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Organization:

Title:

Comments: Do not ban domestic sheep and goats from the Chugach National Forest. According to the Multiple Use Sustained Yield Act of 1960, the National Forest is set aside for timber, range, water, recreation and wildlife. These five major uses of national forests are contained in one law equally, with no use greater than any other. The act further dictates that these multiple uses shall be managed in a "harmonious and coordinated" manner "in the combination that will best meet the needs of the American people." Banning one of these user groups (particularly one that supplies food and fiber) is something that legally cannot be done without an act of Congress to re-write the existing law. Besides acting outside the designated parameters of Forest Service authority, this proposed change is unsupported by any environmental impact statement, study or data analysis that would indicate the logic in banning domestic sheep and goats, or any benefit to be gained by doing so.

This proposed ban is clearly an attempt to placate the demands of one organization whose agenda has also included in the past removing domestic sheep and goats from ADF&G's "Clean List", requiring permits and double fencing around livestock pens, and banning imports from the state. However, now that lab testing has been improved and older samples from frozen storage have been tested, it is evident that M. ovi has existed in Dall sheep, mountain goats, moose, and caribou for quite some time. Banning domestic goats from Chugach National Forest will do nothing to change this condition that may have been present for decades.

Many Alaskan sheep and goat breeders have already invested a great deal of time and money to participate in the state's M.ovi study, with a cumulative total of approximately 4% positive, which correlates closely to the percentage of positive animals identified when testing Dall sheep, mountain goats, moose, and caribou from around the state. Instead of penalizing responsible owners by banning all domestics, which will do nothing to stop the pathogen from spreading, please consider implementing a pack goat certification program such as has been done quite effectively in the lower 48 with NAPgA.

Even in the lower 48, small privately owned herds have never been implicated in the spread of M.ovi, it has always been assumed that it was the large commercial herds of many thousands of domestic sheep grazing on public lands that enabled the transmission of M. ovi to wild populations. The proposal to ban sheep and goats from CNF is no more than a knee-jerk reaction to a problem that exists elsewhere and has no bearing on Alaska, since there is no open-range grazing here.

Controlled groups of grazing goats have proven to be a "green" alternative to using machinery in controlling invasive weeds and reducing fuel loads that feed hazardous wildfires. Banning sheep & goats eliminates any potential future use of this resource by the Forest Service.

I urge you to make all decisions on the CNF based on science, not suspicion, and to abide by the terms of the 1960 Multiple Use Sustained Yield Act, under which all users of the Forest are of equal stature. Please, do not ban domestic sheep and goats from the Chugach National Forest!