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First name: Curtis

Last name: King

Organization: North American Packgoat Assoc.

Title: President

Comments: To: 'objections-chief@fs.fed.us' objections-chief@fs.fed.us

Subject: Objection regarding the forest plan restricting the use of Pack Goats on the Ashley

National Forest.

From: Curtis King

509-539-0982 curtis.king66@yahoo.com

Dear Objections Coordinator or reviewing officer.

On behalf of the North American Packgoat Association and the Packgoat community I hereby express our objection to all proposals to remove recreational pack goat use on the Ashley National Forest.

During the comments period of this forest plan NAPgA was not notified that there would be any changes to the forest plan that would ban or restrict the use of pack goats on portions of the Ashley NF. NAPgA and members of the pack goat community as well as numerous pack goat users that reside in the state of CO were not notified or even made aware of any forest plan proposals to remove or ban recreation goat packing.

I believe that the regional forester overseeing this forest plan would agree that the pack goat community would have a strong interest in this proposal to remove pack goats from the Ashley NF. NAPgA and members of the pack goat community were actively involved in the comments and objections periods that took place on the Shoshone NF in Wyoming as well as the Grand Mesa, Uncompahgre, and Gunnison National Forest plans in Colorado on the use of pack goats.

The North American Packgoat Association is alarmed and concerned any language in the current proposal to eliminate recreational goat packing in any portions of the Ashley NF.

NAPgA strongly endorses and recommends that the Ashley NF remain open to the use of pack goats. NAPgA also endorses and would insist that the use of pack goats be permanently added to the list of recreational activities on the current Land Management Plan.

The pack goat community has numerous members currently from the state of Utah and surrounding states that are using pack goats on these forest lands for hiking, recreation and hunting with their pack goats.

The pack goat community has been using pack goats in the Western United States since the early 1970's. The use of recreational pack goats has increased rapidly in the past thirty years and continues to grow. Since its inception in 1999 the North American Packgoat Association has been increasingly involved in the proper use of and education and awareness issues pertaining to conservation and wildlife.

There has NEVER been a bighorn sheep die-off or disease/ pathogen transmission to wildlife involving a pack goat. To date there has not been a single scientific study implicating pack goats in bighorn sheep die-offs. Dr. Tom Besser, a recent Chair for the Rocky Crater Wild Sheep Foundation Disease Research Unit at Washington State University, cited the following: "I believe that 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 land policies" (Wild Sheep Foundation Newsletter, Summer 2016). Dr. Besser also in a recent pen study at WSU commingled domestic goats with bighorn sheep for one- hundred days without any deaths illness or pathogen transmission. Goat M-ovi and Sheep M-ovi are completely different strains.

In 2016 the pack goat community participated in a pack goat study conducted by Dr. M. Highland USDA ARDU. In this study samples were obtained from 575 pack goats from 83 different premises throughout the western United States. Samples were tested by both USDA ARDU and the Washington Animal Disease Diagnostic Laboratory (WADDL) in Pullman WA. Results from both laboratories provided sufficient and valid evidence as to the extremely low prevalence of M-ovi in pack goats. The result of this study clearly indicated that over 97 % of the adult pack goats tested in this study were M-ovi negative. The M-ovi that was detected in this study was found in kid goats that were less than six months of age and were most likely shedding the pathogen.

Pack goats are extremely well bonded to their owners and extensive care and Goat Husbandry goes into their raising, keeping and training to be used as pack stock animals. Most pack goat owner keep less than twelve pack goats on their property resulting in healthy disease -free animals. Pack goats are not brush clearing goats and should not be placed in the same category. Further, wool Sheep and domestic pack goats are completely different species and should not be lumped together in the same category when making land management decisions. Pack Goat are not Sheep.

The North American Pack Goat Association would like to strongly encourage the Forest Service, Game and Fish agencies, Biologists and Wild Sheep organizations to collaborate with NAPgA and further look to and adopt our Best Management Practices when making land and wildlife management decisions. Please contact NAPgA as a source to promote education and awareness to keeping wildlife safe.

NAPgA encourages and will strive to work -collaborate with the Forest Service to find common ground solutions for the continued use of recreational pack goat use on public lands. We ask that you remove the pack goat ban from the proposed draft plan. There is absolutely no justification or current available science to support a ban on

pack goats.

Sincerely

Curtis King

President, North American Packgoat Association

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