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I am a llama owner and commercial packer, in business since 1977. My family has made a living from the packing abilities of the llama for over 40 years. We worked diligently through the years to breed and train pack llamas that serve our client's needs. Our herd currently numbers 120 animals.

We lease llamas to support trail and backcountry crews for the NPS, USFS, and BLM as well as serve the needs of private outdoor recreationalists including hunters, fishermen, photographers, and families doing backcountry camping. The llamas have proven to be exceptionally low impact regarding the environment, wildlife, and other user groups. Llamas as pack animals in the backcountry is a proven concept that is growing rapidly.

An issue has come to my attention that alarms me. A pack llama owner who hunts wild sheep in Alaska (AK) discovered in August of 2017 that pack llamas had been banned on December 30th, 2016 by a Management Plan from the Alaska-Bureau of Land Management (AK-BLM).

The decision is contained in the BLM-Eastern Interior, White Mountains Record of Decision and Approved Resource Management Plan, Page 51

Wild-4: Maintain health of Dall sheep by maintaining effective separation (WAFWA 2012) between Dall Sheep and domestic animals that pose a risk to Dall sheep health, including sheep, goats, llamas, alpacas, and other camelids. • Prohibit the use of domestic goats, sheep, alpacas, llamas, and other similar species in conjunction with BLM-authorized activities occurring in Dall sheep habitat. • Domestic sheep, goats, and camelids (including alpaca and llama) are prohibited in Dall sheep habitat and adjacent lands. Boundaries for adjacent lands will be defined during development of travel management plans. • Educate the public about the disease risks of using these pack animals within Dall sheep habitat.

The BLM's actions are arbitrary, reckless, and poorly considered.

-BLM did not follow the proper protocol for implementing their management plan in specifically taking comment from user groups that are affected, ie. the llama industry and llama assisted hunters and backcountry users. There is a very precise and structured National Environmental Policy Act (NEPA) process that is required when a new management plan is considered for

implementation. That process includes publication of intent and notification of impacted groups and the general public. It provides opportunity for those users to comment.

It appears BLM conducted a unilateral assessment and made the decision to ban a species, and associated user group, without full consideration of all the information available to them. Had they consulted llama users, owners, and veterinarians and taken public comment from affected citizens as required by the NEPA process, the end result would have seemingly been different.

-BLM has no scientific basis for their actions. There is no documented disease on which they can base the ban. There is no compelling need for any action let alone action this drastic. The disease literature for llamas indicates a very low risk of llamas carrying disease and accordingly, a very low risk of disease transmission to wildlife.

AK-BLM uses Canadian research and resources to document the ban proposal. Why is a U.S. land management agency using the paltry, compromised information available in Canada and ignoring the robust storehouse available in the U.S. archives, universities, and the associated faculty who have done the empirical research and documentation?

The British Columbia Wildlife and Veterinary community have an inexplicable tie to a pair of related Risk Assessments from two NW wildlife veterinarians that are conjecture based on diseases in domestic sheep and goats and were deemed without merit after peer review.

Schwantje, et al 2003. *Communicable Diseases Risks to Wildlife from Camelids in British Columbia*.

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*.

Regardless, it seems all subsequent position papers and statements originating in British Columbia and Alaska are based on the conjecture contained in these two papers. WSF-AK (Wild Sheep Foundation), TWS-AK (The Wildlife Society), and the BC Wildlife Federation all have position papers that are based on the conjecture in Garde 2005. These papers are referenced in the rationale for instituting the BC provisional ban on llamas during hunting season and are widely circulated and compromise the image of the llama as a disease threat.

The BLM-EIRMP Environmental Impact Statement (EIS) cites only two references in the EIS: TWS position paper written by Jim Herriges in 2013 based on Garde's conjecture and the Western Association of Fish and Wildlife Agencies (WAFWA) 2012 Wild Sheep Working Group (WSWG) summary paper. The WAFWA document doesn't even mention llamas as a consideration for separation while it recommends the separation of domestic sheep and goats. (The WSWG early on decided pack llamas were not a threat.)

AK-BLM ignored wild sheep research that over the last 25 yrs. (Foreyt 1992,1994,1995,2000 and Besser 2008, 2010) provided the scientific information that led to the separation of domestic

sheep and goats from wild sheep ranges. These studies proved the transmission of *Mannheimia haemolytica*, *Pasturella* spp. and the predisposing *Mycoplasma ovipneumoniae* bacteria by domestic sheep and goats causing the lethal pneumonias and die offs in wild sheep. These studies concurrently proved the absence of those same organisms in llamas and the absence of mortalities in wild sheep when comingled with llamas.

These studies form the basis of the WAFWA 2012 position advocating separation of domestic sheep and goats and make no mention of llamas. They are using actual research as the basis of their recommendation rather than conjecture.

They (AK-BLM) have created a precedent policy that will be used as a template for management of other lands outside of their seemingly insular Alaska region. They failed to consider that in banning the species least likely to carry and transmit disease they have created a de facto zero tolerance policy that will become the standard for other species (horses, mules, dogs, humans, cattle and other domestic species). These species will necessarily need to be banned as well to equally apply the level of protection they've mandated by virtue of the llama ban. In reality, these other species pose a higher risk to wild sheep and goats than llamas do, particularly the diseases they target in separation studies.

This action sets a precedent and could flow to the lower 48. Followed to its end, the ban will restrict public lands hunting and summer recreation, public lands grazing and the associated food and fiber produced from that use. Of course, it destroys the llama packing industry. The certainty of this occurring is demonstrated by the very presence of this new ban. It is a residual effect of the Canyonlands ban of 1994. Though it was overturned and repudiated, it has sustained an influence in BC and AK. Fixated on that short-lived ban and frustrated by its rescission, some resource managers in AK and BC have never wavered in their desire to pursue policies and legislation to eliminate llama use in their jurisdictions.

This action is uncharacteristic of BLM's usual mode of operation and antithetical to its mission statement: "*Our **Mission. The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of America's public lands for the multiple use and enjoyment of present and future generations.***"

By banning llamas, BLM's vision for protecting the environment and the wildlife within it looks questionable. They've banned the animal least likely to carry and transmit disease. They have banned the animal with superior adaptation and lowest impacts on the high-altitude environments occupied by the wild sheep. They've banned the most effective pack animal in terms of impacts (10% that of a horse). They've banned the pack animal that has the lowest maintenance costs in the off season that could contribute to commercial outfitter profitability. They have pursued the least sustainable option.

They've eliminated the best option for the private hunter as well as the conscientious outfitter/guide to get into the back country and get game out, regardless of the species they hunt.

If other units and management agencies follow this policy and ban llamas, the economic impact would be catastrophic in both AK and the lower 48. It would obviously destroy the llama industry, but it would have a devastating effect on the hunting, recreational, and food/fiber animal industries. You would assume BLM would act to rescind this action prior to reaching that point. In view of no supporting evidence, now would be the appropriate time.

Please enter these comments into your EIS file. I also ask that you put me on your contact list and apprise me of any policy considerations involving camelids, specifically llamas. If you have questions or need additional information, please feel free to contact me.

Most sincerely,

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