



United States
Department of
Agriculture

Forest
Service

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File Code: 1570/2320/2600

Date: JAN 29 2015

Mr. Roger McManus
300 N. Indian House Road
Tucson, AZ 85711

**CERTIFIED MAIL – RETURN
RECEIPT REQUESTED
NUMBER: 9801 7282**

Dear Mr. McManus:

This letter is in response to your December 15, 2014, objection (#15-03-00-0003-O218) to the Authorization of Helicopters in Wilderness Environmental Assessment (EA) and Draft Decision Notice released by the Tonto National Forest. I have read your objection and reviewed the project record and EA, including the disclosed environmental effects. My review was conducted in accordance with 36 CFR 218, Subparts A and B.

On October 31, 2014, Forest Supervisor Neil Bosworth, released the EA, Draft Decision Notice (DN), and Finding of No Significant Impact (FONSI) for the Authorization of Helicopters in Wilderness. Based on his review of the proposed action and alternatives, he intends to authorize the use of helicopters by the Arizona Game and Fish Department for landings within portions of the Four Peaks, Hellsgate, Mazatzal, Salt River Canyon, and the Superstition wilderness areas for a ten year timeframe within the Tonto National Forest. Helicopter landings would be used for bighorn sheep management activities. Up to 60 landings may occur in November and up to 30 landings during other times of the year. The number of captures and number of helicopter landings may vary in any given year, but they would not exceed 450 landings in wilderness for the ten year duration of the project, with a maximum of 90 landings per year.

As specified at 36 CFR 218.11(b), I must provide a written response that sets forth reasons for the response; however, this written response need not be point-by-point. I have reviewed the project in light of the issues presented in your objection letter. Based on my review, I find that the analysis presented in the EA and supporting documentation does not adequately address Forest Service responsibilities under the Wilderness Act and other guidance that requires coordination with States related to wildlife and fish management in wilderness. By copy of this letter, I am instructing the Responsible Official to:

- Revise the Purpose and Need in the Environmental Assessment to reflect Forest Service responsibilities under the Wilderness Act in addition to language in this and other statutes that require coordination with States related to wildlife and fish management in wilderness;
- Explore project alternatives to meet bighorn sheep management objectives outside of wilderness prior to proposing or undertaking action in wilderness;




- Provide a rationale or a methodology for the minimum number of sheep that need to be collared for the purposes of research and population monitoring to meet these objectives as well as minimum requirements for the administration of these areas as wilderness;
- Base the analysis of the effects of the various alternatives on wilderness character, including the intensity of these effects, on definitions and terminology from *Keeping Wild: An Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System* or another interagency or Forest Service protocol or strategy for wilderness character monitoring to ensure that this analysis is accurate;
- Ensure that analyses of the effects of the various alternatives on the wilderness resource in the Minimum Requirements Decision Guide and Environmental Assessment are consistent; and,
- If an alternative other than the minimum activity is ultimately selected via the Minimum Requirements Decision Guide, provide rationale for this selection that balances potential conflicts between applicable legal mandates, agency policy, and other guidance.

The revised EA must be prepared in compliance with the Council on Environmental Quality regulations at 40 CFR 1500-1508, agency National Environmental Policy Act (NEPA) regulations at 36 CFR 220, and the public comment and objection provisions of 36 CFR 218. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or USDA official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,



 CALVIN N. JOYNER
Regional Forester

cc: Neil Bosworth, Kerwin Dewberry