November 6, 2026

On behalf of the Center for Biological Diversity, Maricopa Bird Alliance, the Mount Graham Coalition, Grand Canyon Chapter of the Sierra Club and Southwest Archaeology please accept these comments on the draft Environmental Assessment ("dEA") for the October 2026, Proposal Number: 339379 October 2026, the ORGANIZATIONAL CAMP PERMIT ISSUANCE - CAMP COLUMBINE, INC., on Mount Graham.[1]

Our comments are submitted via https://www.fs.usda.gov/r03/coronado/projects/339379) and are submitted directly to Forest Supervisor Kerwin Dewberry.

The Center has more than 93,000 members and more than 1.8 million online activists dedicated to the protection of endangered species and wild places.

Center members have been intimately involved in protecting Mount Graham and MGRS for nearly four decades.

Maricopa Bird Alliance, formerly Maricopa Audubon Society, is a 501(c)(3) non-profit organization dedicated to the enjoyment of birds and other wildlife with a primary focus on protection through fellowship, education, and community involvement. Maricopa Bird Alliance is a chapter of the National Audubon Society and has over 2,300 members.

Maricopa Bird Alliance has played a central role in protecting endangered species throughout the Southwest through public education efforts, field surveys, public field trips, and position papers since 1953.

[1] We incorporate our December 7, 2020, comments on the "Arizona Church of Christ Bible Camp Reissuance #56651" as most issues that we raised in 2020 remain unanswered by the new dEA.

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Maricopa Bird Alliance has participated intimately in the protection of Mount Graham and MGRS since 1987.

The Mount Graham Coalition is an international coalition of conservation, hunting, Native American, and religious organizations working for the ecological preservation of Mount Graham and MGRS since 1985 providing educational and technical assistance to its members and the general public.

Grand Canyon Chapter of the Sierra Club's mission is to protect public lands, including national parks, forests, and wildlife refuges; rivers and streams; and wildlife. Grand Canyon Chapter has approximately 13,000 members and supporters. National Sierra Club has approximately 600,000 members.

Grand Canyon Chapter of the Sierra Club has been involved in protecting Mount Graham for more than 40 years.

Southwest Archaeology, a private 501 (c) 3 nonprofit organization headquartered in Tucson, Arizona, works with Tribes and local communities to understand and conserve places and the histories, memories, and meanings they hold. Southwest Archaeology respects Tribal sovereignty and advocates for preservation of traditional cultural places, including Dził Nchaa Si'an (Mount Graham).

PLEASE NOTE: The Coronado National Forest refuses timely release of two important documents intimately associated with the dEA.

The first document is the application itself. The second is "The Determination of Effect - Safford Ranger District Recreation Residences, Report 2006-05-042", on file at Coronado National Forest, Tucson, AZ."

The application is obviously essential to any review of the dEA because, as you know, release of the last application revealed critical information contributing to its rejection. The application is mentioned 14 times in the dEA.

Release of the second document, which is cited in an earlier Cornado National Forest document, undoubtedly contains information pertinent to the current proposal where the Columbine recreational structures' eligibility for the National Register of Historic Places was rejected.

OUR COMMENTS:

The Mount Graham Red Squirrel ("MGRS") is one of the most endangered terrestrial mammals in North America.

Preventing extinction and recovering endangered species are national priorities.

With passage of the Endangered Species Act, the U.S. Congress "finds and declares that … these [endangered] species of fish, wildlife, and plants are of esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people."

Today, MGRS is experiencing a historic habitat bottleneck where restoration of any and all existing flatter, mature, canopied forest is critical.

MGRS are precariously surviving in tiny isolated pockets of relatively flat, mature, canopied habitat with the only significant recoverable area surviving on Mount Graham being in the Columbine area of the Ash Creek drainage.

Relocation of the Columbine structures, both the 14 cabins and the camp, and restoration of the area affords MGRS the only short-term relief available.

The structures' permitted locations can be moved, MGRS has nowhere else to go.

There are readily available alternative locations elsewhere on Mount Graham for the 14 recreational cabin and camp owners.

Not only do we oppose the presence of the recreation structures in the Columbine/Ash Creek drainage area, all other hunting, conservation and environmental communities also support prioritizing MGRS protection and pursuing alternative locations for the recreational structures.

Multiple Tribes, White Mountain Apache, San Carlos Apache, Hopi and Zuni, also share these same concerns.

In particular, subordinating the Tribes' concerns to favor 14 recreational cabin and camp owners whose interest can be fulfilled via readily available alternatives betrays the Coronado National Forest's and the Federal Government's trust responsibilities for Native Americans.

The White Mountain Apache Tribe explicitly opposed the structures in writing in 2020, reminding the agency of "the sacred nature and spiritual power" of the squirrels, known as Na'iłtso Łisogé, or the "original keeper of fire."

Earlier, in 2006, the White Mountain Apache Tribe told the Coronado National Forest:

> … we urge Coronado National Forest [to] use every opportunity associated with the environmental analysis and permit renewal process in order to repair and restore *Dzil Nchaa Si An* and to eliminate private and institutional permittee interests as driving forces in land, resource, and fire management. …
>
> The residences have had, are having, and will continue to have adverse effects on the characteristics and qualities that make *Dzil Nchaa Si An* and other mountain ranges eligible for the National Register of Historic Places. In essence, the Forest Service has been and appears to be proposing to continue to allow and facilitate unwarranted damage and desecration to om sacred mountains. Residential uses by individuals, families, and guests who may not understand or respect the mountains as sacred sites and historic properties reflects inattention to the Forest Service's fiduciary duties and longstanding land management principles.

> The residences have also had and are likely to continue to have undue and inappropriate effects on land and fire management. We note on the basis of documentary and on-site reviews of recent fires that fire responses have been premised on the protection of private property rather than on the restoration of ecosystem functions or the protection and expansion of endangered species habitat This is a serious management shortcoming and must be fully addressed in the environmental analysis. On the basis of the previous century of Forest Service mismanagement. to which the residences are important contributors, it is imperative that all impediments to sacred site and endangered species conservation be removed. Because no additional damage or desecration can be tolerated. the Forest Service must, finally, give full management attention to the sacred site and historic property values and characteristics associated with *Dzil Nchaa Si An* and our other sacred mountains. …
>
> All comments and suggestions are intended to support and encourage continued and expanded participation in these proceeding by the San Carlos Apache Tribe, other tribes, and parties with sustained records of interest in the ecological and cultural integrity of *Ndee* sacred sites and historic properties. Until and unless significant and meaningful reductions are made in the overall and rapidly accumulating adverse effects of residential permits and other projects and policies, the White Mountain Apache Tribe has little alternative but to challenge every proposed action as detrimental to our culture, as a violation of federal trust responsibility, and as violations of both Section 110 of NHPA and Executive Order 13007."

And in 2026, the White Mountain Apache Tribe has already provided comments opposing this action on October 10, 2025, and on October 24, 2026.

On October 10, 2026, the White Mountain Apache Tribe's Tribal Historic Preservation Office said:

> "… the White Mountain Apache tribe strongly urges the Coronado National Forest to deny the issuance of the 20-year permit for the Organizational Camp Columbine, as the aging facility continues to

desecrate, not only the sensitive forest environment, but the sacredness of the traditional cultural property in its entirety."

On October 24, 2026, the White Mountain Apache Tribe's Tribal Historic Preservation Office provided more details:

"… I am taking this opportunity to remind you of the longstanding and ongoing opposition on the part of the White Mountain Apache Tribe to this frivolous, disrespectful, and harmful recreation use of the bonafide Western Apache sacred mountain. I attach here Resolution 12-2003-296 of the White Mountain Apache Tribe Council and Chairman Massey's April 28, 2006 letter on this subject. I hereby incorporate by reference these documents into this comment. I also ask, respectfully, that you to do all of the following:

1. Please review these materials and advise me via email response of any questions you may have regarding their applicability to the questions concerning the proposed granting of long-term, low-cost leases to 14 cabin owners at the expense of Apache religious practitioners and Na'iltso Lisoge, a critically endangered species that Apache know is integral to the history and sacredness of Dzil Nchaa Si An.

2. Please shoulder your trust duty to Tribes and give priority to the concerns of the White Mountain Apache Tribe, and the other Tribes that have requested complete respect for Dzil Nchaa Si An, specifically including the removal of the recreational cabins. I think it quite obvious that the Federal Trust Duty to multiple Tribes and their nearly 50,000 members and citizens outweighs any imaginable duty to 14 cabin users.

3. Please also recognize that, should you be inclined to grant these 14 harmful recreational leases, doing so will entail real and enduring damages from the recreation cabins, resulting in adverse effects (per NHPA [National Historic Preservation Act]) and significant impacts (per NEPA [National Environmental Policy Act]). Coronado National Forest would then, of course, be

obligated to lead in-depth consultations with multiple Tribes to resolve adverse effects and to prepare an environmental impact statement that includes specific provisions for reducing the significant impacts.

4. Finally, please advise me regarding the status of our requests, stated in the 2003 Resolution and repeated elsewhere, for (a) the protection of the physical integrity of Dzil Nchaa Si An as a sacred site and (b) restoration of pre-1870 resource conditions and ecosystem processes; and (c) collaborative preparation of a multiple property nomination for the most significant Western Apache sacred mountains, including Dzil Nchaa Si An and other mountains under Coronado National Forest stewardship. …

Coronado National Forest's dEA merely blatantly parrots the work of a mercenary consultant firm (SWCA) contracted by their favored tiny group of 14 recreational cabin and camp owners attempting to increase their destructive toehold on Mount Graham.

Contrast the interests of this tiny group of 14 recreational cabin and camp owners with those of the members and supporters of the Center, Maricopa Bird Alliance, the Mount Graham Coalition, Grand Canyon Chapter of the Sierra Club, Southwest Archaeology expressed in this correspondence; the interests of Arizona Wildlife Federation and their 7,000 members and 84,000 supporters in Arizona as a chapter of the National Wildlife Federation and its seven million members and supporters who will be submitting their own comments; White Mountain Apache Tribe and San Carlos Apache Tribe who will be submitting their own comments; and The Hopi Tribe and Pueblo of Zuni who have previously express their concern.

Such favoritism is especially incomprehensible given that this tiny community has long opposed removal of the Columbine structures, no matter the harmful effects to MGRS and Mount Graham.

It should be an administrative no-brainer to promote and support the greater public interest instead of working so diligently to avoid inconveniencing the 14 permittees who can relocate their recreational cabin and camp activities to less harmful available alternative locations elsewhere on Mount Graham.

Just as preventing extinction and recovering endangered species are national priorities, consistent with the requirements of the National Register of Historic Places, 36 C.F.R. 60.4, Mount Graham continues to be "associated with events [making] significant contribution to the broad patterns of our history; … [has] yielded, or may be likely to yield, information important in prehistory or history."

Correspondingly, the National Register of Historic Places has formally determined that Mount Graham (Dzil nchaa si'an) is eligible for listing … as a traditional cultural property:

> "The entire property within the National Register boundaries of Mt. Graham is eligible for listing as a site. The entire mountain, not just isolated places on the mountain, bolds special importance to the Western Apache tribes and meets the National Register's definition of a traditional cultural property. Ethnographic research presented in the DOE documentation shows that the mountain is associated with the traditional beliefs of Native American groups about their origins, cultural history, and the nature of the world, as well as a location where Native American religious practitioners have historically gone, and are known to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice."

In support of National Register listing for Mount Graham, the White Mountain Apache Tribe stated,

> "*Dzil nchaa si an,* the vast and unique mountain range known to non-Apaches as Mt. Graham, is a sacred site of long-standing and ongoing historical, cultural, and religious importance to many Apaches; and … the United States Forest Service, through the Coronado National Forest, manages *Dzil nchaa si an* in the public trust and continues to process and approve requests for projects and activities that threaten and diminish the characteristics and values that define and perpetuate the mountain's cultural and religious significance to Apache people…"[2]

[2] Resolution No. 07-99-153, White Mountain Apache Tribe of the Fort Apache Indian Reservation, July 15, 1999.

In contrast, the Columbine recreational structures' eligibility for the National Register of Historic Places has been rejected because they are not "associated with events that have made a significant contribution to the broad patterns of our history … [not] associated with the lives of persons significant in our past … [and] have [not] yielded, or may be likely to yield, information important in prehistory or history."

In further contrast to the Nation's legislated commitments to the protection of endangered species, the protection of special and historic places, and the support of the interests of the environmental, conservation, and Tribal communities, the President of the [14] Cabin Owners Association at Columbine "and a group of like-minded friends" now seek the camp permit to expand their destructive grip on Mount Graham.

The National Environmental Policy Act ("NEPA") still requires the Coronado National Forest to examine a reasonable range of alternatives and prohibits piecemealing of any action.

The cabins and the camp are intimately related, especially with the cabin owners buying the camp structure from the Vail, Arizona, Church of Christ, who had abandoned it.

The Coronado National Forest's own Forest Plan argues for cessation of the permits with relocation of the 14 recreational cabins and camp to readily available alternative locations:

> "Desired Conditions … Ecological conditions provide habitat characteristics necessary for associated federally listed species and rare and culturally important plant species. Habitat conditions provide for survival and recovery of species listed under the Endangered Species Act, and contribute to their delisting. … PAGE 22
>
> Developed sites blend with the natural setting, and uses in these places do not cause damage to ecologically sensitive areas." … PAGE 77

Viable alternatives exist for the 14 cabin and camp permittees' recreational pleasure, with their inconvenience being the only negative.

Contrast these 14 cabin and camp permittees' inconvenience with MGRS' survival in isolation on Mount Graham in the Pinaleno Mountains of southeastern Arizona for the last 12,000 years since the glaciers receded at the end of the Pleistocene.

MGRS has survived on Mount Graham because the flatter areas[3] of densely canopied, upper elevation spruce-fir and mixed conifer forest there has provided

[3] DISTINGUISHING CHARACTERISTICS OF MOUNT GRAHAM RED SQUIRREL MIDDEN SITES, Andrew A. Smith and R. WILLIAM MANNAN, School of Renewable Natural Resources, University of Arizona, Tucson, AZ 85721 *J. WILDL. MANAGE. 58(3):437-445, 1994*:

Table 3. Physical and vegetational measurements at midden sites of Mount Graham red squirrels and random sites in the transition-zone forest, Pinaleno Mountains, Arizona, 1989–90.

Variable	Midden sites (n = 115) $\bar{x}$	Midden sites (n = 115) Range	Random sites (n = 143) $\bar{x}$	Random sites (n = 143) Range	$P <$[a]
% slope	24.1	3.0–50.0	26.5	3.0–72.0	0.443
Nearest opening (m)	16.8	1.0–65.0	9.5	0.0–43.0	0.001

PAGE 440 …

Habitat selection is unaltered after severe insect infestation, Claire A. Zugmeyer and John L. Koprowski, Journal of Mammology, 90(1):175–182, 2009.

TABLE 1.—Mean (± *SE*) physical and vegetation measurements for random locations (n = 26) and Mt. Graham red squirrel (*Tamiasciurus hudsonicus grahamensis*) unoccupied middens (n = 28) and occupied middens (n = 18) in the insect-damaged forest above 3,000 m in the Pinaleño Mountains, Arizona, fall 2003 to summer 2005.

Physical or vegetation characteristic	Random location	Unoccupied midden	Occupied midden	Random versus midden P[a]	Unoccupied versus occupied P[a]
Slope (%)	29.0 ± 2.0	25.6 ± 1.9	16.1 ± 2.4	0.012	<0.001

Characteristics of Mount Graham Red Squirrel Nest Sites in a Mixed Conifer Forest, Melissa J. Merrick and John Koprowski, Journal of Wildlife Management, 71(6):1958-1963, December 2010:

Table 3. Stand characteristics ($\bar{x}$ ± SE) among cavity nest sites, drey nest sites, and random sites for Mount Graham red squirrels inhabiting mixed conifer forest, Pinaleño Mountains, Arizona, USA, 2002–2005.

Stand characteristics	Cavity (n = 91) $\bar{x}$	Cavity (n = 91) SE	Drey (n = 38) $\bar{x}$	Drey (n = 38) SE	Random (n = 113) $\bar{x}$	Random (n = 113) SE
Slope (%)	25.2	5.60	15.7	2.20	16.6	0.90

DRAFT MOUNT GRAHAM RED SQUIRREL RECOVERY PLAN, FIRST REVISION (*Tamiasciurus hudsonicus grahamensis*), Original Approval: May 3, 1993 Southwest Region U.S. Fish and Wildlife Service, Albuquerque, New Mexico

May 2011:

> "Hatten (2009) developed a spatially explicit habitat model that could identify Mount Graham red squirrel habitat remotely with satellite imagery and a Geographic Information System (GIS) and that could detect changes in habitat among years. In this study, a boundary surrounding approximately 8,000 ha (19,768 ac) was calculated, encompassing all areas in the Pinaleño Mountains within which Mount Graham red squirrel habitat potentially could exist. The boundary includes all areas on the mountain above 2,744 m (9,000 ft), including West Peak (an area where squirrels resided historically, but no longer exist) and areas down to 2,353 m (7,720 ft) on the northern and eastern slopes of the mountain. Within this boundary, areas are considered habitat if they meet the following conditions:
>
> 1) They are within the mixed conifer, ecotone, and spruce-fir series AND
> 2) They are above 2,744 m (9,000 ft) OR
> 3) If they are below 2,744 m (9,000 ft), they meet the following criteria:
>
> a. > 2,353 m (7,720 ft) elevation
> b. north or east aspect
> c. < 45-degree slope
>
> Based on these criteria, Hatten classified red squirrel habitat with 93 percent accuracy and non-habitat with 83 percent accuracy. PAGES 14-15, 36 …
>
> … Regarding slope (fig. 12.1C), classes 1-2 (0-20º) had the most middens, with a rapid drop in midden frequency in slope classes 3 and 4. Very few middens were observed over 30º and none over 40º. PAGES 101-102 …
>
> … The ground slopes of the moderate-to-good habitats were between 20-45º and contained old-growth or mixed-age forest." PAGE 103

Influence of burn severity and fuel reduction treatments on dispersal movements of an endangered forest obligate, John L. Koprowski and Melissa J. Merrick, JFSP Project Number 13-3-01-15, 2013:

> "Key Findings … Forest Structure – During natal exploration, dispersal, and post-settlement, MGRS consistently selected locations at higher elevation (mean = 2909 m), with greater live and total basal area (mean = 46 and 64 m2/ha, respectively) greater tree height (mean = 14 m) and variability in tree height (an indicator of older forest stands; mean = 5.81), higher canopy cover (mean = 70 %), lower slope (mean =

the protective thermal envelope essential for MGRS' food cache middens critical for MGRS survival on a desert mountain.

In 1987, there were more MGRS than there are now and MGRS' essential, flatter, mature, densely canopied habitat was much more plentiful and much less fragmented than it is now.

A little less than forty years ago, on August 31, 1987, U.S. Fish and Wildlife Service ("USFWS") issued a draft jeopardy Biological Opinion to protect MGRS.

The Columbine/Ash Creek drainage area has long been recognized as important and essential to MGRS recovery and long-term survival.

As the only surviving, recoverable, significant patch of flatter, mature, densely canopied forest, the Columbine/Ash Creek area is now more important than ever.

Dr. Peter Warshall, in his November 20, 1986, comments regarding proposed Critical Habitat designation states,

> "The Ash Creek headwaters has great importance to the conservation and protection of the subspecies. It is the migration

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> 10 %), and lower burn severity classes (mean = < 1) compared to availability of these variables on the landscape (Table 3, Figure 7)." PAGE 11

12-Month Determination on a Petition To Revise Critical Habitat for the Mount Graham Red Squirrel, U.S. Fish and Wildlife Service, 86 Fed. Reg. 41742, 41743, August 3, 2021:

> "Placement of these middens tends to be on gentler, non-southerly-facing slopes" PAGE 41743

Species Status Assessment Report for the Mount Graham Red Squirrel (*Tamiasciurus fremonti grahamensis*), Version 1.0 , U.S. Fish and Wildlife Service Arizona Ecological Services Field Office, Tucson, AZ, March 2025:

> "Remote evaluation of current middens in ArcGIS identified an average slope of 16 degrees; however, 30 percent of middens were on slopes greater than 20 degrees with a maximum slope of 37 degrees." PAGE 52

corridor between Webb Peak and the Emerald/Hawk Peak areas. It is the highest quality habitat left out of the proposed critical habitat. … The Ash Creek headwaters are also a population source for recolonization of lower elevations of the drainage. …

PROPOSED ACTION: All area above a line running east-west through the Mt. Graham Mill Site to a line running north-south from Emerald Peak to a point where these lines encounter the 9,600-foot contour." …

The February 1988, Mount Graham Red Squirrel, An Expanded Biological Assessment states,

"In the Pinalenos there are four locations that could serve as hot spots with the Mt. Graham area being the largest and most spruce-fir based. The other possible locations are Columbine/Ash Creek, Heliograph Peak and perhaps Webb Peak." PAGE 72

In its July 14, 1988, Biological Opinion, to mitigate MGRS jeopardy, USFWS required the removal of the Columbine/Ash Creek drainage recreational cabins and camp to recover and to restore for MGRS the Ash Creek drainage's forested habitat, which is in the heart of the core MGRS population.

At the time, to mitigate MGRS jeopardy, USFWS required,

"Permits for the 14 summer homes at Columbine and the Arizona Bible Camp will not be renewed in 1992. These areas and the access road will be actively reforested to manage for red squirrel habitat once the facilities are removed."

The July 14, 1988, Final Biological Opinion observed several key points that remain even more germane today:

"Over time, as the forest regenerates, we would expect that the area around Webb Peak and Ash Creek drainage would become more important red squirrel habitat and connect with the Emerald Peak portion of the refugium." PAGE 15

"The summer homes at Columbine and the Arizona Bible Camp are along a forest road that leads into the Ash Creek drainage, an area that has considerable potential for red squirrels. Removal *of* the Bible Camp and summer homes would enable those acreages (2.5 and 14.5 respectively) to be incorporated into forest restoration plans for the area. The summer home area was projected to recover to good to excellent habitat, the Bible Camp to fair." … PAGE 28

"Because this is the habitat type where the Forest Service predicts the greater gains in red squirrel equivalents over time (USDA-FS 1988), any augmentation to this area, especially in the Ash Creek drainage, is worthwhile. Removal or the Bible Camp and summer homes and subsequent reforestation represents the best opportunity to regain previously lost habitat outside the refugium." PAGES 28-29

"Permits for the 14 summer homes at Columbine and the Arizona Bible Camp will not be renewed in 1992. These areas and the access road will be actively reforested to manage for red squirrel habitat once the facilities are removed." PAGE 30

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The August 1, 1990, USFWS Mt. Graham Red Squirrel Biological Update Team Findings and Recommendations, states:

> "The Ash Creek drainage contains the major block of good habitat for red squirrels outside of the spruce/fir forest. Other blocks of similar habitat have been degraded by logging. The old-growth forest of Douglas-fir and white fir provides the cool, wet conditions required for long-lasting middens. In years of good cone crops of Douglas-fir (and, to a lesser extent, white fir), this habitat type presumably provides conditions for high rates of survival and reproduction. Because it is lower in elevation than the spruce/fir habitat, it is generally warmer. In the Ash Creek drainage, many areas have a northern or eastern exposure, which probably compensates somewhat for the lower elevation. …
>
> The Douglas-fir/white fir habitat type in the Ash Creek drainage is in relatively close proximity to and is contiguous with two prime areas of spruce/fir forest: Webb Peak to the west and, to the southeast, Emerald Peak, Hawk Peak, and High Peak. … PAGE 5
>
> … The major source of potential immigrants to the spruce/fir forest is the Ash Creek drainage.
>
> Significance:
>
> Regular dispersal between the Ash Creek drainage and the main stand of spruce/fir forest to the southeast focuses attention on the need for good dispersal habitat joining these areas. … The importance of good dispersal habitat was not realized at the time of preparation of the biological opinion. …PAGE 6
>
> Part of the terms and conditions of reasonable and prudent alternatives 2 and 3 included the provision that the Special Use Authorizations (SUA) for 14 summer cabins and the Church of Christ Bible Camp not be renewed in 1992, and the facilities removed to permit reforestation of the area. Forest Service regulations allow for the removal of such facilities over a several year span after the permit period ends. The acreage available at these sites totaled 17 acres (14.5 acres of

homes and 2.5 acres of camp). The removal of these facilities would have allowed for the removal of a road that currently divides the Webb Peak and Emerald Peak habitats thus gaining additional acreage. The opinion assumed that reforestation of these areas would begin prior to 2002. …

The AICA [Arizona-Idaho Conservation Act] does not allow for the closing of these facilities in the timeframe envisioned in the biological opinion. …

This alteration to the project through the change in conditions of reasonable and prudent alternative 3 causes an effect not considered in the biological opinion due to the maintenance of habitat fragmentation within the Ash Creek drainage and maintenance of extensive human use within the drainage, both of which would have been significantly reduced." … PAGES 7, 8

Critical habitat refers to the specific areas within the geographical area occupied by a species at the time it is listed on which are found those physical and biological features essential to the conservation of the species (50 CFR 424.12). … The critical habitat that has been designated does not include hundreds of acres of occupied habitat in the Ash Creek drainage, below the critical habitat line on Webb Peak, near Grandview Peak, and possibly other areas. Additionally, it does not include dispersal habitat believed essential to conservation of the squirrel. There are middens in these areas, so obviously favorable physical/biological features are present. Given that the Mt. Graham red squirrel is in a precarious state and in light of new information the Team believes that a review of the critical habitat designation is warranted." … PAGE 15

The Mount Graham Red Squirrel Recovery Plan (May 3, 1993) states:

"The most important step in preventing short-term extinction is to protect existing habitat from further loss or fragmentation. Protection of suitable habitats will be a major priority in efforts to increase and stabilize the Mt. Graham red squirrel population. Even small losses of habitat are of concern, especially in light of habitat losses to natural

causes that are likely to occur and the precarious situation of a fragmented forest."

Now, more than thirty years since the initial 1987 recognition of MGRS jeopardy, essentially all of MGRS' designated spruce-fir Critical Habitat are gone owing to the successful land acquisition by self-serving and dishonest University of Arizona administrators and astronomers, to the illegal activities of USFWS officials, to the threatening, felonious antics of Senator John McCain, to the inappropriate and unnecessary backburning requested by the astronomers, to the firefighting efforts dominated by structure protection instead of MGRS habitat protection, and to USFWS' weakened jeopardized species protection standards.

The Mount Graham Red Squirrel now survives only in tiny isolated pockets of relatively flat, mature, densely canopied habitat, with the only significant area of short term, recoverable, relatively flat, mature, densely canopied habitat surviving on Mount Graham of this habitat being in the Columbine area of the Ash Creek drainage.

But the population of squirrels living in the Columbine/Ash Creek drainage area is limited by recreational cabins and a camp.

Consequently, the Columbine/Ash Creek drainage habitat, where the 14 recreational cabins and camp are still located, is now more valuable for MGRS survival and recovery than ever.

Removal of the structures and restoration of ground cover in the Columbine/Ash Creek drainage will provide MGRS with the largest amount of the most valuable critical habitat in the shortest period of time.

Denial of the undertaking of this important short term restoration opportunity constitutes an irreversible and irretrievable commitment of federal resources.

The longer-term effects of the MGRS' current, historically perilous habitat bottleneck, and of the effects of MGRS surviving only in widely separated, isolated

pockets of remnant, mature canopied forest are certainly and completely predictable.

The dEA fails to evaluate these clearly foreseeable consequences of short-term inaction in the context of the species' existing population and habitat conditions.

MGRS is experiencing a historic habitat bottleneck with the Coronado National Forest providing no current plans to fulfill the needs necessary for MGRS to get through is short-term challenges.

Inaction by maintaining the status quo deprives MGRS of the only short-term opportunity to secure some short-term relief countering its habitat bottleneck by taking advantage Columbine's intact canopy via removing the Columbine structures and providing for groundcover.

The dEA fails to include the available range of alternatives.

Identification and examination of alternatives is basic to any compliant National Environmental Policy Act ("NEPA") evaluation.

Obviously, the most blatantly omitted alternative is the one most logical and most fair to MGRS, and to the hunting, conservation, environmental and Native American communities, as well as to the 14 cabin and camp owners.

This blatantly omitted alternative is the completely realistic option to relocate or rebuild the camp (and 14 cabins) in an alternative location less detrimental to MGRS.

Multiple alternative locations exist that do not deprive MGRS of short-term recoverable, canopied habitat including, most obviously, those to the south, east and north of Grant Hill for the cabins and the Cunningham Camp area for the camp.

There are undoubtedly many more available and suitable alternative locations that will be identified by a genuine NEPA evaluation.

The dEA piecemeals the NEPA evaluation by examining the camp's presence in a vacuum.

The adjacent 14 recreational cabins similarly deprive MGRS of habitat capable of providing short term, usable, recoverable canopied habitat.

And the proponents of the camp application belong to the same tiny community of cabin permittees.

The ignored "elephant in the room" not addressed in the dEA is the fact that the tiny amount of mature, canopied forest on flatter slope aspects are all now only found in isolated pockets.

These isolated pockets have resulted from past logging, wildfire, firefighting backburning, inappropriate backburning requested by astronomers, firefighting firebreaks, insect infestation, and structures to the point now where MGRS is facing a historic bottleneck.

Here is an image of the top of Mount Graham from October 15, 1989:



© Robin Silver

Here is a November 7, 2010, image of the inappropriate backburning from the Columbus or LBT telescope to just west of High Peak requested by University of Arizona astronomers that resulted in the destruction of approximately 250 acres of the approximately 580 acres still present at the time:



© Robin Silver

Here is an aerial image from November 7, 2010, looking to the east across the telescopes on East Emerald Peak to High Peak:



© Robin Silver

The following aerial image from November 2, 2017, shows the most intact, surviving, mature, canopied forest surviving on Mount Graham in the Columbine/Ash Creek drainage area:



Now, more than thirty years since the initial 1987 recognition of MGRS jeopardy, essentially all of MGRS' designated spruce-fir Critical Habitat are gone owing to the successful land acquisition by self-serving and dishonest University of Arizona administrators and astronomers, to the illegal activities of USFWS officials, to the threatening, felonious antics of Senator John McCain, to the inappropriate and unnecessary backburning requested by the astronomers, to the firefighting efforts dominated by structure protection instead of MGRS habitat protection, and to USFWS' weakened jeopardized species protection standards.

ALL areas of potential short term habitat recovery are now extremely important, especially the areas in the Ash Creek drainage occupied by structures.

The dEA ignores the fact that the very presence of structures within MGRS habitat increases the risk to MGRS and MGRS habitat, as the Forest Service has

and continues to prioritize the protection of structures over protection of endangered species and their essential habitat.

The draft Biological Opinion on Clark Peak Fire Emergency Suppression and Rehabilitation (October 2, 1997) states:

> "In this biological opinion the Service finds that the effects of the suppression actions associated with the Clark Peak Fire, in addition to the current status of the species and the environmental baseline, have likely jeopardized the continued existence of, and likely destroyed or adversely modified designated critical habitat of Mount Graham red squirrel…"

The Wildland Fire Situation Analysis, Nuttall Complex (July 3, 2004) states:

> "Selected Alternative…Rationale for selecting this alternative…The alternative selected is designed to give consideration to fire fighter safety while minimizing loss to Mt. Graham International Observatory, Heliograph Peak Electronic Site, recreation residences and developed recreation facilities…Special consideration should be given to protection of the Mt. Graham International Observatory and recreation residences…Objectives…Mt. Graham International Observatory…Priority 10 [Priority (high = 10)] … T&E Species … This location is the only habitat for the Mt. Graham Red Squirrel…Priority 8..."

The Draft Environmental Impact Statement for the Pinaleño Ecosystem Restoration Project (June 2009) states:

> "The MGIO [Mount Graham International Observatory] and other modern developments on the mountain have precipitated aggressive firefighting techniques, and inhibited the restoration of the natural ecosystem processes." PAGE 176

Assessing Wildfire Risk in Real Time on the 2017 Frye Fire (2020) states:

> "Rocky Mountain Research Station U.S. Forest Service RMRS P-78. 2020. The HVRAs [highly valued resources and assets] were categorized into three prioritized groups, including (1) built assets, (2) natural and cultural resources, and (3) ecosystem function. Built assets included structures, improvements, infrastructure, and private lands (fig. 1). Natural and cultural resources included critical terrestrial and aquatic habitat, range allotment infrastructure, and archaeological sites (fig. 2)." …

The dEA states, "There are three areas of DCH [designated Critical Habitat] for MGRS, none of which are in the Camp Action Area." PAGE 18

This statement is a lie by omission.

USFWS has intentionally delayed redesignation of updated and accurate MGRS Critical Habitat in spite of the destruction of most of the spruce-fir forest by inappropriate, unnecessary, July 8, 2004, back burning, and by the Frye fire.

USFWS has refused to upgrade MGRS Critical Habitat in spite of our December 14, 2017, "Petition to revise the January 5, 1990, Mount Graham Red Squirrel Critical Habitat to reflect the current change in status of the squirrel and its habitat."

During this time of refusing to upgrade MGRS Critical Habitat, this dEA is the second time that USFWS and the Coronado National Forest have stooped to using USFWS inaction as an excuse to avoid MGRS protection.

On July 7, 2025, the Court ruled:

> "THE COURT FINDS that the Service has unreasonably delayed a final response to CBD's December 14, 2017 Petition to revise critical habitat for the Mount Graham red squirrel. … ; and,
>
> Defendants U.S. Fish and Wildlife Service and Deb Haaland shall have until January 30, 2027 to provide a response to the Petition through

> either a proposed rule to revise critical habitat or a final decision denying the Petition."

As you know, the Columbine/Ash Creek watershed will inevitably be included in the updated Critical Habitat because (1) essentially all spruce-fir forest has been destroyed; (2) essentially all surviving flatter, upper elevation mature, canopied mixed conifer habitat is currently occupied by MGRS; and, (3) the only short-term recoverable flatter upper elevation, mature, canopied, mixed conifer habitat is now only found in the Columbine/Ash Creek drainage area.

It is insulting and disingenuous for USFWS and the Coronado National Forest to still be hiding behind the "not in Critical Habitat excuse" to perpetuate the recreational structures' presence in the area.

The dEA plays the numbers game to promote the camp by disingenuously quoting Merrick et al 2021 in the dEA's quotation blatantly intended to minimize and obscure the detrimental effects of the camp:

> "As a result, the continued absence of suitable habitat within the developed Camp footprint may contribute to the displacement of up to one MGRS territory. The MGRS average home range is 5.1 acres in unburned areas and 7.5 acres in burned areas (Merrick et al 2021). Size of a home range can vary with season, and some overlap of territory edges can occur (Koprowski et al. 2008). Therefore, the 5.9 acres of the Camp Permit Area could result in continued displacement of habitat for up to one MGRS." PAGE 23

Merrick et al 2021 only display the means of home ranges, not the ranges themselves where in other studies that display the ranges find that home ranges can be less than 5.1 acres or more depending on habitat conditions, food availability, and seasonality (Koprowski et al (2008), Leonard and Koprowski (2009)).

But minimum MGRS home ranges found in other publications vary from 0.03 hectares or 0.07413 acres in Kreighbaum and Van Pelt (1996), cited in Chapter 20, Reproductive Ecology and Home Range Size of Red Squirrels, Do Mt. Graham Red Squirrels Fit the Pattern?, Karen E. Munroe, John L. Koprowski, and

Vicki L. Greer of The Last Refuge of the Mt. Graham Red Squirrel: Ecology of Endangerment (2009), Editors H. Reed Sanderson and John L. Koprowski, 2009; and 0.198 hectares or 0.49 acres in summer and 0.196 hectares or 0.48 acres in autumn in unburned middens in Blount and Koprowski (2012).

If anything, Merrick et al. (2021) argues for maximizing protection for MGRS:

> "The majority of animals that survived the Frye Fire were displaced from their core territories as nest trees and midden scale piles were burned along with any cones that had been stored the previous fall. Surviving animals were therefore forced to travel within and among isolated patches of live trees for cone harvesting and in search of new territories, leaving them more susceptible to predation. Raptors have been shown to seek out recently burned areas to target exposed prey, a process known as pyric carnivory (Hovick et al. 2017), and this predation behavior presents another challenge for small mammals faced with widespread habitat loss and fragmentation. Life expectancy of MGRS is already markedly lower than other populations of North American red squirrel (Goldstein et al. 2017) as a result of high avian predation pressure on both juvenile and adult age classes (Goldstein et al. 2018). Following the Frye Fire, predation pressure on displaced individuals intensified above already exaggerated background levels potentially as a result of pyric carnivory. …
>
> On this isolated mountain island, we see firsthand how the intersection of climate stressors, insects, tree death, and fire have endangered both unique forest communities and an endemic forest obligate mammal, the MGRS. … forests in the Pinaleños and MGRS now face novel management and climatic conditions that test their resiliency and threaten their persistence. The southwestern United States is in a 20-year drought that, coupled with anthropogenic climate change, is on track to be among the most severe megadroughts (Williams et al. 2020). Past fire suppression led to high densities of now drought stressed trees that are more susceptible to insects and pathogens. Warmer, longer fire seasons increase the likelihood of larger, more severe fires and the probability of a critical fire-driven transition of burned areas into new or

nonforested states (Westerling et al. 2006, Johnstone et al. 2016, Coop et al. 2020).”

The dEA does not evaluate the importance of dispersal, which the Columbine structures impede, nor does it evaluate the increased the risk of predation caused by the structures.

USFWS Mt. Graham Red Squirrel Biological Update Team Findings and Recommendations (August 1, 1990) states:

> "Dispersal among areas apparently is an important aspect of the ecology of the Mount Graham red squirrel. Substantial fragmentation of the habitat inhibits dispersal and is likely to increase mortality among dispersers."

Identification of Distinguishing Characteristics around Middens of Mount Graham Red Squirrels (1994) states:

> "The Pinaleno Mountains are subject to human activities that could degrade habitat of the Mount Graham red squirrel by fragmenting remaining blocks of closed forest stands."

The dEA overestimates the amount of time required for functional restoration:

> “This new habitat may allow establishment of up to one new MGRS home range. This does not mitigate the likely short-term adverse effects, as these beneficial effects cannot be expected to be realized until 10 to 40 years after the restoration is completed.” PAGE 25

The Columbine camp canopy is mostly intact, and minus a short period of building removal and ripping of compacted soil, with return of ground covering materials, the area will become usable near immediately for forage, midden creation, and for providing less perilous migratory opportunities across Columbine and the Ash Creek drainage area.

The dEA inaccurately characterizes the proposed action as "continuation of Camp operation." PAGES 15, 23, 25.

The dEA pretends that the proposal is merely a "continuation" of Camp operation (PAGES 15, 23) and that the Camp should just be considered as "long-standing baseline." PAGES 23, 25.

The camp has been essentially abandoned for almost a decade according to the Church of Christ permittee.

The dEA acknowledges that the camp has been in a state of essential abandonment from at least 2009:

> "[o]ccupancy of the Camp is expected to remain similar to previous levels. The maximum annual use between 2009 and 2019 was 205 overnight users annually, which represents less than 1% of the total occupancy capacity of the Camp, which can be calculated by multiplying the 214-day operating period with the maximum guest counts of 120 for a total annual maximum use of 25,680 people days." PAGE 34

Assuming the permittees can contain their 120 young guests within the immediate camp boundaries, just the amount of feces alone proposed for deposition annually is mind boggling.

The mean number of daily bowel movements for children five to 18 years of age is 1.02 bowel movements per day.

With a "total annual maximum use of 25,680 people days," each of the camp's young "guests" will be depositing at least 25,680 bowel movements in the area each season. And this does not include the large number of adults required to control the young "guests" where the number of bowel movement per day by adults is larger (1.20 per day).

The dEA does not examine the effects of the massive amounts feces deposited in the area yearly by camp users in the proposed action. Nor, does the dEA, consistent with its blatant piecemealing of its evaluation, include the amount of feces deposited cumulative by the adjoining cabin permittees.

Even given the dEA's use of an arbitrary baseline, the dEA's failure to evaluate this new massive influx of "guests" greatly underestimates the impacts of the proposed action.

This is especially inappropriate given that MGRS is in a much more precarious situation now after the Frye Fire and given that the camp has been essentially abandoned for nearly two decades.

The "long standing baseline" chosen by the dEA is completely arbitrary. PAGES 23, 25.

The camp, and the cabins for that matter, have only been on Mount Graham for a relatively short period of time.

MGRS has been there for more than 10,000 years.

The camp has only been in place since the 1960s, and the Swift Trail to Columbine was only built in the 1930s.

A non-arbitrary baseline would be at a time when a closed canopied forest with groundcover sufficient for MGRS occupancy and safe movement existed in the Columbine/Ash Creek area.

The ongoing Pinaleno Ecological Restoration Project ("PERP") is supposed to be governed by the Forest Plan in place during its 2011, Record of Decision. URLs NOT AVAILABLE

The dEA fails to explain the reasons that the Forest Plan Directions in place governing PERP are now being abandoned in the Columbine/Ash Creek drainage.

The PERP FEIS (URL NOT AVAILABLE) promised (PAGES 5,6):

Forest Service and Other Regulatory Direction

Coronado National Forest Land and Resource Management Plan

The "Coronado National Forest Land and Resource Management Plan" (Forest Plan) provides programmatic direction for managing resources of the Coronado National Forest. It recognizes the importance of the Pinaleño Mountains and its unique social and natural resource values. It guides the management and vision for the project area. Actions proposed under the Pinaleño Ecosystem Restoration Project area are in Forest Plan Management Area 2 (dispersed recreation, mixed-conifer), Management Area 2a (wilderness values, enhanced wildlife) and Management Area 8 (research). The Forest Plan states that management for the Mount Graham red squirrel is a primary objective. This direction is reinforced in the "Record of Decision for Amendment of Forest Plans, Arizona and New Mexico" (1996). Relevant direction from the Forest Plan and the 1996 Record of Decision that was used in the development of this project includes:

Management Area	*Plan Direction*
Management Area 2	"Monitor squirrel populations and habitat annually through inventory and analysis. Red squirrel habitat needs will supersede the needs of all other species." (Forest Plan, p. 51)
	"Maintain and improve occupied habitat for: Mount Graham red squirrel… [and]…Mexican spotted owl" (Forest Plan, p. 51)

Management Area	*Plan Direction*
	"Improve old growth spruce-fir and mixed-conifer forest habitat for the Mount Graham red squirrel." (Forest Plan, p. 51)
	"Within suitable habitat for Mount Graham red squirrel (Pinaleño Mountains), dead and down material will not be removed for fuelwood except for on-site recreational use." (Forest Plan, p. 52)
	"Within suitable habitat for Mount Graham red squirrel (Pinaleño Mountains), Christmas trees will not be harvested." (Forest Plan, p. 52)
Management Area 2a (Forest Plan Amendment No. 4, January 1989, and Forest Plan Amendment No. 8, June 1996)	"…Red squirrel habitat needs will supersede the needs of other species." (Forest Plan, p. 54-2)
	"Improve current habitat for the endangered Mount Graham red squirrel and work toward delisting. Emphasize establishment and maintenance of old growth forests within the entire management area." (Forest Plan, p. 54-2)
	"Improve old growth spruce-fir and mixed-conifer habitat conditions." (Forest Plan, p. 54-3)
	"Within the Management Area, removal is limited to research, sanitation and salvage operations, and maintenance and improvement of wildlife habitat." (Forest Plan, p. 54-3)
	"Use of down woody material for firewood is restricted to on-site recreational use within areas open to public use." (Forest Plan, p. 54-3)
	"Utilize prescribed fire to reduce risk from wildfire and enhance wildlife values with emphasis on red squirrel habitat." (Forest Plan, p. 54-5)
	"Within other (non-wilderness) areas, outbreaks of insects or disease will be controlled using integrated pest management concepts when there is significant danger to the vegetation needed to sustain habitat for the Mount Graham red squirrel….." (Forest Plan, p. 54-5)

And now as described in detail earlier, with the historic habitat bottleneck being experienced by MGRS currently, restoration of the Columbine/Ash Creek drainage canopied habitat is more important than ever.

The dEA commits another lie by omission in claiming:

> "Long term, removal of the Camp would eliminate the only organizational camp use on Mount Graham and would permanently discontinue that specific recreational opportunity." PAGE 34

Again, such a statement ignores the fact that multiple, alternative locations less harmful to MGRS exist but have not been evaluated by the Coronado National Forest, nor by this dEA.

Given the facts and information provided in these comments, especially given the Coronado National Forest's denial of the only opportunity for short term habitat recovery to severely endangered MGRS when it is experiencing a historic habitat bottleneck when alternatives are readily available, an Environment Impact Statement ("EIS") is in order.

As a reminder, an EIS is required (42 U.S.C. 4332(2)(C)) to address:

> "1. Reasonably foreseeable environmental effects. …
> 3. A reasonable range of alternatives. … [and,]
> 5. Irreversible and irretrievable commitments of federal resources."

The foreseeable environmental effects of not removing the Columbine/Ash Creek structures predicably include (1) losing the only short-term habitat recovery opportunity to combat the current habitat bottleneck being experienced by MGRS at this most time critical historical moment; (2) increasing MGRS' risk of predation by forcing MGRS to cross known important movement areas artificially maintained cleared of any groundcover; and (3) increasing the risk to surviving MGRS habitat as MGRS habitat receives less protection than structures.

The dEA fails to include these environmental effects at all even though the consequences of not relocating the structures is completely foreseeable.

The two alternatives proposed in this dEA do not represent a "reasonable range of alternatives." The Columbine/Ash Creek structures have enjoyed a prolonged "phaseout" period (since USFWS' recommended 1992 removal) as, in the interim, MGRS has lost most of its habitat.

By artificially and arbitrarily limiting the dEA evaluation to only two alternatives, ignores the most universally accommodating alternative, by simply moving the structures to readily available, less destructive alternative locations.

Choosing such an alternative benefits MGRS, satisfies both the wishes of the huge constituency favoring MGRS and MGRS habitat protection and the camp owning 14 permittees' group's desire for Mount Graham recreational opportunities, minus some temporary inconvenience.

The dEA ignores the fact that the continued siting of the Columbine/Ash Creek watershed structures results in an irreversible and irretrievable commitment of federal resources.

The commitment of federal resources includes the permits, the surviving, relatively flat, canopied, mature forest, the diversion of firefighting efforts elsewhere away from MGRS habitat protection, and MGRS' being subjected unnecessarily to increased risk.

While recent NEPA revisions remove the requirement to consider the socially controversial effects of a project, the revisions do not absolve the Coronado National Forest from including in its dEA the controversy regarding the USFWS' dramatic, politically compelled change in position regarding MGRS jeopardy and relocation of the structures.

Finally, the dEA fails to consider, or even mention the significance of denying MGRS this timely opportunity to secure short-term recovery the only substantially surviving area of relatively flat, intact canopied, mature forest on Mount Graham when this denial represents such foreseeably deleterious effects on MGRS.

If you have any questions, please contact: Robin Silver, M.D., 602-799-3275, rsilver@biologicaldiversity.org.

ADDENDUM

The last business day prior to the comments deadline, today November 5, 2026, we have just received the camp application documents cited in the dEA and the nomination documents cited in the dEIS.

Our comments germane to the dEA regarding these documents that we have time to address at this inappropriately late hour follow.

From the prospective permittees' Operation and Maintenance Plan:

> "Camp Objectives … This authorization is issued with the understanding that the holder will make the camp and facilities available for use by other groups and organizations to the extent possible to obtain the greatest total use during the year…"

The dEA's states:

> "the total occupancy capacity of the Camp, which can be calculated by multiplying the 214-day operating period with the maximum guest counts of 120 for a total annual maximum use of 25,680 people days." dEA, PAGE 34

It is obvious in the Operation and Maintenance Plan that beyond recreation interests, the prospective camp permittees have impressively expansive pecuniary ambitions.

The Operation and Maintenance Plan states,

"The camp is available to groups at a minimal rental fee. …

No. of people	X	No. Nights/Days	X	Amount	Camp Fee
X Overnight	X	_____	X	$20.00	$_____
X Day Use	X	_____	X	$15.00	$_____
X Other miscellaneous charges					$_____

"

At a day use rate of $15 a day per guest, with their "maximum use of 25,680 people days" (from the dEA), the prospective permittees will receive up to $285,200 per season.

At an overnight use rate of $20 aday per guest, with their "maximum use of 25,680 people days" (from the dEA), the prospective permittees will receive up to $513,600 per season.

The prospective permittees' application estimates yearly maintenance and operating activities at $8,000 - $10,000 per year:

> "Rough costs are estimated to be $8,000 to $10,000 a year for maintenance and operating costs."

The application is correct in describing the camp as "being a source for business opportunities" with the prospective permittees poised to bring in each season up to between approximately $285,200 to $513,600 collected from users minus costs of $8,000 - $10,000.

The prospective permittees' purchasing of the camp and attempting to secure a special use permit is clearly a covert attempt to pull off a very lucrative money-making scheme.

Obviously, for the prospective permittees, the camp is proving to be a very lucrative, self-serving "source of business opportunities" in their own words.

The dEA does not address the impressive financial windfall profit that will come to the prospective permittees as a result of their money-making scheme if they secure their desired permit.

In their Operation and Maintenance Plan, the prospective permittees propose to expand the camp with a new "Camp host pad … 80 x 80 feet Concrete pad." PAGE 22.

This concrete pad is dramatically larger, 40 times larger, than that included in the dEA:

> "The application also seeks to construct an overnight Camp host site that would consist of a 160-square foot [12.65 feet by 12.65 feet] concrete pad." PAGE 4

An "80 x 80 feet Concrete pad" is 6,400 square feet, not "a 160-square foot concrete pad" per the dEA.

The dEA does not examine the prospective permittees' desire for such a significant expansion of the camp's destructive and central footprint.

According to the application, the prospective permittees'

> "[e]xpected benefits … are getting youth into the forest for educational experiences ..."; and, "… to further their education…"

Such a claim is dubious at best given the fact that one of the prospective permittees' relatives is on record promoting nonsensical beliefs about MGRS.

> ""Reading the Fish and Wildlife opinion is like reading a comic book," said Bulan Weech, who represents a group of 15 [sic] cabin owners in the area …I can't understand why they need this [the forested Columbine/Ash Creek drainage area] 17 acres for the squirrel, when they are leaving areas like Hospital Flat and Soldier Creek. All areas are on wet, marshy land ideal for the squirrel.""

Wet, marshy land is of essentially no use to MGRS.

Consistent with this history, as recently as 2024 and 2026, the local community continues its cult-like following of anti-environmental and anti-science zealots.

The prospective permittees will likely use the camp to spread further misinformation.

The dEA does not examine the self-perpetuating and ripple effects of the likelihood that the prospective permittees will be spreading disingenuous misinformation to young people during their proposed "educational experiences."

The application itself, like the prospective permittees' purchased dEA, fails to identify, as required, the "estimated cost of next best alternative" when, like for their recreational cabins, multiple alternative, less environmentally harmful locations also exist for the camp elsewhere on Mount Graham.

The dEA similarly fails to address any alternatives involving other locations, much less the "next best alternative."

The application states that "[w]ater will not be impacted."

The massive amount of urine and feces that will be deposited seasonally by the prospective permittees' proposal is noted above. The dEA fails to address the likelihood of water quality diminishment in the watershed.

The application states that "[n]o archaeological or historic resources will be impacted."

This statement is a lie. The Tribes have been quite expressive with White Mountain Apache Tribal comments quoted earlier.

San Carlos Apache Tribe has similar concerns. See their independently submitted comments.

With respect to wildlife, the application states that "[t]he Camp will not impact vegetation or wildlife in the area" and "[t]he Service determined that the

level of anticipated take is not likely to result in jeopardy to Mount Graham Red Squirrel."

As noted above, the Columbine structures occupy the largest area of surviving flatter, mature, canopied forest, and the only such area capable of providing short-term recoverable MGRS habitat.

Perpetuation of the structures denies MGRS of this critical assistance at a time it faces a historic habitat bottleneck.

Claiming that "[t]he Camp will not impact vegetation or wildlife in the area" is simply a lie.

As noted above, almost four decades ago U.S. Fish and Wildlife Service biologists acknowledged MGRS jeopardy when there were more squirrels, and when MGRS were not only surviving in isolated pockets of canopied forest.

Today's agency biologists acknowledge that they are instructed by their superiors to provide rationale for the approval of all agency proposals.

Ironically, today's biologists are facing pressure similar to their predecessors as documented in earlier press coverage, "Pair: Told to fudge data on red squirrel."

Talk to any Coronado National Forest official today and they consistently rationalize their refusal to explore available, alternative locations for the Columbine structures by ignorantly proclaiming that "squirrel numbers seem to be OK."

As noted above, such ignorant rationale fails the NEPA requirement to examine MGRS' current situation surviving in isolated pockets of flatter, mature, canopied forest in the context of the importance of restoring the only available short-term recoverable habitat where failure to move the Columbine structures to available, alternative locations denies MGRS of critical assistance as it faces a historic habitat bottleneck.