All of the below arbitrary pack llama bans, and consideration of pack llama bans from our public lands, were exclusively derived from the work of Dr. Helen Schwantje, her colleagues, and the Wild Sheep Foundation's Thinhorn Sheep Initiatives ("No Contact In The North").

Agencies, coordinated NGO's, and cited non-peer reviewed research arbitrarily banning pack llamas:

- 1) Jim Herriges (EI-BLM) authorship of the <u>"REDUCING DISEASE RISK TO DALL'S SHEEP AND MOUNTAIN GOATS FROM DOMESTIC LIVESTOCK POSITION</u>

 <u>STATEMENT THE ALASKA CHAPTER OF THE WILDLIFE SOCIETY"</u> (February 4th, 2013) (Schwantje 2003, Schwantje/Garde 2005)
- 2) Jerry Hupp <u>AK- Wildlife Society Livestock Position Statement letter</u> (May 13th, 2013) mailed to <u>ALL</u> Alaska federal agencies (BLM, USFWS, USFS, NPS) based upon the Jim Herriges authorship above. (Schwantje 2003, Schwantje/Garde 2005)

The Hupp letter eventually garnered the current pack llama bans from: AK-BLM-Eastern Interior and AK-USFWS-Arctic National Wildlife Refuge. (Schwantje 2003, Schwantje/Garde 2005)

The Hupp letter also garnered a consideration of a pack llama ban on the AK-USFS-Chugach National Forest. It was an internal decision by the USFS in their Draft ROD to ban llamas. However, the general public vigorously "objected" to the Draft ROD, and the arbitrary ban was rescinded in 2020 by the Regional Forester. (Schwantje 2003, Schwantje/Garde 2005, then CCH RA-17)

OVERVIEW OF HISTORICAL PACK LLAMA BANS

1994 NPS-SE Utah Group (Canyonlands NP, Zion NP, Arches NP)— banned pack llamas for pathogen/disease transfer to wild sheep. It was reversed based upon a low risk of pack llamas pathogen/disease transfer.

2012 The Alaska Board of Game (BOG) took action to ban Ilamas for use in hunting wild goats and sheep. The Alaska Department of Fish and Game (ADF&G) reviewed the science suggesting against the ban, and the BOG agreed, removing Ilamas from the ban. (Schwantje 2003, Schwantje/Garde 2005)

2015 NPS-Alaska – Suggested and lumped pack llamas with domestic sheep and goats to be banned in their compendiums based upon the "2013 Herriges- AK-TWS" paper. The NPS compendiums were reversed to allow pack llamas with the requirement of a written authorization from the superintendent in the jurisdictions of travel. **(Schwantje 2003, Schwantje/Garde 2005)**

2015 USFWS-National Arctic Wildlife Refuge (ANWR) Conservation Plan for the next 15-20 years has arbitrarily banned pack llamas based upon the false science and propaganda of the Schwantje 2005 study. The Alaska Regional Director of the ANWR even went so far as to suggest llamas pose a threat of transfer causing Chronic Wasting Disease. (Schwantje 2003, Schwantje/Garde 2005)

2016: AK-BLM-Eastern Interior (Whites, Steese, Fortymile, and Draanjik) banned pack llamas based upon pathogen/disease transmission from pack llamas to wild sheep using their own employee's "2013 Herriges - AK-TWS" paper. The ban is still in effect. (Schwantje 2003, Schwantje/Garde 2005)

2017 The Canadian Provinces of the North West Territories and British Columbia ban pack llamas in wild sheep habitat based upon Dr. Helen Schwantje 2003 and 2005 studies, WSF's Kevin Hurley's (WSF) request to ban llamas, and conversations at the WSF's 2017 Thin Horn Sheep Summit II in Anchorage, AK. (Schwantje 2003, Schwantje/Garde 2005, Schwantje CCH RA-17)

2018 "Minimum Requirements Decision Guide Workbook" (MRDG) drafted by employees of the BLM, NPS, USFS, USFWS, and biologists with the Nevada Department of Wildlife for the "Bighorn Sheep Monitoring in the Alta Toquima and Arc Dome Wilderness Areas". It included possible recommendations to preclude the use of pack goat or llamas in the wilderness. It was not used because it was outside the scope of the wild sheep collaring project that has since been completed.

2018 The Wild Sheep Foundation: In their widely circulated and published <u>"North American Conservation Vision 2020"</u> (pages 4 and 6), recommend the spatial and temporal separation of pack llamas on public land based upon CCH RA-17 (**Schwantje CCH RA-17**)

2019 UT-BLM unit denied a llama trekking special recreational permit application based upon pathogen/disease transfer to wild sheep. **Jace Taylor, UT Division of**

Wildlife Resources and Wild Sheep Working Group member made the recommendation to the BLM based solely upon the CCH RA-17. (Schwantje CCH RA-17)

2019/2020 The USFS-Chugach National Forest in Alaska proposed a llama ban based upon NO cited research for pathogen/disease threat from llamas to wild sheep in their Draft Record of Decision (DROD). The llama industry vigorously opposed the Draft ROD to ban llamas. The Draft ROD and Final Resource Management Plan was amended to not include the pack llama ban in its final plan. (CNF cited the precautionary principle but disagreed with the arbitrary application of a llama ban. Schwantje CCH RA-17)

2019 Idaho Department of Fish and Game, in their Mountain Goat Management Plan (2019-2024), inexplicitly included llamas as a risk to both mountain goats and big horn sheep without any cited reference or research at all and included them with domestic sheep and goats as a threat.

2020 The **Tonto National Forest**, under the leadership of Neil Bothworth, along with the advice of the Arizona Game and Fish Department declined a commercial use permit with the use on llamas based upon the high risk of disease transmission from pack llamas to wild sheep. They scientifically blundered, lumping llamas with domestic sheep and goats as their reasoning. The Tonto NF has a long history of arbitrarily trying to ban pack llamas since the 1990's.