

September 20, 2025

Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands
Supervisor's Office, in care of the Grasslands Plan Revision Team,
2840 Kachina Drive
Pueblo, CO 81008

Grasslands Plan Revision Team,

Comment Number 2: Appearance of Impropriety

The Appearance of Impropriety is to a situation where conduct, while not necessarily a violation of rules or law, creates a perception that a person or organization's honesty, integrity, or impartiality may be compromised. This requires governmental officials to avoid even the appearance of wrongdoing to maintain public trust.

During the Forest Service September 16, 2025 Zoom Chat with Timpas Grazing Association permit holders, Trish Pfeffer Leone, resident of Otero County, Colorado, asked: "Who actually created this document?"

James Pitts, Forest Service: "A contractor."

Pfeffer Leone: "Who is the contractor?"

Pitts: "Many people and organizations contributed to this document."

Pfeffer Leone asked again: "Who is the contractor?"

Pitts responded with another vague rambling answer.

Pfeffer Leone: "Who is the contractor? We as taxpayers deserve to know."

Pitts: "Uh, AECOM."

AECOM is not found on a search of the Draft Assessment. But it states: "The Cimarron and Comanche National Grasslands' staff assisted in the preparation of the draft assessment with input and review from the Mountain Planning Services Group and Rocky Mountain Regional Office staff and leadership." p. 8. Did the Forest Service misrepresent who compiled and created the Draft Assessment?

The Draft Assessment's failure to disclose AECOM as the contractor who compiled, created or in any manner produced the Draft Assessment and James Pitts reluctance to disclose this contractor rises to the level of the appearance of impropriety by the Forest Service and thus compromises the integrity of the entire management plan revision process. If there is no integrity in the process there can be no integrity in the results.

As a result of this lack of transparency, the whole Cimarron and Comanche Grasslands Draft Assessment and management revision process should be halted.

Respectfully

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