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First name: James

Last name: Conner

Organization:

Title:

Official Representative/Member Indicator:

Address1: 472 Lower Deep Creek Rd

Address2:

City: Townsend

State: MT

Province/Region: MT

Zip/Postal Code: 59644

Country: United States

Email: jcbowstring@hotmail.com

Phone: 4062023369

Comments:

I am writing to comment on elements of the Draft Revised Forest Plan for Custer Gallatin which pertain to the use of pack goats. Alternatives B, C, and D listed under the Suitability section (FW-OBJ-REC) would prohibit the use of pack goats on all or significant portions of the Custer Gallatin National forest.

The apparent motivation for prohibiting pack goats is to minimize the risk of disease transmission from domestic sheep and goats to bighorn sheep.

Lumping pack goats into the same category of sheep is like comparing apples to oranges. Most people take 2 to 6 packgoats at a time into the backcountry, and are "low impact" due to short stays, whereas sheep are usually grazed for long periods of time in an area. Packgoat users maintain control of their animals at all times and avoid bighorn sheep and areas bighorns frequent.

Unlike sheep, pack goats are not left to graze on public lands unmonitored. They are always kept close and under control, as they are pack animals carrying gear. At night, I secure them to a sturdy tree with a leash giving them just enough so they can stand and lay down. When grazing during the day, they are always under my supervision. If I am worried that they will graze away, I secure the one or two "leaders" with highline so they can graze, as the others will not leave their side. A good packgoat is expensive due to cost and time spent and it does no good to the user to "lose" them or keep them in poor health.

Pack goats are used as a pack animal, similar to a horse or llama, and they receive timely vaccinations to ensure they are healthy and to prevent disease. I currently follow the Best Management Practices suggested by North American Packgoat Association (NAPgA) <https://www.napga.org/resources/best-management-practices-psr/> as well as common sense.

I realize there is concern of Bighorn Sheep contacting *Mycoplasma ovipneumoniae* (movi) from sheep and packgoats. As discussed above, packgoats are quite different from sheep and the likelihood of transmitting disease from packgoats is very low. There are numerous studies that show that goats are less likely to transmit disease to Bighorn sheep than domestic sheep. Goats and sheep are different and there are studies showing that goats do not carry the same MOVI as sheep (Besser TE, Cassirer EF, Potter KA, Foreyt WJ. Exposure of bighorn sheep to domestic goats colonized with *Mycoplasma ovipneumoniae* induces sub-lethal pneumonia. PLoS One. 2017 Jun 7). While goats and sheep can carry the movi bacteria, the strain of movi carried by goats was found to be less harmful to bighorn sheep. In this study none of the bighorn sheep died.

Additionally, the Montana FWP has conducted a study on domestic sheep, domestic goats, horses and cattle and their ability to transmit disease to Bighorn Sheep, found at <http://fwp.mt.gov/fwpDoc.html?id=81875>. Domestic goats had a potential transmission similar to cattle (11 to 12%), while sheep had a transmission rate to bighorns of 95%.

In summary, domestic sheep and goats should not be grouped together as sheep pose a much higher risk to Bighorn sheep than goats do. Goats are similar to cattle in their low ability to transmit (low). I urge you to allow the use of packgoats, when used with the Best Management Practices recommended by NAPgA and when tied up at night to ensure they are under control and would not wander off. Allowing the use of packgoats

(Alternative E) supports good management and allows those backcountry users that to carry heavy loads and visit remote areas, especially if they are getting older or have back issues.

Sincerely,

J.J. Conner  
472 Lower Deep Creek Rd.  
Townsend, MT 59644  
406-202-3369