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Mr. Joshua Taiz

Travel Management Project Leader

Santa Catalina Ranger District

Coronado National Forest

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Re: Draft EA for the Santa Catalina Travel Management NEPA Project, Coronado National Forest, Arizona

Dear Mr. Taiz,

I appreciate the opportunity to comment on the Draft EA for the Santa Catalina Travel Management project. I have reviewed and fully support the comments submitted by the Coronado Planning Partnership partners Sky Island Alliance, Sierra Club, Center for Biological Diversity, The Wilderness Society, and David Hodges. However, I have these additional comments. Please keep me informed of the progress of this project.

The cumulative effects analysis, where it appears attempted, is cursory and weak. I am very concerned about the failure to analyze the cumulative effects of the desert bighorn sheep reintroduction project and the use of helicopters in the Pusch Ridge Wilderness. This project is likely to displace some quiet users, who are already being driven out of other areas by off-road vehicle use, legal and illegal. Additionally, the DEA does not address illegal mountain bike uses in designated Wilderness Areas on Mt. Lemmon which displace non-motorized users. For cumulative effects, the DEA should have considered the impacts off-road vehicle use has on mountain bikers and how this, in turn, effects non-mechanized forest users. The DEA should also consider the impacts to visitors to Wilderness areas from all projects that authorize motorized uses in Wilderness areas, including the bighorn sheep relocation project.

For the ROS in Pusch Ridge, near the desert bighorn sheep reintroduction project area, the DEA should acknowledge that the use of helicopters in the Pusch Ridge Wilderness Area will significantly impact non-motorized user experiences. See ROS map at DEA page 49. Conflicts between Motorized and Non-motorized recreation section states that the "Pusch Ridge and Rincon Mountain Wilderness Areas provide approximately 93,000 acres of roadless areas from vehicle use and in most cases have minimal noise disturbance." DEA at 56. However, given the proposed helicopter project related to the desert bighorn sheep reintroduction, the Pusch Ridge Wilderness Area cannot be included as an area that has minimal noise disturbance. The helicopter project is long-term, the number of helicopter trips is estimated at 20 per year for 10 years. This will have a significant impact on quiet recreationists who are pushed out of nearly all other areas of the forest and who comprise the majority of forest users according to the NVUM. Therefore, the analysis that assumes Wilderness areas in the Coronado National Forest are free from motorized noise cannot be relied upon to justify allowing excessive motorized uses for the minority of forest users.

The DEA should analyze wildlife linkages impacted by ORV uses and route designations. For example, a critical wildlife linkage in the Catalina District is the Redington Pass area which, if not heavily and negatively impacted by OHV use, would enable free movement of wildlife between the Rincons and Catalinas. Similarly is the linkage on the northwest side of the Catalinas to the Tortolita Mountains. It is critically important to analyze wildlife corridors and the impacts a motorized route system has on wildlife movement in light of climate changed. It is also critically important for the Coronado National Forest to analyze wildlife movement given the recent reintroduction of desert bighorn sheep to the Pusch Ridge Wilderness area. Only if sheep and their predator species are able to move between mountain ranges and across the district will the project ever be successful.

Thank you,

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