
CHUGACH NATIONAL FOREST LAND MANAGEMENT PLAN

Reviewing Officer Response to Eligible Objections



January 27, 2020
USDA Forest Service
Alaska Region



Issue Summary – Llamas as Disease Pathogens

There were multiple objectors who contended that the Forest Service violated NEPA for failing to provide public notice of a change between the DEIS and FEIS which would eliminate pack llamas and failing to support the analysis and draft ROD with science and rationale.

Objectors

Alexa Metrick, Barbara Baker, Bonnie Borowiec, Chela Grey, Dan Marshall, Dr. Kris Bogovich, Elain Partlow, Eran McCarty, Geri Rutledge, James Cook, JC Sheppard, Jeanine Jenovino, Jerrika Mumford, Joy Pedroni, Kaitlyn Lewis, Kaitlynn Virgo, Lanea Burns, Leigh DiNatale, Linda Hayes, Linda Nuechterlein, Michelle Kutzler, Phil Nuechterlien, Ramona Simpson, Robert Rutherford, Scott Woodruff, Shelley Loveless, Sona Gardner, Stan Ebel, Steven Auld, Thad Okerlund

Objectors' Proposed Remedies

Do not identify llamas as a disease threat to wild sheep or other wildlife as referenced in the FEIS and the Land Management Plan.

Rewrite the Land Management Plan FW-WLGOAT-S (2) to exclude llamas

Background

Between the DEIS and FEIS the Forest Leadership Team met with the Forest Land Management Planning Team and discussed the potentially catastrophic and the ecological consequences that could potentially result from transfer of pathogens from domestic livestock, including llamas, to Dall sheep and mountain goats. The Forest Leadership Team determined that due to those potential consequences, and in the absence of past or current use of domestic sheep, goats or llamas by Forest Service personnel, contractors or special use permit holders, prohibiting the use of these animals by Forest Service employees, contractors or special use permit holders on the Chugach National Forest would minimize the risks to three important and highly valued wildlife species (Dall sheep, caribou, and mountain goats) inhabiting the Chugach National Forest and the vast interconnected network of public and private lands without affecting any current Forest users (Meeting Notes from 12/18/2018 Record # 6053). Such changes between the DEIS and FEIS to supplement, improve or modify its analysis are allowed in NEPA (40 CFR 1503.4 (a)(3)).

After this meeting, the response to concerns about Dall sheep and mountain goat populations was revised to include the (misspelled) word “lama,”

Response

Currently, there is little peer-reviewed literature addressing the prevalence and pathogen transmission dynamics for South American camelids. However, the mere lack of documented transmission from camelids to wild ungulates cannot be considered evidence that transmission has not or could not occur (Centre for Coastal Health 2017). NEPA allows for changes and clarifications between the draft and final EIS. However, I find that the change in the FEIS was not easily identified by the reader as llama was misspelled as ‘lama’. Also, the FEIS lacked rationale as to why llamas were the only domestic livestock species, aside from sheep and goats, which was identified as a potential vector for pathogens to Dall sheep and mountain goats.

Conclusion

After considering the planning record, discussions with Forest staff, and the thoughtful dialog at the resolution meeting, I've decided to provide Forest Supervisor Schramm instructions to change FW-WLGOAT-S (2) to the following:

Personnel conducting Forest Service management actions or authorized activities (employees, contractors, cooperators, and special use permit holders) shall not use or keep domestic goats or sheep on National Forest System lands within the Chugach National Forest. [Standard]

I am also instructing Forest Supervisor Schramm to remove references to llamas (or lamas) as potential vectors for the transfer of pathogens to Dall sheep or mountain goats from the FEIS. This may be completed in an errata to the FEIS.

As scientific literature addressing the prevalence, and pathogen transmission dynamics for South American camelid pathogens becomes available the Forest may choose to once again address this issue. With the above instructions, I consider these objections resolved.