Data Submitted (UTC 11): 10/30/2023 6:00:00 AM
First name: Starr
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Organization: San Miguel County
Title: Natural Resources Director
Comments: October 30, 2023

BOARD OF COMMISSIONERS

Anne Brown Kris Holstrom Lance Waring

Frank Beum

Reviewing Officer for Revised Land Management Plan Responsible Official for List of Species of Conservation Concern Regional Forester

USDA Forest Service Rocky Mountain Region 1617 Cole Blvd.

Lakewood, CO 80401

Submitted electronically via the project webpage: http://www.fs.usda.gov/goto/gmug/forestplan_objections

Notice of Objection pertaining to the Regional Forester's Species of Conservation Concern List for the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests

OBJECTOR CONTACT INFORMATION

Pursuant to 36 C.F.R. [sect] 219.54 (c)(3), the Board of County Commissioners of the County of San Miguel, State of Colorado ("San Miguel County" or "County") is designated as the objector.

Board of County Commissioners of the County of San Miguel, State of Colorado Lance Waring

San Miguel County Commissioner Lancew@sanmiguelcountyco.gov PO Box 1170

Telluride, CO 81435

(970)708-8399

ELIGIBILITY TO OBJECT

San Miguel County has participated in the planning process for the FEIS and LMP since their inception. The County submitted comments to the United States Forest Service regarding the draft on August 20, 2019, July 16, 2021, November 25, 2021, and November 26, 2021. Further, USFS entered into a Memorandum of Understanding 18-MU-11020400-050 on August 24, 2018, and 23-MU-11020400-086 on September 7, 2023, designating San Miguel County as a Cooperating Agency for the planning process. The issues raised in this Objection were either raised in the aforementioned comments or were unavailable at the Draft Environmental Impact Statement ("DEIS") stage.

STATEMENT OF REASONS FOR OBJECTION

San Miguel County submitted comments to the GMUG DEIS independently on August 20, 2019, and November 26, 2021, and in collaboration with Gunnison and Ouray Counties on July 16, 2021, and November 25, 2021. The USFS has requested "A statement that demonstrates the link between the objector's prior substantive formal comments and the content of the objection unless the objection concerns an issue that arose after the opportunities for formal comment;" therefore, we have indicated with dates which submitted comments to link our objection to.

OBJECTIONS
A. BIGHORN SHEEP- Inclusion of Rocky Mountain Bighorn Sheep as a Species of Conservation Concern.

2021 comments: We are particularly concerned that bighorn sheep have been left off the SCC list, given their vulnerability to disease passed from livestock and to habitat fragmentation. STND SPEC-13, requiring the separation of bighorn sheep and domestic sheep, must remain a standard.

We support Ouray County's comments regarding Bighorn Sheep:

Dramatic die-offs of significant portions of herds have been documented, including the Tier 1 herd intersecting the Ouray Ranger District and Ouray County.

The Rocky Mountain and Desert bighorn subspecies face a variety of threats, chief among them respiratory diseases transmitted from domestic sheep and goats.1 Respiratory diseases cause not only individual mortality but also herd mortality events.2 They also inhibit population growth,3 population connectivity, and range expansion.4 Further, Colorado Parks and Wildlife recognizes a number of additional threats, including "unregulated harvest, overgrazing, competition with other livestock, plant community succession and forestation of native ranges, and increasing human development of winter ranges" which have all been identified as presently or historically contributing to bighorn sheep declines.5 Climate change is poised as its own threat and an additional exacerbating factor in a number of threats already listed.6 Any one of these threats alone represent a substantial concern about these species' capability to persist over the long- term in the plan area, and combined they demonstrated that the best available science undoubtedly supports the inclusion of Rocky Mountain and Desert bighorn sheep as species of conservation concern in the GMUG Forest Plan. The Forest Service's Handbook does not trump its regulatory mandates.

Thank you for your serious consideration of our objection. We look forward to working with you to find solutions.

Sincerely,

San Miguel County Board of Commissioners

1 Cassirer, E. F., Manlove, K. R., Almberg, E. S., Kamath, P. L., Cox, M., Wolff, P., ... & Besser, T. E. (2018). Pneumonia in bighorn sheep: Risk and resilience. The Journal of Wildlife Management, 82(1), 32-45.

2 George, J.L., D.J. Martin, P.M. Lukacs, M.W. Miller. 2008. Epidemic pasteurellosis in a bighorn sheep population coinciding with the appearance of a domestic sheep. Journal of Wildlife Diseases 44:388-403 .

3 Grigg, J.L. L.L. Wolfe, K.A. Fox, H.J. Killion, J. Jennings-Gaines, M.W. Miller, B. Dreher. 2017. Assessing timing and causes of neonatal lamb losses in a bighorn sheep herd via use of vaginal implant transmitters. Journal of Wildlife Diseases 53: 596-60 I; Manlove, K., E. F. Cassirer, P. C. Cross, R. K. Plowright, and P. J. Hudson. 2016. Disease introduction is associated with a phase transition in bighorn sheep demographics. Ecology 97:2593 -2602; Wood, M.E., K.A. Fox, J. Jennings-Gaines, H.J. Killion, S. Amundson, M.W. Miller, W.H. Edwards. 2017. How respiratory pathogens contribute to lamb mortality in a poorly performing bighorn sheep herd. Journal of Wildlife Diseases 53: 126[bull] I 30.

4 Butler, C. J., Edwards, W. H., Paterson, J. T., Proffitt, K. M., Jennings-Gaines, J. E., Killion, H. J., ... & Garrott, R. A. (2018). Respiratory pathogens and their association with population performance in Montana and Wyoming bighorn sheep populations. PloS one, 13(11), e0207780.

5 George, J. L., R. Kahn, M. W. Miller, & B. Watkins. (2009). Colorado Bighorn Sheep Management Plan 2009[minus]2019. Colorado Division of Wildlife, Special Report No. 81. February.

6 Creech, T., C.W. Epps, J. Wehausen, R.S. Crowhurst, J.R. Jaeger, K. Longshore, B. Holton, W. B. Sloan, R. Monello. 2020, Genetic and environmental indicators of climate change vulnerability for desert bighorn sheep. Frontiers in Ecology and Evolution 26: https://doi.org/l0.3389/fevo.2020.0027; Epps, C.W., D.R. Mucullough, J.D. Wehausen, V.C. Bleich, J.L. Rechel. 2004. Effects of climate change on population persistence of desert dwelling mountain sheep in California. Conservation Biology 18: 102-113. 9 Rocky Mountain Region Forest Service Manual, FSM 2600, Chapter 2670. December 18, 2018.