



## Greater Appalachian Llama and Alpaca Association

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Greater Appalachian Llama and Alpaca Association  
12564 Hacksneck Road  
Hacksneck, VA 23358

June 28, 2018

Greg Siekaniec, Alaska Regional Director  
US Fish & Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99603-6199

RE: Pack Llama Prohibition – Arctic National Wildlife Refuge

Dear Mr. Siekaniec:

I am writing to you on behalf of the 3000+ llama owners and users represented by the Greater Appalachian Llama & Alpaca Association (GALA), the International Llama Registry (ILR), and the Rocky Mountain Llama Association (RMLA). The North American llama (alpaca) community recently became aware of a prohibition on pack llamas in the Arctic National Wildlife Refuge (ANWR) per the ANWR Comprehensive Conservation Plan (2015). This USFWS decision was apparently based on the premise that llamas pose a significant disease transmission risk to wildlife populations. We have reviewed the EIS and find that it presents **no scientific evidence** to support USFWS's conclusion. However, we did find references in the EIS that appear to be based on *hypothetical risk scenarios*.

The British Columbia risk assessment (Schwantje et al), and the Northwest Territories risk assessment (Gaarde et al).” discredit themselves as “hypothetical” and “with insufficient data available to clearly assess the role of camelids as a source of disease”.

- a) Garde, E., et al. 2005. *Examining the Risk of Disease Transmission between Wild Dall Sheep and Mountain Goats and Introduced Domestic Sheep, Goats, and Llamas in the Northwest Territories*. On page 2 of the above publication it states, "Conversely, contact between llamas and wild Dall's sheep or goats may result in disease in wild species, **but there is insufficient data available to clearly assess the role of camelids as a source of disease at this time** (for additional information see *Communicable Diseases Risks to Wildlife from Camelids in British Columbia*)."
- b) Schwantje, et al 2003. *Communicable Diseases Risks to Wildlife from Camelids in British Columbia*. On page v of the above publication (Executive Summary) it states "**Risks from camelids to wildlife in British Columbia remain hypothetical after this risk assessment, as no direct evidence was found to implicate camelids as sources of significant diseases in wildlife in BC or elsewhere.**"

In the absence of any scientific studies to support any distinctive or significant disease risk from camelids (as compared to other domestic species), then any ban imposed by USFWS would have to prohibit all other domestic animals that pose a disease risk (horses, etc.). Certainly USFWS must realize that all domestic species carry some degree of disease transmission risk. To impose a ban only on camelids would require that USFWS provide scientifically defensible evidence to support such a decision.

USFWS apparently did not make diligent effort to seek or acknowledge the science published by camelid disease experts in the United States (US) and elsewhere. The extensive reservoir of US scientific information authored by these experts presents overwhelming evidence contrary to USFWS's supposition that pack llamas are a disease threat. USFWS failed to identify or address any of that information.

USFWS did not take into account the role of taxonomic separation and disease epidemiology by categorizing llamas with sheep and goats. There was a failure to recognize fundamental taxonomic differences. Dr. Gregg P. Adams DVM, MS, PhD professor at the Western College of Veterinary Medicine, University of Saskatchewan stated "*it is inappropriate to lump llamas with sheep and goats with respect to infectious disease – this reflects a basic ignorance of the tylopod family. Camelids are not new nor exotic to North America - they originated in North America. The diseases listed as a risk posed by llamas are no different than a list that could be made up for any species entering the back country, not least, humans. For example, every mammalian species harbours mycoplasma. Contagious ecthema, chlamydiosis and MAP in camelids are rare - far less than in humans. In any risk assessment, the objective is to determine the probability of an event happening and the consequences of such an event. There is no such thing as zero risk, and a zero-risk policy is not a legitimate argument to "strongly support a precautionary approach", if for no other reason than this approach is not being applied to all equally.*" USFWS has clearly taken a zero tolerance approach by prohibiting pack llamas.



As Dr. Adams went on to say (in reference to officials in BC at the time considering a pack llama ban), *"If the BC Wildlife Branch does not prohibit horses, dogs and humans in the BC back country, the onus is on the Ministry to provide documentation for their decision to prohibit llamas. Perhaps they know something we don't. If so, fine - let's see the evidence. If not, then the prohibition must be rescinded."*

In the attached 2012 letter from the late Dr. Murray Fowler (recognized camelid expert) to the Alaska Department of Fish and Game (ADF&G) he takes exception to the Canadian publications a) and b) (above). Fowler states that llamas should not be categorized with sheep and goats as the Canadian publications have done. Fowler is not alone. Dr. Larue Johnson, recognized camelid expert/professor emeritus at Colorado State University addressed this same issue (see attached "Precautionary Principle Paper" to B.C. Canada Ombudsman).

Regarding any rationale that Alaska wildlife populations are unique or especially vulnerable to disease because they are immunologically naive, that must be applied to all domestic animals equally in the absence of scientific evidence that would demonstrate that llamas pose a distinctive or significant risk as compared to other domestic animals. Recent research from ADF&G suggests that Alaska's Dall's sheep populations may have been first exposed to pathogens of concern beginning many years ago. Until very recently most wildlife disease experts thought these pathogens were non-existent in Alaska. For example, ADF&G recently announced new *M. ovi* research findings (2018) indicating that Dall's sheep populations throughout much of Alaska (including some of the remotest parts of the Brooks Range) currently carry the pathogen and may have been carriers all along. Additional evidence from ADF&G suggest that Alaska's moose and caribou carry the pathogen and are also potential vectors. Until recently, the primary potential vector was thought to be domestic goats and sheep but the current research suggests otherwise.

The goal of our organizations is to resolve the inconsistency in pack-animal policies in Alaska. While it recently came to our attention that Bureau of Land Management Eastern Interior Resource Management Area (BLM-EIRMA) has also imposed a pack llama prohibition (December 2016), the policies in ANWR and BLM-EIRMA appear to be inconsistent with the policies that apply within Dall's sheep habitat throughout the rest of Alaska. It is our understanding that such inconsistencies should have been identified during an EIS Governor's Consistency Review, but that process apparently failed to identify the inconsistencies. Our organizations and the membership we represent appear to have been completely unaware that the USFWS pack llama prohibition in ANWR had been imposed back in 2015. The EIS notification process in both agencies (USFWS & BLM) appears to have been very ineffective (insufficient) in that we were not made aware that there was even a public comment period prior to imposing these restrictions on an established user group.

We would like to bring to your attention the National Park Service (NPS) policy with respect to pack llamas. It is our understanding that NPS does not prohibit pack llamas due to a disease threat anywhere in their jurisdictions (including Alaska region and lower-48 states) and this includes areas with sensitive wild sheep and goat habitat. For example, it is our understanding that pack llamas are welcome in Yellowstone NP and Rocky Mountain NP.

Rocky Mountain NP has apparently been using pack llamas for more than 30 years for various maintenance activities. Both of these parks have sensitive wild sheep and/or goat populations. AK-NPS has issued permits each year since 2015 to use pack llamas in their jurisdictions. We have been in communication with one of those permit holders, Mr. Nuechterlein who is a llama packer in Alaska. At the time the AK-NPS permit process was initiated in 2015, NPS (in consultation with the AK-NPS Director) assured Mr. Nuechterlein that the intent of the permit process was not to prohibit any pack llama user groups but rather to monitor who is using pack llamas in each park and to have a general idea of when and where they will be traveling. Mr. Nuechterlein's activities include using pack llamas to hunt wild Dall's sheep. AK-NPS has monitored him in the field and is well aware of his sheep hunting activities. The NPS permit requires Mr. Nuechterlein to use weed free llama feed (as stipulated in his permit). Mr. Nuechterlein reports that the permit process is simple and available to the prospective llama packer at no charge from NPS.

Per the attached letter from the ADF&G dated June 11, 2018, the current Department's position is "at this time we have no intention to promote or support limiting the use of South American camelids on public land in the State of Alaska". This decision was made by ADF&G despite the fact that they supported and helped pay for the Canadian *Risk assessment on the use of South American camelids for back country trekking in British Columbia* study and report (RA) dated October 24, 2017 (as referenced in the attached ADF&G letter). The ADF&G letter states "there is no significant information in the RA. After discussing the document internally and with other biologists from several jurisdictions (including the Western Association of Fish and Wildlife Agency Wild Sheep Work Group - WSWG), we will continue to focus and enhance our evaluation of disease risk from species other than llamas or related camelids. There is not enough information presented in this report or other current publications to warrant spending additional resources on this issue." Furthermore, the ADF&G letter states "we understand that the WSWG pulled the RA report from their website partially due to some concerns about the report itself." Please note that WSWG does not recognize either of the Garde, E., et al. 2005 or the Schwantje, et al 2003 Canadian publications as reasonable justification to support a pack llama prohibition in wild sheep and goat habitat. See attached letter from ADF&G dated June 11, 2018 that should adequately address the WSWG opinion of the Canadian RA paper.

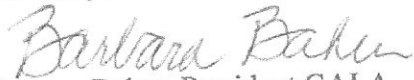
Our organizations have developed the website [www.packllamas.org](http://www.packllamas.org) to provide scientific information about pack llamas and help clear up any perceived disease issues. Pertinent documents are posted here for public access.

Are there any other USFWS jurisdictions (US wildlife refuges) in Alaska that prohibit pack llamas based on a perceived threat of disease transmission? We are not aware of any such prohibitions within US Wildlife Refuges outside of Alaska. Please confirm one way or the other. By this letter, we also formally request that USFWS notify us of any and all future proposed rulemaking concerning llamas in Alaska USFWS jurisdictions. The email address for notification follows my signature on this letter.



In summary, we request that you re-consider the ANWR pack llama prohibition in light of the new information we have provided, and amend ANWR policy to equally accommodate the pack llama. We also look forward to a timely response to the issues raised in this letter.

Sincerely,



Barbara Baker, President GALA

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Enclosures: Dr. Murray Fowler letter to ADF&G dated April 9, 2012 (public record)  
Dr. Larue Johnson "Precautionary Principle Paper" to B.C. Canada Ombudsman  
dated May 22, 2016  
ADF&G June 11, 2018 letter to GALA