

The North American Packgoat Association (NAPgA) has reviewed the Washington Department of Fish and Wildlife's (WDFW) proposed new section to WAC 220-500-045.

Please submit your comments regarding this proposed packgoat ban in 12 wildlife management areas. Comments must be submitted by November 23, 2022, to be included in the Directors Packet. We have provided information below to help you in writing your comments. You can read the proposed rule and submit your comments here: <https://publicinput.com/sheepandgoats102>

- 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.
- Many people who use packgoats do so because they are no longer able to recreate without the aid of a pack animal. Unlike horses and mules, packgoats are small and docile enough for any person to manage, care for and control at home and in the field. Banning packgoats will unfairly prohibit an entire user group from recreating in the 12 wildlife areas. **The State of Washington and WDFW have an obligation under the Washington State Constitution, the Americans With Disabilities Act, and court case law to hold and manage all the public lands granted to the state in trust for all of the people. Imposing a ban on packgoats unfairly discriminates against one particular user group without scientific evidence that packgoats pose any risk, much less a significant risk, of disease transmission to wild bighorn sheep.**
- The WDFW manages over 1 million acres of public lands. The proposed ruling will ban the public from accessing 688,471 acres, or roughly 68%, of all WDFW managed public lands with packgoats.
- Packgoat owners are aware of and are concerned about the health and disease issues facing wild sheep populations in Washington State. The NAPgA Best Management Practices (BMPs) address and mitigate all concerns or undocumented risk factors that might be associated with the use of packgoats in wild sheep habitat. **Specifically, BMP #2 states that all packgoats shall be under direct human supervision at all times, shall be on leads or have leads attached to their collar/halter, be in direct sight or tethered in some manner in camp and tethered at night with bells attached to their collar.** The BMPs were developed collaboratively and have been carefully reviewed by wildlife biologists and 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.
- There is no scientific research or evidence that has ever confirmed that a packgoat has ever infected a wild bighorn sheep (not held in captivity) with *Mycoplasma ovipneumoniae* (commonly referred to as Movi) or any other pathogen.
- **A packgoat specific risk analysis study has never been performed and it is therefore impossible for the WDFW or any other agency or group to assert that there is a statistically relevant risk of disease transmission from packgoats to wild bighorn sheep.**

- Researchers have discovered the “goat strain” of Movi differs from the “sheep 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.
- Dr. Tom Besser, DVM and past Wild Sheep Foundation Rocky Crate Chair for Wild Sheep Disease Research at Washington State University, stated in the Wild Sheep Foundation newsletter: “I believe that *M. ovipneumoniae* test-negative pack goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies.”
- 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.
- 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 with more than one human companion, making it easy for goatpackers to control their packgoats.
- WDFW permits sheep grazing on lands they manage and this rule specifically states that it will not apply to existing sheep grazing permits. There are numerous scientific studies showing sheep (not goats) carry a strain of *Mycoplasma ovipneumoniae* that is a threat to bighorn sheep. WDFW states: “Note that this does not affect existing grazing permits for domestic sheep (e.g. on the LT Murray).” The LT Murray is one of the wildlife areas the WDFW intends to close to domestic sheep and goats and specifically packgoats. Allowing grazing permits to continue while implementing this rule does nothing to protect wild bighorn sheep from disease transmission from domestic sheep on grazing allotments which pose the only proven risk of transmission of Movi to wild bighorn sheep. Although this rule proposes a ban on both sheep and packgoats, in reality it specifically targets packgoats because sheep are seldom if ever used as pack animals. Packgoats have never been proven to have transmitted Movi or any pathogen to wild bighorn sheep. Banning packgoats does nothing to protect wild bighorn sheep.