Data Submitted (UTC 11): 8/13/2022 4:24:25 AM
First name: Curtis
Last name: King
Organization: North American Packgoat Association
Title: President
Comments: Dear Sequoia/Sierra Planning Committee,

Please find this letter submitted in a timely manner submitted on August 12, 2022 to the Sequoia/Sierra National Forest Plan Revision Objection.

Thank you for your consideration in adding a goal to conduct a packgoat-specific risk assessment to the most recent forest plans. Past studies have demonstrated that goats pose a much lower disease risk to bighorn sheep than domestic sheep, and packgoats specifically pose a lower disease risk than goats in general.
We are also pleased to see that mitigation measures will be reviewed and considered. The North American Packgoat Association (NAPgA) uses "Best Management Practices" to provide mitigation measures that prevent packgoat/bighorn contact even within bighorn habitat. Because the disease prevalence among packgoats is so low, and because mitigation measures to prevent contact are easy to implement and follow, we at NAPgA believe that packgoats can be used safely even within most "high risk" areas.

The goal in your plan states that you will, "Coordinate with the California Department of Fish & Wildlife, the U.S. Fish & Wildlife Service, and adjacent national forests to conduct a risk assessment of pack use on National Forest System lands and develop mitigation strategies to manage the risk of disease transmission, if needed."
We hope that you will bring NAPgA to the table during this risk assessment in order to provide first-hand experience and expert knowledge about packgoat behavior, and to help you develop appropriate mitigation strategies. Of the plan alternatives provided in Volume 3 under SPECIES DIRECTION--Bighorn Sheep--Suitability, we prefer Alternative B-modified. The modified version states that packgoats are not suitable within high-risk areas of disease transmission unless the risk can be mitigated. We are confident that with the use of Best Management Practices the risk can indeed be mitigated.

NAPgA would like to see more specific language included as to what exactly constitutes a "high-risk" area of disease transmission and how that is determined. Is it an area where bighorns are accustomed to human activity and are wandering around in campgrounds? Or is it any area where bighorn sheep might happen to pass through on occasion? There should be specific language to determine what constitutes "high-risk" so that mitigation measures can be implemented effectively and in a way that makes sense for the situation. Obviously, greater measures would need to be taken in areas where bighorns have lost their fear of human encampments vs. areas where bighorns are shy and keep to themselves.

NAPgA would ask that the Forest Service follow the NEPA process while conducting a thorough "Risk Assessment" of packgoats and strongly consider the recent research (2015-2016 study) conducted by Dr. Margaret Highland USDA ARS at WSU Pullman WA. NAPgA and the packgoat community actively participated in testing over 576 adult packgoats from 80 different premises in eight western states. The results of this study showed over 98% of all the adult packgoats tested negative for M-ovi or sheep pneumonia the disease of concern that is fatal to Bighorn sheep. The results of this study and the duplicates are currently stored and on file at the WADDL Laboratory, a federally accredited USDA laboratory at WSU in Pullman WA.

NAPgA would also ask the Forest Service to consider in the "Risk Assessment" The Wild Sheep Foundation funded study conducted by researcher Tom Besser WSU Pullman WA. In this research test negative domestic goats were co-mingled with test negative wild sheep for over one hundred days in the same pen with no negative results. Dr Besser has also been quoted in the Wild Sheep Foundation quarterly Journal citing "test negative packgoats pose a negligible risk to wildsheep and this should be taken into consideration by land managers

when setting precedence".

Thank you for carving out a specific goal of assessing packgoats separately from other livestock types and for considering mitigation measures instead of outright bans. Packgoats are becoming increasingly popular as their versatility and ease of use is discovered, and as more older Americans are retiring and finding the need for pack animal assistance in the backcountry. We believe packgoat enthusiasts will become a much more significant user group in the coming years, and NAPgA looks forward to working with the Forest Service to craft mitigation strategies that prevent packgoat/bighorn sheep interaction while allowing packgoat users to safely enjoy the areas bighorn sheep call home.

Thank You,

Curtis King
President: North American Packgoat Association