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Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands
Supervisor's Office
2840 Kachina Drive
Pueblo, CO 81008

Submitted via email SM.FS.CCNGRevision@usda.gov

Re: R-CALF USA Comments in Cimarron and Comanche National Grasslands Land Management Plan Revision #66622

Dear Forest and Grasslands Supervisors:

This letter concerns the U.S. Forest Service (USFS) Cimarron and Comanche National Grasslands Land Management Plan Revision, specifically the Timpas and Carrizo units in southeast Colorado and the Cimarron National Grasslands in southwest Kansas.

After reviewing the plan revision, several areas of concern have come to my attention.

First, in the 1,500-page draft assessment, the majority of the plan references Species of Conservation Concern (SCC). The SCC list came from natureserve.org, which uses heritage rankings from The Nature Conservancy. The Nature Conservancy has no statutory authority for policy or rulemaking.

Fourteen of the species listed on the “potential” SCC list were identified as being threatened by overgrazing, livestock farming and ranching, livestock grazing, or grazing intensity. The concerns here are twofold. First, in the document, “overgrazing” and “grazing intensity” were undefined and “sightings and occurrences” of SCC were wholly misrepresented. For example, in 1997 Bigelow’s bluegrass was reported in Picketwire Canyon — the only alleged sighting in the plan area — but it was never verified and the habitat cannot support it. Second, the resource information for the draft assessment used artificial intelligence (AI) such as Integrated Digitized Biocollections and registries like re3data.org and biosharing.org for scientific, factual information. The lack of data screening or article accuracy screening within these AI resources is wholly inappropriate.

The recommendation to designate the Purgatoire River as ‘wild and scenic’ is unfounded. Congressional approval requires the river to meet specific criteria, including maintaining an ‘inventoried’ classification unless a suitability study finds otherwise. However, the authors of the draft assessment sourced their plant and animal inventories from internet resources, not on-site, and without the inclusion of local USFS employees to draw from their knowledge and experience.

Local stakeholders report rude behavior, stifled cooperation, and little transparency from USFS employees at a recent community meeting. Furthermore, when a stakeholder asked if Agriculture Secretary Brooke Rollins had been informed and invited to participate, the answer was, “No, let’s be honest, she doesn’t have time.” This proves the agency is working beyond the scope of USDA authority and effectively ignoring the constituents that the USFS serves daily. The changes to the management plan endanger the financial viability and true stewardship planning of stakeholders and local producers, while threatening the rural economies of southeast Colorado and southwest Kansas.

I urge the USFS to work with stakeholders, community leaders, and local employees on management plan changes. The USFS is here to serve the people.

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