

Data Submitted (UTC 11): 9/8/2020 11:54:58 PM

First name: Nike

Last name: Stevens

Organization:

Title:

Comments: XRegional Forester's List of SCC

Statement of issues and/or parts of the plan revision to which the objection applies: The list is ridiculously short and excludes all large terrestrial wildlife including iconic species linked to the Greater Yellowstone Ecosystem and with limited range elsewhere including bison, bighorn sheep, wolverine, wolves, and grizzly bear.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: Lack of representative wildlife as species of Conservation Concern

Proposed Solution: Expand list to include at a minimum those species uniquely important in the Greater Yellowstone ecosystem because the GYE is the southernmost extension of their range (grizzly bears, wolves, bison are examples) or because their original range has been reduced by over 90% and the GYE contains the greatest expanse of suitable habitat within the region much of which is currently unoccupied (bighorn sheep). Bighorn sheep are of Conservation Concern because they require unique management consideration because of their susceptibility to disease borne by domestic sheep and goats.

As a wildlife biologist who has worked on bighorn sheep I believe that it does not make sense that the Custer Gallatin National Forest does not have Bighorn Sheep as a species of Conservation Concern. I believe that disease risk in bighorn sheep should be directly addressed in the Forest Plan. The Custer Gallatin includes large areas of excellent bighorn habitat only some of which is currently occupied. Outstanding occupied and unoccupied bighorn habitat within the Custer-Gallatin NF such as the Beartooths, Gallatins and Pryors should be managed to maintain their value for bighorn sheep. Pack goats, domestic sheep and vegetation management using goats or sheep should not be permitted in bighorn sheep habitat or anywhere near (buffers of 20 miles are recommended). Most domestic sheep and goats carry *Mycoplasma ovipneumoniae*, *Mannheimia hemolytica* and other pneumonia bacteria that transmitted to bighorn cause significant all age mortality and often depress lamb survival for decades. It is critical to minimize the risk of contact as much as possible since there is no available vaccine or treatment for wild bighorn sheep. One nose to nose contact between a bighorn and a domestic sheep or goat can spread disease to the bighorn sheep and then back to the bighorn population and their linked herds causing declines that will last decades.

Statement demonstrating the link between objection and prior formal comments: I submitted comments in earlier comment periods - including in June 2019 and March 2018. I attended a week of meetings of the Gallatin Community Cooperative. I also attended at least one public meeting near the initiation of the process.