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Comments: Helicopter Use in the Push Ridge Wilderness NEPA

Attention Shalonda Guy, Deputy District Ranger

Dear Ms. Guy,

In response to the proposed environmental analysis by the Coronado National Forest Santa Catalina Ranger District, I respectfully submit my comments.

The original Wilderness Act implied that wilderness is a place where nature is untrammelled by humans and where people are themselves only visitors.

The Wilderness Act prohibits the use or landing of aircraft (i.e., helicopters) in wilderness except in emergencies, rescue operations, and as necessary to meet the minimum requirements for the administration of the area to protect its wilderness character.

Helicopters intrude on the primitive character of wilderness, and significantly detract from the "wilderness experience" of visitors. Helicopters shatter the natural quiet and destroy solitude. The deafening noise of helicopter blades can cause stress on other wildlife in the wilderness. Lower altitude helicopters have shown to flush birds from feeding and nesting areas. It has also shown to decrease foraging and increase panic running of deer and other mammals. It has shown to decrease young survival (USDA 1999). There is also the temporary flattening of vegetation (i.e. moving branches, bushes) that may occur at helicopter landing sites. Even if there are no visitors present to see, to hear, or to object to a helicopter in the wilderness, the spirit of wilderness would be diminished.

These are significant adverse effects that must be acknowledged and considered.

Among the many values of wilderness is the preservation of traditional skills. The Arizona Game and Fish Department must have the ability to travel and work in the Push Ridge Wilderness without the aid of mechanized transport or motorized equipment such as helicopters in order to observe, manage, and monitor the relocated big horn sheep population.

Helicopter surveys may adversely affect populations of mountain sheep "... by altering the movement, habitat use, and foraging efficiency of sheep so that survivorship or reproduction is reduced" (Stockwell 1991 in Bleich et al. 1994).

Bighorn sheep can respond so dramatically to helicopter use that it may override other factors affecting sheep movement (Bleich et al. 1990, Bleich et al. 1994). Sheep do not habituate or become sensitized to repeated helicopter flights (Bleich et al. 1994). MacArthur et al. (1982) reported no heart rate responses in bighorn sheep to helicopters above 400 meters in altitude. However, helicopter flights at 90-250 meters above the ground increased the heart rate in ewes 2.5 - 3 times above normal. Bleich et al. (1994) found that radio collared bighorn moved significantly farther following a helicopter survey than on the day prior to a survey.

Where a choice must be made between wilderness values, and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness (FSM 2320.6).

I am hopeful that the Santa Catalina Ranger District will consider the severe adverse effects of helicopter use in our beautiful Push Ridge wilderness and unequivocally deny their use requested by the Arizona Game and Fish Department.

Helga Klynn

Tucson, AZ