

December 23, 2019

Nez Perce-Clearwater National Forests

Attn: Zach Peterson, Forest Planner

903 3<sup>rd</sup> Street

Kamiah, ID 83536

Dear Mr. Peterson,

I wish to comment on the Nez Perce-Clearwater National Forest draft revised forest plan and draft environmental impact statement (DEIS).

I believe the entire Nez Perce-Clearwater National Forests should remain open to packgoats without restrictions.

I am a senior citizen and avid outdoorsman. I can no longer carry a backpack. My packgoats carry my gear for me. They are easy to manage and control on the trail, in camp and just the right size for me.

The most recent and best available science is a study conducted in 2016 by the USDA-ARS-ADRU with duplicate study samples tested by the Washington Animal Disease Diagnostic Lab (WADDL). This study tested 576 goats from 83 premises for *M. ovipneumoniae*. 419 of the tested goats are packgoats with the additional 157 being goats housed on the same premises as the packgoats. It is the most comprehensive study of packgoat health to date. The results overwhelming show packgoats present little risk to bighorn sheep. This best available science study should be used to permit packgoat use, without restrictions, in the entire Nez Perce-Clearwater National Forests.

Dr. Tom Besser, the Chair for the Wild Sheep Disease Research Unit at Washington State University, stated the following: "pack goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies" (Wild Sheep Foundation Newsletter, Summer 2016).

Packgoats are not "just another goat." Packgoat are athletes. They are a long-term investment of time and money. They are 4 years old before they can carry a full load. During the time from birth to 4 years of age hundreds of hours are spent training a packgoat to do its job. Packgoats must receive proper feed, vaccinations, hoof care, body conditioning and be provided with fresh water and shelter. They must learn the skills that will make them an excellent packgoat when they are of age.

A sickly, malnourished or untrained goat cannot fulfill the role needed to carry gear for any length of time or distance and would be worthless as a packgoat. Packgoats must be healthy trained athletes on the trail who can cover great distances over varied terrain under all conditions.

The North American Packgoat Association has written a list of Best Management Practices (BMP's) for goatpackers. The use of the BMP in bighorn sheep habitat will result in bighorn sheep being at low-to very-low risk for any potential disease. The BMP's can be found on the NAPgA website: <https://www.napga.org/resources/best-management-practices-psr/>

The DEIS states, "*The primary reason the bighorn declined is due to their susceptibility to pneumonia after exposure to bacteria (Pasteurella spp.), viruses (Parainfluenza type-3), lungworm, and stress agents. Sources of these diseases are generally domestic sheep and goats. Major reductions or total extirpation of bighorn herds due to pneumonia outbreaks are well documented.*"

The North American Packgoat Association (NAPgA) is the leading organization in making recommendations on how to safely recreate with packgoats in and around bighorn sheep habitat. As a Board Member of the NAPgA, I am willing to serve as a Subject Matter Expert, when analyzing the risk of packgoats contacting and passing diseases to big horn sheep.

NAPgA created a list of Best Management Practices (BMP's) for goatpackers. The use of the BMP's in bighorn sheep habitat will result in no contact with bighorn sheep. I am willing to serve as a Subject Matter Expert concerning the use and implementation of the BMP's.

*Bighorn in the planning area have survived when other regional populations have been reduced or extirpated. This, coupled with the fact that domestic sheep grazing on the Nez Perce-Clearwater has been ongoing for centuries, make these populations of bighorn particularly interesting. In fact, individuals of this population have served as the source for other bighorn re-introductions around the west (Mack, Kasprzak, & Luiz, 2017)."*

Because bighorns in this planning area have survived for centuries when other populations have not there is no reason to now react with fear that "the sky is falling."

All alternatives permit livestock grazing in all areas except developed recreational sites and administrative sites. All alternatives should also permit goatpacking without restrictions.

Sincerely,

Theresa Mercer

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