

Data Submitted (UTC 11): 11/1/2018 7:00:01 AM

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Title:

Comments: NAPGA lawsuit in Shoshone Nat'l Forest makes allowance for clean tested pack goats, a "negligible risk" per Besser

(<https://www.napga.org/wp-content/uploads/2017/04/Andy-Irvine-Comments.pdf>)

EIS in Beaverhead-Deerlodge Nat'l forest determined no change needed to public lands grazing leases to protect reintroduced Big Horn herd.

https://www.bozemandailychronicle.com/news/environment/forest-service-won-t-change-forest-plan-after-analysis-of/article_9a09e1fb-ed4d-5f16-a144-7c483f62c89e.html

Detection is not infection.

Date of discovery is not date of entry.

(<https://dec.alaska.gov/media/7820/movi-presentation-highland-201708.pdf>)

Can't keep M. Ovi out with a pointless and harmful ban of domestics as it is already present.

Present domestics are not responsible for past introduction.

Present percentage of domestics testing positive is lower than present percentage of wilds testing positive.

<https://www.adfg.alaska.gov/index.cfm?adfg=hottopics.movi>

Therefore it is more likely for M. Ovi to be passed INTO the domestic population by a wild animal than OUT OF it.

M. Ovi free domestics pose no more threat than other hoof stock.

<http://www.jwildlifedis.org/doi/pdf/10.7589/0090-3558-48.1.168>

Current positive tests in wild populations are in areas where there are not currently domestics.

https://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2018_06_15

Past entry possible with Gold Rush Miner's pack stock (cart oxen, pack goats, pack horses), or import and reintroduction of Muskoxen from Norway to the Brooks Range, or reintroduced reindeer on the west coast.

M. Ovi is already in Alaska in wild populations of sheep, goat, musk ox, moose, and caribou.

It is impossible to separate these species from each other in the wild.

https://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2018_06_15

Only one documented caribou to succumb had juvenile starvation complication (born late) AND poly-microbial pneumonia. The rare perfect storm of beast-burden-bug.

Past introduction and uninterrupted natural course events, "Survival Of The Fittest" has likely already developed a disease resistant population in Alaska Dall Sheep unlike the interference into nature's strengthening process with the Big Horn.

The recommendation for M. ovi management going forward in the lower 48 is to salvage the 9/10 Disease Resistant Big Horn Ewes who test positive for antibodies, but negative for nasal shedding. Eliminating only the 1/10 shedding sheep. Versus the eradication/extirpation nuclear option favored by Special Interest Group WSF of ALL Big Horn in a reintroduced herd if even one animal tests positive on either test.

(Besser 2017 fall wild sheep magazine)

Prejudice against domestic sheep/goats is outdated science when all hooved ruminant species, wild and domestic POSSIBLY INCLUDING PACK HORSES (LOGGER'S/FIRE FIGHTER'S/GUIDE & HUNTER'S) can and do also carry same and other inter species pathogens.

<https://www.businessinsider.com/these-firefighting-mules-go-where-trucks-and-helicopters-cannot-2017-8>

Humans also have a risk to transfer inter species pathogens (such as cryptosporidium and giardia) into the population.

<https://www.sciencedirect.com/topics/immunology-and-microbiology/dall-sheep>

Domestic ruminants rotationally pulse grazed and regeneratively managed (not set-stocked) are non-motorized invasive weed and fire fuels controllers producing protein and improving habitat.

Citations

[https:// www.fs.usda.gov/custergallatin](https://www.fs.usda.gov/custergallatin)