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Comments: As further comment after the second webinar, I would like to add that the proposed GMUG forest plan's packgoat ban is not in harmony with other land bordering the GMUG, including BLM. You asked that we comment regarding areas of potential conflict along these border areas, and this would be a big one. Anyone hiking trails that cross both BLM and FS land would face totally different and conflicting usage rules regarding packgoats. So far, Colorado has not banned packgoats in any NF or BLM area, so the proposed GMUG plan is out of step with all the others. To make such a radical change would require overwhelming proof that packgoats are a direct threat to bighorn sheep. Since the GMUG plan still allows widespread sheep grazing allotments, it makes no sense to ban packgoats as an unmanageable disease threat to bighorns.

Brittany Duffy was kind enough to point me to the scientific studies cited during the creation of the working draft plan and only one of them deals with domestic goats. (Foreyt, W.J. 1994. Effects of controlled contact exposure between healthy bighorn sheep and llamas, domestic goats, mountain goats, cattle, domestic sheep, or mouflon sheep. Proceedings Biennial Symposium of the Northern Wild Sheep and Goat Council 9:7-14.) It can be found on the web here:

<http://media.nwsgc.org/proceedings/NWSGC-1994/1994-all.pdf>

I looked up this document and it actually shines very favorably on goats. A controlled contact exposure experiment was conducted using captive bighorn sheep, domestic sheep, llamas, cattle, domestic goats, elk, and mountain goats. Page 3 has a chart showing the cytotoxicity status of *Pasteurella haemolytica* isolates from this variety of species. Goats (and elk) had 0 cytotoxic isolates). Page 4 says, "To date, no cytotoxic isolates have been identified in domestic goats..."

Further down on page 8 we see Experiment 2 in which 2 bighorns were housed with 3 domestic goats purchased at auction(!). (Auction houses are notorious breeding grounds for disease, and goat owners are strongly cautioned against purchasing animals at auction because they have no herd or disease history. Packgoats simply do not come from auction houses!) Yet despite using the riskiest domestic goats possible, the bighorns suffered no illness from being housed with them. Page 10 says, "Contact experiments between bighorn sheep, domestic goats, llamas, cattle, and mountain goats did not result in respiratory disease or death of any of the animals."

The only science regarding domestic goats that is being used to shape the GMUG working draft provides evidence that goats are NOT a threat to bighorns.

I would also like to add that packgoats are mentioned on page 143 as an example of disease transmission to bighorns, yet there is not one single documented case in which a packgoat infected a bighorn sheep with disease. Please strike this line from the plan as it is completely unsubstantiated.

Thank you for your time and for allowing us to be involved in this process. The webinars were very informative, and everyone I've spoken to has been friendly and helpful.

-Nan