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First name: Chris
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Organization: North American Packgoat Association
Title: President
Comments: As the President of the North American Packgoat Association ("NAPgA"), I request that I be listed as an interested person for the Nez Perce-Clearwater NFs Forest Plan Revision #44089. I would like to attend the objection resolution meeting and request that I be allowed an opportunity to comment at the meeting.

Although there has never been a documented case of pathogen transmission from a packgoat (not to be confused with domestic sheep or goats placed on grazing allotments or used for brush clearing purposes), NAPgA has always supported reasonable efforts to mitigate any potential risk of pathogen transmission between bighorn sheep and packgoats. It is important to note that a formal packgoat specific risk analysis has never been conducted. Instead, land managers including the Forest Service have continued to use the "Risk of Contact" model that was developed to assess the risk of contact between large herds of domestic sheep on grazing allotments and bighorn sheep. The "Risk of Contact" model is entirely irrelevant and should not be used when assessing the risk of pathogen transmission between bighorn sheep and packgoats because packgoats are under direct human supervision and control, have collars and leashes attached to them, are high-lined/low-lined/tethered at night while in camp, and are limited in number to between 2-10 packgoats in nearly all instances.

The individuals and organizations that are opposed to the use of packgoats in or near Bighorn sheep habitat continue to ignore the most recent scientific research regarding mycoplasma ovipneumoniae and the fact that a bighorn sheep disease outbreak and/or die-off has NEVER been traced to a packgoat. This is the best evidence that NAPgA and packgoat owners have been extremely successful at mitigating any potential risk of pathogen transmission. Those opposed to the use of packgoats on public lands are, without specifically stating it, insisting that "zero risk" is the only acceptable risk when it comes to Bighorn sheep. They do so even though they know and acknowledge that there is no such thing as "zero risk." It is far more likely that a foraying bighorn sheep will come into contact with domestic sheep or goats on private land or with domestic sheep on a grazing allotment than it is that a bighorn sheep will come into contact with a packgoat while under the control of its handler in bighorn sheep habitat. There is a forty plus year historical record of packgoat use on public lands in and around bighorn sheep habitat and yet there is not one documented case of pathogen transmission from a packgoat to bighorn sheep. The truth of the matter is that packgoat owners have been managing their use of packgoats to zero risk, or as close to zero risk as possible, for decades. NAPgA has and will continue to diligently strive to maintain this perfect record by teaching, promoting, and implementing our Best Management Practices (see attached).

I support the adoption of the Nez Perce-Clearwater Forest Plan Revision (released November 2023) which included reasonable risk mitigation provisions related to the use of packgoats.

I oppose the packgoat related objections raised by Mike Schlegel who states that he is representing the Idaho Wild Sheep Foundation. I question whether Mr. Schlegel had standing to submit his January 29, 2024, comment or to be considered an Interested Person since I have been unable to locate any record of him having submitted a timely comment during the dates specified for the comment period. Interestingly, Mr. Schlegel states that the justification for allowing packgoat use is very flawed and that it only takes one exposure to have devastating results for bighorn sheep, yet the fact remains that there is not one documented case of pathogen transmission from a packgoat to bighorn sheep.

I also oppose the packgoat-related objections raised by Jace Hogg of the Idaho Governor's Office of Species Conservation. Mr. Hogg's comment and the statement of issues attached to his comment, as they relate to packgoats, are not based on the best available science, a packgoat specific risk analysis, or factual history of

actual risks packgoats pose to bighorn sheep. Recent scientific research shows that mycoplasma ovipneumoniae has been conclusively detected in multiple wildlife species (white-tailed deer, caribou, etc.) as well as other domestic animal species (i.e., cattle). Clearly these species of wildlife carriers of mycoplasma ovipneumoniae cannot be controlled or prevented from making contact with wild bighorn sheep. Requiring packgoats to undergo M.ovi testing is an unreasonable and burdensome restriction considering research has shown there is an extremely low prevalence of M.ovi positive packgoats, there has never been a documented case of M.ovi pathogen transmission from a packgoat to bighorn sheep, and a packgoat specific risk analysis has never been conducted.

I look forward to attending the objection resolution meeting as an Interested Person and having the opportunity to comment in that meeting to provide additional information and reasons for opposing any modifications to the Nez Perce-Clearwater Forest Plan Revision that was released in November 2023 as far as it relates to packgoats.

Chris Gifford
President - North American Packgoat Association
January 2023 - Present