

## Interested Person Request

I would like to participate as an interested person in the objection resolution discussions for one or more of the identified objection issues for the Custer Gallatin National Forest 2020 Land Management Plan or the regional forester's list of species of conservation concern (SCC).

Name: Theresa Mercer

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Name of lead interested person (if more than one): \_\_\_\_\_

**I am interested in participating in any resolution discussions between the objector(s) and the reviewing official for the following objection issues:**

My objection applies to the following restrictions on use of pack goats without a justification derived from best available science, or a properly conducted and peer reviewed Risk Assessment, specific to the Project Area.

- Goats are once again lumped in with sheep in the language. Sheep and goats are not the same species and should not be treated as such. Packgoats are mentioned separately from "sheep and goats" in most instances, however, they are still lumped in with "sheep and goats" when it comes to disease transmission.
- The risk assessment is flawed. The risk assessment uses faulty science by not analyzing packgoats separately or including the North American Packgoat Association's Best Management Practices.
- Failure to distinguish between risk of contact and risk of disease transmission during the risk assessment process.
- Faulty science is cited regarding packgoat use, including the Western Association of Fish and Wildlife Association (WAFWA) 2012 Recommendations for Domestic Sheep and Goats Management in Wild Sheep Habitat and studies by Besser et al. 2013 and Cassirer et al. 2017.
- Members of the packgoat community were not consulted when preparing a risk assessment, even though they requested to be "Subject Matter Experts" during the process.
- Packgoat use should not be limited to arbitrary dates. How and why was June 20<sup>th</sup> determined? Hunting season, where packgoats are used to carry out game, occurs beyond October 31<sup>st</sup>. Packgoats should not be eliminated from use for packing game.
- There should be no set limit on the number of packgoats per person or the total number of packgoats in a party.

**Please provide a brief explanation of your interest in the objection(s) and any specific concern(s), including a description of your support or opposition to the objection(s):**

The Custer-Gallatin 2020 Management Plan needs to address the following issues:

- Include Best Management Practices developed by the North American Packgoat Association (NAPgA) to mitigate and minimize risk of contact between packgoats and bighorn sheep.
- Develop a risk assessment model that incorporates the Best Management Practices, that objectively demonstrates the lowered risk of contact between packgoats and bighorn sheep.
- Provide documentation that determines whether existing risk assessments are adequate. Perform a new risk assessment specific to the Project Area and provide an opportunity for peer review, or allow the pack goat community to act as "Subject Matter Experts" that can provide reliable information and input to the risk assessment process.

**Please identify when you commented during the planning process (scoping, draft EIS, and/or final EIS):**

April 9, 2019

Signature: \_\_\_\_\_

*Meresa Mercer*