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Comments: Any proposed restrictions on pack goats should be based on a risk assessment of the potential for pack goats to cause a disease outbreak among bighorn sheep.

The proposal to treat pack goats "consistent with domestic sheep" is inappropriate because compared to domestic sheep because:

1)Pack Goats are significantly less likely to carry Movi.

1a)Movi is less prevalent in goats than sheep.

1b)Movi is less prevalent in small herds than large herds - pack goats are typically kept in smaller herds than domestic sheep or goats used for meat, fiber or weed clearing.

2)Pack Goats are significantly less likely to transmit move to domestic sheep.

2a)Movi transmission requires direct contact between an infected animal and an uninfected animal. Movi cannot survive outside of a live host for a more than a few minutes. Pack goats are used in small groups are constantly closely supervised, they are not typically tethered unattended or left to wander unattended because they are very susceptible to depredation by domestic dogs or other predators. Unattended and or large concentrations of domestic sheep or weed clearing goats are much more likely to directly contact bighorn sheep.

3)It is very rare for the strain of movi found in goats to infect bighorn sheep. There are distinct "domestic goat strains" and "domestic sheep strains" almost all bighorn sheep die offs have been caused by "domestic sheep strains".

Domestic sheep are very likely to transmit harmful pathogens to bighorn sheep. Domestic goats are much less likely to cause disease outbreaks in bighorn sheep than domestic sheep.

Pack goats are very unlikely to carry movi because of how they are managed (closely monitored small herds) and they are extremely unlikely to come in direct contact with bighorn sheep because pack goats are not left unattended.

The risk of pack goats transmitting diseases to bighorn sheep can be mitigated through targeted rules (limits on number of goats per person, and best management practices such as tethering the goats at night near humans). Pack goats are lower risk than domestic sheep and should not be managed "consistent with the rules for domestic sheep"