

Date submitted (Alaskan Standard Time): 9/19/2019 12:12:51 PM

First name: Linda

Last name: Nuechterlein

Organization:

Title:

Comments:

By this comment I am providing formal notice of objection to the Final Chugach National Forest Land Management Plan (signed by Jeff E. Schramm, Forest Supervisor) during the 60 day objection period ending October 28, 2019. I strongly object to the "final" Chugach National Forest Land Management Plan (CNFLMP) restrictions/prohibitions on pack llamas because llamas do NOT pose a disease threat and should not be banned or restricted for any use within the Chugach National Forest (CNF).

The final CNFLMP decision states on page 55, "Personnel conducting Forest Service management actions or authorized activities (employees, contractors, cooperators, and special use permit holders)" shall not use or keep "llamas". It is unclear whether this applies to recreational pack llama users however, it does not allow "llamas" for commercial llama packing in the CNF. If llamas pose a disease threat in official and/or commercial use, it would follow they are a threat in all types of use. Therefore I request that llamas (llamas) be allowed for any use (commercial or otherwise) in CNF without restriction and request that CNF refrain from identifying "llamas" (pack llamas) as a disease threat and remove all reference in the final CNFLMP that implicate them as such.

CNF has provided no defensible rationale for identifying pack llamas as a disease risk and banning their use in CNF commercially (or otherwise). The sole reference in the final Environmental Impact Statement (EIS) for the CNFLMP is a Canadian publication (Garde, E., et al. 2005) that states (within the document itself on page 2) there is insufficient data to clearly assess the role of camelids as a source of disease. The authors of Garde publication ignored the overwhelming amount of US scientific data that specifically identifies llamas as extremely low risk for disease transmission due to taxonomic characteristics that widely separate them from wild sheep. Llamas are from the family Camelidae while wild sheep, domestic sheep, and goats are from the family Bovidae. Their evolutionary pathways diverged beginning 40 million years ago. Consequently, strong species barriers (similar to horses) make llamas extremely unlikely to transmit disease as compared to goats and sheep. CNF staff have demonstrated a surprising lack of understanding of fundamental taxonomic principles and disease epidemiology by categorizing "llamas" in with sheep and goats with complete disregard of the wealth of US scientific literature that is available on this subject.

In contrast to CNF, the Alaska Department of Fish and Game (ADF&G) looked at the same Canadian study that CNF based their decision on and came to a completely different conclusion. As stated in the ADF&G letter dated June 11, 2018 "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 a camelid disease study (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." Further, 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." (WAFWA is widely recognized among state and federal wildlife agencies as the scientific reference for wildlife disease issues.)

Science has shown that llamas are less likely to transmit disease to wildlife than other pack stock such as horses or mules. Ironically these are the very animals that are considered to be the preferred species. Horses (equine species) may pose a greater disease risk than llamas as they have a number of endemic disease susceptibilities (equine influenza, equine encephalomyelitis, equine herpesvirus rhinopneumonitis-EHV, Potomac Horse Virus, vesicular stomatitis, strangles, etc.) and are overall less healthy than llamas. Llamas have an exceptionally strong, broad spectrum immunologic system such that their serum is being considered in development of flu vaccines for humans that give a wider spectrum and more enduring protection. See <https://www.smithsonianmag.com/smart-news/llama-antibodies-may-be-key-flu-prevention-180970704/>.

It is clear that CNF has provided no defensible rationale to eliminate llamas on the basis of "precautionary principle" while allowing continued access to horses. There is no such thing as zero risk and a zero risk policy

is not a legitimate argument, if for no other reason than this approach is not being applied equally to all. If CNF bans the use of pack llamas (Camelidae family) based on a disease threat, then it would only be reasonable that CNF impose these same restrictions on pack horses (Equidae family).

And finally, CNF has demonstrated a disturbing lack of transparency throughout the entire public process. By all appearances CNF avoided the intent of the NEPA process by not providing any public notice of their intent to prohibit/restrict pack llamas during the prescribed public comment process associated with the draft CNFLMP. The draft CNFLMP says nothing about llamas so the public would assume that the CNFLMP would not change anything with regard to the use of pack llamas in CNF. Now the public is suddenly faced with a final CNFLMP that contains pack "lama" prohibitions/restrictions and forced to protest as opposed to being offered a fair opportunity to comment during the prescribed NEPA public comment processes.

Furthermore, CNF successfully thwarted further public comment by misspelling llama as "lama" so that those electronically searching the public documents would NOT find any change to the draft CNFMP under "llama." If CNF had intended to refer to the llama by genus rather than common name, then it would be logical for CNF to have referred to goats and sheep by genus rather than by common name. And lastly, the CNF website was dysfunctional for posting comments for a period of time.

In conclusion, I again request that CNF refrain from identifying "lamas" (pack llamas) as a disease threat and remove all reference in the final CNFLMP that implicate them as a disease threat. By this letter I am providing formal notice of objection to the Final Chugach National Forest Land Management Plan (signed by Jeff E. Schramm, Forest Supervisor) during the 60 day objection period ending October 28, 2019.