



P.O. Box 9175, Missoula, MT 59807 • (P) 406.542.2048 • wild@wildernesswatch.org • www.wildernesswatch.org

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Moscow, ID 83843
(P) 208.310.7003

June 13, 2014

Jim Upchurch
Forest Supervisor
Coronado National Forest
300 W. Congress St.
Tucson, AZ 85701

Neil Bosworth
Forest Supervisor
Tonto National Forest
2324 E. McDowell Rd.
Phoenix, AZ 85006

Dear Supervisors Upchurch and Bosworth,

It has come to our attention that the Coronado and Tonto National Forests are conducting scoping on projects to use helicopters in Wilderness for capturing, collaring, translocating, monitoring, and other activities related to “managing” bighorn sheep. It appears the proposed helicopter use may also involve aerial gunning or other forms of predator control. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Wilderness Watch appreciates the concern for long-term viability of bighorn sheep expressed by this proposals, however we believe the projects as proposed are contrary to the letter and spirit of the Wilderness Act.

We are sending this single letter to you, as it appears that these projects are linked in that bighorn sheep from Wildernesses on the Tonto National Forest will be captured and sent to a Wilderness on the Coronado National Forest. Further, it seems there is an overall plan to heavily manipulate bighorn populations by the Arizona Department of Game and Fish (AGF). It would behoove the federal agencies that have jurisdiction over these Wildernesses to look at the overall plan through an environmental impact statement (EIS) as the site-specific projects appear to be inextricably linked and are likely to have a significant impact given the potential duration and extent of activities and given the number of protected areas impacted. Even if the agencies were able to legally extract an independent NEPA analysis for just the Pusch Ridge Wilderness or just the Wildernesses on the Tonto National Forest, each of these proposed actions would necessitate the preparation of an EIS due to the extensive and prolonged nature of activities that are expressly prohibited by the Wilderness Act due to impacts on Wilderness character. Impacts to wildlife are also likely to be significant.

The proposal for the Pusch Ridge Wilderness in the Coronado National Forest is for at least **four** years duration, though it is not clear how long the radio collaring operations would occur. The agencies may approve 160 helicopter landings and countless flights over the next four years. It would reintroduce more bighorns via helicopter (flight numbers are not clearly explained), radio collar bighorns in the area (10 to 20 landings annually), and monitor mortalities (20 landings per year). The scoping notice also states, very briefly, “In some instances, predator body samples will be taken for analysis and research investigation.” Thus, it seems this proposal would

allow aerial gunning of cougars or other predators in Wilderness by AGF employees. None of this is compatible with Wilderness. Please clarify the extent and methods of any anticipated or authorized predator control and/or killing for other purposes.

The proposal for the Tonto National Forest includes activities in five designated wilderness areas, which apparently provide the source populations of bighorn sheep for translocation to Pusch Ridge. This proposal would radio collar bighorn in the area (10 to 20 landings annually) and capture sheep (20 to 30 landings annually). The proposal is for at least ten years. This could approve 500 landings and countless flights over the next ten years.

For at least the Tonto National Forest, we were under the impression, after speaking with the project manager, that AGF is both the proponent and contractor for the NEPA document.

Since the Tonto National Forest scoping letter clearly distinguished between radio collaring and capturing activities and states that captured sheep will be translocated, and since it notes an expected need of 30 sheep for translocation in the first year (the same number expected for translocation in the Pusch Ridge Wilderness), we assume the projects are related. Please clarify where the captured sheep will be relocated.

We understand bighorns are a native species, but the scoping letters do not explain why these actions would meet the minimum requirement for protecting and preserving the Wildernesses. The Arizona Game and Fish Department's Statewide Action Plan is not a Wilderness Plan; please clarify how these activities are necessary to meet minimum requirements for the administration of the area as Wilderness.

In the case of Pusch Ridge Mountains, the bighorns disappeared in the late 1990s (reintroduction has occurred since that time). That fact alone would suggest that the area may no longer be able to support a population of bighorn sheep and/or that AGF has mismanaged the bighorn sheep. If the area is no longer able to support a viable population of bighorn, and since habitat manipulation for bighorn sheep would not be consistent with Wilderness, it seems clear that a thorough and scientifically valid assessment of why the sheep disappeared needs to be made before the Wildernesses are invaded with helicopters. Please clarify the reasons for the population disappearance (e.g. habitat loss, predation, hunting, human disturbance, etc) and explain what the agencies are doing to address those reasons. Please also clarify if the agencies anticipate a need to modify habitat, add structures, or continue with motorized access to ensure that this reintroduced population remains viable.

In the case of the Wildernesses on the Tonto National Forest, there is even less justification offered than for the Coronado National Forest. The letter merely alleges that bighorn sheep must be collared and that it must occur by helicopter to meet AGF's statewide bighorn sheep management objective and Tonto Forest Plan monitoring. Neither meet the test of section 4(c) of the Wilderness Act, which only allows motorized or mechanized transport in such a case for the singular purpose for wilderness preservation. Again, please clarify the reasons for population decline, if it has occurred, and what the agencies are doing to address these reasons.

We certainly don't object to research geared toward understanding more about bighorn use in Wilderness as long as the research does not violate the Wilderness Act and Wilderness values. Indeed, this is consistent Forest Service policy clearly explained in the Forest Service Manual at

2323.32 at 2 “Wildlife and fish management programs shall be consistent with wilderness values.” See also FSM 2323.33b, for issues regarding the requirement to conduct “habitat surveys and population assessments in a manner compatible with the wilderness environment;” FSM 2323.33c regarding predator control; and FSM 2323.37 for requirements that, “In all cases, research shall be conducted in such a way as to minimize any adverse impacts on the wilderness resource or its users.”

FSM also notes in 2323.37 at 1 that, wildlife “Research methods that temporarily infringe on the wilderness character may be used, provided the information sought is essential for wilderness management and alternative methods or locations are not available.” Similarly, FSM 2324.42 requires the agency to “ensure that research areas outside wilderness could not provide similar research opportunities.” The agency must, “Direct projects that would jeopardize wilderness values to areas outside wilderness.” Lastly, this section prohibits “the use of motorized equipment or mechanical transport unless the research is essential to meet minimum requirements for administration of the area as wilderness and cannot be done another way (sec. 4(c) the Wilderness Act).” As noted above, meeting AGF’s desires and plans is in no way essential to wilderness preservation.

Please keep us updated on these projects. We understand that EAs will be prepared and that there will be an opportunity for formal public input at a later date. Again, we encourage the Forest Service and other federal agencies to do a programmatic EIS on the AGF plan in terms of wilderness administration. At an absolute minimum, EISs should be prepared for the proposed projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane".

Gary Macfarlane
Board Member

cc: Dana Johnson, Staff Attorney