

USDA Forest Service
Attn: Objection Reviewing Officer
EMC, Mailstop 1104
1400 Independence Ave., SW
Washington, D.C. 20250

Subject: Notice of Objection: Use of Sheep, Goats and Pack Goats EIS / Shoshone National Forest

I vehemently object to the decision of the Forest Service to ban packgoats from such massive swaths of backcountry in the Shoshone National Forest. While I don't have the time or energy to respond to the substantial body of flaws and issues within the Forest Service's FEIS and RADT, I have carefully reviewed the content, and have also continued to research this issue and discussed it at length with many other sportspeople. For the sake of submitting some form of objection to this injustice, I'll briefly cover four main points below.

First, I would refer you to the comprehensive response written by NAPGA's attorney, Andy Irvine. I believe he has addressed the bulk of the flaws, omissions, and other failures within the FEIS and RADT. I fully agree with his response.

Second, the Forest Service's treatment of packgoats is inconsistent with the treatment of other domestic animals and runs contrary to the currently available science. Contrary to the available science, the Record of Decision allows existing domestic sheep allotments to continue unaltered. Contrary to available science, packgoats have been banned, when all information available shows that risk of disease transmission from packgoats to BHS is negligible or nonexistent. Further, the Forest Service completely ignores the substantially equal risk posed by horses and cows in or near core BHS habitat.

Third, I object to the Forest Service's preferential treatment of the available science, as well as making decisions on the basis of fears, suspicions, and beliefs. Studies with tiny sample sizes have been relied upon when they support the packgoat ban, while in the DRAFT Record of Decision, Dr. Highland's study is downplayed as "emerging", while it had by far the largest sample size in any relevant study. Numerous statements in the documents reveal what many of us already knew: that without the ability to prop up their actions with faulty science, the Forest Service would have nothing left to fall back on but personal opinions.

Last, I object to the disproportionately puny concession made to allow packgoats in the Shoshone Forest, relative to the sizable area that is being banned. Goatpackers are willing to follow your recommended best practices and permitting process, give us back another tier of BHS habitat to recreate in. We'll recreate responsibly with what we have and stay out of the rest.

Thank you for the opportunity to comment.

Sincerely,

Matt Lyon