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Title:

Comments: I object to the heavy reliance on Dr. Tom Besser's latest research on Bighorn Sheep and goats (2017) and all the inconsistencies within the study and his inaccurate observations (see NAPgA objections). Especially disturbing is when he describes the bighorns (that he killed when they were getting better) as having pasturella lessons. After the histology (lab) work was done, the bighorn sheep were shown not to have pasturella. This information was obtained from Washington State University. For somebody involved in bighorn sheep research for as many years as he has been and to make a misdiagnosis as basic as that would seem to be deliberate.

The other research study that is the most current is the one done by Maggie Highland a USDA veterinary researcher. In that study 99.47% of packgoats (500 or so) that are of a packable age (3 or more years old) were free from MOVI. This research was brushed aside as not being significant enough.

Even Dr. Tom Besser the chair for the wild sheep disease research unit at W.S.U. stated "I believe that M. ovipneumoniae (MOVI) test-negative at 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) The other research that was missing was the testing of the Whiskey Mountain bighorn sheep heard on January 12 and 13th of 2012. The testing was by Wyoming game and fish in conjunction with the wild sheep foundation. In this testing nearly 30% of the bighorn sheep carried the MOVI bacteria along with several others. This data could easily be obtained from the Wyoming game and fish. It has since been removed from the website (bighorn.org) since the objection period.

By letting the public know that almost 30% of the bighorn sheep already have the MOVI bacteria would be counter to the argument that we can't let goats in because they will give MOVI to the bighorn sheep. Will cattle be kept the same distance from the bighorns as goats even there are several studies that show that cattle have given MOVI to bighorns.

I didn't see anywhere that other wildlife were even considered as possible carriers of MOVI.

There was no percent for risk of transmission in the RADT, other assuming that it is 100% if they are in close proximity.

If the goats don't have it how can they transmit it?

The permit system is vague and can effectively eliminate any use due to expensive and unnecessary testing.

To date there has not been a published pneumonia outbreak in the silver bell bighorn herd in New Mexico where more than a 1000 brush goats were left to mingle with them. They did transfer pink eye but that would be easy for a veterinarian to recognize during a routine health certificate inspection that should be required.

Thank you

Kent Daniels