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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 beginning approximately August 30, 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). In the following statement "llamas" (llamas) are identified by Chugach National Forest (CNF) as a threat of M. ovi transmission to wild sheep. WAFWA 2017 is cited as a reference in support of this assertion (alleged llama M. ovi disease threat) but WAFWA 2017 does not include any discussion of llamas. CNF's assertion of a llama M. ovi disease threat appears to be in striking conflict with documented research and clinical observation. We are not aware that WAFWA recognizes M. ovi to be a disease of any significance in llamas. There appears to be no basis and CNF offers no references that support their assertion. The onus would be on CNF to demonstrate a disease problem in llamas if they know something that the llama community doesn't know.

Chugach National Forest Land Management Plan Final Environmental Impact Statement Volume 1, page 442 states as follows: "Personnel conducting Forest Service management actions or authorized activities (employees, contractors, cooperators, special use permit holders) shall not use or keep domestic goats, sheep or llamas on National Forest System lands within the Chugach National Forest. This measure is designed to maintain separation of Dall sheep and mountain goats from domestic livestock and reduce the risk of wild herds becoming infected with M. ovi, the primary pathogen believe responsible for epizootic pneumonia (WAFWA 2017)."

It appears that CNF may have looked only for evidence in support of their hypothesis (pack llama disease threat) because Garde, E. et al. 2005 appears to be the only reference (see CNF EIS volume 1 References on page 493). The Garde publication consists of flawed advocacy research that has been rejected by peers. (See attached letters from the late Dr. Murray Fowler and Dr. Larue Johnson. Both are recognized camelid disease experts.)

Flawed research on almost every topic has flooded the internet. This has become problematic for the public when it is selectively cited by regulatory agencies or activists to support a hypothesis, sometimes long after the findings have been discredited. Part of the problem could be a failure to identify what constitutes science. The following link is a Hoover Organization article Scientifically Illiterate America:

<https://www.hoover.org/research/scientifically-illiterate-america>

The Garde publication on page 2 states ".there is insufficient data available to clearly assess the role of camelids as a source of disease at this time" The Garde publication as referenced by CNF clearly discredits itself as a scientific document by this admission.

Another part of CNF's problem is that they miscategorised llamas in with sheep and goats as having similar infectious disease potential. This reflects CNF's lack of understanding of "lama" taxonomy and how that relates to infectious disease potential. The attached letters from camelid experts should adequately address this issue.

Another possible error with respect to CNF's interpretation of the Garde publication is that in any risk assessment, the objective is to determine the probability of an event happening and the consequences of that event. There is no such thing as "no risk". A no risk policy is not a legitimate argument to "invoke the precautionary principle", if for no other reason than it is not being applied to all uniformly.

If CNF does not prohibit horses on the basis of disease risk, the onus is on CNG to provide documentation for their decision to prohibit llamas. CNF has apparently not provided scientific documentation to support their assertion of "lama" disease risk. I request that all references to "llamas" as a disease risk and all prohibitions/restrictions on "llamas" be removed from the CNFLMP.