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Comments:

I wish to comment on the Custer Gallatin National Forest Draft Revised Forest Plan and DEIS.

I believe the entire Custer Gallatin should remain open to packgoats in its entirety and that packgoats should be regulated like any other packstock.

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."

When will this "risk assessment" be completed? What are the methods that will be used? Will the risk assessment be quantitative or qualitative? Who will do the risk assessment and what are their professional qualifications to perform one? What will the decision criteria be? Will members of the packgoat community be solicited to be subject matter experts during the risk assessment process?

The North American Packgoat Association (NAPgA) is the leading organization in making recommendations on how to safely recreate with packgoats around bighorn sheep habitat. As a Board Member of the NAPgA I am willing to serve as a Subject Matter Expert, when analyzing the risk of packgoats contacting and passing diseases to big horn sheep.

The complete lack of relevant research regarding *M. ovipneumoniae* prevalence in packgoats lead NAPgA to contact the USDA - Agricultural Research Unit - Animal Disease Research Unit (ARDU) in December of 2015. ARDU and APHIS (Animal and Plant Health Inspection Service) developed a packgoat *M. ovipneumoniae* surveillance research project. Samples were tested by both ARDU and the Washington Animal Disease Diagnostic Laboratory (WADDL). Results from both laboratories provided sufficient and valid evidence as to the very low prevalence of *M. ovipneumoniae* in packgoats.

NAPgA created a list of Best Management Practices (BMP's) for goatpackers. The use of the BMP's in bighorn sheep habitat will result in no contact with bighorn sheep. I am willing to serve as a Subject Matter Expert concerning the use and implementation of the BMP's.

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 most current best available science has shown packgoats present a negligible risk to big horn sheep. Packgoats should be permitted in the entire Custer Gallatin NF without restrictions and should be treated the same as other packstock.