

Data Submitted (UTC 11): 9/2/2020 4:20:29 PM

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Organization:

Title:

Comments: Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

X Land Management Plan

?Regional Forester's List of SCC

Statement of issues and/or parts of the plan revision to which the objection applies:

I am writing to object to some of the Custer Gallatin National Forests proposed restrictions on pack goats which are contained in the 2020 Land Management Plan.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are:

I support restrictions to enforce Best Management Practices to prevent disease transmission between Pack Goats and Bighorn sheep. Those include:

*Avoiding and reporting contact between bighorn sheep and pack goats

*Attaching identification to pack goats

*Requiring that they be under direct human supervision

*Requiring that they be tethered at night near humans with bells on

*Only taking healthy goats into the forest

The risk of supervised pack goats transmitting disease to bighorn sheep is very low, and does not support the need to close most of the forest to pack goat use for most of the year. There are alternative options available to protect bighorn sheep, and I encourage the forest service to work with pack goat users, bighorn sheep biologists and other stakeholders to implement them.

Two researchers that have extensively studied disease bighorn sheep, Dr. Thomas Besser of Washington State University and Dr. Maggie Highland of USDA-Agriculture Research Service Animal Disease Unit in Pullman, Washington, spoke in February 2017 at a symposium in Helena sponsored by the Montana Wool Growers Association, Montana Wild Sheep Foundation, and Montana Fish, Wildlife and Parks. Videos of their presentations are available at <https://www.youtube.com/watch?v=VVbN8Hq5QII&feature=youtu.be> (Dr. Highland) and <https://www.youtube.com/watch?v=A6ZIYXqYZQ&feature=youtu.be> (Dr. Besser).

Some relevant quotes from their presentations, along with the timestamp from the video are:

The primary disease concern, Movi, requires animal to animal contact between a bighorn sheep and an infected sheep or goat. Animal to animal contact between a human-supervised pack goat and a wild bighorn sheep is unlikely because people can avoid bighorn sheep or haze them away. The odds that a pack goat is carrying movi is very low. Dr. Highland's study only identified 3 adult pack goats that were movi positive out of over 400 sampled. Goats that test negative for movi are not at risk for causing a pneumonia outbreak in bighorn sheep. Movi testing is available from Washington State University's WADDL lab.

https://www.wildsheepfoundation.org/cache/DOC47_2019-05-13UpdatedVetMovisamplingprotocol.pdf?20190514031711 I encourage the forest service to consider waiving the proposed restrictions on pack goats that have been tested negative for Movi by WADDL.

I object to the proposed limit of 4 pack goats per person. I do not object to limiting the number of pack goats per party to 12 but I believe that the number of pack goats per person should be limited to 6 per person rather than 4. Pack goats are often used by hunters to transport their harvest out of the mountains. It takes a minimum of 6 goats to pack out an elk in one load. In order to prevent conflicts between hunters and grizzly bears, it is best if game meat can be removed as quickly as possible. If 6 goats were allowed per person, the meat from an elk could be packed out in one load, which would eliminate the need for hunters to return to their kill site after leaving

it unattended when the carcass could be claimed by a bear. 6 goats are a manageable number for a single person to lead as I have taken 6 goats many times by myself. They are very sociable and do not leave my side and follow very easily. Although I usually hunt with a partner, it is not unusual to for only one of us to lead the goat string back to the parking area with the meat. 6 packgoats would allow one person to remove an entire elk in one trip and ensure they are under contrl.

I object to the proposed seasonal restriction on the use of pack goats. Seasonal restrictions on the use of pack goats were not listed as an alternative during the original public comment period, so there was not opportunity for public comment on the appropriateness of seasonal restrictions, or the particular dates that would be appropriate. To my knowledge he forest service has not provided a motivation or justification for the proposed prohibition on the use of pack goats from October 31st to June 20th.

I object to the requirement that a special use permit will be required to use pack goats in the Madison, Henrys Lake, and Gallatin Mountains; Absaroka Beartooth Mountains; or Pryor Mountains Geographic Areas. If special use permits are required, they should only be required in areas frequently used by bighorn sheep. Much of the land in the listed geographic areas is not bighorn sheep habitat, or is only rarely visited by bighorn sheep. I believe the forest service could narrow down the geographic areas where pack goat use is restricted by using data from Montana Fish Wildlife and Parks and input from biologists and forest users.

Rather than limiting the dates that goats can be used, it may be appropriate to restrict underage (trainee) pack goats from the forest. Younger goats are more likely to carry movi. Goats younger than 2 years of age are usually not used for packing, but some people allow them to tag along as trainees.

The proposed regulations violate the following forest service regulations:
Forest Service regulations require that "best available science" be taken into account in forest planning. 36 C.F.R. § 219.3. In taking "best available science" into account, the Forest Service must "document how the best available science information was used to inform the assessment, the plan decision, and the monitoring program" and such documentation must "[i]dentify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered."

The forest service has not documented their rationale and scientific justification for the proposed pack goat restrictions. The best available science does not support the restrictions proposed.

***Proposed Solution:**

Waive requirements for goats that have been tested negative for Movi (*Mycoplasma ovipneumoniae*).
Increase the number of goats allowed per person from 4 to 6.
Eliminate seasonal restrictions on the use of pack goats or modify the dates.
Eliminate the requirement that pack goat users obtain a special use permit in the in the Madison, Henrys Lake, and Gallatin Mountains; Absaroka Beartooth Mountains; or Pryor Mountains Geographic Areas. If special use permits are required, they should only be required in areas frequently used by bighorn sheep, not the entire geographic areas.
Prohibit use of pack goats less than 2 years of age.