

The North American Packgoat Association (NAPgA) has reviewed the Washington Department of Fish and Wildlife's ("WDFW") recent emergency rule (the "rule") which is being proposed as a permanent rule and provides the following comments in response.

There is no scientific basis for singling out packgoats in this rule. Not one study has shown packgoats have ever infected bighorn sheep with mycoplasma ovipneumoniae (commonly referred to as Movi). Until a packgoat specific risk analysis is performed it is simply an inflammatory statement with no basis.

Packgoat owners are aware of and concerned about the health and disease issues facing wild sheep populations in Washington State. NAPgA has developed Best Management Practices (BMPs) that should address any concerns that might be associated with using packgoats in wild sheep habitat. These practices were developed collaboratively & have been carefully reviewed by wildlife biologists & veterinary researchers.

In August of 2018, representatives from NAPgA, the Wild Sheep Foundation (WSF), Wyoming Wild Sheep Foundation, Nevada Department of Wildlife, wildlife biologists, a veterinary medical officer-researcher from the USDA-ARS-ADRU and Washington State University researcher met to discuss BMPs for goatpackers. This two-day workshop meeting resulted in the establishment of NAPgA's current BMPs as a mutually agreed upon effective means of reducing the risk of contact between packgoats and bighorn sheep.

NAPgA promotes responsible use of packgoats by regularly emphasizing the importance of following our BMPs on social media, in newsletters and at events. Furthermore, NAPGA welcomes the inclusion of NAPgA's BMPs in public land regulations and wildlife management recommendations. NAPgA's BMPs are included with this letter.

NAPgA believes packgoats should be distinguished from domestic sheep and domestic goats that are not used for packing. It must be noted that packgoats are typically kept and used in small numbers, usually less than 10 wethered males, who are bonded to their human companions. Packgoats view their human companions as their leaders, protectors, and providers. In this regard, larger herds of domestic sheep and goats placed on allotments for grazing or brush clearing without continuous direct human supervision are dramatically different from packgoats. It is unreasonable to continue to classify and treat packgoats as if they pose the same level of risk of comingling with bighorn sheep as is posed by domestic sheep and goats used for grazing or brush clearing.

Researchers have discovered the "goat strain" of Movi differs from the "sheep strain" strain of Movi. Co-mingling studies have shown that Movi found in goats is far less virulent to bighorn sheep than Movi found in domestic sheep. Bighorn sheep are far less likely to contract Movi from domestic goats but in the rare event that a spillover from domestic goats occurs, bighorn sheep are far less likely to develop pneumonia or experience die offs and low lamb recruitment than they are when a spillover from sheep strains of Movi occurs.

Recent research has shown that goats have a lower prevalence of Movi than domestic sheep, and even more importantly, that packgoats have a much lower prevalence than goats generally. In 2016, NAPgA members participated in a nationwide study conducted by Dr. Margaret Highland, DVM, PhD, Dipl. ACV, ADRU-ARS-USDA, to discover the prevalence of Movi in packgoats. In that study, 485 packgoats and goats housed with them were tested from 83 premises across 12 western states. Out of the goats tested during this study only 18 (3.7%) tested positive for Movi. Most of the goats that tested positive for Movi were less than a year old meaning they were not yet mature enough to pack and they therefore posed little to no risk of having contact with bighorn sheep. The attached Summary of Understanding titled "Packgoats and Mycoplasma ovipneumoniae Prevalence Study 2016" provides additional details about this study.

Decreased Movi prevalence in packgoats is likely due to management styles that differ significantly from those of domestic goats kept in commercial herds. Packgoats are typically kept in very small, stable herds and have limited to no contact with other domestic goats or sheep. Packgoats are more accurately classified as companion animals rather than livestock and receive an elevated level of individual care and attention. Packgoats are athletes and must be in good physical condition in order to keep up with their owner while carrying a heavy pack. As an athlete and a pack animal, a sick packgoat cannot perform its job on the trail. Owners have a vested interest in making sure their packgoats are free of diseases at all times.

As stated above, packgoats are raised as companion animals and are very closely bonded to their owners and to humans in general. The fact that packgoats are bonded to humans makes it far less likely for them to have any desire to seek out and interact with bighorn sheep. Packgoats typically become distraught if separated from their owners and will actively seek out humans over other species. Packgoats are kept under direct human supervision at all times while in the back country. Packgoat strings are typically limited to less than 10 goats and are often led by more than one human companion, making it easy for humans to control their packgoats.

For the reasons stated above, NAPgA respectfully requests that the WDFW recognize the significantly reduced risk that packgoats pose to bighorn sheep. In addition, NAPGA requests that WDFW acknowledge there are significant differences between packgoats and livestock, including sheep and goats placed on allotments for commercial purposes and provide a separate classification for packgoats in this rule and any future plans.

NAPgA encourages WDFW to use NAPgA's BMPs to establish guidelines for responsible packgoat use within bighorn sheep habitat. The proposed rule should not restrict packgoat use in bighorn sheep units or on any of the WDFW managed lands.