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Comments: First off, I want to personally thank the GMUG planning team for working hard on the rules regarding packgoats. I see that the previous forestwide standard that banned all packgoats on all bighorn sheep habitat (including within sheep grazing allotments) has been changed to a guideline that minimizes potential for packgoats to interact with bighorn sheep, and to treat them consistently with domestic grazing sheep. This is a huge improvement and I know that all of us in the packgoat community are very grateful for what appears to be an open door for management solutions rather than outright bans.

However, I believe there is room for improvement and clarification. The current guideline is very vague. It reads:

"FW-GDL-SPEC-14: To maintain long-term population viability for bighorn sheep, the Forest Service should minimize the potential for recreational pack goats to interact with bighorn sheep. The Forest Service should manage recreational pack goats consistently with its management of domestic sheep within the comparable allotment(s) area."

Nothing is said about how packgoat use will be managed outside of sheep grazing allotments, which leaves a lot of ambiguity. Will packgoats be prohibited outside of sheep grazing allotments? Will they be permitted without any restrictions at all? My suggestion is for packgoats to be treated the same both inside and outside of domestic sheep grazing allotments. Packgoats are completely different from grazing sheep in numbers, behavior, and disease risk so it only follows that management should be different as well.

I suggest that the Forest Service draw on the "Best Management Practices" created by the North American Packgoat Association. These guidelines minimize the potential for wildlife interaction, including contact with bighorn sheep. It is reasonable to implement guidelines such as:

1. Individually identify each packgoat with both a permanent ID (tattoo, microchip, ear tag) and a collar with tag containing owner contact information.
2. Keep packgoats under human control at all times. When not physically restrained, packgoats must be kept within eyesight and under vocal control.
3. Packgoats must be tethered or contained within an electric fence at night.
4. Packgoats must wear bells in camp and while hiking within active bighorn sheep territory.
5. If bighorn sheep are encountered on the trail the packgoat owner must take physical control of all packgoats and maintain physical distance by either hiking well around bighorns or waiting until they move.
6. If bighorns come near camp where packgoats are tethered or fenced, the bighorns must be hazed away.
7. Female packgoats cannot be used in bighorn territory during the rut season.
8. Lost packgoats must be immediately reported to the district Forest Service or BLM office and every effort will be made to recover it as quickly as possible.

The rules I just outlined may be more detailed than necessary, but they are common sense practices that are easy for goat packers to follow yet are very practical for ensuring physical separation even within active bighorn

sheep habitat. Combine these practices with the extremely low prevalence of M.ovi among packgoats and the risk to bighorns is eliminated.

I would like to point out one more thing in the plan that bothers me. It is this example used on page 24:

"To increase awareness, educate partners and visitors of the potential for pathogen transmission affecting native plants and animals (e.g., recreation pack goats and bighorn sheep, the need to decontaminate wading boots to reduce spread of chytrid fungus or whirling disease)."

It is important for the Forest Service to recognize that there is not one single example of packgoats spreading disease to bighorn sheep anywhere at any time. This statement is based on pure speculation and should be replaced with a real world example rather than a hypothetical one. We believe that physical separation is important for a variety of reasons (among them, keeping wildlife wild!), but using packgoats as an example of pathogen transmission when they have never once been implicated in any such event leads to the kind of unfounded prejudice that prompted the GMUG to ban packgoats outright in the first place. As the North American Packgoat Association continues to battle such prejudice all over the west, we would encourage the GMUG team to remove this statement lest it lead to more preemptive bans in other forest plans in the future. Examples should always be based on reality, not on speculative theories that might result in unfair, real-world exclusion.

Thank you for your time and consideration,
-Nan Hassey