



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
1011 E. Tudor Rd.  
Anchorage, Alaska 99503



IN REPLY REFER TO:  
NWRS719-0024

MAY 02 2019

Ms. Barbara Baker, President  
Greater Appalachian Llama and Alpaca Association  
12564 Hacksneck Road  
Hacksneck, Virginia 23358

Dear Ms. Baker:

Thank you for your letter from June of 2018. I appreciate you taking the time to share your organization's views and concerns regarding pack animal use in Alaska, in addition to providing references on risk assessments and other scientific information. I want to apologize for the significant delay in our response to your questions.

The Draft Arctic National Wildlife Refuge (NWR) Comprehensive Conservation Plan/Environmental Impact Statement (CCP/EIS) was released for public review on August 15, 2011. Over 612,000 public comments were received. The final Arctic NWR CCP/EIS was released for public review on January 25, 2015. The preferred alternative adopted management goals and objectives, and revised management policies and guidelines for management of the Refuge over the next 15-20 years. The Record of Decision for the CCP/EIS was signed by the Alaska Regional Director of the U.S. Fish and Wildlife Service (Service) on April 3, 2015. As part of the process, the Service completed extensive outreach, consultation and coordination with the State of Alaska, other Federal agencies, Tribal Governments, local governments, and the public.

As you are aware, the Arctic NWR CCP addresses the prohibition on camelids in section 2.4.12.9 Disease Prevention and Control. It states: *Dall's sheep in Alaska, including Arctic Refuge, are free of domestic livestock diseases and are believed to have very low immunity to many of these diseases. In particular, domestic sheep, goats, and camelids (e.g., llamas and alpacas) are recognized as being at high risk for carrying disease organisms, often asymptotically, that are highly contagious and cause severe illness or death in Dall's sheep (Garde et al. 2005). Therefore, domestic sheep, goats, and camelids are not allowed on Arctic Refuge. This restriction is subject to promulgation of regulations for non-commercial uses.* Dall sheep are of particular interest to us because the Alaska National Interest Lands Conservation Act gives Arctic NWR a purpose specific to Dall sheep that reads: *The purposes for which the Arctic National Wildlife Refuge is established and shall be managed include (i) to conserve fish and wildlife populations and habitats in the natural diversity including, but not limited to.... Dall sheep.... and (iii) to provide.... The*

*opportunity for continued subsistence use by local residents....* ". At this time, we do not have a timeframe for initiating a new rule making process for the Arctic CCP. However, we appreciate your interest and will notify your organization at such a time that this process may begin. Our goal in promulgation of any regulations is to ensure the use of the best scientifically based information possible in decision making.

As the Alaska Director of the Department of Fish and Game wrote in his letter to you, we recognize that many different wild and domestic animals can be vectors for disease in wildlife. Tragedies such as the continued spread of chronic wasting disease in lower 48 states remind us of the value of a cautious approach to these issues in our largely intact ecosystems of Alaska. At this time, no other National Wildlife Refuge in Alaska has prohibitions against pack llamas. We strive for regulatory consistency in our system of Refuges in Alaska, while also recognizing that there are often different purposes and other localized conditions that result in different regulatory approaches.

Thanks again for your letter and interest in Arctic National Wildlife Refuge. If you have any additional questions, please contact Mr. Doug Damberg, Refuge Supervisor Alaska North Zone, at (907) 786-3329.

Sincerely,



Gregory E. Saitanic  
Regional Director