



DEPARTMENT OF PARKS AND RECREATION
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Ruth G. Coleman, Director

Jim Bartel
Field Office Supervisor
U.S Fish & Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA 92011

Nov. 20, 2007

Dear Mr. Bartel:

I am writing to you on two aspects of your proposal to reduce Critical Habitat for the bighorn sheep of the Peninsular Ranges. First, to officially request a public hearing concerning the proposed changes to Critical Habitat, and second, to express California State Park's opposition to the proposal to reduce CH by more than 50%.

I feel it is imperative the public have an opportunity to understand how the USF&WS derived at the proposed Critical Habitat revision. The proposal presented to the public in the Federal Register reflects a hurried process, aimed solely at reduction of acreage, with little to no regard for scientific method, or knowledge of desert bighorn natural history.

The proposed Critical Habitat map depicts a retraction of CH from most alluvial fan habitat (249,000 acres), much of which is the most important sheep habitat in the range in need of protection, due to threats of housing and golf course projects. The proposed CH also proposes to create two areas of metapopulation fragmentation, one isolating the San Jacintos, and the other isolating the Carrizo Canyon population in the south end of the range. One over-riding premise of the Recovery Team in putting together the original CH was *connectivity* and *maintenance of corridors* to provide long-term genetic and demographic connection between ewe groups.

The proposed changes to Critical Habitat completely ignore many of the parameters in bighorn natural history which the Recovery Team noted were crucial to population recovery in the future. The proposal to change Critical Habitat was conducted entirely out of context, without the consultation or support of the Recovery Team or any other group of biologists with in-depth knowledge of bighorn sheep or of the Peninsular Range habitat.

I find your proposal without scientific merit or support and would like to meet in the public forum to obtain answers and find some accountability within your agency for this potentially harmful proposal.

Sincerely,

Mark C. Jorgensen
Superintendent
Anza-Borrego Desert State Park