

Data Submitted (UTC 11): 11/7/2019 5:36:10 AM

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Comments: I strongly support renewal of the Special Use Permit for the Arizona Church of Christ Bible Camp on Mt Graham. After two years of construction, the first session was held in 1968, and the camp has been enjoyed by countless folks since then. I have been involved with the camp for 14 years, being vice-president of the board which operates the camp for the last 10. I am often the person who serves as the on-site board representative (maintenance man) when the facility is rented to other users. I have witnessed folks grow closer to each other, the environment, and God during their time at camp.

This camp is a rarity, providing "civilized" amenities in a remote mountaintop location. The chance to be so isolated from the technological hustle-bustle of modern life is becoming a rarity, for both adults and children. I suspect many folks have not been to a place where the electricity (generator) is shut off at night, where cell phone reception is so spotty, and where the possibility of seeing nature and wildlife up close and personal is such a reality.

Local camp facilities (Bible, Scout, or other) are decreasing in number. Huachuca Oaks (Huachucas) and Broken Arrow (Dragoons) were shut down for financial reasons, and Pine Canyon Camp (Chiricahuas) was removed due to flood concerns following the Horseshoe II fire. The opportunity for children to experience camping is becoming more difficult, an experience that can help shape their lives, and teach them to appreciate nature.

The camp is generally used by our group just two weeks a year, and is also available to rent by others. Some years it has been occupied for six weeks, some years not at all. Rental fees cover costs of a generator and fuel, plus liability insurance and necessary maintenance and supplies. This is certainly not a money-making operation! Despite damage caused by the fire, the camp is still a great place to spend time away from the usual activities of life. Time to slow down and appreciate the wild, natural world.

The camp is used by religious groups, Scouts, family reunions, and groups of friends. It offers secure sleeping accommodations, hot and cold running water in the restrooms (with showers), a large commercial-grade kitchen, and a meeting hall that also serves as the dining area. The only "structured" recreation area is a sandy volleyball court. Other activities take place in an open field or under the trees of the forest. Numerous hiking options are available nearby.

I realize there is concern for the Mount Graham Red Squirrel, especially after the Frye Fire. I have spent a lot of time on the mountain, but have seen only one Red Squirrel, and that was in a tree within 20' of the main building at camp. The facilities are not used enough to cause any great disturbance to them.

If the permit is approved, there isn't any need for much to change on site. Some buildings need roof work, maybe a coat of paint, plus some electrical upgrades, but overall it is a functional and easy-to-maintain installation. A correction is needed on the Scoping Notice's list of improvements that constitute the camp: what is listed as a shower house is actually the staff housing and nurses' office; propane is used, not butane; there are three 250-gallon tanks, not two; the ramada shelters no longer exist.

Floods following the 2017 Frye Fire wiped out our water intake system, as the canyon it is in was a high-intensity burn area, which subsequently eroded 12 feet deep and 40 feet wide. Our source is officially known as Bible Spring, and we have (successfully) done rudimentary work to re-establish it and get water flowing into the storage tanks. Without water we have no sanitation, which would keep the camp from being used at all, even just for maintenance work. Further work will be needed to make the intake system more secure. Our system includes 20,000 gallons of stored water, which is available for firefighters and other needs.

Denial of the Special Use Permit will result in the structures being removed. This will involve the use of heavy equipment to demolish the block buildings and their foundations, with dozens of trips up and down the mountain with large dump trucks. More importantly, it will remove yet one more opportunity for people to enjoy the forest via group camping events.

My understanding of legalese is limited, but the following reads to me that renewal/transfer of the Special Use Permit is not subject to NEPA:

16 USC Ch. 81A: NATIONAL FOREST ORGANIZATIONAL CAMP FEE IMPROVEMENT

§6236. Ministerial issuance, or amendment authorization

(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.).

(b) Rule of construction

For purposes of subsection (a), the ministerial issuance or amendment of an authorization occurs only when the issuance or amendment of the authorization would not change the physical environment or the activities, facilities, or program of the operations governed by the authorization, and at least one of the following apply:

- (1) The authorization is issued upon a change in control of the holder of an existing authorization.
- (2) The holder, upon expiration of an authorization, is issued a new authorization.