

Date submitted (Mountain Standard Time): 6/5/2019 2:00:22 PM

First name: Justin

Last name: Starck

Organization:

Title:

Official Representative/Member Indicator:

Address1: 121 Rustic Hills Road West

Address2:

City: Rozet

State: WY

Province/Region: WY

Zip/Postal Code: 82727

Country: United States

Email: starckjustin@yahoo.com

Phone: 3073408183

Comments:

This letter in regards to the Draft Revised Forest Plan - Custer Gallatin National Forest. The proposed regulations concerning pack goats are my greatest concern. Only alternatives that allow pack goat use should be considered until it is proven that pack goats are a threat to wild, bighorn sheep populations.

#### 2.4.15 General Recreation (REC)

##### Suitability

Alternative E for the recreational use of pack goats forest-wide is the only alternative that should be considered. As explained below in the "latest available science/studies" section pack goats are not a threat to bighorn sheep and they help achieve the desired conditions with respect to recreation especially with increased opportunities for family recreation and being a lower impact stock option.

#### 2.4.25 Recreation Opportunities - Outfitter Guides (RECOG)

##### Standards (FW-STD-RECOG)

Only alternatives that allow the use of pack goats should be considered. As indicated below in the "latest available science/studies" section goats and especially pack goats are not a concern for disease transmission to bighorn sheep. The North America Pack Goat Association has procedures included in their Best Management Practices for what should be done in the instance of a lost pack goat, reducing the likelihood of contact with all wildlife; this could be used as a reference for the permit instructions. If health testing or screening makes the difference between allowing access and restricting access then pack goat users should be given that option as long as the tests are directly related to risks to wildlife as proven by the latest available science.

##### Latest Available Science/Studies

The latest available science I have reviewed has not shown that goats are a threat to bighorn sheep; especially with respect to *Mycoplasma ovipneumoniae* (M.ovi) and its link to pneumonia outbreaks; the main health concern when it comes to wild sheep. Domestic sheep and goats have been lumped together when it comes to this issue, but research has shown that they are very, very different.

Studies comingling domestic sheep and bighorn sheep have had devastating results with very high fatality (~95%). It makes sense to do what we can to keep domestic sheep and bighorn sheep from having contact. Studies with goats have had very different results. Even when M.ovi positive goats were comingling with bighorn sheep, the bighorn sheep did not get pneumonia or die (Besser-WSU, 2012 & 2016). I understand there has been a domestic goat/bighorn sheep comingling study that resulted in the death of a bighorn sheep. However, when you look at all of the comingling studies done, domestic goat studies have had comparable death rates to the horse and cattle studies (Goats-12.5%, Horse-17%, Cattle-11%). (Foreyt-1982, 1989, 1990, 1994, 1996, 1998, 2009; Onderka-1988; Besser-2012, 2016).

Furthermore, with recent discoveries of M.ovi carried non-sheep/goat species also needs to be considered. M.ovi has been found in caribou and moose as discovered by the Alaska Department of Fish and Game in a

June 15, 2018 press release. Another June 15, 2018 press release but by the Wild Sheep Foundation sited discovery of M.o.vi in deer, bison, moose and caribou. There is no evidence that goats are any more of a threat to bighorn sheep than any of these other ungulates.

#### Conclusion

In closing, pack goats are a negligible risk to bighorn sheep populations when you consider the minimal risk indicated by the latest available science coupled with the nature of pack goats, health inspections and some simple backcountry handling practices. I wouldn't have pack goats if that wasn't the case. I appreciate you taking the time to consider my comments. I hope wildlife and land managers can reach an agreement with pack goat users.