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**COLORADO**  
**HOUSE OF REPRESENTATIVES**  
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Denver  
80203

July 27, 2019

Grand Mesa, Uncompahgre, &  
Gunnison National Forrest  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO 81416

VIA email: gmugforestplan@fs.fed.us

RE: Feedback on Working Draft of the Forest Plan

Dears Sirs:

Having reviewed the Working Draft of the Forest Plan for the GMUG, my office felt compelled to submit comments or feedback regarding two proposed rules, namely: FW-STND-SPEC-16 and FW-STND-SPEC-15.

Under proposed rule FW-STND-SPEC-16, recreational pack goats would be prohibited in habitat occupied by bighorn sheep. There are several reasons my office is against this rule, but number one; it conflicts with FW-STND-SPEC-15. Under proposed rule FW-STND-SPEC-15, active grazing allotments are allowed for domestic sheep in habitat occupied by bighorn sheep. The rule goes on to have specific temporal and spatial separation elements between domestic and bighorn sheep. While sheep and goats are each a distinct species and genus, there is a lack of parity between the two rules. Recreational pack goats will be kept together, very close to the owner or possessor. Conversely, sheep in an allotment are much more likely to be away from the herder. There could be parity if rule FW-STND-SPEC-16 was not a prohibition, but instead had the same temporal and spatial separation language as rule FW-STND-SPEC-15.

Pack goats are a means for some hunters and hikers to be able to enjoy our public lands and national forest. To prohibit pack goats in regions occupied by bighorn sheep is to effectively ban them from 1/3 of the Grand Mesa, Uncompahgre, and Gunnison National Forest. Additionally, a pack goat used for hunting is going to be in habitat where a bighorn sheep may be found.

The underlying reason for a ban is disease transmission from domestic pack goats to bighorn sheep. The risk of contact is what most pack goat handlers see as almost zero risk. For starters, pack goats are usually strings of ten animals or less, who are bonded to their handlers and castrated males. The animals are escorted by a human, that bighorn sheep are afraid of and rarely more than 50 feet away from the goats. Being castrated, the goats have less urge to investigate the bighorns and put off less scent that the bighorns are inclined to be attracted to.

The risk of contact is virtually zero percent by nature of the standard practices. However, there is a list of best management practices to help further reduce issues. Among the more relevant issues to bighorn separation is tethering at night. This is done mostly with predation in mind, but also to prevent wandering by the pack stock. Additionally, bighorn sheep, unlike deer and elk, are relatively inactive at night and not likely to come into an occupied campsite.

Regarding the risk of disease transmission, a voluntary testing program for *pasturella pneumonia* and *mycoplasma ovipneumoniae* showed very low rates of the presence of these two pathogens. Only 3% of packing age goats tested positive for any level of these pathogens. When you add in the fact that pack goat strings are very small, and their owners do not want to take a sick goat on a recreational pack trip, it's even less likely. Lastly, these animals are cared for in very different means and any visibly sick animal would receive treatment if it wasn't culled. The same cannot be said about rearing large flocks of domestic sheep on public lands.

My recommendation is that rule FW-STND-SPEC-16 be rewritten to allow pack goats, with rules for temporal and spatial separation.

Please feel free to contact my office for additional feedback as you go through the rule making process.

Best regards,



Matthew Soper