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Organization:

Title:

Comments: Received at 7:08 PM MST

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

The RADT still contains language implicating pack goats as disease carriers responsible for Bighorn die-offs without solid substantiating scientific evidence, instead citing unrelated studies and opinion as scientific fact to support an erroneous conclusion.

Faulty "science" i.e. misinformation and opinion should not be inaccurately represented as best available scientific evidence in the RADT, as this can have far reaching negative consequences should other National Forests base their decisions on this.

Specifically

1. The Shoshone NF must remove statements in the Final RADT report indicating that pack goats and Bighorn sheep are somehow attracted to each other and/or that there is an increased probability of contact between the species, as such statements are unsupported as follows:

Ex: Drew (2014) did NOT find "that contact between bighorn sheep and domestic sheep and goats was weakly associated with the bighorn sheep rut and estrus in domestic species" as the Shoshone NF's RADT language states. In fact Drew found the exact opposite in this quote from his study: "contact with domestic sheep or goats did not correlate with either the bighorn breeding season or estrus in the domestic species."

Ex: Wehausen (2011) - this study was only for domestic sheep, not goats - so this study cannot be used to substantiate any conclusions about purported "attraction" between pack goats and Bighorn and in fact does not make any conclusions about this.

Ex: Foreyt/Lagerquist (1996) - this study was on cattle, not goats and again there is no evidence in this study supporting a purported "attraction" between pack goats and Bighorn.

2. Shoshone NF cannot cite Coggins (2002) as scientific evidence of contact/disease transmission. This was not a scientific study, it is an opinion paper and merely quotes a DFW staff member's beliefs and suppositions. Coggins himself qualifies his statements with verbiage such as "cause and effect evidence is admittedly lacking", "proof of contact is lacking," etc.

3. Besser (2017) - the Shoshone NF cannot rely upon Dr. Besser's erroneous conclusions concerning pneumonia in bighorn sheep from experiment 3, as the actual data in the study from the Washington Animal Disease Diagnostic Laboratory (histopathology report-WADDL#2015-7604) has NO diagnosis of pneumonia. It's a head-scratcher as to how he arrived at that conclusion from this data point. One correction has already been published for this flawed study, I'm pretty sure we'll see more - or a complete retraction.

Sincerely,

Kathy Cropp