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Organization:

Title:

Comments: Dear Forest Service,

I would like to object to your statements about goats and disease transmission in the Revised Forest Plan for the Custer Gallatin NF. There has yet to be ANY scientific proof that goats pose a greater threat of disease transmission than other livestock such as cattle and horses. All studies to date have focused on disease transmission between domestic sheep and bighorns, yet goats have somehow been lumped in with sheep. The only scientific study on disease transmission between goats and bighorns was actually inconclusive (Dr. Besser). There has been no evidence that goats are in any way responsible for bighorn die-offs, nor that they are common carriers of M.ovi--the disease now thought to be primarily responsible for bighorn die-offs.

In consideration of this, I would like you to remove all references to goats in conjunction with domestic sheep. Sheep and goats are different species and should be considered separately (as are cattle, horses, and llamas) when drafting forest plans.

I would also like to voice my support for Alternative E under section 2.4.15 General Recreation (REC):
Recreational use of pack goats is suitable forestwide.

Packgoats are the most eco-friendly pack stock choice and are the only pack animals that are bonded to humans and therefore extremely unlikely to go astray. The same cannot be said for equines or llamas. Packgoats are becoming recognized as low maintenance, easy to manage, environmentally friendly pack animals that even older folks, children, and handicapped people can handle and control.

"Alternative E: Use of pack goats under new special use permits shall be permitted only if a risk assessment indicates that spatial or temporal separation, or other mitigation can effectively minimize risk of disease transmission between livestock and bighorn sheep."

I believe keeping packgoats away from bighorn sheep and other wildlife is a goal that is easily attained with a few simple guidelines. The North American Packgoat Association outlines these in their Best Management Practices. Packgoats do not want to be near bighorns--they want to be near humans. They take comfort and security in human company and are not attracted to other ungulates. In fact, goats from one herd usually will not readily mingle with goats from another herd even though they are the same species. Wild ungulates such as bighorns are even less attractive to goats. Since packgoats want nothing to do with bighorns, it is quite easy to maintain physical separation at all times. Tethering goats at night and keeping them always within short distance of humans only reinforces this natural separation.

As a species, goats are generally quite hardy and disease-resistant. Because of this, they should be considered separately from sheep, which are not so hardy as a species. Because goats are not prone to carry diseases, they are in this way a better choice of pack animal than equines, which seem to catch and carry diseases readily. However, since disease control is of utmost importance in the bighorn herds, a veterinary health certificate issued within 30 days is not unreasonable in order to obtain a goat packing permit in core bighorn sheep habitat. In non-core habitat and in day hiking areas veterinary certificates should not be required. Permits should not be required for day hiking use, but only if goat packers intend to stay overnight in bighorn territory.

Goats are not the same as sheep and should be studied and considered separately. Brush goats are not the same as packgoats and also should be considered separately. Packgoats are a type of companion animal that should be regarded more like low-maintenance dogs than livestock. The beauty of packgoats is that, unlike dogs,

they stay close to their owner and they don't chase, bark, or harass wildlife. They are the perfect back country companion and pack animal and they do not put bighorn sheep at risk, particularly if there are guidelines in place to ensure that packgoats are under human control at all times.

Thank you for your time and consideration,

-Shannon Hassey - Member of the North American Packgoat Association