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August 29, 2014

Neil Bosworth  
Forest Supervisor  
Tonto National Forest  
2324 E. McDowell Road  
Phoenix, AZ 85006

Sent Via Email to comments-southwestern-tonto@fs.fed.us and Via US Mail

Dear Supervisor Bosworth:

Wilderness Watch submits the following comments on the Preliminary Environmental Assessment for Authorization of Helicopter Landings in Wilderness within five Wildernesses in the Tonto National Forest--the Hellsgate, Mazatzal, Four Peaks, Superstition and Salt River Canyon Wildernesses. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Wilderness Watch appreciates the concern for long-term viability of bighorn sheep, however we believe the project, as proposed, is contrary to the letter and spirit of the Wilderness Act.

Attached is our earlier scoping comment on this proposal to ensure you include it as part of the project record. Please note we have yet to receive a response to the questions we raised in our June 13 scoping letter.

Wilderness Watch strongly opposes the unprecedented and extraordinary intrusions by helicopters and heavy-handed management planned for these five Wildernesses.

Our comment letter is divided into two main categories, Wilderness and National Environmental Policy Act issues. However, these topics do have considerable overlap in some important aspects of the proposal.

## Wilderness

The EA states on page 6 regarding wilderness:

Wilderness is designated by Congress and management of wilderness areas differs from the general forest portions of National Forest System Lands. Wilderness is a

unique and vital resource; offering opportunities for primitive recreation, for scientific and educational uses, as a benchmark for ecological studies, and for the conservation of historical and natural features.

What is omitted is a recognition of the key value of untrammeled wilderness and any mention of the primary and foundational purpose of the Wilderness Act – preservation of wilderness character. This statement misses what Wilderness is really about, wildness, and sets an improper tone for the analysis in the EA.

Congress defined wilderness in section 2(c) as a place "in contrast" to areas where humans and their works dominate, "where the earth and community of life are untrammeled by man, where man himself is a visitor who does not remain." Thus, there is a clear intention that Wilderness remain in contrast to modern civilization, its technologies, conventions, and contrivances. Congress also intended that Wilderness remain untrammeled, meaning free of intentional human manipulation. In Wilderness, the forces of nature and natural processes would be allowed to unfold without intentional human interference. In this definition, Congress defines not only qualities of Wilderness but also provides statutory direction for how humans interact with Wilderness, and what our relationship will be with these places. In Wilderness, Congress clearly intended that humans would not dominate or develop the landscape, and will not control natural processes.

Section 4(b) states:

Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the **wilderness character** of the area and shall so administer such area for such other purposes for which it may have been established **as also to preserve its wilderness character**. (Emphasis added)

The mandate is to administer all activities so that this Wilderness will remain “unimpaired for future use and enjoyment as wilderness”. It is also clear that this mandate applies to the setting rather than to any particular use. The wilderness character will not be preserved if one or more element(s) of character is allowed to degrade.

The Wilderness Act is explicit about its prohibitions in section 4(c):

. . . except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area, 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.”

“Purpose” is singular in Section 4(c), and that is crucial to understanding the Act. Thus, a clear direction is established in law. The benefits of an enduring resource of wilderness through the establishment of the National Wilderness Preservation System, which is to be administered to protect its wilderness character for the American people now and in the future, is the singular and overriding purpose for the Wilderness Act. The public purposes in section 4b are allowed, but only if they preserve wilderness character. The EA, on page 6 and elsewhere, misleads one to

believe wilderness administration derives primarily from these public purposes. As Howard Zahniser, chief architect of the Wilderness Act, noted in a hearing on the Act, the purpose is to preserve wilderness, not establish any particular use. These public purposes come under the overall mandate to preserve an untrammelled wilderness, and any public use authorization must be compatible with the preservation of this untrammelled character.

Thus, the Wilderness Act clearly requires that federal land management agencies not manipulate or dominate the wilderness. This mandate is reflected in the epigram written by Howard Zahniser who wrote, “With regard to areas of wilderness, we should be guardians not gardeners.”

This is important as the EA erroneously conflicts public purposes in section 4b with the singular purpose in Section 4c. Page 50 of the EA notes:

There are six specified purposes of wilderness: scenic, scientific, recreation, education, conservation, and historical use. Land managers can approve and implement activities in wilderness provided that the activities further one or more purposes of wilderness without degrading wilderness character.

That is a complete mischaracterization of the Wilderness Act in stating that there are actually six specified “purposes”. In other words, the EA’s analysis gives human use the primary emphasis with a sort of background qualification on compatibility with wilderness character. Wilderness is to be a self-willed, wild landscape, not one where the agency conducted actions to further specific uses. Nor does it allow for the use of helicopters to further one of the purposes of Wilderness (how about “heli-skiing” or “heli-hiking”?). Even if one were to erroneously accept the EA’s characterization of “purpose” under the Wilderness Act as focused on the above human uses, 450 helicopter landings expressly and significantly degrades wilderness character in a flagrant violation of the Wilderness Act and its 4c prohibitions.

Even using the Forest Service’s own deeply flawed wilderness character monitoring protocol this proposal harms every “quality” of wilderness character. It harms “untrammelled” because it involves the intentional manipulation of wildlife populations in the Wilderness. It harms the “natural” quality because it removes many individuals of a native species from the Wilderness. It trashes the “undeveloped” quality because it involves up to 450 helicopter landings and who knows how many collars, radios and other motorized equipment. And it obviously impairs opportunities for solitude.

One can’t help but conclude from this proposal and analysis that the Forest Service and ADFG believe an iconic wilderness species—bighorn sheep—is completely unable to exist in a wilderness landscape without the extraordinary and continuous intervention of humans, and in that context a species whose continued existence is completely at odds with Wilderness. But, in fact, it is the Forest Service and ADFG’s programs that are at odds with Wilderness and that exemplify what Edward Zahniser recently described as “the very danger pointed to by Howard Zahinser when he warned that our own management programs may be the worst enemy of our wilderness.”

Equally troubling, the EA confuses wilderness characteristics (page 49) with the mandate to preserve wilderness character by arguing that helicopters are a necessary tool to preserve this

character. The EA does not make the case that helicopters are needed to make sure bighorns survive in the five Wildernesses on the Tonto National Forest. Our scoping letter noted:

We understand bighorns are a native species, but the scoping letters do not explain why these actions would meet the minimum requirement for protecting and preserving the Wildernesses. The Arizona Game and Fish Department's Statewide Action Plan is not a Wilderness Plan; please clarify how these activities are necessary to meet minimum requirements for the administration of the area as Wilderness.

The EA sheds no more light on this question. In fact, the Purpose and Need barely mentions Wilderness and is therefore not in accordance with the Wilderness Act. Pages 9 and 10 note:

The need for the authorization of helicopter landings in designated wilderness areas is to create an efficient process for the Arizona Game and Fish Department to meet state population management objectives that are tied to Arizona Game and Fish Department Bighorn Sheep Management Guidelines (2011), Arizona Game and Fish Department Final Project Implementation Priorities (2012b), the Arizona State Wildlife Action Plan (Arizona Game and Fish Department, 2012c), the master Memorandum of Understanding between the Southwestern Regional Forester and the Arizona Game and Fish Department (2013), and the Association of Fish and Wildlife Agencies (2006).

How does the EA, by failing to analyze any other alternative other than no-action, meet the strict threshold in the Wilderness Act that aircraft intrusion is prohibited ". . . *except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act . . .*?" Two specific examples come to mind. Why wasn't an alternative that allowed capture (including helicopter use) outside of Wilderness evaluated since nearly half of the acreage where bighorns are supposedly found is outside of Wilderness? How can translocating bighorns *from* Wilderness meet the purpose of the Act? What "*minimum requirements for the administration of the area*" are met by *removal* of native wildlife by helicopter from a Wilderness?

It is clear from the EA that the Forest Service believes supporting Arizona Game and Fish Department ('s) wildlife management objectives is far more important than complying with the Wilderness Act. While the Wilderness Act allows for scientific study of wildlife populations, the gathering of data and monitoring must be done in a Wilderness compatible manner. The Forest Service's management direction also dictates that, wildlife "[r]esearch methods that temporarily infringe on the wilderness character may be used, provided the information sought is *essential for wilderness management and alternative methods or locations are not available.*" FSM 2323.37 (emphasis added). The FSM also prohibits "the use of motorized equipment or mechanical transport unless the research is essential to meet minimum requirements for administration of the area as wilderness and cannot be done another way (sec. 4(c) the Wilderness Act)." Meeting AGFD's desires and plans is in no way essential to wilderness preservation. As such, the Forest Service must independently demonstrate that its authorization of a decade of helicopter use with up to 450 landings and active manipulation of the bighorn population is *essential* to administer the area as wilderness. The Forest Service cannot abdicate its responsibility to administer this area pursuant to the mandates of the Wilderness Act.

In sum the EA does not explain how AGFD's desires can legally outweigh the Forest Service's duty to preserve wilderness character. Thus, the premise of the EA and analysis is flawed.

Regarding past actions, the EA notes:

Bighorn sheep captures on the Tonto National Forest (1995-2012) - Arizona Game and Fish Department bighorn sheep management actions have led to increases in the population and distribution of bighorn sheep on the Tonto National Forest since the 1980's when populations were reintroduced into several areas (Goat Mountain, Mazatzal Mountains, Painted Cliffs, and Superstition Mountains).

There are several problems with this statement. First, where is the analysis of the *resource of Wilderness*? Second, this statement is somewhat inconsistent with the EA elsewhere, which notes in Chapter 1 that bighorn sheep migrated to at least one of the Wildernesses. As such, it would appear that intensive management is not necessary for bighorn sheep survival. Indeed, several places, including national parks, have bighorn sheep populations that are not hunted and they are not routinely captured, collared, and harassed by helicopters. Third, there is no evidence that increased and permanent helicopter use is needed for viable bighorn sheep populations. Most other state fish and game agencies do not require constant monitoring or reduction in populations via translocation (and ironically, increases in populations via augmentations).

Furthermore, the following paragraphs demonstrate the inaccurate and inconsistent evaluation of the proposed action and the no action alternative. It appears there is no objective analysis of alternatives, rather a very biased and incomplete analysis is found in the EA.

Page 54, regarding cumulative impacts to wilderness under the no-action alternative, states, "Although is unlikely that forage resources would become limited for these bighorn sheep populations, not capturing bighorn sheep from these wilderness areas may eventually lead to an undesirable epizootic outbreak." In other words, the EA implies there are too many bighorns in the Wildernesses. Even more troubling, this statement implies that human intervention and heavy-handed management of wildlife is necessary, and will likely continue to be necessary, to avoid "undesirable" processes, including natural population fluctuations due to disease or other factors. This is in stark contradiction to the hands-off mandate of the Wilderness Act and indicates a concerning precedent for future management.

Page 59 affirms this concern by stating, "Monitoring captures and augmentations may be necessary to sustain current a current (sic) population of bighorn sheep (Salt River Canyon Wilderness) . . ." It appears there are not enough bighorn sheep in this Wilderness.

Pages 52 and 53 note regarding the no-action alternative:

As bighorn sheep herds within these wilderness areas increases (sic), they expand their range outside wilderness into surrounding urban areas such as Gold Canyon or into the Heber- Reno domestic sheep driveway. The possibility of bighorn sheep coming into contact with domestic goats and sheep in these areas is a serious concern because of potential disease transmission from domestic animals to wild sheep.

This suggests bighorns expand their range on their own. Furthermore, even though there is no proposal to change sheep and goat grazing on the Tonto National Forest in this EA, in violation of the “necessary” threshold of the Wilderness Act, the analysis of the proposed action projects such a need. Page 59 notes:

Current and potentially future actions to conserve the bighorn sheep populations within these wilderness areas would include monitoring, regulated hunting, and changes in domestic sheep grazing management. In the absence of an unforeseeable event such as a major disease outbreak, this beneficial effect would persist in the long term as bighorn sheep population and distribution would increase and continue to be an important wildlife resource for the State of Arizona.

If viability concerns for bighorn sheep might be addressed through management actions that do not violate the Wilderness Act (e.g. restrictions on domestic sheep grazing, restrictions on harassment factors such as hiking trails in sensitive areas, etc.), other actions that do violate the Wilderness Act are certainly not necessary as contemplated by the Act. Why are there no current or potential future actions like this to conserve bighorns under the no-action alternative? Instead, the EA claims that bighorn sheep will run into problems in Gold Canyon and the Heber-Reno driveway under the no-action alternative but not under the proposed action.

Page 59 notes:

Continued bighorn sheep colonization of new areas within the Tonto National Forest prompt research and monitoring needs to inform statewide management decisions necessary for the continued health of bighorn sheep and maintenance of the this natural quality of wilderness.

Yet again, bighorns are able to translocate without human help. This contradicts other statements in the EA on that same page that indicate bighorns require extensive manipulation or game farming:

Monitoring captures and augmentations may be necessary to sustain current a current population of bighorn sheep (Salt River Canyon Wilderness) and translocations would help reduce a population of bighorn sheep (Four Peaks Wilderness) to reduce likelihood of an epizootic event.

Page 59 further suggests for the proposed action alternative that, "bighorn sheep population and distribution would increase and continue to be an important wildlife resource for the State of Arizona." The same positive scenario is not stated for the no-action alternative. Rather, the EA illogically concludes increases in bighorn numbers will eventually lead to extirpation.

The upshot of the proposed action is game farming for bighorn sheep. 450 helicopter flights over a minimum of ten years is a long-term, extremely negative impact on Wilderness. This directly contradicts agency direction, reprinted in the EA, from the Forest Service Manual at 2323.3, that requires the Forest Service to "[p]rovide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist." If the agency determines populations *cannot* exist without pervasive and intensive actions that very explicitly violate the Wilderness Act by degrading Wilderness character, the

action cannot be justified under the Wilderness Act. By authorizing such an ongoing degradation, the Forest Service is converting designated wilderness into something else – in this case, a game farm. That the species at issue is a native species is incidental to this fundamental problem. If the species can no longer persist in these areas (due likely to human caused factors that the agency is either not willing to address or cannot address) without extensive human management, the Forest Service must not authorize the action.

In order to make the proposed action look better, and further perpetuating the above problem, the EA delves into the absurd. Page 58 notes, "Helicopter use in support of bighorn sheep management would have a beneficial effect on the visitors' opportunities for the primitive recreation experiences." It is oxymoronic to suggest *helicopters* are necessary to benefit *primitive* recreation.

This statement turns the Wilderness Act on its head. Downplaying of helicopter use--some 450 flights over a minimum of ten years--completely misses the point that helicopter use is illegal in wilderness because it is antithetical to what the Wilderness Act sought to preserve. The agency's absurd argument could apply to motorized use on trails. Any passing motor vehicle is only temporary, so why prohibit them in Wilderness? The essence of wilderness is destroyed by motorization, regardless of how temporary. And, the essence of wilderness is eroded by authorizations of actions that will necessitate ongoing, heavy-handed human management in areas that are designated by Congress to be free from ongoing, heavy-handed human management.

The issue of the Minimum Requirements Decision Guide is also problematic. None was included in the EA. How can the public adequately comment on this proposal absent such a key document that the EA claims will be a basis for the decision?

While bighorn sheep are an important wildlife species, it is not essential they be in the Tonto National Forest Wildernesses, particularly if their presence requires such extensive, heavy handed, and enduring management as the activities proposed here (NOTE: We seriously doubt this heavy manipulation is necessary, bighorns survived for eons without helicopters). As noted above, the EA does not make the case that this helicopter use *needs* to be done in order for bighorns to survive in the Wildernesses. And, more importantly with regard to the statutory mandate of the Wilderness Act, the EA does not make the case that helicopter use for bighorn management is *necessary for administration of the area as Wilderness*. Far from necessary, an authorization of this action would ensure that this area becomes something other than Wilderness.

In summary, the EA's biased analysis misstates wilderness policy and law. Most importantly, it conflates the purpose of the Wilderness Act with the public uses of Wilderness. The EA confuses wilderness character with its selected wilderness characteristics. It can't decide whether there are too many or too few bighorn sheep and erroneously concludes that 450 helicopter flights are necessary. It ignores the possibility of restricting helicopter use to areas outside of Wilderness, which constitutes nearly half of the bighorn range.

## NEPA

The EA fails to comply with NEPA's "hard look" mandate in several respects. These problems are explored below.

This action will have a significant effect on several designated wilderness areas over a long period of time and requires the preparation of an Environmental Impact Statement (EIS). The proposal, which would have at minimum, a ten-year impact on Wilderness, is not analyzed in an EIS. This is an action that would significantly affect the environment. It is not one landing of helicopters, but 450 (or more) landings over a period of ten years. That has a significant impact on Wilderness by virtue of the fact helicopter landings are prohibited in Wilderness. In addition, the project seems to be one that must go on in perpetuity as bighorn sheep numbers will rise and fall in some areas, naturally. However, the state's bighorn plan, which is driving this proposal, apparently mandates that bighorn numbers be at very certain levels, no more and no less, in the he'd units.

Likewise, the project involves actions that threaten to violate the Wilderness Act in several designated wilderness areas, and there may be other connected actions to this project, which are not analyzed. These could include translocating sheep from these Wildernesses to other Wildernesses, a double whammy against Wilderness. Aerial gunning of predators in Wilderness or other anti-predator measures that would negatively affect Wilderness could be done as mountain lions are mentioned as a problem in the EA. The federal agencies that have jurisdiction over these Wildernesses must look at the overall plan through an environmental impact statement (EIS) as the site-specific projects appear to be inextricably linked and are likely to have a significant impact given the potential duration and extent of activities and given the number of protected areas impacted. Even if the agencies were able to legally extract an independent NEPA analysis for just the Tonto National Forest Wildernesses, the proposed action would necessitate the preparation of an EIS due to the extensive and prolonged nature of activities that are expressly prohibited by the Wilderness Act due to impacts on Wilderness character. Impacts to wildlife are also likely to be significant.

Further, it seems there is an overall programmatic desire to heavily manipulate bighorn populations in all Wildernesses by the Arizona Department of Game and Fish, and the federal agencies appear to be adopting a change in policy that attempts to diminish the agency's obligation to administer these areas as wilderness. This represents a position in policy that has the potential to impact future authorizations and requires the preparation of an EIS.

This project is likely to be highly controversial and the effects are highly uncertain. As discussed above, there are several factors impacting bighorn sheep viability that must be addressed before the agency may authorize extensive helicopter intrusion. These factors have not been addressed and thus perpetuate the uncertainty of bighorn viability in these areas. Further, it is clear that the such actions have and will continue to promote other activities with controversial and uncertain outcomes (e.g. predator control, harassment factors for other wildlife species, degradation of wilderness character, etc.). It is also clear that the extent of the proposed activities, and their relation to other activities, are uncertain, or at least not fully disclosed. These factors mandate the preparation of an EIS.



Regarding wildlife, there is no cumulative impact analysis in violation of NEPA. One of the ironies of the wildlife analysis is that many of the species analyzed, which would be negatively affected by helicopter use, are far rarer than are bighorn sheep. This fact contributes to a public perception that the AGFD is a game-farming entity rather than a wildlife agency.

The EA also fails to look at cumulative impacts from increased proposals to use helicopters. It is obvious that that the AGFD is increasing its reliance on helicopters and manipulative wildlife management techniques rather than on tried-and-true wildlife observation. The Forest Service gave permission for AGFD to land in Tonto National Forest Wildernesses in the past. The new proposal is a significant increase in the program. Given the apparent loss of outdoor skills by AGFD personnel, future requests to increase the number and frequency of helicopter landings for bighorn sheep in Wilderness is to be expected as that has been the trend in recent years. It may not be long before AGFD will want to capture and collar every bighorn sheep multiple times.

There is not an adequate range of alternatives presented. The EA does not even look at an alternative that conducts activity only outside the Wildernesses even though nearly half of the bighorn range is outside the Wilderness. The EA does not look at a non-motorized option. Rather, it eliminates a non-motorized, ground based alternative because it does not meet the purpose and need of the analysis or meet state objectives. Again, *the state's objectives cannot dictate federal wilderness policy or NEPA compliance, and the federal agencies cannot abdicate their responsibilities under federal statutes*. Yet, that seems to be what is occurring in this instance. The purpose and need was so narrowly defined as to preclude a reasonable range of alternatives.

At the same time, in a bizarre twist, the EA oddly analyzes non-motorized, ground-based means under the no-action alternative. It appears this is analyzed in order to negatively bias the no-action alternative by claiming that negative impacts to Wilderness and other resources would occur from the non-motorized capture methods. Then, flip-flopping again, the EA concludes those methods will be completely ineffective when analyzing differences between the no-action and the proposed action alternatives, again biasing the analysis of the no-action alternative. What the EA fails to consider is that AGFD likely wouldn't do those actions if they were completely ineffective. This illogical, inconsistent and contradictory analytical approach does not meet NEPA requirements for a quality analysis.

Similarly, the EA's biased analysis regarding wilderness quality is further reflected on the chart on pages 26 and 27. Here, the EA claims that natural quality will be less under no-action even though there is no proof bighorn sheep won't continue to persist in these Wildernesses without 450 helicopter landings. The claim that the impact on untrammelled qualities of the Wildernesses is worse for non-motorized means completely neglects the fact that motorized means, by definition, trammels or confines wilderness. This analysis turns the Wilderness Act on its head.

Another problem with the analysis, on page 44, is that the EA seems to conflate aircraft use with helicopter use. Fixed-wing aircraft have far less of an impact on bighorn sheep and other wildlife than do helicopters. The five attached research papers look at the issues of aircraft and helicopter disturbance on wildlife and note. The harassment risk on wildlife inherent with helicopter use was not sufficiently analyzed.

For example, in the attached BLM's status of science report, it has this to say:

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 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. 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. Helicopter overflights may also reduce foraging efficiency during winter (Harris 1992). Miller and Smith (1985) recommended that helicopter flights be kept at over 100 meters above ground level to minimize impacts to bighorn sheep.

As noted in the Wilderness section of these comments, the EA assumes helicopter use of 450 landings in Wilderness over at least ten years (in other words, a program in perpetuity that is reauthorized/expanded every ten years or sooner) is necessary to monitor bighorns successfully. However, the EA notes on page 31:

*Salt River Canyon Wilderness Area Bighorn Sheep Study Project:* Bighorn sheep populations within and adjacent to the Salt River Canyon Wilderness in Game Management Units 23 and 24A have been documented by Arizona Game and Fish Department and private parties for approximately 30 years. During 2004, the Arizona Game and Fish Department captured and affixed VHF radio telemetry collars on four bighorn sheep within this area to gather information on movement corridors and habitat use. Helicopter surveys performed since 2006 have shown a steady decrease in the estimated bighorn sheep population in this area and further research is needed.

This suggests a couple of things. First, bighorns were monitored and documented for 20 years before being collared by helicopters. Thus, this can be done without helicopter collaring. Second, contrary to what the EA alleges, capturing and collaring of bighorn sheep by helicopter may actually correlate with decreases in bighorn populations. Again, the EA does not make the case that this is needed for bighorn management, let alone necessary to administer the Wildernesses on the Tonto. Full disclosure by the agency is mandated by NEPA and is essential to informed public participation and comment on proposed agency actions.

The EA fails to provide the public with credible and reliable information required under NEPA. There is no peer-reviewed science that proves 450 helicopter landings over ten years is necessary to manage bighorns (NOTE: There is simply a reference to AGFD beliefs that this method is necessary, which is biased as it comes from the project proponent). Indeed, bighorns were better off 200 years ago when there were not helicopters. Likewise, impacts to other wildlife were not sufficiently analyzed or disclosed.

The EA can't even determine how long the project will last. It will be a minimum of ten years. Will it be longer? The EA fails any test of site-specificity because it is really a programmatic document incapable of assessing specific impacts of landing in specific places.

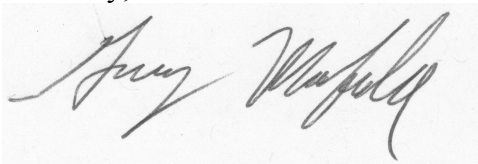
The EA notes on page 11 that there were 11 comments received. It states 3 were supportive. It also notes "comments were both supportive and critical" of the proposal. It would seem the EA is trying to downplay opposition (apparently greater than 70% of the comments) to the proposed action. Even the opposite word of *supportive*, *opposed* or in *opposition*, was not used in the EA. This again reflects a consistent bias in the EA that shows it to be far from an objective analysis of alternatives as required by NEPA

### Summary

The EA is inadequate. Assumptions that erroneously portray helicopter use as more desirable in Wilderness than natural processes of predation, extirpation and re-colonization miss the mark. An EIS is needed to consider the impacts of this proposal and more site-specific data required. AN EIS that looks at the entire bighorn program in Arizona seems in order as these proposals are occurring in other places as well.

Please keep us updated on this proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Macfarlane", is written on a light-colored rectangular background.

Gary Macfarlane  
Board Member

cc: Dana Johnson, Staff Attorney