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Comments:

To: 'objections-chief@fs.fed.us' objections-chief@fs.fed.us

Subject: Objection regarding the forest plan restricting the use of Pack Goats on the Custer Gallatin National Forest.

From: Curtis King

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Dear Objections reviewing officer

I am objecting to the Draft Revised Forrest Plan referring to the use of pack goats. It states on page 104 of the Draft Revised Forest Plan, it states: "Use of pack goats under new special use permits may be permitted only if a risk assessment indicates that spatial or temporal separation, or other mitigation can effectively minimize risk of disease transmission between livestock and bighorn sheep."

The Packgoat is not part of the commercial goat industry. Packgoats are not out clearing brush, being bred for meat or dairy. Traditionally, pack goats are wethers and users maintain fewer than 10 packgoats which are kept on private property and separated from other livestock.

Please use the most current available science and allow packgoats into all areas included in the Revised CUSTER GALLATIN National Forest Plan.

Please review with your planning team and consider the following response to the CUSTER GALLATIN Forest Plan pertaining to the use of domestic pack goats. I have broken down my response to this topic in three areas' (Education, Engineering, Enforcement) to hopefully ease in the use of implementing the many decisions that the Forest Service Supervisors will need to consider in this plan and the effects or impacts that those decisions will make for generations to come.

* Education and Awareness

Educating the public on the proper use of recreational pack goats where Bighorn Sheep and Rocky Mountain Goats are present is the critical key to prevent the risk of disease transmission. There has NEVER been a pathogen or disease transmission incident that has occurred between a Domestic Pack Goat and Bighorn sheep, and or Mountain Goats, and the probability of this ever happening is extremely low. The Pack Goat is not the problem and never has been. The Packgoat community has been using pack goats in the western United States in and around core Bighorn Sheep habitat since 1972. Continued education and awareness of pathogen or disease transmission, annual health certificates for pack goats, combined with BMP's best management practices will pilot a bulletproof plan for recreational Goatpacking for generations. We can do this. The following comment explains how.

Dr. Tom Besser, the Chair for the Wild Sheep Disease Research Unit at Washington State University, stated the following: "I believe that *M. ovipneumoniae* test-negative pack goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies" (Wild Sheep Foundation Newsletter, Summer 2016).

The problem is lack of education and awareness and misinterpreted information of best available science. Dr. Besser's study (WSU) of comingling clean domestic goats with clean (M-ovi free) Bighorn Sheep for 100 days is absolutely a scientific study that proves that clean domestic goats are not a disease threat to Bighorns or other wildlife. This WSF, Wild Sheep Foundation funded study conducted by Dr. T. Besser concluded that clean domestic goats can eat, sleep, drink, play, rub noses, cough and sneeze on each other for over 100 days in the same pen and absolutely nothing will happen to them. They were all tested again after the 100-day period of comingling. All the Bighorns and the goats were healthy and disease free.

Misinterpreted information of best available science. The Karen Rudolph study (WSU) about the 1994-1995 Hells Canyon Die Off- with Bighorns pointed a finger at two abandoned or escaped FERAL Goats (not pack goats) observed with- comingling with Bighorns in that area when a large die off occurred. This study was a hypothesis and NEVER concluded scientifically that the two feral goats had anything to do with the die off. Please review Dr. Highland's (USDA ARS, Pullman WA) review of this study that clearly points this out.

Misinterpreted information of best available Science. 2004 Silver Bell Mountains Bighorn Sheep herd north/west of Tucson AZ. Over four thousand BRUSH Clearing Feral Goats (not pack goats) are dropped into an allotment near the Silver Bell Herd. After an exhausting 60+ day effort by AZ Department of Fish and Game to remove the Brush Goats comingling with the Bighorns the only infection transmission that occurred was Pink Eye (conjunctivitis). See the Jim Heffelfinger study Arizona Game and Fish. This was a very unfortunate situation and Gross Negligent practice by the Rancher Mr. Johnson who was operating a brush clearing goat operation in the south west using trash goats from all over the place that had not been vaccinated or inspected by a veterinarian prior to being released on the landscape near the Silver Bell Herd. As unfortunate as this situation was, it should be noted that no other type of disease transmission occurred even after comingling occurred for over sixty days. The fatalities that occurred in the Silver Bell Herd were caused by Bighorns falling off rocks and cliffs after becoming infected with pink eye and were temporarily blinded. Most all the other Sheep infected were treated by biologists and recovered. No other strains of disease were found or reported to be transmitted.

Education and Awareness continued. Another problem is not the "pack goat", but is lack of education and awareness in small- scale farms and hobby farms that lay on the fringes of Bighorn sheep habitat. The Laura Heinse study, WSU researcher Pullman WA. There are numerous dairy and hobby farms (All Private Property) that are nestled very close to some of our Bighorn Sheep populations in CO, WY. OR and eastern WA. Most of these small farms house domestic wool sheep, 4-H projects and domestic goats used for dairy, meat and or 4-H projects on the same property. This increases the opportunity for the housed wool-sheep to spread pneumonia or other disease to the domestic goats. Young Bighorn Rams or ewes then wonder into lower elevations of core habitat and jump the fence getting into the pastures with domestic sheep and goats. Potential disease can be spread to the bighorns if contact occurs and the domestic sheep or goats are carriers of a disease. Most of the property owners interviewed in this study were not aware of disease transmission, and did report seeing Bighorns on their property comingling with their livestock when interviewed about this in the study. Again, this is a wool sheep and domestic goat husbandry practice that needs improvement and more education and awareness.

This is not a pack goat issue as most all the members in the Packgoat community are utilizing goat husbandry practices that house and quarantine their pack goats clear of wool sheep, and keep and house only disease-free animals. See the Laura Heinse study for details. Dr. Besser has also publicly disclosed that small-scale herds of sheep and goats kept on one premises (less than twenty head) typically do not carry(M-Ovi) pneumonia and therefore pose very negligible risk to wildlife.

Pack goats are selectively breed for, cared for and trained by their owners for years before they carry a saddle and pack. Most pack goats do not start to carry a load until they are 3 ½ to 4 years of age. The training, care and goat husbandry practices that goes into keeping and training pack goats is exceptional. They are not dairy goats, meat goats, brush clearing goats or trash goats. They are Pack Goats. They are different and should be recognized for their ability and the care and training that goes into them. They are the most versatile low impact pack stock animal on the planet. Put it this way, calling or referring to a pack goat as just another domestic goat is somewhat of an insult. It is like comparing a 6 million-dollar Kentucky Derby wining thoroughbred to a wild mangy mustang that was just captured on the beach in Australia. Yes, they are both horses but one would agree they are quite different.

The 2016 study conducted by Margaret Highland, who is a Research Veterinary Medical Officer with the USDA-ARS-Animal Disease Research Unit in Pullman, WA and a board certified veterinary pathologist with specialized training in wildlife pathology, titled: "Investigating *Mycoplasma ovipneumoniae* in domestic pack goats in the United States reveals low prevalence and poor diagnostic accuracy of published molecular assays" clearly shows a negligible risk to bighorn sheep from packgoats.

Education and awareness of recent scientific experiments. In the spring of 2016 Dr. Margaret Highland USDA-ARS Pullman WA, conducted a scientific peer reviewed experiment with Pack Goats. Note-this has never been done before by any organization. Over 572 pack goats from different herds and owners scattered across the western United States to include WY, MT, UT, WA, OR, NV and CO are field tested on their housed property for potential diseases. Deep nasal swab samples, ocular swabs, and blood samples are collected from each individual pack goat, then are carefully under the care, direction and supervision of the researcher and qualified associates collected and transported to the WADDL Lab in Pullman WA. The results of this lengthy experiment concluded that less than 3% of the pack goats tested were shedding *mycoplasma ovipneumoniae*. That's a more than 97% clean bill of health considering some of the goats were kids under six months of age that were shedding pneumonia and one goat was an African Boer being housed near other meat goats on an adjacent nearby farm. Less than 25 % of the pack goat owners that were interviewed in this study actually stated that they use or intended to use pack goats inside of or near Bighorn Sheep habitat.

Education and awareness on the proper use of packgoats is the responsibility of the pack goat community and the individual owners who are using pack goats in or near bighorn sheep habitat. Educating pack goat users on these issues can be circulated through numerous web -based sites such as The North American Pack Goat Association or Napga.org and Packgoats.com another website committed to educating pack goat users. Collaboration with the Forest Service utilizing the Forest Service webpage on the use of all pack stock animals will educate thousands of users or potential pack goat users on the awareness, guidelines, and Best Management Practices that should be considered mandatory for backcountry use in or near Bighorn Sheep habitat. The Forest Service Supervisors must absolutely consider all current and best available science when making management decisions about the use of domestic pack goats on Forest Service lands.

* Engineering a plan that will work

The Forest Service is not in the business of removing certain user groups off the landscape. Engineering a plan that is, effective, functional and versatile is critical to the success and prevention of disease transmission. Engineering a permit user system for pack goat users will allow the forest service to have an up close and personal look at who and what is using the forest and it will provide for useful data collection. This data will help Supervisors and land managers make improvements or modifications in the permit system for future use and provides a database of intelligence gathering for biologists. Applicants can then be mailed questioner forms to aid in gathering critical information to help improve the permit process.

Questions like>

1. How long were you inside of the permitted area?
2. How many people were in your group, and how many pack goats did you take into the permitted area.
3. Did you see Bighorn Sheep, and if yes how close were the sheep during observation. Did your Pack goats at any time ever make physical contact with any wild Bighorn Sheep?
4. If any physical contact was made between your pack goats and wild Bighorns, describe the location, circumstances and how the contact occurred.
5. Did you lose any pack goats while in the permitted area? If so what is temporary, fatal, or completely lost with no recovery of the pack goat? Please explain the circumstances in detail.
6. What was the primary purpose of your pack goat user permit? Examples would be recreational hiking, camping, fishing, photography, research, and hunting.

* Permit system. The use of a permit system will pave the way for ethical, safe, and enjoyable Goatpacking. It will clear all the pathogen transmission concerns cited by biologists, Land managers, Bighorn Sheep working groups and wildlife managers. The permit system should be required for all Packgoat users that are entering core or sensitive Bighorn Sheep habitat areas. Applicants for a permit will be required to obtain a health certificate and a M-ovi test from their certified veterinarian who will be required to collect two nasal swab samples. The veterinarian or certified technician will then package and send the samples to the WADDL laboratory in Pullman WA, or another certified laboratory deemed appropriate by the USDAD- ADRU. The

Forest Service Supervisors can determine what laboratory will be the most effective to do the testing within the western United States.

* The laboratory testing and mailing fees will be the responsibility of the pack goat owner. Once the designated laboratory completes the testing, the results will be mailed or e-mailed back to the pack goat owner's veterinarian. Any goats testing positive for M-ovi would be disqualified from obtaining a permit. Once receiving the lab results the veterinarian will sign the health certificate and return it to the (applicant) pack goat's owner. The applicant will then forward the signed health certificate to the Forest Service designated office for approval and issuance of a user permit. The applicant will be required to keep and maintain pack goats in quarantine on their own property during this testing and application period to ensure that their pack goats remain clean, and disease free.

* Applications should be received and issued in a timely manner to assist in trip or expedition planning. A permit should only be valid for 60 to 90 days. This is something that will need further review and discussion from the Forest Service biologist and supervisors. Most pack goat users will only do one or two trips into remote areas each season and most of the user groups will apply for an application between June 18th through September 20th. The permits should only be issued to pack goat users between June 18 through November 10 in the same year to assist in avoiding potential contact or disturbance with Bighorn sheep during the kidding or lambing season and the fall rutting season when Rams are moving about more frequently.

* The health certificate should be recognized as valid for at least three months and would be required annually for those wishing to apply for additional user permits. These season issue dates will accommodate over 95% of the Pack Goat User applicants and will allow for great summer month trips where users are interested in hiking, fishing alpine lakes and recreating. These dates will also accommodate tag holders or hunters who wish to use pack goats during hunting seasons that fall within the permit user season. Again, these are just guidelines and could be modified as needed.

* A use permit should be required for all commercial use of goat packing.

* User permits will be required to be in the applicant's possession. The permit is also subject to be reviewed or inspected at any time by an authorized Forest Service Employee, Wildlife Officer, law enforcement officer or any other persons or officials deemed necessary by the Forest Service Supervisor.

* The number of pack goats for each applicant should be restricted to 12 goats. This will allow for four goats per person in a four-person group. This will reduce the number of goats entering the forest and allows for safer handling, control and tethering of goats in camp. A good conditioned pack goat can carry up to fifty pounds of equipment for up to 8-10 miles a day. That is 200 pounds of gear for each person in the party using the four goats per man formula. This is perfect, and does not need to be increased. It's a wilderness experience not a circus.

* All permit applicant users will be required to strictly comply with all Forest Service Pack Stock Use Regulations and all Best Management Practices that pertain to the use of pack goats. See the attached following best management practices. The following BMP's were designed and written by North American Pack Goat Association members who have extensive experience and knowledge in goat packing.

* Best Management Practices

NAPgA Best Management Practices (BMP'S)

The BMP document is a living document which is open to editing and updating as needed.

NAPgA created the BMP's to establish responsible common-sense guidelines for goat packing. They are not intended to be overly restrictive or to discourage packgoat use in any way or in any location.

NAPgA will use best available science as a guide in which to measure and develop the BMP's to address wildlife and other resource concerns.

BMP#1: Individually Identify Your Packgoats

Each packgoat shall be individually identified. Each goat shall have a collar with a tag attached to it containing, at a minimum, the current owner's name and phone number.

Packgoats may be identified with a tattoo or microchip which is specific to each individual goat in conjunction with a collar.

Tattoos containing the individual packgoat's Scrapie Herd Number & ID or an official Scrapie ear tag may be used in conjunction with a collar.

BMP#2: Control

All packgoats shall be under direct human supervision at all times. They shall be on leads or have leads attached to their collar/halter.

In camp, all packgoats shall be in direct sight or tethered in some fashion (picketing, high lining, etc.).

All packgoats shall be tethered at night within 30 feet of humans and bells will be attached to their collars.

BMP#3: Separation

Goatpackers shall minimize packgoat contact with wildlife.

BMP#4: Lost Packgoat

If a packgoat becomes lost every effort will be exhausted to locate and recover it.

If the owner is unable to locate and recover the lost packgoat the following agencies shall be contacted by telephone as soon as possible.

Information given should include a detailed description of the packgoat (size; color; ears erect, hanging or none, horned or not), any equipment they are carrying and the last known location. A photograph of the packgoat, if possible.

The local County Sheriff's office. Call 911 or the non-emergency line to dispatch of that county. Most hikers, hunters, land owners or citizens will call the sheriff's office first if they find a lost pack stock animal.

The state's Department of Fish and Game or Fish.

The local land management agency responsible for the area where the packgoat was lost. (Forest Service/BLM/DNR).

Post information, including photos if available, at convenience stores, trail heads and camp grounds with owners contact information, goat and gear descriptions.

Contact the North American Pack Goat Association (NAPgA) to report the loss. NAPgA will maintain a documentation file on all lost pack goats. NAPgA will request an initial report as well as an after-action report from the packgoat's owner/user. The information will be used for documentation as well as continued training and educational awareness training for pack goat users.

Contact the North American Pack Goat Association (NAPgA) to report the loss. NAPgA will maintain a documentation file on all lost pack goats. NAPgA will request an initial report as well as an after-action report from the packgoat's owner/user. The information will be used for documentation as well as continued training and educational awareness training for pack goat users.

BMP#5: Leave No Trace

Leave No Trace principles are strongly encouraged.

Leave No Trace principles are found on this website: <https://Int.org/learn/7-principles>

* Enforcement of the Plan

Enforcement of any policy or regulation can be extremely difficult for any agency when enforcement personnel and resources are limited. The Forest Service does not have sufficient manpower or law enforcement officer staffing to adequately cover the hundreds of square miles within Custer Gallatin National Forest. It is unreasonable and cost prohibitive to expect two or three enforcement officers to police such an issue as pack goat's. They have more important issues to be addressing. Creating a policy that allows continued use of recreational pack goats on the forest with mitigation factors far outweighs a complete closure or ban. Every state in this country issues a driver's license to those individuals who are qualified to safely drive a motor vehicle on our streets and highways. Those that are licensed can drive from state to state. We have laws that govern the use of our public highways and we expect those that use our roads and highways drive clean and sober and obey all traffic laws. We need to do the same thing with goat packing.

The implementation of simple permit system gives all users the opportunity to continue to use pack goats on the national forest in an extremely safe and responsible manner. The pack goat community is very small and consists of very responsible people from all walks of life and different backgrounds. Compliance with a simple stock use permit system would be extremely high and I would anticipate 100 % compliance. If we give folks a

permit (A License) to pilot their pack goats on the national forest responsibly, the response and compliance will be overwhelmingly positive. The pack goat community cares about Bighorn Sheep and all wildlife and they are very eager and positive about collaborating with agencies to reach sensible solutions that will keep wildlife safe and ultimately keep recreational Goatpacking open on public lands.

Conclusion: In order to prevent further litigation, unnecessary legal action or suits, the Forest Service must consider all current and best available science in making a final decision on this issue. Building positive relationships and collaborating with organizations such as the Wild Sheep Foundation, The Rocky Mountain Goat Alliance Group, Bighorn Sheep working groups, Fish and Wildlife agencies and The North American Pack Goat Association is critical. These trusted relationships will foster and pave the way for progress and enhanced wildlife management. It is critical that only best available peer group reviewed science be used as a guide in making wise intelligent decisions for the forest plan. Please consider the following points in finalizing the forest plan that pertains to the use of pack goats in CUSTER GALLATIN NATIONAL FOREST.

- * Consider not allowing commercial goat packing on the National Forest.
- * Consider modifying the dates or season that permits would be issued to pack goat users to reduce contact or disturbance with Wild Sheep during the kidding / lambing season and the fall rutting season. Example -permits issued only between June 20th through November 10th of each year.
- * Consider working closely with other organizations to implement and simplify the permitting system and health certificate procedures.
- * Consider posting information about pack goats and disease transmission awareness at trailheads and parking lots that are commonly used by hikers and recreational Goat packers. Education and awareness is the key to the safety of all our wildlife.
- * Consider limiting the use of pack goats to four goats per person with a maximum of 12 goats in a party.
- * Consider permitting only castrated male goats (Wethers) to be used as recreational pack goats on the National Forest.

Thank you for reviewing and taking into consideration the above comments for implementing the use of recreational pack goats on the CUSTER GALLATIN national Forest.

Sincerely

Curtis King