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Organization:

Title:

Comments: Helicopter Use in the Pusch Ridge Wilderness NEPA

Marc Stamer

Forest Wildlife and Rare Plant Program Manager

Coronado National Forest

300 West Congress Street

Tucson, Arizona 85701

Dear Mr. Stamer:

I understand that the Coronado National Forest is proposing a wilderness exemption for the Pusch Ridge Wilderness for the following purposes:

1. Use helicopters to capture bighorn sheep to instrument with radio collars or replace failed collars.
2. Use of helicopters in Pusch Ridge Wilderness to safely and quickly access desert bighorn sheep mortalities and transport tissue samples for analysis.

I have concerns about: (1) the certain significant impacts of the proposed action to an area designated by Congress as Wilderness; (2) the necessity of authorizing helicopter landings added to the installation of electronic GPS radio collars in wilderness to recover a herd of Santa Catalina bighorn sheep; and (3) the cumulative impacts of this proposal on the other efforts to preserve wilderness characteristics, while balancing high recreation demands in the Pusch Ridge area and the entire western reach of the Santa Catalina Mountain Range.

The Wilderness Act was passed in 1964 and created a legal definition for wilderness. When President Johnson signed the bill, which provided guidance for the federal government to designate wilderness areas, he famously stated, "If future generations are to remember us with gratitude rather than contempt, we must leave them a glimpse of the world as it was in the beginning, not just after we got through with it." Sec. 4 (c) of the Wilderness Act included specifications of non-mechanized use of these areas:

...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

The Wilderness Act has been vigorously defended by the public and continues to be upheld as one of our nation's most visionary and important environmental laws. I take the proposed exemptions to non-mechanized prohibition as a significant action by the US Forest Service.

An Environmental Impact Statement Must Be Prepared

I have concerns about the lack of environmental review for this project that is within the Coronado National Forest and its impacts on the stewardship of the Coronado National Forest are far reaching.

In light of the requirements of the Wilderness Act, the project would result in significant adverse effects to wilderness character (e.g., motorized equipment, mechanized intrusion, noise, loss of solitude) due to the installation of electronic radio collars and use of helicopters within designated Wilderness. Therefore, an analysis must be completed to demonstrate that the project itself is necessary to meet minimum requirements to preserve the area as Wilderness. Even if the project were deemed necessary, the proposed actions are not the "minimum tool" for achieving the project's objectives, and therefore are inconsistent with the requirements of the Wilderness Act.

I submit the following list of questions of concern for consideration in the forthcoming environmental impact assessment of this proposal. My concerns and questions includes but is not limited to:

- \*What are the long-term impacts of radio collars on wildlife?
- \*What is the decibel range of helicopters?
- \*What are the impacts of noise from helicopters on wildlife?
- \*What are the impacts of noise from helicopters on recreation?
- \*Will there be economic impacts from the impact on recreation?
- \*What are the impacts from landing pads on wilderness?
- \*What are the efforts being implemented to prevent the spread of invasive weeds from helicopter landing?
- \*What alternatives exist to helicopters?
- \*What precludes alternatives?
- \*Are horse riders being consulted on the impacts to horses from helicopters?
- \*Are there other helicopter exemptions in the Pusch Ridge Wilderness or other Wilderness areas in the Santa Catalina Mountains? What are the cumulative impacts from these other exemptions?
- \*What are the impacts by helicopters to the original intention of the wilderness act and its commitment to the intrinsic value of wilderness?
- \*What is the monitoring plan for assessing impacts in the future?
- \*Will the public know when helicopters are in use?
- \*Will the public be notified in advance when helicopters are going to be in use?
- \*Will this proposal eventually include an allowance by Arizona Game and Fish or their contractors to pursue, monitor or kill mountain lions?
- \*Where will the helicopters land the other 5% of the time that "helispots" are not available?
- \*The scoping letter refers to a map with the designated "helispots" however these were not included. Please inform the public of these places.
- \*It has been reported that the collars being used have had significant malfunctions. This proposal allows for Arizona Game and Fish to use helicopters to replace the collars. We believe that there is a severe lack of protocol around these collars at the point that they are purchased and placed on the sheep. Has the U.S. Forest Service or the Arizona Game and Fish Department consulted with the staff of other relocation project on the effectiveness or longevity of the collars being used for this project?
- \*How does the Forest Service intend to analyze the effects of increased helicopter use under recent climate change impact NEPA requirements?
- \*What best available science has been used to understand the impacts on wild animals from stress caused by helicopters as it relates to noise, vibration, human contact and interference on natural predation systems?

Thank you for considering my concerns,  
Curt Bradley  
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