

Data Submitted (UTC 11): 12/21/2019 8:00:00 AM

First name: Matt

Last name: Lyon

Organization:

Title:

Comments: I am objecting to some of the language in this document. On page 64 it states "In order to prevent disease transmission between wild and domestic sheep, domestic sheep or goat grazing shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home range". On page 12 it states "Sources of these diseases are generally domestic sheep and goats."

These statements are unfounded and cannot be justified or verified with respect to domestic goats. First, prohibiting the grazing of domestic goats has absolutely no bearing on transmission between wild and domestic sheep. Second, pathogens are transmitted, diseases are not transmitted. Third, while there may be evidence that domestic sheep and goats can transmit pathogens to bhs (bighorn sheep), those same studies (Besser) show that there is a drastic difference in the recovery and survival rate of bhs infected by domestic goats versus domestic sheep. The evidence shows that infected domestic goats are far less of a threat to bhs than infected domestic sheep. Thus, domestic goats should not be lumped together with domestic sheep as "sheep and goats".

Next, there is no evidence that wild bhs herds in their natural habitat have contracted pathogens from domestic goats. While it may have happened in a lab/farm setting as part of a study, that does not allow us to conclude that it has happened in the wild.

Also, more recent research has shown that there is already a high prevalence of the pathogens-of-concern among bhs herds. The pathogens are also carried at a high rate of prevalence by other wild animals, including other big game species. The pathogens are also carried by other domestic species besides domestic sheep and domestic goats (such as horses, cows, and llamas), which species are grazed on public lands and/or used as pack animals in or near bhs habitat.

If the final document prohibits the grazing of domestic goats near bhs habitat, please clarify that the use of packgoats does not constitute "grazing".

On page 64, it calls for provisions to prevent the spread of disease from packgoats to bhs. Pathogens are transmitted, diseases are not.

More importantly, independently-verified research (sample size of approx 500 animals) conducted by Dr. Margaret Highland shows that less than 1% of adult packgoats carry pathogens-of-concern. Also, Tom Besser is quoted as stating that the risk of transmission from packgoats to bhs is negligible. There is no basis for requiring provisions to prevent transmission from packgoats to bhs.