under the Permittee's supervision.
- B. Modification, Suspension, Termination.** An SRP authorizes specific uses of the public lands and related waters and when circumstances warrant, the permit may be modified by the BLM at any time, including modifying or limiting the amount of use. The Authorized Officer may suspend or terminate an SRP if necessary to protect public resources, health, safety, the environment, or because of non-compliance with permit stipulations. Actions by the BLM to suspend or terminate an SRP are appealable.
- C. Permit Value & Operating Rights.** No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit is not to be considered property on which the Permittee shall be entitled to earn or receive any return, income, price, or compensation, and may not be used as collateral for a loan. In the event of default on any mortgage or other indebtedness such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the Permittee's SRP. This permit, which can be suspended or terminated, is not a contract or a lease, but rather a Federal license.

- D. Non-Exclusive Use.** Unless expressly stated, the SRP does not create an exclusive right to use an area by the Permittee. The Permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- E. Subcontracting.** Where the BLM authorizes a Permittee to subcontract a portion of the permitted activities, the Permittee must retain operational control of the permitted activities and must comply with any applicable special stipulations related to contractors and subcontractors which may include, but are not limited to, provisions regarding permit compliance, fee payment, reporting requirements, and insurance requirements.
- F. Minimum Wage Requirements.** The Permittee must comply with all provisions of Executive Order 14026 of April 27, 2021, (Increasing the Minimum Wage for Federal Contractors) and its implementing regulations, including the applicable contract clause, codified at 29 C.F.R. pt. 23, all of which are incorporated by reference into these General Terms and Permit Stipulations as if fully set forth in these General Terms and Permit Stipulations.
- G. Advertising.** All printed, electronic, and oral advertising and representations made to the public and the Authorized Officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, the Permittee will not seek or obtain trademark rights, use, or incorporate the names, trademarks, or logos of the BLM, the Government, or their employees in any advertising, promotional materials, sales literature, or on any product without the prior written approval of the BLM for the specific use. The Permittee shall not state or imply that the Government or any of its organizational units or employees endorses any product, service, or activity as being conducted by the BLM. The BLM does not directly or indirectly endorse any product or service provided, or to be provided, by the Permittee whether directly or indirectly related to this SRP. The Permittee may not portray or represent the permit fee as a special Federal user's tax. The Permittee must furnish the Authorized Officer with a current brochure or website, including price list.
- H. Responsibility of Permittee.** The Permittee assumes responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous flora/fauna, abandoned mines, or other hazards that present risks for which the Permittee assumes responsibility.
- I. Resource Protection.** The Permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon completing the permitted activities, the lands must be restored as nearly as possible to pre-existing conditions.
- J. Display of Permit.** The Permittee, Permittee's employees, agents, and Authorized Officer approved subcontractors, must present or display a copy of the SRP to an Authorized Officer's representative or law enforcement personnel, upon request. If required, the Permittee must display a copy of the permit or other identification tag on equipment used during the period of authorized use.

K. Operating Plan. The operating plan submitted in the application corresponding to this permit is incorporated as the operating plan for this permit. Any changes to a Permittee's operations as described in this plan must be requested in writing to the BLM and approved in writing by the BLM. This request must receive prior written approval from the BLM Authorized Officer before any operating plan changes can take effect.

L. Accounting Records. The Authorized Officer, or other duly authorized representative of the BLM, may examine any of the books, documents, papers, or records pertaining to the permit or transactions related to it, in the custody, control, or possession of the Permittee or its employees, business affiliates, or agents for up to 3 years after expiration of the permit. For permits with fees greater than \$10,000 annually, when requested by the BLM, the holder, at their own expense, shall have their annual accounting records audited by an independent public accountant acceptable to the BLM. The permit holder must maintain internal accounting records pertaining to this authorized use, and these records must be readily discernible from accounting transactions with other permits, business endeavors, or personal use. Accounting records must include the following:

1. A recordkeeping procedural outline or process plan.
2. Customer receipt deposit log or similar detailed information, which includes at a minimum: (A) Customer identifier; (B) Location identifier; (C) Dated deposit and amount; (D) Gross fee collected; (E) Subtotal after each customer transaction; (F) Grand total after each deposit; (G) Grand total of year-end receipts.
3. Corresponding monthly bank statement ledgers to the customer receipt deposit log or other compensation attributed to activities conducted under this permit.
4. Price advertisements.
5. Original customer reservation listings or event registration sheets.
6. A record of all financial relationships with booking agents, advertisers, subcontractors, and business affiliates connected to permitted use.
7. A record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source conducted under the permit.
8. A record of all payments made by the permit holder and claimed as a deduction in the permit holder fee submission. Records consist of receipts, debit transaction logs, bank statements, or similar records.
9. W-2 records or other similar records of employment for all employees conducting activities under the permit.

M. Revenue Reporting. The Permittee must submit a post-use report and any other required forms to the Authorized Officer by the due dates shown on the permit or annual validation. If the post-use report is not received by the established deadline, the permit may be suspended or terminated, and/or late fees assessed. The post-use reports for permits for commercial use must contain a trip-by-trip log of trip location, beginning and ending dates of each trip, number of

clients, number of employees (including contractors and volunteers), and gross receipts for the trip. Post use reports for all permit types must contain the information requested by the BLM. Deductions based on pre- and post-trip transportation and lodging expenses and discounts based on percentage of time, acres, or miles off of public land, if being claimed, must be requested by the Permittee and approved by the BLM in writing in advance of the report submission. Receipts are required for all claimed deductions, including transportation and lodging, and must show proof of payment.

N. Resource Damage and Injury Reporting. The Permittee shall notify the Authorized Officer in writing within 24 hours of any incident that occurs while involved in activities authorized by this permit which results in death, personal injury requiring admission to a hospital, emergency evacuation, or in property damage greater than \$2,500 (lesser amounts if established by State law). The Permittee shall coordinate with the BLM and, in accordance with applicable law, submit any documentation related to the incident, including reports, within a time frame agreed upon with the Authorized Officer.

O. Indemnification. The Permittee waives all demands, claims, and causes of action against the United States and its officers, employees, agents, and representatives, and releases the United States and its officers, employees, agents, volunteers, and representatives from all liability, arising out of or resulting from the permitted activities and operations. The permitted activities and operations include all activities and operations occurring within locations identified in the permit area of operation, permit map, operating plan, and any associated published closure notices. The BLM issues this permit upon the express condition that the United States and its officers, employees, agents, volunteers, and representatives will be free from all liability arising out of, or resulting from, the permitted activities and operations. Accordingly, the Permittee hereby agrees to indemnify, defend, and save and hold harmless the United States and its officers, employees, agents, volunteers, and representatives from and against all liability arising out of, or resulting from, the permitted operations or activities.

P. Insurance. If required by the Authorized Officer, the Permittee shall carry general liability insurance against claims occasioned by the action or omissions of the holder, its agents, employees, volunteers, and contractors in carrying out activities and operations under this permit. The permitted activities and operations include all locations within the permit area of operation, permit map, operating plan, and associated published closure notices. The policy shall name the United States of America as additional insured, with waiver of subrogation against the United States, and must be issued by a company licensed to do business and in good standing in the state(s) covered by this permit. The Permittee agrees to have on file with the BLM copies of the above insurance with the proper endorsements.

Q. Fee Payment. The Permittee must pay the required fees before the BLM will authorize the use identified in the permit. For installment payments when more than \$1,000 is owed, the Permittee must sign and submit a BLM promissory note, which must also be signed by the Authorized Officer. For multi-year permits, final payments may be adjusted based on post-use reports. For multi-year commercial permits, excess payments will be applied toward the following year's or season's estimated fee. For permits other than multi-year commercial permits, the BLM will give the Permittee the option whether to receive refunds or credit overpayments to future permits, less processing costs.

R. Equal Opportunity and Nondiscrimination. The Permittee, its employees, and affiliates shall not discriminate against any person on the basis of race, color, sex, national origin, age, or disability or by curtailing or refusing to furnish accommodations, facilities, services, or use privileges offered to the public generally. In addition, the holder and its employees shall comply with the provisions of Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, as amended, Title IX of the Education Amendments Act of 1972, as amended, and the Age Discrimination Act of 1975, as amended.

APPENDIX B: External Scoping Summary Report

SCOPING COMMENT SUMMARY AND ISSUE IDENTIFICATION REPORT

The BLM is conducting an Environmental Assessment (EA) to consider the issuance of Special Recreation Permits (SRPs) for heli-ski operations for up to a ten-year period, from 2026 through 2035. The areas of operation to be considered in the EA include BLM managed lands in the Thompson Pass, Tiekel Block, and Valdez areas of the Chugach Mountains. Primary goals of this EA include address the changing needs of multiple types of recreation uses in the Chugach and consider public input on current heli-ski operations and permitting practices.

External Scoping

On March 14th, 2024, BLM started a 30-day external scoping period to gather public input on current heli-ski operations and permitting practices. People wishing to comment were encouraged to consider points such as:

- What activities do you participate in on these BLM managed lands during the months of February through May?
- What opportunities would you like to have available on these BLM managed lands during the months of February through May?
- Have you experienced any issues or user conflicts on these BLM managed lands? Please explain.
- To what extent should existing commercial heli-ski permits be modified, enhanced, and/or expanded?
- What limitations and restrictions, if any, are needed and why?

Scoping and public awareness efforts consisted of the following:

News Release

On February 28th, 2024, BLM published a news release requesting public input, with information about the public meeting in Valdez and how to register comments on the BLM National NEPA Register Project Website.

BLM also provided information for five news articles published in local and state newspapers.

- Alaska Beacon March 4th, 2024
- Anchorage Daily News March 5th, 2024
- Confluence Alaska March 7th, 2024
- Copper River Country Journal & North Country News March 14th, 2024
- Copper River Record March 14th, 2024

Social Media

On March 13th, 2024, BLM posted a social media message requesting public input, with information about the public meeting in Valdez and how to register comments on the BLM National NEPA Register project website.

BLM National NEPA Register Project Website

BLM maintains the BLM National NEPA Register project website with project information, description, milestones, maps, and the ability to submit comments on the project. The link to the project website is <https://eplanning.blm.gov/eplanning-ui/project/2031076/510>

Posters

Flyers and posters were posted in public places in Valdez to inform users of the application window, draft EA, scoping period, and upcoming public meeting.

Public Meeting

On March 14th, 2024, BLM hosted a public meeting in Valdez, AK. See section 1.2 Public Meeting.

Written comments

BLM solicited comments from the public through the BLM National NEPA Register website, email, and mail. The comments shall be addressed in the EA. See section 1.3 Scoping Comments Received and Issues Identified.

Public Meeting

On March 14th, 2024, BLM conducted a Public Scoping Meeting at the Valdez Civic Center. There were 31 attendees. The BLM presented a slide show with information about SRP applications, the Public Scoping portion of the EA process, the East Alaska Resource Management Plan, and current operating practices. There was then a question-and-answer session, in which BLM mostly answered questions that related to current heli-ski operations and the development of the EA regarding the next 10 years of heli-skiing in the Thompson Pass, Tielkel Pass, and Valdez areas. The public was encouraged to submit comments through the BLM National NEPA Register. BLM also offered each attendee a printed project summary and paper comment form. BLM provided maps of the area in question, and asked attendees to place pins on areas they use to recreate personally or commercially.

The BLM answered questions such as the following:

- Does motorized use include helicopters? No.
- Do helicopter operators have to provide post-use reports at the end of the season? Yes.
- Do all SRPs last for 10 years? There is a 1-year probationary period, then if in compliance will renew for 5 years then 10 years.

The public was provided the opportunity to submit handwritten comments if necessary.

Scoping Comment Received and Issues Identified

The public comment period was open for 30 days from March 14 to April 12, 2024. The BLM received 79 comments: 59 submitted on the BLM National NEPA Register project website, 16 via email, and 3 via the postal service. Public comments were individually considered and the issues they expressed were identified and grouped into the following 18 general issue categories. A more detailed summary of each issue, including proponent and opposition are further outlined in bullet points below each issue category.

1. Issue: user conflict between human powered recreation and helicopters
 - Helicopters landing above or in the vicinity of human-powered recreationalists and commercial helicopter-powered groups of users in the immediate vicinity of human-powered groups.
 - Conflicts include safety issues, the interruption of solitude, and unnecessary noise.
2. Issue: user conflict between snowmachine or other motorized recreation and helicopters
 - Helicopters landing above or in the vicinity of snowmachine-powered recreationalists.
 - Conflicts include safety issues, the interruption of solitude, and unnecessary noise.
3. Issue: noise pollution
 - Helicopters bring mechanical noise into an otherwise quiet environment, potentially disrupting humans and wildlife.
4. Issue: wildlife considerations
 - The impact of helicopters on wildlife in the area has not been adequately researched or assessed.
 - Helicopters disturb wildlife at all stages of life and at all times of the year due to noise, stress, and physical disturbance.
 - BLM should not allow helicopters in the Tonsina Controlled Use area that is closed to motorized access during hunting season, since this environment is important for Dall sheep and mountain goats.
5. Issue: conflict specifically in the 40-Mile Richardson Highway area
 - The 40-Mile area (generally between mile 36-56, commenters' descriptions vary) is an especially valuable place for road-accessible backcountry skiing and therefore should be preserved for human-powered recreation.
6. Issue: flight safety considerations
 - There is danger posed by helicopter crashes, both to helicopter occupants as well as anyone who might be below the helicopter in the fall line.
7. Issue: skier safety considerations

- There is danger from avalanches triggered by helicopter operations. Slides can be triggered from cornices or unstable snowpack. Helicopter operations that may trigger avalanches that affect other users include winds from rotor-wash, helicopters landing above skiers, and heli-ski groups skiing down above other users.
8. Issue: powder or untracked snow as a resource
- Heli-skiing provides backcountry access to more people, resulting in more use of backcountry terrain. When helicopters land above road-accessible terrain, heli-users can track out terrain that would be otherwise less tracked if only human-powered users skied there.
9. Issue: permit duration
- The length of permit issuance (10 years) may be too long to adequately assess the effects of heli-skiing on the environment and other users.
 - The length of permit issuance does not provide adequate opportunity for new operators to break into the market.
 - The length of permit issuance does not allow BLM to respond to infractions of permittees.
10. Issue: number of permits
- The number of permits is too high.
 - The number of permits is adequate.
11. Issue: number of helicopters
- The number of helicopters allowed to fly with current permitting practices is too high.
 - The number of helicopters has increased over the last decade.
 - The number of helicopters allowed to fly with current permitting practices is adequate.
12. Issue: Leave No Trace/waste management practices
- Helicopter groups leave litter and human waste behind.
13. Issue: public availability of flight path and landing data
- Helicopters should provide flight path data to BLM to inform future management decisions and improve transparency and safety.
 - Operators should provide daily flight plans and use areas to the public.
14. Issue: pollution, fossil fuel consumption, and climate change
- Helicopter operations are fossil fuel resource intensive and produce significant amounts of air pollution.
 - The impact of the amount of pollution created by current helicopter operations has not been adequately analyzed, nor has there been accurate estimates of continuing effects of pollution in the immediate and larger vicinities.

15. General support of the establishment of a “No Helicopter Zone”

- There should be a 10-mile (5-mile, 2-mile) buffer on either side of the road corridor.
- Miles 36-56 of the Richardson Highway should be closed to helicopter operations.
- Particular areas, such as Crudbusters, Crybabies, to the NW Billy Mitchell area should be closed to heli-ski operations.
- The north and west sides of the Richardson Highway should be open to heli-ski operations while the south and east sides should be for non-motorized use only.
- Helicopters have the flexibility to fly farther than non-motorized groups can easily access so they are cheating their clients when they utilize road-accessible terrain.
- BLM should not allow helicopters in the Tonsina Controlled Use area that is closed to motorized access during hunting season, since this environment is important for Dall sheep and mountain goats.

16. General support of heli-ski operations

- Heli-ski operations improve public and tourist access to remote backcountry areas.
- Heli-ski operations are important for local economies, bringing income to local businesses and jobs for community members.
- Heli-skiing is important to the history of the Chugach Mountains and Alaska.
- Heli-ski operators already avoid other backcountry users and should plan to continue to do so.
- More strict rules should be imposed on heli-ski operations regarding required distances between user groups, while allowing permitted operations to continue.

17. General opposition to the establishment of a “No Helicopter Zone”

- A “blue hole” often forms around the 40-mile area and this is sometimes the only safe operating area for helicopters.
- Helicopters improve highway safety in the proposed “No Helicopter Zone.”
- Having the option for heli-ski groups to ski to the road as the last run of the day improves operations’ safety, since helicopter pickup is no longer necessary in case weather turns.
- Lodge(s) in the proposed “No Helicopter Zone” are owned and operated by heli-ski companies and access is needed.

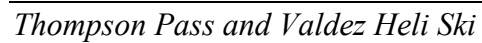
18. Helicopter operations improve skier and public safety

- Heli-ski companies have airlifted highway accident victims to the hospital.
- Heli-ski companies have aided in the rescues and emergency transport of

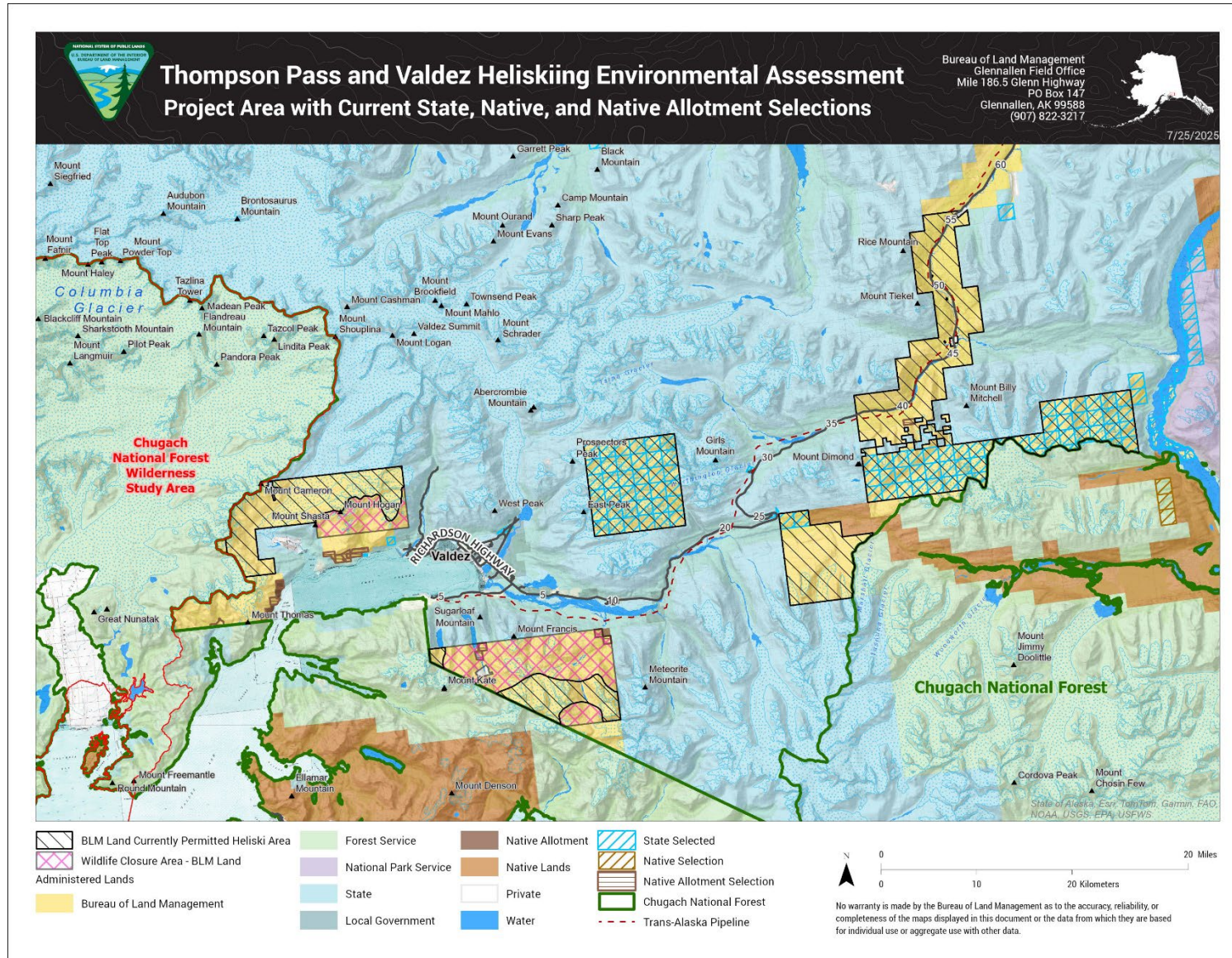
backcountry users in need of assistance, providing help more quickly than could be dispatched by troopers or search and rescue.

- Helicopters in the backcountry are a resource in case of emergency.

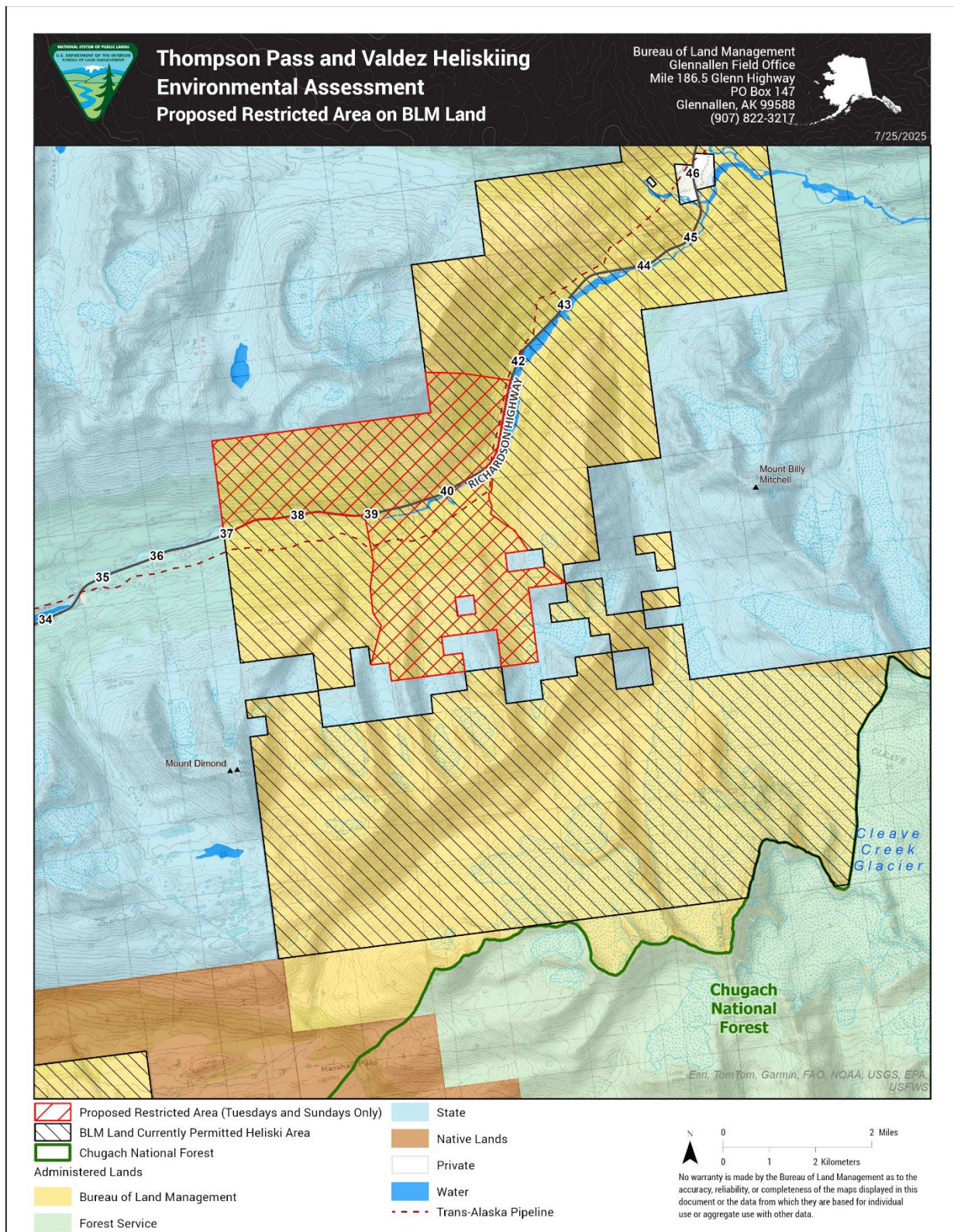
MAP 1: Thompson Pass and Valdez Heli-ski Project Area



MAP 2: Thompson Pass and Valdez Heli-ski Project Area with Native and State-Selected Lands Indicated



MAP 3: Thompson Pass Proposed Restricted Area



MAP 4: Thompson Pass Recreation Opportunity Spectrum (ROS) Classes

