Data Submitted (UTC 11): 7/5/2019 5:19:04 PM First name: Theresa Last name: Mercer Organization: North American Packgoat Association Title: Board Member Comments: I wish to comment on Grand Mesa, Uncompangre, and Gunnison National Forests Draft Revised Land Management Plan.

I am extremely concerned about the proposed forest wide ban on packgoats. I believe the entire GMUG NF should remain open to packgoats. Goatpacking should also be added to the list of recreational activities on page 8 of the Land Management Plan.

The Revised Land Management Plan should NOT lump domestic sheep and domestic goats under the same analysis. These are difference species and the one-size- fits-all approach on the science and on management is NOT justified.

Packgoats are not managed like brush clearing goats or commercial goat herds. They are raised to be athletes who are closely bonded to their human leader and can carry up to 50# of gear. They do not want to be out of sight of their human leader. The chances of a packgoat coming into contact with a bighorn sheep is around zero.

Goats, in general, are healthier than domestic sheep, and packgoats are an even healthier subgroup. They are closely monitored and given daily attention by their owners. They are not just livestock but are treated more like athletes and receive an elevated level of care.

To date there has not been one scientific study implicating packgoats in bighorn sheep die-offs. Dr. Tom Besser, the Chair for the Wild Sheep Disease Research Unit at Washington State University, stated the following: "I believe that ... pack goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies" (Wild Sheep Foundation Newsletter, Summer 2016).

USDA ARDU completed a study of packgoat diseases by obtaining samples from 576 packgoats from 83 premises. Samples were tested by both USDA ARDU and the Washington Animal Disease Diagnostic Laboratory (WADDL). Results from both laboratories provided sufficient and valid evidence as to the very low prevalence of disease in packgoats.

Please remove the ban from the proposed draft and add goatpacking to the list of recreational activities to be included in these areas.