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Organization:

Title:

Comments: Dear Forest Supervisor and Forest Planning Team:

I am an interested person for the Gila National Forest's Public Review and Objection Period regarding the July 2024 Draft Revised Land Management Plan (the "Draft Plan"). Please accept this as my formal objection to the Draft Plan.

I respectfully request the Gila National Forest adopt, as its final forest plan related to recreational packgoats, language similar to that contained in the Grand Mesa Uncompahgre and Gunnison (GMUG) National Forest Plan which was finalized in June 2024. The relevant portions of the GMUG Final Forest Plan related to recreational packgoats are as follows:

#### Guidelines

FW-MA-SPEC-16.f: Coordinate with recreational pack goat user groups to educate (the) public about best practices within bighorn sheep habitat, including but not limited to the following: When recreation pack goats are being used in bighorn sheep habitat, any direct contact with bighorn sheep should be prevented while on the trail and in campsites by (1) keeping pack goats under control at all times by the owner and (2) discouraging bighorn sheep from approaching domestic goats.

#### Management Approaches

FW-MA-IVSP-13: To increase awareness, educate partners and visitors of the potential risk of pathogen transmission to 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.)

Objection to Paragraph 5, of the Standards listed on page 223 of the draft plan:

This paragraph reads as follows: "Special-use permits authorizing domestic sheep and goats will not be issued with the following exception: special use permits authorizing recreational use of pack goats outside of bighorn sheep occupied range may be issued if the prospective permittee can demonstrate their animals have tested negative for pneumonia-causing pathogens, have been vaccinated against the pathogen, and are up to date with those vaccinations."

A special use permit should never be required and is not justified for recreational packgoat use outside of bighorn sheep occupied range. A special use permit for recreational packgoat use where bighorn sheep are not present is completely unnecessary and unreasonably burdensome because the fact that bighorn sheep are not present eliminates the risk of contact and any potential risk of disease transmission between packgoats and bighorn sheep.

I further object to the proposed requirement that recreational goatpackers obtain a special use permit to access any portion of the Gila National Forest with their packgoats as provided in the current version of the draft plan. Two of the three requirements for obtaining a special use permit for recreational packgoat use are impossible to achieve. Specifically, there is not a vaccine in existence that can be used to vaccinate goats against pneumonia-causing pathogens. It is impossible to vaccinate goats and/or keep them up to date on a vaccination for a pneumonia causing pathogen when no such vaccine exists.

Regarding the requirement that packgoat owners test their goats for the *Mycoplasma ovipneumoniae* pathogen - each PCR test for *mycoplasma ovipneumoniae* costs approximately \$40 not including the cost of nasal swabs,

any veterinarian fees, shipping costs, etc. The cost of conducting individual nasal swab tests for typical packgoat string of 4-6 animals would easily exceed \$200. This places an unreasonable, arbitrary, and disproportionate burden upon recreational packgoat users to access national forest lands which are required to be managed for all members of the public and for all user groups.

Requiring packgoats to undergo *Mycoplasma ovipneumoniae* testing is an unreasonable and burdensome restriction considering research has shown there is an extremely low prevalence of *Mycoplasma ovipneumoniae* positive packgoats, there has never been a documented case of *Mycoplasma ovipneumoniae* pathogen transmission from a packgoat to bighorn sheep, and a packgoat specific risk analysis has never been conducted.

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