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Comments: Helicopter Use by the Arizona Game and Fish Department within Pusch Ridge Wilderness

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Mr. Stan Helin

Santa Catalina District Ranger

5700 N. Sabino Canyon Rd

Tucson, AZ 85750

Dear Mr. Helin,

Please include this letter as my comments for the official record of the Draft Environmental Assessment that proposes Authorizing Helicopter Use by the Arizona Game and Fish Department within Pusch Ridge Wilderness.

Your District within the Coronado National Forest is an area that I have recreated in for more than fifty (50) years. I continue to hike and photograph in the Pusch Ridge Wilderness area, when my wife and I winter in Tucson. I first hiked in the Pusch Ridge Wilderness with Arizona Game & Fish Warden for Unit 33, Bob Hernbrode Sr., long before Congress designated it as wilderness. That was in the mid-1960s, when I was a student at the University of Arizona Wildlife Research Unit. I completed a bachelor's and a master's degrees in wildlife biology. Mr. Hernbrode, another student and I constructed a water catchment with a float valve below a 750 gallon metal cylindrical tank on Table Mountain for desert bighorn sheep to water up high. The sheep would then be more likely to avoid poachers at lower elevations in Pima Canyon. In the 1990s my wife and I observed that metal tank covered with spray painted graffiti, demonstrating that people hike way off established trails back then. I suspect there is a much higher frequency of off-trail hiking today.

I am a member of the Friends of Wild Animals and of the Sierra Club, two organizations that voiced their opposition to the use of helicopters by the Arizona Game & Fish Department in the Pusch Ridge Wilderness Area.

The Draft Environmental Assessment is insufficient. A full environmental impact statement that considers a long list of alternatives is required, because the use of helicopters by the AZG&FD has a major impact on

humans, on the wilderness areas and on the wildlife within wilderness areas. Such use is NOT okay, because it would continue disturbing the peace and quiet of the PRWA for ten years. People who frequent the PRWA would have their enjoyment of that peace and quiet grossly altered by loud helicopter engines.

One of the obvious alternatives that is absent from the EA is for AZG&FD personnel to hike and/or ride horses/mules into the Pusch Ridge Wilderness to complete their work relocating desert bighorn sheep. Just because the present personnel are a bit too pudgy to hoof it up into steep country, does not justify omitting the use of non-motorized methods, including horses, mules and afoot as a viable alternative. Truly dedicated field biologists should be able physically to spend a sufficient time in the field to monitor sheep and complete whatever work they feel is necessary.

Another alternative that is not considered is halting the relocation project. The AZG&FD is politically dominated by a single species advocacy group, the Desert Bighorn Sheep Society. Members of the AZG&F Commission are also members of the DBSS. The Commission's vote to proceed with relocation of bighorn sheep into the Pusch Ridge Wilderness is grossly biased and lacks thorough and objective analyses of the conditions that are very likely to result in failure of the relocation project.

Over half of the sheep relocated in November 2013 are dead, and it is very likely that more are dead today. Removing bighorn sheep from familiar habitat and dumping them out into an unknown area, where they scatter and lose herd vigilance to avoid predators is a waste of bighorn sheep lives. Furthermore, the quality of habitat classification that identifies over half of the potential sheep habitat as either poor or fair is the basis for halting the project.

USDA Forest Service Manual 2323.32 states that "Wildlife and fish management programs shall be consistent with wilderness values." and that the Forest Service policy should "Discourage measure for direct control (other than normal harvest) of wildlife and fish populations."

Loud helicopter engines are far from being "consistent with wilderness values", because a major wilderness value is quiet that those engines will shatter for ten years. The objectives of the AZG&FD are "direct control" of desert bighorn sheep. Another alternative that should be considered in a full EIS is other areas that are available in Arizona that the AZG&FD could work in.

Due to the increased human activity in the Pusch Ridge Wilderness Area that will continue during the anticipated ten years of proposed helicopter use, it is very likely that an increasing number of hikers will be significantly impacted by the proposed helicopter landings. While trail restrictions are talked about as mitigating the number of humans off trail, exceptions for hunters to walk anywhere they want short circuit trail closures effectiveness. And, there not enough personnel to direct the large number of people that hike off trail back onto the trail limitations.

The AZG&FD's bighorn project is very likely going to be a waste of resources in the long run, if it does proceed for ten years. The genetic viability of bighorn sheep long term in the Pusch Ridge Wilderness area is suspect due to isolation of any breeding herd, if such a herd does become temporarily established.

The bighorn sheep project should be halted and helicopters should not be allowed to fly in the Pusch Ridge Wilderness due to the loud engines, due to the poor chances of a successful re-introduction of sheep and to conserve resources.

Granting permission for the AZG&FD to use helicopters as proposed in the Draft EA would be a violation of the NEPA, which requires a full EIS for this significant of an exception to wilderness protections. I urge you to decline permission for the AZG&FD to use helicopters until ALL of the alternatives can be completely analyzed in a full EIS.

Sincerely,

Ricardo Small