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Comments: Helicopter Use in the Pusch Ridge Wilderness NEPA

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RE: Draft Environmental Assessment for Authorizing Helicopter Use by the Arizona Game and Fish Department Within Pusch Ridge Wilderness

In the last thirty-five years, I have hiked over 15,000 miles in Pusch Ridge Wilderness (PRW) and spent at least that many hours in this part of the Catalinas. Although most of my hiking has been in the Finger Rock Canyon drainage, I have also hiked in Romero, Alamo, Montrose, Pima, Pontatoc, Ventana, Bird, Rattlesnake, Breakfast, Sabino, and Bear Canyons. I have enjoyed observing desert bighorn in PRW on many occasions, the last being October 28, 2001 when I viewed a ram and two ewes (through 16-power binoculars) in the bottom of Finger Rock Canyon at a semi-permanent pool.

I strongly support the reintroduction of desert bighorn sheep in the PRW. It will restore a valuable asset to the Wilderness and will greatly enhance the wilderness experience. I also support the use of helicopters in the Wilderness to assist the Arizona Game and Fish Department (AGFD) in the reintroduction, as well as subsequent management, and believe it will contribute to the success of the project. For those reasons I support Alternative 2 (Modified Proposed Action).

Because the PRW is adjacent to a metropolitan area, it is often difficult to avoid the sights and sounds of human presence. The distant sound of trains, motorcycles, and sirens; the roar of airplanes overhead; and even the sound of gunfire from the Pima Pistol Range (and formerly Tucson Rod and Gun Range) all reduce the experience of wilderness to some degree. I have found, however, that by focusing on what is immediately around me (and turning my back to the city) those human sounds can become like white noise and almost disappear. There are also many places in PRW canyons I have hiked that one can escape all human noises other than an occasional plane or helicopter flying overhead. Those who claim one cannot have a wilderness experience so close to an urban area, something I have heard even from Forest Service employees, should try a little harder.

Based on my many years hiking in the area I can say unequivocally that the biggest impact on and threat to the

wilderness experience in Pusch Ridge is the noise of throngs (scores and, in some times and places, hundreds) of hikers out for exercise and a day in the sun, with little understanding of, or appreciation for, the concept of wilderness. Constant chatter and sometimes loud music can often be heard a quarter mile or more away. That is why I avoid hiking on weekends and holidays or with large groups of people; I am sure that most individuals hoping to enjoy a wilderness experience in Pusch Ridge do exactly the same thing. I suppose the intent of avoiding "trails and concentrated areas" on weekends and holidays as proposed in the draft EA is somehow to protect the wilderness experience, but I dare say that the vast majority of people on the trails on weekends and holidays are not seeking a wilderness experience. To protect the wilderness experience for the most people who seek it, it would be far better to concentrate helicopter use during weekends and holidays. That said, the sound of an occasional helicopter while I'm enjoying the wilderness, particularly when I know the sound is of an AGFD helicopter engaged in bighorn management activities, would be a temporary interruption of my solitude and certainly worth the rewards of a successful reintroduction. I would recommend deleting any references to weekends and holidays.

Following are specific comments and questions:

1. The first sentence of the Location and Description of Project Area section (p. 7) states "The project area is the Pusch Ridge Wilderness boundary...." The word "boundary" should be deleted.

2. In the Background section, second paragraph (p. 9), it states, "The specific reason is unknown although it is believed reduced habitat quality due to a long regime of fire suppression, human disturbance from increased recreation and urbanization, disease, and predation were contributing factors." The problem with dogs should be discussed as a human disturbance, particularly since they are prohibited in the Bighorn Sheep Management Area (BSMA). I remember learning in meetings years ago when the regulations were being developed that the presence of dogs was thought to be a major problem. I have seen bighorn flee when a dog came into view on two occasions. I believe more information on the prohibition of dogs in the Draft EA would be useful to inform the public. Both as a Forest Service volunteer and a concerned citizen, I have talked to scores of dog owners (most in violation of the regulation) about the ban and the reason for it; a common misconception is that the problem with dogs merely concerns dogs chasing sheep (but "my dog is always well-behaved"). I have consistently found people more willing to accept regulations when they understand the rationale for them. The new signage at trailheads is an improvement, particularly since it provides alternatives for dog owners, but more education needs to be done.

3. The first paragraph of the Purpose and Needs section (p. 10) states that "...AGFD personnel are unable to safely access sites in rugged areas to gather the data..." Given that AGFD personnel on the whole are physically fit, I think most of them could access these rugged areas if they had to. It would seem more accurate to include "in a timely manner."

4. The above section also states (p. 11) "Collaring of sheep is necessary to provide data for monitoring of population size, vital rates, habitat use, health, and cause specific mortality." I'm pretty sure collaring of sheep doesn't "cause specific mortality"-this should read "...and the cause of specific mortality."

5. In the same section, p. 11, it states that AGFD will "affix collars on newly-born lambs" but on p. 18 in the Alternative 2 (Modified Proposed Action) section, it states "...bighorn sheep born in the wild may be collared upon reaching maturity...." Unless lambs grow much more slowly than I thought, the second wording is probably correct.

6. The second sentence of the Modified Proposed Action section (pp. 15-16) states "Helicopters would be used to monitor population, conduct research, investigate sheep mortality, replace/retrieve malfunctioning collars, and capture bighorn sheep within Pusch Ridge Wilderness for a period of 10 years." Do you mean "to monitor population trends"? What would be the purpose of capturing sheep? A similar sentence is found in the first paragraph of the Alternative 2 (Modified Proposed Action) section (p. 24): "Under the Modified Proposed Action, helicopter landings would be authorized within Pusch Ridge Wilderness to monitor population, conduct research, investigate sheep mortality, replace/retrieve malfunctioning collars, and capture bighorn sheep for a 10- year period." Perhaps population trends would be appropriate here also. I would also move the phrase "for a 10-year period" to after "Pusch Ridge Wilderness" unless for some reason sheep are to be captured regularly over a 10 year period for some unspecified reason(s).

7. In paragraph 3 (p. 16) of the Modified Proposed Action section, it states, "In this case, helicopter landing includes the firing of hand-held net guns from the helicopter...." I assume this should read "helicopter use" since the net guns are fired from the air, not after landing, according to the section on capture methods on p. 20.

8. Paragraph 1 of the Modified Proposed Action section (p. 18) states "...helicopter landings would occur in designated helisite locations...." Do these locations include both current and historic landing sites as shown in Figure 2, p. 19? Although I would support using both types of landing sites, this should be clearly stated.

9. In the Proposed Action section (p. 22), item 1) states "...there may be 10-20 landings (including long-line operations for release) during a 1-3 day period" to fit or replace collars; item 2) states "...AGFD estimates the need for approximately 20 landings within one calendar year" to access mortalities and take tissue samples. Does this then mean that 10-40 (10-20 + 20) landings per year are anticipated?

10. Table 3-1, pp. 25-26 includes two entries for the BSMA: "Bighorn Sheep Management Area closure (dogs, off-trail hiking) 1996-2013" and "Revised Bighorn Sheep Management Area closure (dogs, off-trail hiking) 2013." I was unaware there was any change in the closure regulations in 2013. It would be helpful to indicate somewhere in the text what changes were made in 2013 and why such changes were made. Also, shouldn't 2013 be 2013-2014?

11. The above table also includes "Unauthorized Trail Construction." Depending on how one defines "trail

construction," I would expect there are far more than 15 miles of illegal trails (including regularly-used routes) in PRW. Proliferation of trails is known to fragment wildlife habitat and to facilitate the spread on invasive species. Indeed, in the Cumulative Effects paragraphs on pp. 43-44, the draft EA states: "Construction of unauthorized trails in the PRW has adversely impacted wildlife in general and bighorn sheep in particular by fragmenting habitat and increasing human influence outside the vicinity of authorized trails. Unauthorized trails have adversely affected the quality of lambing habitat in the PRW, by increasing the presence of humans during the lambing season" Although probably beyond the scope of this Draft EA, a significant step the Forest Service could take to enhance bighorn habitat and the wilderness experience would be to close these trails/routes.

12. The first paragraph of the Wilderness Resources and Character section (p. 26) indicates that the Pusch Ridge area supported bighorn "prior to the early 1990s" while on the Background section on p. 9 states bighorn were extirpated in the "late 1990s" (emphasis added). As I indicated previously, I last saw bighorn sheep in PRW in 2001 (and reported this to the Coronado NF biologist).

13. The last sentence of the Past Actions paragraphs (p. 31 and p., 35) reads "Some of the actions discussed in Table 3-1, such as invasive species removal and wilderness designation itself, have contributed to the preservation of wilderness character." First these actions are merely listed, not discussed (see item 8 above). Second, the BSMA closure regulations have also contributed to the preservation of wilderness character (although better enforcement would significantly increase the benefits).

14. The Reasonably Foreseeable Actions paragraphs (p. 32 and p. 35) should include that the BSMA closure and associated regulations are a long-term beneficial effect.

15. Re the Overall Cumulative Effects sections (p. 32 and p. 36): Although the State of Arizona may have control over wildlife within the state, the presence of bighorn sheep in the Catalinas is "an important wildlife source" for Coronado National Forest and, indeed, the people of the United States. Given the importance of the tourist industry, we should be a bit less provincial.

16. To say "mountain climbing" in the second sentence of the Affected Environment paragraph on p. 36 is a stretch. "Rock climbing and bouldering" would be more accurate.

17. In the second sentence of the Cumulative Effects paragraphs (p. 38 and p. 39), I would change "especially" to "usually limited to" given that these are negligible to minor effects.

18. Affected Environment section p. 41: In paragraph 2, *Pseudotsuga* should be capitalized; in paragraph 3, *Quercus emoryi* is misspelled; in paragraph 4, *Bouteloua curtipendula* should be two words; in paragraph 5, *Quercus emoryi* is again misspelled. In addition, Golden agave (*Agave chrysantha*) is also common in the

Catalinas. It is also inaccurate to say that "grasses are poorly represented" in woodland dominated by Emory Oak; in the Finger Rock Canyon drainage, I have identified 51 grass taxa in scrub grassland, 42 in (Emory) oak woodland, and 56 in oak-pine woodland (92 total grass taxa in the canyon). In paragraph 7, p. 42, velvet ash (*Fraxinus velutina*) should be included.

19. In the same section above, paragraph 4, *Pinus cembroides* should be *Pinus discolor*. This species has long been misidentified but recent molecular data clearly shows that the species in our area is *P. discolor* and that *P. cembroides* enters the US only in Texas. See Flores-Renteria L., A. Wegier, D.O. Del Vecchio, A. Ortiz-Medrano, D. Pinero, A. V. Whipple, F. Molina-Freaner, and C. A. Dominguez (2013) Genetic, morphological, geographical and ecological approaches reveal phylogenetic relationships in complex groups, an example of recently diverged pinyon pine species (Subsection *Cembroides*). *Molecular Phylogenetics and Evolution* 69:940-949.

20. In paragraph 4 on page 42 "Desert bighorn sheep (*Ovis Canadensis Mexicana*)" appears. There is little consistency in the Draft EA as to capitalization of common names (convention usually either doesn't capitalize any words in the name-unless a proper name-or only the first word; species and subspecies scientific names are not capitalized in modern usage). Whatever practice is followed should be used consistently. This comment also applies to Table 3-3.

21. The link to the Region 3 Regional Forester's Sensitive Species List is only for animals.

http://www.fs.usda.gov/detail/r3/plants-animals/?cid=FSBDEV3_022105 is a link to both.

22. Of the species listed in Table 3-3, pp. 43-44, I have observed the following species in PRW: Montezuma quail, Mexican spotted owl, rufous-winged sparrow, cordilleran flycatcher, band-tailed pigeon, and azure bluebird. Those in bold have been seen numerous times.

23. The Cumulative Effects paragraph (p. 45) under both Alternatives 1 & 2 states "One of the most important past actions was the designation of the PRW itself in 1978. Wilderness designation changed the management approach and direction by placing limitations on group size and the types of activities that could occur within Desert bighorn sheep habitat. By designating Pusch Ridge as a wilderness area, less people are encroaching upon Desert bighorn sheep habitat therefore the sheep have less chance of human interaction." Certainly the presence of bighorn sheep in the Pusch Ridge area was a factor in the Wilderness designation. I do not believe, however, that the Wilderness designation per se led to the group size/activity limitations in the Wilderness; these limitations were imposed after designation of the BSMA following public meetings, some of which I attended. The claim that designating the wilderness designation has resulted on fewer people encroaching on bighorn habitat is patently false. Anyone who has spent 10 years or more hiking in the Wilderness is well aware of the exponential increase in usage, driven not by the wilderness designation but by the proximity to the metropolitan area. Neither the Wilderness act nor the current Land and Resource Management Plan limit the number of Wilderness visitors in any way.

Thank you for the opportunity to comment on the Draft Environmental Assessment.

Sincerely,

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