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March 7, 2014

Marc Stamer
Forest Wildlife and Rare Plant Program Manager
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701
Submitted via email to comments-southwestern-coronado@fs.fed.us
cc: mstamer@fs.fed.us

RE: Scoping Comments for the Proposed Helicopter Exemption for the Pusch Ridge Wilderness

Dear Mr. Stamer:

Please accept these comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our more than 35,000 members and supporters.

The Sierra Club is one of the oldest grassroots environmental organizations in the country. The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Many of our members use and enjoy the Pusch Ridge Wilderness and were significantly involved in its establishment. Sierra Club has also been involved in trying to keep development from creeping close to the Santa Catalinas and with trying to ensure that healthy populations of predators, including mountain lions, thrive along with other species on our public lands.

The Sierra Club is a strong supporter of wilderness protections. In passing the Wilderness Act of 1964, Congress made clear its intent to provide places in this country free from expanding settlement and growing mechanization, providing a wilderness experience insulated from the sliding scale produced by increased population and evolving technology, and undiminished by time. In reviewing any proposed action in wilderness, we think it is imperative to keep in mind the words of the Wilderness Act and to ensure that all actions are consistent with it:

"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. [Wilderness is] an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions." 16 U.S.C. § 1131 (c)



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We have significant concerns about the potential impacts of this proposal on the wilderness and wilderness values.

We also have had and continue to have significant concerns about the Santa Catalina Bighorn Sheep Restoration Project, including the potential negative impacts of the project on the wilderness. While we are generally supportive of restoring native species to their natural habitat, we do question the efficacy of introducing animals to an area where they disappeared and where it is unclear why and where one of the key issues affecting the sheep – development around the Santa Catalinas – is not and likely cannot be addressed. If development around the Catalinas was a major factor in the disappearance of the bighorn sheep population in the first place, then this reintroduction project is unlikely to be successful. Even the habitat benefits from fire may be short-lived as utilizing fire may be limited due to the proximity of development.

The scoping notice from the Coronado National Forest indicates that it is proposing “to authorize the use of helicopters to capture and investigate mortalities of desert bighorn sheep in the Pusch Ridge Wilderness on the Santa Catalina Ranger District (SCRD) in Pima County, Arizona.” It states that Arizona Game and Fish needs to use helicopters for the first four years of the reintroduction. We question the efficacy of the project as well as the purpose and need for the helicopters and believe the Forest Service must do a thorough analysis of its impacts on the wilderness and the wilderness resources, including other wildlife.

The scoping notice states that the use of helicopters in the wilderness is needed, “To increase the potential for successful reintroduction of desert bighorn sheep, AGFD requires the intermittent use of helicopters for the first four years of the reintroduction and restoration process.” We question this statement and whether it would actually increase the success of the project. The Forest Service should evaluate the purpose and need as part of the National Environmental Policy Act (NEPA) process.

The Forest Service should consider and analyze alternatives to the use of helicopters. What is the impact of the helicopters on both the sheep and the other wildlife? Why can't the bighorn sheep be monitored by ground? Wouldn't doing ground monitoring reduce the stress on these and other animals, which is already considerable? How does using a helicopter for this project meet the Wilderness Act's minimum requirements?

Because the duration of use is four years versus a short period, this action could be considered a major action pursuant to NEPA. The Forest Service must evaluate that.

Currently, there are very few details available about the proposed action. When and where will the helicopters be used? Why helicopters versus ground monitoring? What are the impacts, including the cumulative impacts of the proposed action? The Forest Service must disclose additional information, so the public can adequately analyze this project, understand its impact on the wilderness and the wilderness values, see what the alternatives might be, and provide meaningful comments.

Due to the potential significant and detrimental impacts on the wilderness and its wildlife, we ask that a thorough NEPA analysis be conducted, including an analysis of a ground alternative.

Please keep us informed about any developments or actions related to this proposal.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Sandy Bahr". The signature is written in a cursive, flowing style with a prominent loop at the end.

Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter