

Data Submitted (UTC 11): 8/15/2022 12:26:36 AM

First name: Nan

Last name: Hassey

Organization: North American Packgoat Association

Title:

Comments: Dear Sequoia/Sierra Planning Committee,

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.

I am 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.

I 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.

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. I believe packgoat enthusiasts will become a much more significant user group in the coming years and as a member of NAPgA I look forward to working with the Forest Service to come up with mitigation strategies that prevent packgoat/bighorn sheep interaction while allowing packgoat users to safely enjoy the areas bighorn sheep call home.

-Nan Hassey, Rye, CO