Data Submitted (UTC 11): 9/20/2019 8:00:00 AM
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Comments: I strongly object to the "final" Chugach National Forest Land Management Plan (CNFLMP) restrictions/prohibitions on pack llamas for the following reasons: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)" shallnot use or keep "lamas". While this apparently does not apply to public recreational pack llama users, it does not allow "lamas" for these specified activities (to include commercial llama packing).CNF's point of introduction through use by sanctioned personnel leaves the door wide open for banning private recreational use in a predictable, logical progression. If they are established as a threat in official use, it would follow they are a threat in all types of use.1. Chugach Natio .nal Forest (CNF) has demonstrated an alarming lack of transparency. 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. Consequently, the public is now being forced by CNF to protest the final decision as opposed to being offered a fair opportunity to comment during the prescribed NEPA public comment processes.To further support the very underhanded and secretive draft CNFLMP process, CNF successfully thwarted further public comment by misspelling llama as "lama". If CNF had intended to refer to the llama by genus rather than common name, then logic would have it that CNF would also have referred to goats and sheep by genus rather than by common name.2. CNF provides no evidence of a pack llama disease risk.The sole reference in the final Environmental Impact Statement (EIS) for the CNFLMP is a Canadian publication (Garde, E., et al. 2005) that discredits itself (within the document itself on page 2) as unscientific by stating that there is insufficient data to clearly assess the role of camelids as a source of disease.CNF essentially "cherry picked" one unscientific document that consists of a hypothetical risk scenario to support their position that "lamas" present a disease risk to wild sheep and goats. 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 thatwidely separate them from wild sheep over 40 million years of evolution.Wild sheep and goats are afforded strong disease barrier protection associated with this widely separated taxonomy. Llamas are from the family Camelidae while wild sheep, domestic sheep, and goats are from the family Bovidae.CNF has demonstrated lack of understanding of fundamental taxonomic principles and disease epidemiology by categorizing "lamas" in with sheep and goats with complete disregard of the wealth of US scientific literature that is available on this subject.3. Given the overwhelming amount of US scientific data that demonstrates the safety record of llamas (see packllamas.org) and given the taxonomic separation of llamas from wild sheep and goats, if CNF follows through with their arbitrary identification of pack llamas as a disease threat, CNF will be required to impose these same restrictions on pack horses (Equidae family) that they have placed on pack llamas (Camelidae family).Horses (equine species) are 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.). Llamas have no identified endemic diseases and are naturally healthy and disease free.Additionally, 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 htt ps: / / www .healt h.com /cold- flu-sinus/ llama-flu-vaccine .All current information and history indicate llamas present less disease threat to wild sheep than horses and humans. Humans develop zoonotic infections (TB, MAP, and CE) which can be transmitted to wild sheep. In view of these considerations, it is arbitrary and prejudiced to eliminate llamas on the basis of "precautionary principle" while allowing continued access to horses and humans.4. The final CNFLMP position on pack llamas is at odds with the official position of the Alaska Department of Fish and Game (ADF&G) and the Western Association of Fish and Wildlife Agencies (WAFWA). Per a letter from ADF&G dated June 11, 2018, (see packllamas.orq website)

ADF&G's position is "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." Furthermore, 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."The Western Association of Fish and Wildlife Agencies (WAFWA) positions are foundational to ADF&G's stated policy. WAFWA is widely recognized among state and federal wildlife agencies as the scientific reference for wildlife disease issues. The CNFLMP position on "lamas" is in direct conflict with wildlife disease management recommendations of WAFWA wildlife researchers and veterinary authorities.5. The CNFLMP appears to be inconsistent with USDA - Forest Service research and policy regarding the "pack llama disease issue" in other Forest Service jurisdictions. The Shoshone National Forest Land Management Plan Revision FEIS Volume II states "Pack animals that do not pose disease transference issues including llamas, horses, donkeys, and assistance dogs are not restricted for use by elderly forest visitors."Also see USDA - Forest Service research/technical publications entitled "A Review of Disease Related Conflicts between Domestic Sheep and Goats and Bighorn Sheep", also see "A Process for Finding Management Solutions to the Incompatibility between Domestic and Bighorn Sheep". Both Forest Service publications specifically address pack llamas with disease research that is favorable to their use in wild sheep habitat.In summary, I 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.