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Comments: USDA Forest Service
Rocky Mountain Region,
Attn: USFS Chief Randy Moore, Reviewing Officer,
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submitted online to https://cara.fs2c.usda.gov/Public/CommentInput?project=51806

October 29, 2023

Thank you for the opportunity to object to the GMUG National Forest Plan and FEIS. I submitted 2 comment letters on the Draft Plan on 11/24/21. One of the letters addressed land issues, and other letter addressed Rocky Mountain Bighorn Sheep (RMBS) Species of Conservation Concern (SCC)issues. In this letter I am objecting to the RMBS SCC issues from my second 11/24/21 comment letter.
In FSH 1909.12_10, 12.52 the species of conservation concern are defined as: A species of conservation concern is a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.

Section 12.52d identifies species to consider - it is NOT the criteria to define a species as a SCC, it is only the criteria to consider. In addition, nowhere does it say that ALL of the criteria must be met in order for the species to be considered, or beyond that, defined as SCC. The Regional Forester (RF) seems to have interpreted the 12.52d3 items as all necessary criteria for SCC identification while it clearly is not that - it is simply a list of items that SHOULD be considered.

The criteria for SCC is simply the 12.52 definition (above):
1) known to occur in the plan area
2) best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.

My objection is that the Regional Forester incorrectly interpreted the SCC definition, and further "cherry-picked" the dates in the population data to show an increase, not decrease of the population. Within the GMUG area there is clearly very substantial and scientific concern about the RMBS ability to persist long-term:
1) There are definite population decreases long-term - the population has decreased since 1992. The RF cherry picked a local min in 2002 to show an increase.
2) Particularly in the GMUG area there is considerable overlap of RMBS summer range with active domestic sheep allotments - that in itself is enough for substantial concern.
3) Within the GMUG area there are only-ever-increasing human/recreation/vehicle effects and infringements on the RMBS habitat, routes, and overall range.
4) RMBS in the GMUG area are already at the edge of their possible geographic range - they can't expand to the west or south because of climate and topography.

Both DNR (11/24/21) and CPW (11/22/21) have written very good letters trying to clarify the SCC process and their strong beliefs that Rocky Mountain Bighorn Sheep should be declared an SCC. The RF had a different opinion. DNR and CPW are the experts on Colorado Wildlife - their opinions should have more value.

Thank you again for the opportunity to participate in this process.

Jennifer Cram