

July 27, 2019

Justin Starck
121 Rustic Hills Rd. W.
Rozet, WY 82727

Jerry Krueger, Acting Forest Supervisor
2250 South Main Street
Delta, CO 81416

RE: Grand Mesa, Uncompahgre, and Gunnison National Forests Draft Revised Land Management Plan

Dear Forest Plan Revision Team:

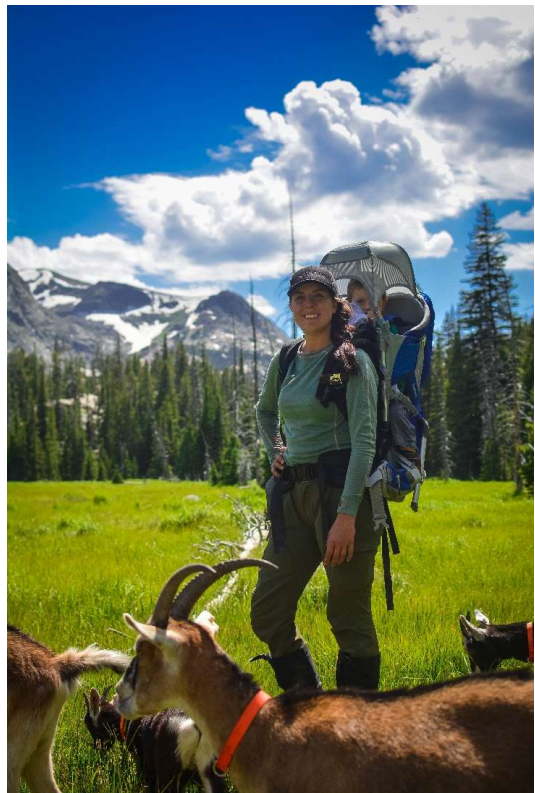
This letter in regards to the Grand Mesa, Uncompahgre, and Gunnison National Forests Draft Revised Management Plan. The proposed regulations concerning pack goats are my greatest concern. Only alternatives that allow pack goat use should be considered until it is proven that pack goats are a threat to wild, bighorn sheep populations. Not only that, I think “packing goats” is an activity that should be listed as one of the Public Enjoyment recreational activities.

Public Enjoyment

I would like to see “goat packing” included in the list of recreational activities. We got into pack goats so that we could continue “backpacking” after we had kids. We wanted to share those experiences with our kids and expose them to the backcountry we love. Pack goats have allowed us to do that in a safer, lower impact way than other stock animals.

FW-STND-SPEC-16

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 pathogen transmission to bighorn sheep. “Effective separation” as suggested in the draft plan is not supported by the best available science. Pack goats have been singled out among the pack stock animals due to a false assumption that sheep and goats can be lumped together when it comes to pathogen transmission. The commingling studies show that sheep and goats are not equal, and do not suggest that pack goats are any more of a threat than horses.



Even though science has not shown that pack goats are a proven threat to bighorn sheep, “effective separation” is maintained by pack goat users due to the nature of pack goats and best management practices while using them in the backcountry. Unlike any other pack animal, pack goats are bonded to their human. They will not leave you like other pack animals so it is very uncommon to for a pack goat to be separated from their handler. Best management practices as suggested by the North America Packgoat Association further reduce the likelihood of contact with wildlife.

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 it’s 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 Movi positive goats were comingled 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.ovi 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, heath 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.

Sincerely,

Justin Starck