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First name: Chris
Last name: Gifford
Organization: North American Packgoat Association
Title: President
Comments: Dear Forest Supervisor and Forest Planning Team:

My name is Chris Gifford and I am the current President of the North American Packgoat Association ("NAPgA"). I am an interested person for the Gila National Forest's Public Review and Objection Period regarding the July 2024 Draft Revised Land Management Plan (the "Draft Plan"). Please consider this document as NAPgA's formal objection to the Draft Plan.

NAPgA respectfully requests that the members of this Forest Plan Revision Team refer to the Grand Mesa Uncompahgre and Gunnison (GMUG) National Forest Plan which was finalized in June 2024 and include similar language related to packgoats in the final revised Gila National Forest Plan. The relevant portions of the GMUG Final Forest Plan related to recreational packgoats are as follows:

Guidelines
FW-MA-SPEC-16.f: Coordinate with recreational pack goat user groups to educate (the) public about best practices within bighorn sheep habitat, including but not limited to the following: When recreation pack goats are being used in bighorn sheep habitat, any direct contact with bighorn sheep should be prevented while on the trail and in campsites by (1) keeping pack goats under control at all times by the owner and (2) discouraging bighorn sheep from approaching domestic goats.

Management Approaches
FW-MA-IVSP-13: To increase awareness, educate partners and visitors of the potential risk of pathogen transmission to native plants and animals (e.g., recreation pack goats and bighorn sheep, the need to decontaminate wading boots to reduce spread of chytrid fungus or whirling disease.)

Members of the GMUG planning team met on numerous occasions with one or more of NAPgA's members, were introduced to the member's packgoats, and engaged in discussions with the member(s) to address specific concerns they and NAPgA have with the research frequently being relied upon by Forest Service personnel during their respective Forest Plan Revision processes.

NAPgA also encourages you to review the attached Final Environmental Impact Statement and Draft Forest Plan for the Nez Perce-Clearwater National Forests (November 2023) regarding recreational use of packgoats. In addition, please review the September 26, 2024 final written response to the species of conservation concern objections by the objection reviewing officer for the Nez Perce-Clearwater as it relates to recreational packgoat use. NAPgA requests that you incorporate forest plan policies for packgoats that are like those contained in the Nez Perce-Clearwater and/or GMUG when finalizing the Gila National Forest Plan.

Objections to Research Relied Upon

A."Exposure of bighorn sheep to domestic goats colonized with Mycoplasma ovipneumoniae induces sub-lethal pneumonia" (Besser, Cassirer, Potter, Foreyt), 2017, referred to hereafter as the "Besser Study."

NAPgA objects to the GILA NF Planning Team's reliance on the Besser Study to support the packgoat restrictions and permit requirement contained in the draft forest plan.

The very title of the Besser Study clearly states that exposure of bighorn sheep to domestic goats that have the Mycoplasma ovipneumoniae pathogen "induces sub-lethal pneumonia." The background information in the

Besser Study further states that while previous comingling studies with domestic sheep have resulted in nearly 100% pneumonia mortality, only sporadic occurrence of fatal pneumonia was reported from previous comingling studies with domestic goats. The conclusion of the Besser Study states that Mycoplasma ovipneumoniae strains carried by domestic goats were transmitted to comingled bighorn sheep, triggering development of pneumonia, however, the severity of the disease was markedly milder than that seen in similar experiments with domestic sheep strains of the bacterium. In both experiments where previously mycoplasma free bighorn sheep were comingled with mycoplasma positive domestic goats, the bighorn sheep started showing signs of pneumonia after 2-3 weeks but after 70 days of illness, both groups of bighorn sheep exhibited decreasing signs of respiratory tract disease. After 100 days of comingling, and (presumably) the continued improvement of clinical signs of pneumonia in the bighorn sheep, the bighorn sheep were euthanized. None of the bighorn sheep in the Besser Study died from pneumonia. The Besser Study does not support the notion that domestic goats, and packgoats in particular, pose a significant risk of causing mortality in wild bighorn sheep. Therefore, it cannot be relied upon to support the implementation of restrictions on the recreational use of packgoats on public/forest lands.

It is important to note that the comingling experiments involved previously wild bighorn sheep being held in captivity with domestic goats. These animals were housed together in the same pens, using the same shelters, shared the same feed sources and containers, water source and containers, loose minerals and containers, and were in constant direct daily contact for at least 100 days. Nevertheless, none of the bighorn sheep died due to pneumonia induced respiratory disease. In fact, the respiratory disease observed following experimental contact with domestic goats carrying Mycoplasma ovipneumoniae was "relatively mild, resulting in no fatalities." Again, the Besser Study does not support the conclusion that packgoats pose a significant risk of disease transmission to bighorn sheep which would result in bighorn sheep fatalities (ie: die-offs).

B."A Bighorn Sheep Die-off in Southern Colorado Involving a Pasteurellaceae Strain that May Have Originated from Syntopic Cattle" (Wolfe, Diamond, Spraker, et. al), 2010, hereinafter referred to as the "Colorado Study".

NAPgA objects to any reliance by the Forest Service on the Colorado Study to implement restrictions on recreational packgoat use. If this study demonstrates anything it is that there are multiple animal species, both wild and domestic, which can and do carry various types of mycoplasma bacteria which may pose a risk to bighorn sheep. Other domestic species such as horses and llamas which are used for packing do not appear to be subjected to special use permit requirements. It should also be noted that various types of mycoplasma bacteria have been detected in many wild animal species such as moose, caribou, mule deer, and white-tailed deer. See the attached Research Letter titled Mycoplasma ovipneumoniae in Wildlife Species beyond Subfamily Caprinae (Highland, Herndon, Bender, Hansen, Gerlach and Beckmen), 2018.

Restrictions on recreational packgoats without a packgoat specific risk analysis is not justified by the most recent and best available scientific research. NAPgA continues to support and is actively involved in the education of the public and recreational packgoat users regarding the importance of following NAPgA's Best Management Practices as the best way to mitigate risks of contact between packgoats and wild bighorn sheep and any potential risk of disease transmission. A copy of NAPgA's Best Management Practices are attached hereto for reference.

There has never been a documented case of pathogen transmission from a packgoat (not to be confused with domestic sheep or goats placed on grazing allotments or used for brush clearing purposes). NAPgA has always supported reasonable efforts to mitigate any potential risk of pathogen transmission between bighorn sheep and packgoats. It is important to note that a formal packgoat specific risk analysis related to disease transmission between packgoats and bighorn sheep has never been conducted. Instead, land managers including the Forest Service have continued to use the "Risk of Contact" model that was developed to assess the risk of contact between large herds of domestic sheep on grazing allotments and bighorn sheep. The "Risk of Contact" model related to domestic sheep on grazing allotments is entirely irrelevant and should not be used when assessing the

risk of pathogen transmission between bighorn sheep and packgoats. Domestic sheep on grazing allotments typically include 100's of domestic sheep that are typically allowed to free range on public land without any human control or supervision. On the other hand, packgoats are kept under direct human supervision and control, have collars and leashes attached to them, are high-lined/low-lined/tethered at night while in camp, and are typically limited to between 2-10 packgoats per human handler. We believe that a packgoat specific risk analysis is required under NEPA before restrictions on packgoats can be imposed.

The individuals and organizations that are opposed to the use of packgoats in or near Bighorn sheep habitat continue to ignore the most recent scientific research regarding Mycoplasma ovipneumoniae and the fact that a bighorn sheep disease outbreak and/or die-off has NEVER been traced to a packgoat. This is the best evidence that NAPgA and packgoat owners have been extremely successful at mitigating any potential risk of pathogen transmission. Those opposed to the use of packgoats on public lands are, without specifically stating it, insisting that "zero risk" is the only acceptable risk when it comes to Bighorn sheep. They do so even though they know and acknowledge that there is no such thing as "zero risk." It is far more likely that a foraying bighorn sheep will come into contact with domestic sheep or goats on private land or with domestic sheep on a grazing allotment than it is that a bighorn sheep will come into contact with a packgoat while under the control of its handler in bighorn sheep habitat. There is a forty plus year historical record of packgoat use on public lands in and around bighorn sheep habitat and yet there is not one documented case of pathogen transmission from a packgoat to bighorn sheep. The truth of the matter is that packgoat owners have been managing their use of packgoats to zero risk, or as close to zero risk as possible, for decades. NAPgA has and will continue to diligently strive to maintain this perfect record by teaching, promoting, and implementing our Best Management Practices.

Objection to Paragraph 5, of the Standards listed on page 223 of the draft plan:

This paragraph reads as follows: "Special-use permits authorizing domestic sheep and goats will not be issued with the following exception: special use permits authorizing recreational use of pack goats outside of bighorn sheep occupied range may be issued if the prospective permittee can demonstrate their animals have tested negative for pneumonia-causing pathogens, have been vaccinated against the pathogen, and are up to date with those vaccinations."

The North American Packgoat Association is strongly opposed to this entire section of the Plan.

A special use permit should never be required and is not justified for recreational packgoat use outside of bighorn sheep occupied range. A special use permit for recreational packgoat use where bighorn sheep are not present is completely unnecessary and unreasonably burdensome because the fact that bighorn sheep are not present eliminates the risk of contact and any potential risk of disease transmission between packgoats and bighorn sheep.

NAPgA also objects to a requirement that recreational goat packers obtain a special use permit to access any other portion of the Gila National Forest with their packgoats. Two of the three requirements for obtaining a special use permit for recreational packgoat use are impossible to achieve. Specifically, there is not a vaccine in existence that can be used to vaccinates goats against pneumonia-causing pathogens. It is impossible to vaccinate goats and/or keep them up to date on a vaccination for a pneumonia causing pathogen when no such vaccine exists.

Furthermore, the requirement that goat owners test their goats for the Mycoplasma ovipneumoniae pathogen lacks multiple crucial details regarding what would be required to obtain a special use permit. For example, how recent would a negative test result need to be? Would "pooled" testing of nasal swabs from multiple goats in one PCR test (ie: nasal swabs from up to 5 goats) be allowed? Would goat owners be able to collect the nasal swabs and submit them themselves or would they be required to have a veterinarian take and submit the nasal swabs? How far in advance of a planned trip would a packgoat owner need to submit a permit application? Would the

permit applicant be assessed a fee for the permit?

Each PCR test for Mycoplasma ovipneumoniae costs approximately $40 not including the cost of nasal swabs, any veterinarian fees, shipping costs, etc. The cost of conducting individual nasal swab tests for typical packgoat string of 4-6 animals would easily exceed $200. This places an unreasonable, arbitrary, and disproportionate burden upon recreational packgoat users to access national forest lands which are required to be managed for all members of the public and for all user groups.

Requiring packgoats to undergo Mycoplasma ovipneumoniae testing is an unreasonable and burdensome restriction considering research has shown there is an extremely low prevalence of Mycoplasma ovipneumoniae positive packgoats, there has never been a documented case of Mycoplasma ovipneumoniae pathogen transmission from a packgoat to bighorn sheep, and a packgoat specific risk analysis has never been conducted.

I would like to invite the Gila National Forest Supervisor and/or any member or members of the Planning Team, to contact me by e-mail or phone to discuss opportunities for the Forest Service to collaborate with NAPgA on this plan revision or any other questions or concerns related to the recreational use of packgoats.

Sincerely,

Chris Gifford, President
North American Packgoat Association
January 2023 - Present