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Organization:

Title:

Comments:

I would like to express my concern regarding the restrictions placed on pack llamas in the Chugach National Forest Final Land Management Plan (signed by Jeff E. Schramm, Forest Supervisor). This is my objection to item 2 of (FW-WLGOAT-S or G) on page 55 and it is being submitted during the 60-day objection period ending October 28, 2019.

I request that CNF refrain from identifying "llamas" (pack llamas) as a disease threat and also request that CNF remove all reference in the final CNFLMP to llamas, llamas, or pack llamas that implicates them as a disease threat.

Page 55 of the Chugach National Forest's Final Land Management Plan, published on August 29, 2019, reads:

2. Personnel conducting Forest Service management actions or authorized activities (employees, contractors, cooperators, and special use permit holders) shall not use or keep domestic goats, sheep, or llamas on National Forest System lands within the Chugach National Forest. [Standard]

There is no scientific evidence that llamas (members of the Camelidae family) are a disease threat to mountain goats and Dall sheep. The sole literature cited on this topic is on page 318 of the Assessment of Ecological and Socio-Economic Conditions and Trends for the Chugach National Forest:

Garde, E., Kutz, S., Schwantje, H., Veitch, A., Jenkins, E., & Elkin, B. (2005). Examining the risk of disease transmission between wild Dall's sheep and mountain goats, and introduced sheep, goats, and llamas in the Northwest Territories.

This is a Canadian paper being used to ban pack llamas across the United States, even though it clearly states, on page 2, that there is no evidence of disease transmission:

"...there is insufficient data available to clearly assess the role of camelids as a source of disease at this time."

The paper then references another study, Communicable Disease Risks to Wildlife From Camelids in British Columbia that, in its Executive Summary on page v, reads:

"Risks from camelids to wildlife in British Columbia remain hypothetical after this risk assessment, as no direct evidence was found to implicate camelids as sources of significant diseases in wildlife in BC or elsewhere."

Forest Plan decisions are based in evidence-based science, and in study after study, no discernible risk has been discovered. This has been the case for decades. Therefore, item 2 of (FW-WLGOAT-S or G) on page 55 of the Chugach National Forest Final Land Management Plan should be removed.

I would also like to object to the lack of transparency in this Forest Plan process. There was no mention of banning pack llamas in the draft CNFL MP. The addition of FW-WLGOAT-S or G (page 55) into the Final Plan was disingenuous; banning an entire user group, especially with no evidence-based science to support the ban, between the draft and final Forest Plan, is unacceptable.

I have been a recreational llama packer in the state of Colorado since the age of 4 and my family has been in the pack equipment manufacturing business since 1985. I have been the editor of Pack Animal Magazine, a publication highlighting the use of alternative pack animals, since 2013. I am well acquainted with llamas as pack animals and we, as an industry, would be happy to provide the Objection Reviewing Officer with further documentation regarding the lack of risk posed to wildlife by pack llamas. Extensive documentation can also be found on the website www.packllamas.org.

Thank you for your consideration of this objection.

Sincerely,

Thad Okerlund