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Alaska Board of Game,

2/9/12

I am requesting a reevaluation of proposition 102, and the inclusion of llamas in the ban that will become law on July 1, 2012. I want the board to know first and foremost that I am appreciative of the amendment allowing me the opportunity to certify my animals in the anticipation that I may secure a permit from the *Alaska Fish and Game* to use them while hunting. You gave the information you had, deliberate, meaningful dialogue which allows us an opportunity to still possibly hunt with our animals. I just wanted to take this opportunity to draw your attention to the current research and the science that has been done, and accepted on the llama / wild sheep controversy.

I have sent along with this letter, the *KOFA Proposed Llama Ban*, which is considered the definitive study on this issue, and although it is an extensive read, it outlines the 16-year history of this issue as well as the results of previous efforts by land managers to ban llamas based on the disease transference *perception*.

Biologists and veterinarians over the years have tried to find llamas with these diseases and make the connection that they could potentially threaten wild bighorn herds in the lower 48 as well Dall sheep herds in Canada. They have been unable to find any, and therefore, have only been able to *speculate* on the risk of llamas used as pack animals.

Glacier National Park has llama trekking. Yellowstone Park has llama trekking. The BLM permits llamas as pack animals. The USFS not only allows pack llamas, but in many places, encourages it and has its own. All of these agencies are well aware of the issue, and have been through the very same process the *Board of Game* in Alaska is going through right now. All of them have examined the science and the evidence and have concluded that pack llamas with their owners pose little if any risk to the land or the wildlife. In all of these examples, land and wildlife managers have decided that science cannot support a ban on llamas used as pack stock.

I have also included a series of what I call "sound bites" that give a universal overview of where this issue has been and where it is now. Llamas have been in the United States for about 100 years. We have had them in Alaska since the early 70's. I have been packing and hunting with them since the mid 90's. The documentation speaks for itself so I'll try not to belabor the point in this letter. My hope is that you will take a moment and give this documentation a concentrated overview.

During the last 15 years, I have used llamas as a business venture, although I stopped because I became just too busy with so many people that wanted to access the Kenai Mountains. I have and continue to contract llama work with the Chugach National Forest. I have contracted and done volunteer work with

our llamas for the State of Alaska. ON one occasion, I retrieved a dead sheep hunter on request from the *Alaska State Troopers*. They could not get ATV's, horses or a helicopter to the body. Members of *Alaska Mountain Rescue*, the Troopers and I strapped the body onto a litter and one big llama dragged him out of the mountains and all the way to highway.

I am asking the Board to consider removing llamas from proposition 102, based on the science that has been conducted over the last 16 years. Although the language states that the Alaska Fish and Game may issue a permit based on a clean health certificate, I am left feeling uneasy about it for these reasons: First, the perception both within the department and out in the public is damaging, and once established, is difficult to counter. Second, this listing acts as a slippery slope toward a more involved process and the next rational act by any organization toward a complete ban. Third, I have not been able to nail anyone down on the actual cost of annually certifying my five llamas, but I am told it is expensive.



We are a family of walking hunters. We don't own ATV's. We don't own snowmachines. We don't own boats or planes. We don't have the financial resources to hire pilots. We walk into the mountains on the eastern side of the Kenai Range, and llamas allow us to expand our hunt beyond the accessible thoroughfares. My sons became hunters at an early age because llamas

allowed us a vehicle for transporting gear in and meat out. Little boys have a difficult time at best climbing in to the Kenai Mountains with all the right gear needed to survive. This is why less than one percent of the students in the Seward Schools hunt. Less than one percent. These are Alaska kids, and they don't hunt. But they like to play video games. My boys have always told their peers that they prefer realty to virtual reality. We lay my son's trapline in with llamas. We load float tubes, fly rods and gear on our llamas and fish the high mountain lakes of the Resurrection drainage. Llamas have taken much of the risk out of taking my family into the mountains for extended periods of time. As I stated in my earlier letter to the board, my wife is a breast cancer survivor and due to her numerous and extensive surgeries, she can no longer shoulder a pack. Llamas have been the only reason that she has been able to continue with the boys and I on our ventures.

If you study the results of the research and the science and choose to decline my request to revisit this very important issue, I will abide by the law and go through the certification process. I would welcome

any questions you may have, and if I can't answer them, I'll contact the pertinent researchers and scientists, and I'll get the answers for you. Please give this another look. There are only a handful of us in Alaska anymore that have llamas and even fewer of us really use them. We are an incredibly small user group and don't have the resources that llama packers do in the lower 48. Oh, I was just thinking that since camels originated here, what would you think of a reintroduction program. Big, bushy Bactrain camels roaming Alaska again!

Thank you for the time you give, the work you do, and your attention to this appeal.

Respectfully,

Dan L. Marshall
Seward, Alaska

<http://www.llama.org/johnes/kofa0.htm> Definitive findings on the llama / sheep controversy

Science and Research Sound Bites:

17) **Recreational livestock permitted on the refuge include horses, mules, burros, and llamas.** (KOFA National Wildlife Refuge - 2011 hunting regulations) *KOFA (home of the desert bighorn) and Canyonlands were the hotbed of the llama / Sheep controversy in the mid nineties. KOFA rescinded their ban on llamas after reviewing the science.*

Glacier National Park explained, "after several months of information gathering, consultation and evaluation, Park officials have decided **not to prohibit the use of llamas as pack animals in the park's backcountry**. This measure was being considered due to the possibility that llamas could transmit Johnes's disease to native mountain goats and bighorn sheep."

"To date, there are no identified pathogens that are specifically adapted to llamas as a host species. That is to say, that if you scour the veterinary literature, you will find reports of llamas that have contracted viral and bacterial problems from horses, cattle, sheep and goats. But there are no reported incidences of diseases contracted by these other species specifically from contact with llamas." (KOFA)

"In light of the uncertainty and expense of litigation, the *Canyonlands Task Force* agreed to this settlement in order to lay the disease issue to rest. In doing so, Superintendent Dabney had to publicly admit what veterinarians have been saying all along: **llamas do not pose a Johnes's disease threat.**"

- The American Association for Small Ruminant Practitioners issued the following statement ". . . **Scientific evidence does not justify a ban of llamas on public lands . . .**"
- The Executive Committee of the United States Animal Health Association, which includes all 50 state veterinarians, adopted the following resolution, ". . . **USAHA recommends that no public lands be closed to llamas accompanied by people for the reason of Johnes's disease . . .**"
- The BLM stated ". . . **the BLM will not consider banning llamas or other domestic species from the public lands based on its current understanding of Johnes's disease . . .**" Since the risk of llama

paratuberculosis transmission is near zero, in order to sustain a pack llama ban based on a perceived threat of such transmission, the Agencies would effectively have to adopt a zero-risk tolerance policy with respect to the Planning Area.

Oregon State University Veterinarian Dr. Stanley Snyder stated ". . . As a reason for keeping llamas out of areas of our national forests, etc., the threat of llamas disseminating Johne's disease to wild ruminants is quite remote. **In Oregon, where Johne's disease in cattle, sheep and goats is quite common and where llama raising is extremely popular, we have not had even a single confirmed case of Johne's disease in llamas . . .**"

"The incidence of Johne's disease in llamas appears to be virtually non-existent. **At most, there have been only two (2) confirmed and two (2) more suspected cases of Johne's disease diagnosed llamas in North America during this century.** Ex. 20 - Belknap at 21; Stehman at 101. Two of those four cases came from a herd of approximately 200 llamas in Colorado. After the discovery of Johne's disease in the two llamas in the herd, the entire herd was systematically tested with no new cases in the several succeeding years. There was no evidence that paratuberculosis had been transmitted to any other llama in the herd. Ex. 20 - Belknap at 23-24. The only epidemiology or pathogenesis study on llamas with Johne's disease could not find any infected adult llamas to include in the study. Dr. Tim Deveau, who works with the U.S. Department of Agriculture's APHIS unit in Wisconsin, tried to determine the incidence of diarrhea in adult llamas with Johne's disease. He interviewed over 75 llama owners and breeders and could find no diseased animals to incorporate into his investigation." Ex. 23, Ex. 20 - Belknap at 30.

"While the National Park Service may have legitimate reasons for restricting the use of non-native species within its boundaries to preserve the integrity of its contained ecosystems, **the Park Service should not be using Johne's disease as the vector for it ban ... it's just not scientifically sound land management (see attached letters from the Colorado State University Veterinary Teaching Hospital and Oregon State University College of Veterinary Medicine.) Similar statements/positions have been offered by the Wyoming State Veterinarian, Dr. Beth Williams, the Idaho Fish and Game State Veterinarian, Dr. Dave Hunter, and Dr. LaRue Johnson of Colorado State University who is the leading Veterinary researcher on llamas in North America.**"(KFOA)

United States Representative Wayne Allard, himself a veterinarian, wrote:"I have been informed by Llama organizations in my district of the action taken by yourself to ban llamas from the Canyonlands National Park. I have studied the history of this particular situation stemming from the original commentary by Dr. Terry Spraker of Colorado State University that seemingly was misquoted by a news reporter. I am a veterinarian and have recently finished some continuing education courses at Colorado State University. I spent some time discussing with my colleagues paratuberculosis in domestic animals. **In this case it seems as there is no scientific basis for banning llamas in National Parks or BLM land based solely on the remote possibility of Johne's disease.**"

Johne's disease camelids

“More than 700 alpacas and llamas were tested for the presence of Johne's disease over the past 12 months, with negative results. Because of the relatively small camelid population in Western Australia, it was possible to undertake a full census of stock over 12 months of age. Testing was based mainly on faecal culture (BACTEC) although serology (CFT) was used on animals imported during the study. The results provide further evidence that Western Australia is free of Johne's...”

“A growing body of evidence is emerging that *M. avium* is the primary cause of Johne's disease in horses. Since our initial reports of **equine Johne's disease in horses**, we have identified three additional cases (10, 11). In addition, **Dr. C. C. Wu (Purdue University) has identified a sixth horse with Johne's disease** due to *M. avium*. The identity of the pathogenic mycobacterium in horses has been confirmed by three different diagnostic facilities” (Infectious Diseases, Inc

