

November 18, 2019

To whom it may concern,

We are in receipt of the scoping letter and have noticed that you have posted this project on the Coronado National Forest Schedule of Proposed Actions (SOPA). By listing this project on SOPA and sending out a scoping notice, it appears the Forest is in the process of NEPA for the issuance of an organizational camp use authorization. We would remind the Forest that Organizational Camps special use authorizations are not subject to NEPA (FSH 1909.15 section 32.4 "Statutory NEPA Exception. Organizational camp special use authorizations. The National Forest Organizational Camp Fee Improvement Act of 2003 (16 U.S.C 6231 et seq.) establishes that the ministerial issuance or amendment of an organizational camp special use authorization is not subject to NEPA. Sections 502 © and 507 (16 U.S.C. 6231, 6236) provide as follows: 507 (a) NEPA EXCEPTION. The ministerial issuance or amendment of an organizational camp special use authorization shall not be subject to the National Environmental Policy Act of 1969 (42 U.S.C 4321 et seq.) . It appears that your NEPA exercise is in direct violation of your handbook and U.S. Codes 16 and 42.

We appreciate that the Forest Service is concerned with the Mount Graham Red Squirrel and we are equally concerned. To the end that we have worked tirelessly for many years to clean the area of Columbine and the surrounding area in which the Bible Camp resides. Due to our efforts, the Bible Camp and Columbine are not black sticks today. This is a testament that the policies which have been in place to "protect the squirrel" by leaving the forest with unnaturally high fuel loads was a recipe for disaster. Evidence now shows that the cleaned areas are where the squirrels now can and have resided. If the Bible Camp is removed, that area will burn in the next fire. The Arizona Idaho Conservation Act of 1988, Federal Law, states that the Bible Camp and the Cabins at Columbine will remain with the continuation of permits.

The reissuance of the Organizational Camp permit is in compliance with FS and Congressional directives to provide a place for youth, handicap persons, and groups to enjoy the forest. FSH 32.4 (B) provides a valuable service to the public by ^{by using} such lands as a setting to introduce young people or individuals with a disability to activities that they may not otherwise experience and to educate them on natural resource issues).

We press upon the Forest Service to follow the procedures and Federal Codes and reissue the Organizational camp permit as soon as possible.