Data Submitted (UTC 11): 7/21/2019 10:11:24 PM

First name: Lincoln Last name: Vannah Organization:

Title:

Comments: Thank you for the opportunity to comment on the Draft. Here are my comments and suggestions:

- 1. While I appreciate the NFS intent to protect Bighorn Sheep populations, I think that the draft is overly zealous and misguided in approach. I am opposed to the Pack Goat Ban for many reasons (see below). Specific changes I reqest are: On page 8, please add "goat packing" to the list of public enjoyment activities. Please remove "pack goats" from standard FW-STND-SPEC-16 on page 27. Please remove "pack goats" from page 143. My reasoning for my request (besides that I'm a pack goat Owner and avid backpacker) is as follows:
- In my research I was unable to find any scientific studies proving transmission of pneumonia from domestic goats to wild bighorn sheep.
- If a pack goat were suffering from pneumonia, it is very unlikely that the ill animal would be taken on a pack goat trip as he/she would be incapable of carrying a heavy load in the mountains.
- Domestic goats are proven to be far LESS of a danger to bighorns than domestic sheep (which currently are allowed to graze throughout much of the GMUG).
- Packgoats are not allowed to free range like grazing animals, but are under direct human control at all times
- A person takes only a few packgoats at a time, in contrast to the thousands of animals taken into grazing allotments.
- Packgoats are uniquely bonded to humans and are not attracted to wildlife or even other livestock.
- Research has shown that 95% or more of packgoats are free of mycoplasma ovipneumoniae (M.ovi). https://www.napga.org/wpcontent/uploads/2019/04/NAPgA-Summary-of-

Understanding-4.16.19.pdf

- The North American Packgoat Association has outlined a list of Best Management Practices for preventing goat/wildlife contact: https://www.napga.org/resources/best-management-practices-psr/
- Goats are environmentally friendly because their hooves leave little impact on the soil, their tracks and droppings resemble native wildlife, they prefer to browse here and there rather than graze down an area, they can eat native vegetation rather than relying on hay brought in from other areas, their rumens destroy most seeds, making them less of a vector for spreading noxious weeds.
- Goats are easier to control, manage, transport, and afford than larger pack animals such as llamas and horses, making them far more "accessible" as pack animals for many folks.
- There is no scientific evidence that packgoats pose more of a threat to bighorn sheep than horses, llamas, or cattle.
- Packgoats make it possible for older and disabled hikers to continue pursuing their passion even after the doctor says "No more backpacks."
- 2. As a general guide, I ask that the GMUG Revision be guided by the Community Conservation Proposal, at https://www.gmugrevision.com/. I am not in favor of fluid mineral development on National Forest Land.
- 3. Recreation in the Steven's Gulch Area: There is an increasing need for an area designated "skiers only" up Steven's Gulch Road near Windy Point. Perhaps along Cunningham Creek, just north and east of Forest Road 703? Also, Forest Roads 701.3A, 701.3B, 701.3C.