



## 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

Geoff Beyersdorf, Fairbanks District Manager  
Bureau of Land Management  
222 University Ave  
Fairbanks, AK 99709

RE: Pack Llama Prohibition – BLM Eastern Interior Resource Management Plan

Dear Mr. Beyersdorf:

Thank you for your commitment to provide a forum for further discussion on the topic of pack llamas in the Eastern Interior Resource Management Area (EIRMA) as stated in your letter dated June 18, 2018 to Mr. Nuechterlein, an Alaskan llama packer. 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 has had the opportunity to review BLM's letter to Mr. Nuechterlein. It is our understanding that Mr. Nuechterlein first discovered (in August 2017), that a prohibition on pack llamas in or near Dall's sheep habitat within the EIRMA had been imposed. That prohibition apparently occurred approximately eight months prior (in December 2016) by approval of the Eastern Interior Resource Management Plan (EIRMP). It is our understanding that Mr. Nuechterlein sent you a letter in December 2017 and BLM recently sent a reply to his letter dated June 18, 2018. BLM's reply letter states "Based on this review, I

do not find sufficient reason to amend the Eastern Interior RMP". We request that you reconsider amending the EIRMP (by removing the prohibition on llamas) because of the following **new information**.

- In your letter to Mr. Nuechterlein you attached "supplemental information on the potential for disease transmittal from camelids to Dall sheep". Included in that "supplemental information" (in support of BLM's llama prohibition) is a reference to the British Columbia Centre for Coastal Health (CCH) paper (dated October 2017) that was published 10 months after the BLM –Eastern Interior Resource Management approval. The new information that we have for you is that per the attached letter from the Alaska Department of Fish and Game (ADF&G) dated June 11, 2018, the 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 CCH (RA) report. 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."
- Your letter states that "Alaska wildlife populations are unique" and "may be especially vulnerable to disease due to this long term isolation." More 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 the Alaska Department of Fish and Game (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.

Also, we request you **address the following issues** pointed out in Mr. Nuechterlein's letter (see attached). These are issues that were apparently not addressed in BLM's reply to Mr. Nuechterlein:

- Your reply does not address the **taxonomic separation/disease epidemiology** issue as it pertains to BLM's categorization of llamas with sheep and goats. There are fundamental taxonomic differences. Llamas are not ruminants like wild sheep and domestic sheep and

goats. Their evolutionary pathways diverged beginning 40 million years ago. Consequently, strong species barriers make llamas far less likely to transmit disease than goats and sheep. The references attached to Mr. Nuechterlein's letter (recognized camelid expert opinions) should adequately address this issue.

- Your reply states, "due to the various pathogens potentially carried by both camelids, and wild sheep, risk for transfer exists where these animals share space." Certainly BLM must realize that all domestic species carry some degree of disease transmission risk. To impose a ban on llamas would require that BLM provide scientifically defensible evidence that llamas pose a risk that is unique or significantly higher than other animals that are permitted in this jurisdiction. It appears that the "supplemental information" contains only **hypothetical risk scenarios**. Those publications clearly discredit themselves (by their own author's admission) as "hypothetical" and "with insufficient data available to clearly assess the role of camelids as a source of disease". There is a **conspicuous absence of any science** to support BLM's position.

Your letter identifies the following government jurisdictions where pack llamas are "prohibited." We will attempt to **address each of these government jurisdictions** that you have identified:

- *The Arctic National Wildlife Refuge Comprehensive Plan* – Thank you for bringing this to our attention. Our organizations will address that issue with the US Fish and Wildlife Service (USFWS) directly. Our goal is to resolve the inconsistency in pack animal policies that exist in both the BLM -EIRMA and USFWS – ANWR because those policies appear to be inconsistent with the policies that apply within Dall's sheep habitat throughout the rest of Alaska. Our organizations and the membership we represent (3000+ camelid owners in the US) appear to have been completely unaware that the US Fish and Wildlife Service (USFWS) pack llama prohibition in ANWR had been imposed back in 2015. The EIS notification process in both agencies 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.
- *BLM's Kobuk-Seward Resource Management Plan (2008)*. Your letter states that this jurisdiction does not allow use of llamas as pack animals in conjunction with permitted activities (commercial use). We recognize that certain commercial activities are not allowed or are only allowed through a permitting process for various reasons which may be legitimate. Blocking access to any user group (commercial or not) based on hypothetical disease risk scenarios is unacceptable. It appears that the Kobuk-Seward Peninsula Record of Decision and Approved Management Plan (2008) refers to Objective Fish and Wildlife-5 as "Minimize the potential for disease transmission from livestock to wildlife" with the Required Operating Procedure (ROP FW-5a) "The use of domestic goats, alpacas, llamas, and other similar species in conjunction with permitted activities will not be allowed". What are "similar species" given the mixture of taxonomic classifications described? How are any species that BLM considers "similar" comparable to goats/sheep but also comparable to camelids when Bovidae and

*Camelidae are completely different families (taxonomic classifications)? Pack horses and mules are also livestock separate from Bovidae, but yet seem to be arbitrarily allowed in "conjunction with permitted activities", while pack llamas are arbitrarily put in the "permitted activities not allowed" along with the unknown unidentified similar species? We also find it interesting, it appears this ROP FW-5a had no public input in this EIS process that has eliminated this established user group. This appears strikingly similar to the same vocabulary and process used in the BLM EIRMP.*

- *The National Park Service (NPS).* Your letter states that NPS “prohibits llamas in National Parks that have Dall sheep or mountain goat populations, except that a permit may be issued for packing purposes, which can include measures to mitigate risks. One individual has been permitted in one park since 2015.” This statement may be subject to misinterpretation. 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. In the NPS - Alaska Region (AK-NPS) llama packing is apparently allowed by permit (so the word “prohibited” is misleading because the activity is actually “allowed” under the condition of a permit).

Your statement that “One individual has been permitted in one park since 2015” is irrelevant. Mr. Nuechterlein tells us that he is apparently the permit holder that you are referring to. If Mr. Nuechterlein is the only permit holder, that should not diminish the importance of providing access to a user group based on criteria that is applied equally to all user groups. AK-NPS has issued Mr. Nuechterlein a permit each year since 2015 to use pack llamas in Wrangell-St. Elias NP. Mr. Nuechterlein currently holds a permit for 2018. 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 “measures to mitigate risks” you refer to may pertain to the requirement to use weed free llama feed as stipulated in his permit. Mr. Nuechterlein has seen no indication from AK-NPS that they are abusing their authority to restrict access in any areas within their jurisdictions (including wild sheep and goat habitat).

- *Gates of the Arctic National Park and Preserve General Management Plan.* We will refer to our explanation above with respect to NPS. It is our understanding that there are no pack llama prohibitions based on disease threat in this AK-NPS park (or any other AK-NPS park) as long as a proper permit is obtained. Mr. Nuechterlein reports that the permit process is simple and available to the prospective llama packer at no charge from NPS. See page 213 GAAR Management Plan Amendment 2016 attached to this letter.

- *The Alaska Department of Environmental Conservation (ADEC) State Veterinarian and the Alaska Department of Fish and Game Wildlife Veterinarian* - this BLM statement simply recites an old news release in 2005 that was an advisory (non-regulatory) and was subsequently dismissed by both ADEC and ADF&G. BLM should be relying on current information from these Departments. Also refer to the current letter from ADF&G (attached) that should clarify ADF&G's position on this issue.
- *British Columbia (BC)* – BLM should not set policy based on the regulatory decisions of any other agency (especially other countries) without scientific analysis of the basis of those decisions and independent scientific peer review. Like the BC camelid prohibition, the BLM-EIRMP cites Canadian literature (hypothetical risk scenarios) and fails to recognize the wealth of readily available US scientific information that will address the camelid “disease issue”. Please note that WAFWA-WSG does not recognize these same 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 WAFWA-WSG opinion of the Canadian CCH 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.

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

Sincerely,



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Enclosures: ADF&G June 11, 2018 letter to GALA  
Page 213 GAAR Management Plan Amendment 2016  
Nuechterlein December 21, 2017 letter to BLM