

• WILDERNESS WATCH •
• GRAND CANYON CHAPTER (ARIZONA) SIERRA CLUB •
• TUELL CONSULTING •
• FRIENDS OF THE SONORAN DESERT •

May 20, 2019

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Attn: Bighorn Sheep Management Project
Forest Supervisor
Tonto National Forest
2324 E. McDowell Road
Phoenix, AZ 85006

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

RE: Bighorn Sheep Management Project

Dear Supervisor Bosworth:

We are commenting on the Environmental Assessment (EA) for Bighorn Sheep Population Management. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Sierra Club is one of the oldest grassroots environmental organizations in the country. Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Cyndi Tuell of Tuell Consulting is an attorney, conservation advocate, who recreates in the Tonto National Forest and is concerned with the management of wildlife and federal public lands. Friends of the Sonora Desert (FSD) is a charitable organization dedicated to the stewardship of the Sonoran Desert ecosystem throughout its range, including the Sea of Cortez. Wilderness Watch, Tuell Consulting, Friends of the Sonoran Desert, and Sierra Club's Grand Canyon (Arizona) Chapter appreciate the concern for long-term viability of bighorn sheep expressed by this proposal, however we believe the project as proposed is contrary to the letter and spirit of the Wilderness Act.

We have submitted several comments on this proposal over the years. We incorporate those by comments by reference here. They should still be part of the Project Record. In an effort to avoid redundancy related to what we have already submitted, this letter attempts to address only new issues specific to this EA. Nonetheless, the concerns we have are interconnected so there may be some comments that duplicate our past submissions.

This new project appears to be only a very slightly modified version of the prior project. What is most disappointing is that no significant changes have been made regarding Wilderness in this proposal. The EA leads one to believe that bighorn sheep somehow need helicopters and

collaring to survive. Bighorn sheep didn't spring *ex nihilo* into being once the US Forest Service (FS) and the Arizona Game and Fish Department (AGFD) had helicopters and radio collars at their disposal.¹

Wilderness/Purpose and Need

The EA states:

The Department seeks to conduct portions of their ongoing bighorn sheep conservation and management program within the aforementioned wildernesses. These management objectives include capturing and collaring bighorn sheep to monitor habitat use, monitor population status (genetic diversity, reproductive status, mortality, overall health, declines due to disease and/or other factors), evaluate travel and movement corridors, evaluate the potential for their interaction with domestic and feral ungulates, and to detect outbreaks of epizootic and other diseases.

EA at 3. Aside from the fact that bighorn sheep do those things—travel, contract diseases, reproduce and die—the Department's desire to manage bighorn sheep in ways that are incompatible with Wilderness designation should not influence the Forest Service in its duties under the Wilderness Act. Indeed, the EA leads one to believe what is now routine state agency management actions outside of Wilderness might be allowed by the Forest Service regardless of the mandates of the Wilderness Act:

Because bighorn sheep management techniques commonly employed by the Department include a use generally prohibited within wilderness (landing of aircraft), a federal evaluation and decision regarding these proposed actions within designated wilderness is appropriate. Helicopter landings are commonly used by the Department to address bighorn sheep management objectives¹.

Id. The standard is not whether a helicopter is the minimum for administering lands within a designated Wilderness, rather it is whether it is the minimum necessary for the singular purpose of the Act.

While wilderness areas should certainly be utilized as places to study an untrammelled baseline, they must be studied in a manner that preserves wilderness character. An area demonstrates "wilderness character" when "in contrast with those areas where man and his own works dominate the landscape . . . the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." 16 U.S.C. §1131(c). The Forest Service has described "wilderness character" as "the combination of biophysical, experiential, and symbolic ideals that distinguish wilderness from all other lands." The Wilderness Act and the Forest Service's implementing regulations are clear: helicopter flights and landings constitute motorized intrusions that are harmful to wilderness character. Accordingly, the Wilderness Act prohibits the

¹ The EA is muddled on whether bighorn sheep are "historic" or whether they "trace directly to the ongoing bighorn sheep restoration and management program" that AGFD has conducted. EA at 1.

use of motorized equipment and transport, including helicopters, in designated wilderness with only one exception: “except as necessary to meet minimum requirements for the administration of the area *for the purpose of this chapter*.” 16 U.S.C. § 1133(c) (emphasis added).

Based on our review of the EA, the Forest Service mainly asserts that the project as proposed would be useful to AGFD’s “ultimate goal” that “robust populations of this indigenous species to be restored throughout remaining suitable habitat in its historic range.” EA at 4.² This justification falls far short of what the Wilderness Act requires, which is to demonstrate that the project as proposed is necessary to “preserv[e] the wilderness character of the area.” *Id.* § 1133(b). Unless the Forest Service can make and support this demonstration in its forthcoming analysis of the project, the project cannot proceed. *Id.* § 1133(c); *Wilderness Watch v. U.S. Fish & Wildlife Serv.*, 629 F.3d 1024, 1040 (9th Cir. 2010) (setting aside agency’s authorization of new structures in wilderness area pursuant to § 1133(c) where agency failed rationally to demonstrate that structures would advance wilderness preservation and no less intrusive approach could achieve that goal).

The Forest Service in proposing this project is responding to AGFD’s proposal for up to 150 helicopter landings³ in the Four Peaks, Hellsgate, Mazatzal, Salt River Canyon, and Superstition Wildernesses so AGFD can “capture bighorn sheep for research, population monitoring, and response to disease as based on information provided by the Department” EA at 8. AGFD’s request is based upon a plan by that agency.⁴

Under the Wilderness Act, the Forest Service may approve the use of helicopters to collar bighorn sheep in the Tonto National Forest only if the agency rationally demonstrates that (1) studying bighorn population dynamics to inform state wildlife management decisions is necessary to preserve wilderness character and (2) there is no alternative to helicopter use that would achieve that purpose. 16 U.S.C. § 1133(c); *Wilderness Watch*, 629 F.3d at 1036. Consistent with this statutory standard, the Forest Service’s management direction 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 Forest Service Manual 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).” FSM 2324.42 (4). As discussed below, the justifications for the project advanced in the EA do not satisfy this standard and, indeed, it appears that the statutory standard cannot be met with respect to AGFD’s project.

² The EA at 4 also tries to shoehorn in wilderness stewardship, “The desired future condition also includes an element of improved knowledge related to bighorn sheep management, conservation, research, and wilderness stewardship.” This is not explained in this section of the EA.

³ The EA at 8 states that up to 30 flights could be considered for any one Wilderness for one year. That leads the reader to believe that up to 750 flights could be approved. Thus, the EA is not clear.

⁴ The FS website contains no information about AGFD’s goals and plans other than what is in the EA. Unless one has a copy of the latest AGFD plan, it is impossible to ascertain the underlying reasons for this proposal and how that may intersect with Wilderness. That information should have been appended to the EA.

The Forest Service must demonstrate that facilitating ADFD's broad wildlife management goals advance the preservation of wilderness character. How does the emphasis on "harvest" (EA at 20), and other routine wildlife management objectives of AFGD meet the high bar in the Wilderness Act for prohibited uses?

Indeed, the Wilderness Act contains a narrow exception to allow otherwise-prohibited activities—such as helicopter use—only where such activities are necessary to meet the *minimum requirements* for administration of an area *for the purpose of the Wilderness Act*. 16 U.S.C. § 1133(c). In other words, the exception applies only where the otherwise-prohibited activity will affirmatively advance the "'preservation and protection' of wilderness lands ... in their natural, untrammelled state." *Wilderness Soc'y v. U.S. Fish & Wildlife Serv.*, 353 F.3d 1051, 1061 (9th Cir. 2003) (en banc) (quoting 16 U.S.C. § 1131(a)). The Wilderness Act charges "each agency administering any area designated as wilderness [with the responsibility of] preserving the wilderness character of the area." 16 U.S.C. § 1133(b). As the Ninth Circuit stated in *High Sierra v. Blackwell*:

The Wilderness Act twice states its overarching purpose. In Section 1131(a) the Act states, 'and [wilderness areas] shall be administered for the use and enjoyment of the American people *in such a manner as will leave them unimpaired for the future use and enjoyment as wilderness, and so as to provide for the protection of those areas, the preservation of their wilderness character,*' 16 U.S.C. § 1131(a) (emphasis added). Although the Act stresses the importance of the wilderness areas as places for the public to enjoy, it simultaneously restricts their use in any way that would impair their future *as wilderness*. This responsibility is reiterated in Section 1133(b), in which the administering agency is charged with preserving the wilderness character of the area.

High Sierra Hikers Ass'n v. Blackwell, 390 F.3d 630, 648 (9th Cir. 2004) (emphases in original); see also *id.* at 645 (citing 16 U.S.C. 1133(b)). AFGD's broad management goals are not coextensive with the statutory mandate to preserve wilderness lands in their untrammelled state and thus cannot be used to invoke the exception to the Act's prohibitions. See 16 U.S.C. § 1133(c). Instead of repeating AFGD's management objectives motivating the project (see also EA at 23), the Forest Service must demonstrate how the active management of wildlife (helicopter collaring, culling actions and the like) will advance the preservation and protection of the five Wildernesses in their natural, untrammelled state.⁵

Instead, the EA states the AFGD, "has asked for authorization from the Tonto National Forest to land helicopters in wilderness areas for the purposes of bighorn sheep management for research,

⁵ That scientific and recreational activities are valid uses of wilderness areas does not excuse the Forest Service's obligation to demonstrate that the project will advance "the purpose of" the Wilderness Act, 16 U.S.C. § 1133(c), which is to preserve designated wilderness in an untrammelled state, *id.* § 1131(a), (c). Congress and the federal courts have made clear that the goal of advancing recreation and research in wilderness, while allowable and encouraged, cannot trump the overriding statutory purpose to preserve wilderness character. See *id.* §§ 1131(a), (c), 1133(b)-(c); *High Sierra Hikers v. Blackwell*, 390 F.3d 630, 647 (9th Cir. 2004) (affirming that, under the Wilderness Act, the Forest Service may not "elevate[] recreational activity over the long-term preservation of the wilderness character of the land").

population monitoring and disease response.” EA at 4. Those are hardly the purpose of wilderness. If so, any proposal by state agencies in Wilderness would be exempt from the requirements of the Wilderness Act. Further, the determination of what is the minimum necessary must be a Forest Service decision. The AGFD has no statutory duty over wilderness administration. Indeed, that agency is hostile to real Wilderness. Yet, the EA states, “When management alternatives outside these wildernesses are not available as determined by the Department, limited helicopter landings by the Department would be authorized to facilitate capture of bighorn sheep,” inappropriately leaving that decision up to AGFD. Id. at 8.

If AGFD’s goal is to have populations of bighorn sheep “throughout remaining suitable habitat” the Forest Service must explain why earlier populations were natural while current population numbers are not. Id. at 4. The agency must also explain why the “islands of remaining habitat are now largely isolated from one another” (Ibid.) when the Wildernesses are all connected by national forest as demonstrated by Figure 1 in the EA? Clearly, the minimum would be to ensure that the national forest habitat outside of the Wildernesses provides the kind of connectivity the EA seeks to achieve.⁶

The Forest Service must also explain how any resulting intervention or active management activities are consistent with the foundational principles embodied within the Wilderness Act. Howard Zahniser, drafter of the Wilderness Act, explained that the key characteristic of wilderness is its “untrammeled” nature – “Untrammeled – not untrampled – untrammeled, meaning free, unbound, unhampered, unchecked, having the freedom of the wilderness.” 1957 speech discussing the Wilderness Bill. Likewise, the Forest Service Manual 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.” FSM 2323.31; *see also* FSM 2320.2 (Forest Service objective to “[m]aintain wilderness in such a manner that ecosystems are unaffected by human manipulation and influences so that plants and animals develop and respond to natural forces.”). If a species population requires active human manipulation (i.e. “trammeling”) to remain at a desired level, how is that level “natural”? Add to that the rapidly changing nature of our forests and wildlife habitat from climate change, and it becomes nearly impossible to discern a historical “natural” baseline point from which we should gauge “naturalness.” This is why Howard Zahniser’s foresight is so important. He focused, primarily, on the “untrammeled” character of wilderness in the Wilderness Act knowing that what is “natural” for that area will necessarily flow from what is “untrammeled.” The uncontrolled, unmanipulated processes in wilderness create the state of naturalness for that area.

The Forest Service must demonstrate that the use of helicopters is necessary to meet the minimum requirements for administering the Wilderness to preserve wilderness character.

Assuming, for sake of argument, that facilitating AGFD’s wildlife management objectives advances the purpose of the Wilderness Act and that the information must be obtained within the Wilderness, why can’t the information be obtained without the use of helicopters or other prohibited uses? “Helicopters carry ‘man and his works’ and so are antithetical to a wilderness experience. It would be a rare case where machinery as intrusive as a helicopter could pass the

⁶ Also, the failure of the EA to consider non-wilderness options, in violation of NEPA, is inscrutable because the purpose and need is predicated on habitat outside of Wilderness on the Tonto National Forest.

test of being ‘necessary to meet minimum requirements for the administration of the area.’” *Wolf Recovery Found. v. U.S. Forest Serv.*, 692 F. Supp. 2d 1264, 1268 (D. Idaho 2010). Before approving the project, the Forest Service must rationally demonstrate that the proposed helicopter use “is sufficiently limited and focused on restoring the wilderness character of the area that it falls within the phrase ‘necessary to meet minimum requirements for the administration of the area.’” *Id.* (quoting 16 U.S.C. § 1133(c)).

In this regard, the Forest Service cannot proffer a justification for the proposed helicopter use that would set a precedent for the routine use of helicopters to facilitate management of bighorn sheep. Yet, that is precisely what is proposed, helicopter landings in perpetuity, because this ongoing monitoring is necessary. As such, the EA is inaccurate in ascribing only short-term negative impacts to this proposal. EA at 37 and 38. The EA is also wrong in concluding that this proposal will prevent the impacts of a disease event. EA at 38.⁷ Any disease event—and it must be remembered disease is a natural process—would be met with more helicopter use and killing of bighorns. Either way, there will be a reduction in bighorn sheep numbers. The proposal seems to be premised on the idea that AGFD wants a consistent if not growing number of bighorn sheep. This is game farming and it is not consistent with Wilderness, the goal of which is natural population fluctuations. The negative cumulative impacts on Wilderness of this monitoring and perhaps culling program (perpetuity) would appear to be much greater than the threat of disease and the temporary loss of sheep.

Thus, it seems to be AGFD’s generalized need for quality data to inform routine wildlife management decisions cannot justify actions that are generally prohibited under the Wilderness Act. *Cf. id.* at 1270 (authorizing limited helicopter use for wolf collaring in the River of No Return Wilderness based on unique objective to “restor[e] ... a specific aspect of the wilderness character of the Frank Church Wilderness that had earlier been destroyed by man”—*i.e.*, native wolf populations—and stressing that “the next helicopter proposal in the Frank Church Wilderness will face a daunting review because it will add to the disruption and intrusion of this collaring project. *The Forest Service must proceed very cautiously here because the law is not on their side if they intend to proceed with further helicopter projects in the Frank Church Wilderness.*”) (emphasis added).

Further, the Forest Service must explain why less intrusive approaches would not satisfy both the Wilderness Act and the objectives advanced by the project. *See e.g.* FSM 2320.3 (“Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations...”). Yet, the EA refuses to look at any other action alternative.

Shoehorning the proposal by declaring disease an “emergency” is not consistent with the Wilderness Act. EA at 9, 10 and 18. The provision is only for persons in the Wilderness. Besides, disease is a natural process. In any case, addressing domestic sheep allotments and driveways on the Tonto National Forest is the best way to prevent disease transmission.

⁷ The approach to fragmenting wilderness character into wilderness qualities, as done in the wilderness character monitoring protocol, is seriously flawed and is criticized by wilderness professionals (see Cole et al.). We addressed this issue in earlier comments.

NEPA Concerns

The Forest Service must also complete an Environmental Impact Statement (EIS) under the National Environmental Policy Act (“NEPA”) analysis for this project addressing the above concerns and fully analyzing direct, indirect and cumulative impacts as well as a reasonable range of alternatives that may avoid or lessen adverse impacts. The EIS is NEPA's core requirement. Environmental concerns must be “integrated into the very process of agency decisionmaking” and “interwoven into the fabric of agency planning.” *Andrus v. Sierra Club*, 442 U.S. 347, 350- 351 (1979). NEPA directs federal agencies to prepare a detailed Environmental Impact Statement (“EIS”) for federal actions that may significantly affect the quality of the human environment. 42 U.S.C. § 4332(2)(C). The phrase “human environment” is “interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment.” 40 C.F.R. § 1508.14. The reason for an EIS is two-fold: 1) to ensure that the agency will have available and will carefully consider detailed information on significant environmental impacts when it makes decisions, and 2) to “guarantee that the relevant information will be made available to the larger audience that may also play a role in both the decision-making process and the implementation of that decision.” *Robertson v. Methow Valley Citizens*, 490 U.S. 332, 349 (1989); 40 C.F.S. § 1501.2(b).

Pursuant to NEPA’s implementing regulations, to determine whether an EIS is required, federal agencies may first prepare a less detailed environmental assessment. *See* 40 C.F.R. § 1501.4. This is what the Forest Service has done in this case. Any Finding of No Significant Impact must provide a convincing statement of reasons why the action will not have a significant effect on the environment. *Id.* It is *only* when the proposed action will not have a significant effect on the environment that an EIS is not required. 40 C.F.R. § 1508.13. “[I]f substantial questions are raised regarding whether the proposed action may have a significant effect upon the human environment, a decision not to prepare an EIS is unreasonable.” *Save the Yaak Committee v. Block*, 840 F.2d 714, 717 (9th Cir.1998).

NEPA regulations list ten factors the Forest Service must consider in determining whether an action is “significant” and thus whether the action would trigger the need for an EIS. 40 C.F.R. § 1508.27. “[A]n EIS *must* be prepared if ‘substantial questions are raised as to whether a project ... *may* cause significant degradation of some human environmental factor.’” *Alaska Wilderness League v. Kempthorne*, 548 F.3d 815, 824 (9th Cir. 2008) (citing *Idaho Sporting Congress v. Thomas*, 137 F.3d 1146, 1149 (9th Cir.1998)). Several of these factors are present in this case indicating that an EIS is needed. For example:

Speculation of future benefit cannot discount other impacts. 40 C.F.R. § 1508.27(b)(1).

Even if the Forest Service speculates that, on balance, the effects of the this helicopter proposal will be beneficial,⁸ NEPA regulations do not allow an agency to avoid the preparation of an EIS if other regulatory significance factors are present. *See e.g. Environmental Protection*

⁸ Note that while NEPA provides this factor for determining the appropriate level of review under NEPA, the Wilderness Act does not provide for this type of balancing act in its narrow exception to otherwise prohibited activities. The Wilderness Act requires that an otherwise prohibited activity be “necessary to meet minimum requirements for the administration of the area for the purpose of [the Wilderness Act].” 16 U.S.C. § 1133(c).

Information Center v. Blackwell, 389 F.Supp.2d 1174, 1197 (N.D. California 2004)(rejecting the Forest Service’s rationale that the benefits of logging would outweigh the adverse affects because the “area [was] plagued by the *H. annosum* fungus and that, if these harvest units [were] not treated, they ... ‘would become unsuitable as foraging and dispersal habitat in the immediate future and the disease may spread outside the harvested boundaries.’”).

The project would impact designated wilderness. 40 C.F.R. § 1508.27(b)(3).

This project concerns the impacts of intensive helicopters use in congressionally designated Wildernesses. Designated wilderness areas are the epitome of “area[s] demonstrat[ing] unique characteristics,” and the actions contemplated by the Forest Service in this case are actions expressly prohibited by the Wilderness Act, absent certain very narrow circumstances, because they harm the unique character of wilderness.

The project would establish precedent for future authorizations. 40 C.F.R. § 1508.27(b)(6).

The Forest Service’s authorization would set a troubling precedent for future actions by AGFD whereby the use of helicopters would be authorized to facilitate wilderness monitoring to inform routine wildlife management decisions. Presumably, AGFD will again see a need for quality data to inform routine wildlife management decisions, and in fact, the Forest Service has indicated through the PAR (at 16) that future elk collaring projects within the Wilderness are reasonably foreseeable.

An action may be significant if it is reasonable to anticipate a cumulatively significant impact on the environment. 40 C.F.R. § 1508.27(b)(7).

Cumulative effects are “the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 40 C.F.R. § 1508.7. In a similar case in Idaho, the Idaho District Court has already acknowledged the cumulative harm presented by repeated helicopter intrusion into a wilderness area. *Wolf Recovery Foundation*, 692 F. Supp. 2d at 1270. The court made clear that any future projects requesting helicopter use in the River of No Return Wilderness area would “face a daunting review because it will add to the disruption and intrusion of this [project]”*Id.* The court further stated “[t]he Forest Service must proceed very cautiously here because the law is not on their side if they intend to proceed with further helicopter projects Given that this project is allowed to proceed, the next project will be extraordinarily difficult to justify.” *Id.*⁹

The Forest Service must consider the impacts of the past helicopter-assisted projects in the five Wildernesses on the Tonto National Forest and analyze the impacts of the proposed project on top of the impacts of that past research. Further, the EA indicates that these Wildernesses already impacted by air traffic, including military overflights. EA at 38 and 42. We have noted in these comments that continued helicopter activity for sheep are reasonably foreseeable. The Forest Service must fully explain the extent of these ongoing and reasonably foreseeable activities and analyze these impacts in conjunction with the activities proposed by AGFD through this project.

⁹ The Forest Service did not proceed cautiously and lost in the Idaho District Court on a proposal to collar elk in the Frank Church-River of No Return Wilderness.

The action threatens a violation of federal law imposed for the protection of the environment. 40 C.F.R. 1508.27(b)(10).

As discussed throughout this comment letter, the project would authorize activities generally prohibited under the Wilderness Act, specifically up to 150 helicopter landings, for the purpose of assisting AGFD in reaching its wildlife management objectives under state law.

These five factors, as well as questions over the controversial and uncertain extent of the project, raise substantial questions over whether a significant impact is likely and necessitate the preparation of an EIS. If the Forest Service wishes to avoid the preparation of an EIS, it must fully analyze all ten factors listed in 40 C.F.R. § 1508.27 and explain why each of those factors are not implicated to a significant degree in this case.

The Forest Service “may not define the objectives of its action in terms so unreasonably narrow that only one alternative . . . would accomplish the goals of the agency’s action, and the EIS would become a foreordained formality.” *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 196 (D.C. Cir. 1991). The Forest Service’s objectives might be addressed through actions that do not violate the Wilderness Act—an alternative that includes non-wilderness lands. However, the agency has refused to analyze such an options. EA at 4 and 5.¹⁰ See *Wilderness Watch, Inc. v. U.S. Fish & Wildlife Serv.*, 629 F.3d at 1039; *High Sierra*, 390 F.3d at 647.

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. 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 the organizations and individuals updated on this proposal. Please send information to those listed below.

¹⁰ The EA at 18 also notes impacts to bighorns from a domestic sheep driveway, on the national forest but outside of Wilderness. This is a tacit admission that the EA is inadequate in looking at any other action alternative. The issue of disease, EA at 10, may be solved by closure of this driveway.

Sincerely,

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