

From: Stan Ebel [REDACTED]
Sent: Monday, February 26, 2018 2:30 PM
To: mcox@ndow.org
Cc: [REDACTED]
Subject: WSWG posting of Risk Assessment

Dear Mike,

Please find the attached letter directed to you as the Chair of the Wild Sheep Working Group (WSWG)/ Western Association of Fish and Wildlife Agencies (WAFWA). It has come to my attention that The CCH Risk Assessment for South American Camelids has been posted on your WSWG page on the WAFWA website. This is of great concern to me and the llama industry as that survey is being presented by the Wild Sheep Foundation as the basis on which they are seeking to ban llamas from all North American sheep ranges per their 2020 Conservation Vision Statement. The assessment and its' recommendations are without merit and I want to know why it was posted and if it is being considered in policy decisions by WAFWA.

Please read the attached letter. You will also receive a certified copy of the letter mailed to your office. You may access all the documents referenced in the letter on the website www.packllamas.org . I look forward to your response and answers to the questions posed in the letter. Thank you for your time and consideration.

Stan Ebel, President

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P.O. Box 64

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[REDACTED]

Mike Cox, WSWG Chair
Nevada Department of Wildlife
6980 Sierra Parkway, Suite 120
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Dear Mr. Cox,

I have been a commercial llama breeder and packer since 1977 and have dealt with a number of land use issues regarding llamas and wildlife, specifically regarding wild sheep. Through this process I have had occasion to use the information coming out of the Western Association of Fish and Wildlife Agencies (WAFWA). I was impressed that the organization and specifically the Wild Sheep Working Group (WSWG) that you currently chair, made decisions based on solid science and methodology.

I am now quite alarmed to see the CCH Risk Assessment for Camelids 10/24/2017 posted on your WSWG web page and to learn that your committee is referencing the document in formulating policy recommendations for wild sheep. After reviewing the assessment, it is the conclusion of the llama community and the clinical and research veterinarians supporting that community, that the assessment not only lacks scientific merit, it opposes documented clinical research and observation. It is an obvious attempt to construct a reason to eliminate llamas under the pretense of disease risk.

It is based on peer rejected speculation presented in a 2003 risk assessment by Dr. Helen Schwantje, and a second presentation she contributed to under the authorship of Dr. Elena Garde in 2005. The WAFWA/WSWG has previously reviewed these assessments in formulating WAFWA policy recommendations and obviously discounted them, since llamas aren't mentioned in their recommendations. I'm curious why 15 years later, with no disease emergence, this repackaged presentation is now being embraced without peer review or consultation from the veterinary research community.

It appears you have previously relied on documented research in your recommendation to separate domestic sheep and goats from wild sheep ranges. The studies done by Washington State University wild sheep researchers Dr. William Foreyt and Dr. Tom Besser are consistently referenced. Those have taken place over the last 25 years, have included llamas, and the llamas have been shown to present no disease risk to wild sheep. The specific pathogens of concern to your committee: *Mannheimia haemolytica*, *Pasturella* spp, and *Mycoplasma ovipneumoniae* are not demonstrated as pathogens in llamas. Pneumonia of any etiology is rare in llamas and they are naturally healthy, and have no endemic diseases. They present no significant threat to wild sheep.

The question I have is, "why this sudden departure by WSWG from characteristic scientific discipline?" The "ban llamas" theme in the wild sheep community has become very apparent in the last 2-3 years and as the llama community has investigated, The Wild Sheep Foundation's (WSF) role is readily apparent. A website has been created as a point of information

dissemination by the llama community www.packllamas.org . The base document of the site is the Commentary on the CCH Risk Assessment. I urge you and other committee members to become familiar with the commentary.

The "Commentary" using the Risk Assessment document and the WSF Thinhorn Summit II Synthesis (THSII) exposes:

- The lack of science in the Risk Assessment you have posted.
- The role the WSF and Helen Schwantje played in formulating the assessment.
- The intention of the WSF to seek a ban of llamas using the Risk Assessment and now publicly stated in their Vision 2020 posting.
- The WSF's free access to wildlife agencies and their lack of accountability in agency interactions.

As I look at the WSWG page it is apparent that WSF has a great deal of influence. The sponsorship is primarily by WSF chapters and I see that WSF actually has a seat on the committee currently filled by Clay Brewer. WAFWA is an association of public agencies. How does a 501C3 special interest hunting group get a committee appointment to a public agency policy forum? There are also WSWG members associated with WSF that are in a position to push a WSF agenda. Helen Schwantje is of particular interest. At the THS II, Kevin Hurley was engaging the WSWG contingent exploring funding from WSF auction tag proceeds.

We have this information not as a result of transparency, but as a result of investigative urgency. When it's understood that an agenda exists that intends to arbitrarily and dishonestly eliminate public lands user groups and the associated businesses (one of which is mine), it's imperative to ask questions and look for answers. The llama community has compiled the answers in the commentary based on analysis of the previously mentioned sources.

The intent of my letter is to find out WAWFA/WSWG's level of involvement. Are you actively engaged in banning llamas or is this something that has been subtly insinuated within the organization? Please read the commentary in its entirety and understand the llama community's position. Llama owners and packers are tired of the behind the scenes manipulation that has been going on.

Since there has been no active engagement of the llama community regarding valid disease concerns and there have been denials of wanting a ban, we can only assume those actively seeking the ban understand the weakness of their position and have jettisoned science for the alternative of power and influence.

This will not end well. State veterinarians will have to defend the additional species drawn into this action of necessity, because they pose more significant threats than llamas. (Notably horses, canids, cattle, and humans.) We assume the WSF strategy is to get state wildlife agencies to present llamas as a disease threat to wild sheep that land management agencies will in turn use to enact bans in their jurisdictions. Those bans will be challenged by the affected

user groups and it will be at that point that science re-enters the process. Judges tend to be partial to scientific facts. They will label any such decisions as “arbitrary and capricious”, because they originate from a compromised process, collusion, and lack of transparency. I urge you to carefully consider my remarks and the position in which I and other llama owners and users find ourselves. We have been arbitrarily targeted for elimination and we intend to persist and prevail on the basis of the truth. Thank you for your time and careful consideration.

Most sincerely,

Stan Ebel, pres. Buckhorn Llama Co., Inc.

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