



March 18, 2020

On behalf of our thousands of supporters both within Wyoming and throughout the nation, we submit a strong plea to stop progress on the helicopter tours proposed by Tony Chambers and Wind River Air, LLC. Our main mission is to protect our shared wildlife resources from human threats and to educate the public about issues that affect our wildlife, which is a shared public resource. Helicopter tours pose a great threat to our wildlife and the Jackson community has been against the tours since they were first proposed in the early 2000s. The community remains so today.

We outlined some of our concerns in a letter written by us and 10 other conservation organizations in the valley dated February 12, 2020. However, in these comments, we wanted to provide specific detail about the effects recreational helicopter tours will have on solitude and wildlife.

The Greater Yellowstone Ecosystem is a United Nations Educational, Scientific, and Cultural Organization (UNESCO) World Heritage Site. UNESCO states that Yellowstone National Park and the surrounding area, "is a protected area showcasing significant geological phenomena and processes. It is also a unique manifestation of geothermal forces, natural beauty, and wild ecosystems where rare and endangered species thrive. As the site of one of the few remaining intact large ecosystems in the northern temperate zone of earth, Yellowstone's ecological communities provide unparalleled opportunities for conservation, study, and enjoyment of large-scale wildland ecosystem processes." UNESCO (2020) states, "at nearly 900,000 hectares, Yellowstone National Park is a large property, and is at the heart of the vast "Greater Yellowstone Ecosystem," (GYE) encompassing over 7 million hectares. The park, along with the GYE, is one of the last remaining intact large ecosystems in the northern temperate zone."

This unique place is one of the last of its kind on earth. We have the responsibility to protect what is left of it and to leave it better than we received it from our ancestors. By restoring some of the large carnivores, further protecting lands within the GYE and being mindful about restrictions on human activities, we have begun the process of allowing the GYE to return to and maintain its natural state. However, as the human population increases in all communities within and surrounding the GYE, the threats to this place continue to rise. If we remain on the course of chipping away at protections and allowing additional human factors to affect the wildlife and wild lands of the GYE, we will lose everything and future generations of both people and wildlife will not be able to experience the GYE as we do now.

In our modern world, it is nearly impossible to escape the noise of human civilization. The GYE provides us with an opportunity though. The furthest location from a road is just to the southeast of Yellowstone National Park. It is not difficult to travel on foot for days and encounter few other humans. We have various places within the GYE that are designated as Wilderness where the land can remain “untrammeled by man,” and the solitude of sitting next to a high mountain lake with only your thoughts and the wind can still be experienced. These are rare occurrences in the Anthropocene, but ones that are desperately a necessity. The health benefits of wilderness are being touted by many, many health care professionals as a way to ease stress, reconnect with yourself, reduce anxiety, and provide opportunities for physical fitness (ten Brink et al., 2016).

Noise pollution is becoming an increasing environmental challenge and has been declared as the second-worst environmental issue in Europe (ten Brink et al., 2016). The World Health Organization (2020) recognizes noise as a major health threat “responsible for a range of health effects, including increased risk of ischemic heart disease as well as sleep disturbance, cognitive impairment among children, annoyance, stress-related mental health risks, and tinnitus.” Helicopter flights would be a main contributor to transportation noise in the GYE. This area serves as one of the best places within the continental United States to seek relief from noise pollution. The institution of helicopter tours even on a weekly or monthly basis will disturb our access to a place of peace. No matter where you are located within Grand Teton National Park or adjacent lands, the helicopter noise will be inescapable.

Helicopter tours in and around Jackson Hole and Grand Teton National Park will have potentially severe negative effects on wildlife, especially the Teton Range Bighorn Sheep Herd. One study (Brambillaa & Brivio, 2018) “compared ibex activity levels in the hours before and after 34 helicopter overflights during the summer of 2013 in Gran Paradiso National Park (Italy), a protected area that is essential for the conservation of Alpine ibex. The behaviour of Alpine ibex was affected both during and after helicopter overflights: compared to the average activity levels in the hours before the disturbance event, activity increased during the disturbance and decreased during the hour following the overflights. The reduction in activity persisted over the whole day of the helicopter disturbance and finally went back to normal levels during the following day. There was no evidence of habituation to the disturbance throughout the study period. The prolonged behavioural response to the disturbance suggests that frequent helicopter overflights may ultimately affect the ibex’s body conditions, as well as the life-history traits of a population.”

Churchill & Holland (2003) found that “habituation (or lack of obvious reactions) by some animals imposes energetic costs on animals; they are often under stress even though they may appear undisturbed. For example, sheep in escape terrain cannot show obvious stress by running to escape terrain as they are already there, lack of movement masks the stress reactions of increased heart rate, etc. Motorized vehicles including helicopters, airplanes, snowmobiles, off-highway vehicles (OHVs), and jet boats are typically loud and fast. They have, both a great likelihood of disturbing wildlife, and a great potential of severe impact. It is important to also consider the impact of

aircraft operations disturbances may be cumulative with the impact of other motorized disturbances.” Further they found that, “aircraft operation near cliff escape terrain can have a very high impact factor and are likely to have severe consequences for both individual animals and cumulatively on the population.”

Significant evidence exists that proves “helicopter and fixed-wing aircraft activities does stress mountain sheep” (Churchill & Holland, 2003). Best Management Practices: Aircraft Operations and Wildlife (2003) for bighorn sheep recommend that “helicopter-supported recreation should be permitted within sheep habitat only during the period of July 15 to October 31 to avoid the winter, birthing, rearing, and rut seasons.” With only 100 bighorn sheep remaining in the Teton Range Herd, we must be doing everything we can to prevent the extinction of this unique population. Current discussions are now underway among the Bighorn Sheep Working Group ([www.tetonbighornsheep.org](http://www.tetonbighornsheep.org)) and the public on how to reduce impacts that recreationists have on this population of sheep. To introduce yet another risk factor (and one that could have a significant impact on the sheep) would be irresponsible and reckless at this time.

Evidence has shown that both grizzly and black bears, during the time they are in hyperphagia (increased calorie intake before hibernation) can be significantly impacted by aircraft operations. Grizzlies are facing dramatic reductions in access to food sources and are highly dependent upon berry patches and army cutworm moths in high-elevation sites during the autumn months. Helicopter tours would most certainly have an impact on bears which could be detrimental to them surviving through the winter. Once again, reactions from wildlife may not always be visible immediately by humans, but can affect survival at a later time (Churchill & Holland, 2003).

Nesting raptors also face significant threat from helicopter tours. Peregrine falcons, bald eagles, northern goshawks, prairie falcons, and gyrfalcons are all species that nest either on cliffs or in trees from April through September and could be impacted by helicopter operations, especially from noise. Helicopters could unknowingly approach a nest, especially on cliffs, and cause the adults to abandon their eggs or young (Churchill & Holland, 2003).

When the GYE is facing such dire threats from so many sources, it’s quite short-sighted of us to allow disturbing helicopter tours for *recreational* uses that will disturb both people and wildlife. Levels of disturbance to people could include negative health effects as well as annoyance. Levels of disturbance to wildlife are likely to include negative impacts (and quite possibly severe impacts) on their *survival*. Wildlife are counting on us to protect them, let’s not let them down.

Sincerely,



Kristin Combs  
Executive Director

Resources:

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ten Brink, P., Mutafoğlu, K., Schweitzer, J-P., Kettunen, M., Twigger-Ross, C., Baker, J., Kuipers, Y., Emonts, M., Tyrväinen, L., Hujala, T., and Ojala, A. (2016). *The Health and Social Benefits of Nature and Biodiversity Protection*. A report for the European Commission (ENV.B.3/ETU/2014/0039), Institute for European Environmental Policy, London/Brussels.

UNESCO. (2020). *Yellowstone National Park*. <https://whc.unesco.org/en/list/28>.

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