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Comments: From: Robin Silver <rsilver@biologicaldiversity.org>

Date: Thu, Oct 31, 2019 at 10:58 PM

Subject: [EXTERNAL] SCOPING FOR MOUNT GRAHAM BIBLE CAMP PERMIT RENEWAL; ARE YOU TRYING PUSH THE MGRS OVER THE BRINK OF EXTINCTION?

To: Kerwin Dewberry <kdewberry@fs.fed.us>, Cal Joyner <calvin.joyner@usda.gov>, Vicki Christiansen <vcchristiansen@fs.fed.us>, Jeff Humphrey <jeff_humphrey@fws.gov>, Amy Lueders <amy_lueders@fws.gov>

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Mr. Dewberry, Mr. Joyner, Ms. Christiansen, Mr. Humphrey and Ms. Leuders.

Today, we were forwarded a copy by one of our members of a scoping notice for permit renewal for the Columbine bible camp.

We (Maricopa Audubon Society and the Center for Biological Diversity) have been involved with trying to protect Mount Graham and the Mount Graham Red Squirrel ("MGRS") for more than three decades. Yet once again, we find out indirectly about another significant, inappropriate and offensive, Coronado NF Mount Graham action.

There are likely less than 80 Mount Graham Red Squirrels ("MGRS") surviving on Earth. Most of the only canopied forest habitat left for MGRS recovery is occupied by cabins and this bible camp that were already supposed to have been removed. All need to be removed so that MGRS can survive, much less recover.

The bible camp has not been used for more than two years. (see attached email correspondence) And prior to the last more than two years of nonuse, the owners have been trying to sell the bible camp because they are "unable to maintain it."

On April 13, 2018, we filed a Notice of Intent to Sue with USFS and FWS for "failing to reinstate failing to reinstate Endangered Species Act (ESA) consultation on termination of the Columbine area special use permits in order to secure essential recovery habitat to aid survival of the critically endangered Mount Graham Red Squirrel." (attached)

In response, on June 27, 2018, the Coronado National Forest sent a reply stating, "the Coronado National Forest is in the initial phases of the preparation of the required Biological Assessments, and will be working with the Tucson Field Office of the U.S. Fish and Wildlife Service to complete the re-initiation of consultation far ongoing activities in the Pinaleno Mountains[hellip]" The June 27, 2018, correspondence also says that, "Coronado National Forest is also in the process of renewing the Special Use Permit for the Columbine recreational summer camp (i.e., Arizona Bible School Organization Camp). Prior to re-authorizing this permit, the USDA Forest Service will consult with the U.S. Fish and Wildlife Service."

"Prior to re-authorizing this permit, the USDA Forest Service will consult[hellip]" your correspondence says?

How about "IF" USFS decides to re-authorize the bible camp? But then, maybe it is just too much for the Coronado NF to even pretend that another decision to authorize has not already been made, even if it is obviously not in the public interest to promote and facilitate an extinction via permit renewals?

Given the recent August 17, 2019, reporting in the Arizona Daily Star of another significant, pre-ordained Coronado NF decision, in "Forest supervisor says her boss ignored critical questions about Rosemont Mine" it is impossible for us to not be skeptical of this dubious bible camp decision also. In the Arizona Daily Star article, "A former Coronado National Forest chief says her boss forced her a decade ago to stop questioning the legality of the proposed Rosemont Mine."

And while we are on the subject of your June 27, 2018, correspondence, let us correct your boilerplate, disingenuous statement that MGRS' predicament has resulted primarily because "[m]uch of the Mount Graham red squirrel's food supply was impacted by the Frye Fire."

The MGRS' predicament is the result of years of piecemeal habitat loss, including just as importantly as the Frye Fire, USFS' inappropriate, unnecessary, July 8, 2004, back burning of at least 250 acres of the total 615 acres of spruce-fir habitat, critically important for MGRS survival and recovery. These 250 acres of the total 615 acres of spruce-fir habitat were found to the east of the telescopes from Emerald Peak to High Peak. At the time, the winds were blowing away from telescopes towards the Nuttall wildfire. In other words, the wild fire would have needed to move against or into the wind in order to reach the telescopes. The unnecessary torching took place from the west to the east with the wind blowing from the west towards the east into the face of the wildfire.

Please include this correspondence and its attachments into the bible camp permit renewal record. And once again, we request to be added to your interested party list for all Coronado NF activities on Mount Graham.

Mostly, and lastly, please try and be more respectful and more protective of Mount Graham and of the Mount Graham Red Squirrel.

Sincerely, Robin Silver