



YOUR HELP IS NEEDED

Llamas Banned from BLM Lands in Alaska

The Bureau of Land Management (BLM) has banned the use of pack llamas in Alaska's Eastern Interior Resource Management Area (EI-RMA). Some Alaska National Park Service (NPS) management units attempted this 3 years ago. When we asked for your help so many of you commented that the NPS pack llama ban was withdrawn. Once again, your help is needed.

The EI-RMA pack llama ban was approved because the notification process required by the Environmental Impact Study (EIS) was ineffective. The notification process did not make an effort to target the llama industry, llama organizations, llama outfitters, or any pack llama users. The EIS ultimately determined that pack llamas should be prohibited because they could transmit disease to wild sheep, a claim that is unsubstantiated. BLM received little or no input objecting to their proposal because their notification process was so ineffective.

Per the EIS, "Allowing the use of domestic sheep, goats, or llamas/camelids in and near Dall sheep habitats could result in substantial risks to health and productivity of Dall sheep populations through disease transmission"

The main basis of this BLM decision is a Canadian publication, Garde, E., et al. 2005. *Examining the Risk of Disease Transmission between Wild Dall Sheep and Mountain Goats and Introduced Domestic Sheep, Goats, and Llamas in the Northwest Territories*. This Canadian publication presents hypothetical risk scenarios and at the same time discredits itself by stating that there is insufficient data available to clearly assess the role of camelids as a source of disease. BLM did not make diligent effort to seek or acknowledge the science published by (or the opinions of) camelid disease experts in the United States (US) and elsewhere. The extensive reservoir of US scientific information authored by these experts presents overwhelming evidence contrary to BLM's supposition that pack llamas are a disease threat. BLM failed to identify or address any of that information. Instead BLM cites only this Canadian publication and an Alaska Chapter of The Wildlife Society position statement that references that same publication. The International Llama Registry (ILR) is not aware of any other state or federal agencies in the US that prohibit pack llamas based on a threat of disease transmission. The NPS, for example, evaluated the same Canadian publication but drew just the opposite conclusion to allow pack llamas on NPS administered lands.

The history of previous lawsuits & settlements relating to pack llamas on US federal lands and the existing federal land EIS's that support pack llama use were not evaluated by BLM.

Special interest groups such as The Wild Sheep Foundation (WSF) have an agenda to persuade public land agencies to prohibit pack llamas on public lands. WSF maintains that a pack llama ban is necessary to curtail the transmission of disease to wild sheep. Ironically, science has shown that llamas are less likely to transmit disease to wildlife than horses or mules, the very animals that BLM and the WSF consider to be the preferred species.

The danger that we now face is that other government agencies will soon follow BLM's lead in a domino effect. Will the lower 48 states be next?

Mention:

*** Proper National Environmental Policy Act (NEPA) procedures were not followed as to affirmatively solicit comments from the llama industry nor make diligent efforts to involve the llama industry in preparation of the Environmental Impact Study (EIS). Our user group (llama packers), has been arbitrarily eliminated from AK-Eastern Interior BLM managed lands. This is our public land. Therefore, we request an amendment to eliminate the restrictions on pack llamas.**

*** No existing previously documented federal EIS's and/or general use policies allowing pack llamas (based upon little to no disease transmission threat), were reviewed. Other federal land management agencies that completed similar EIS's that also considered the "issue" of disease transmission from llamas to wild sheep, determined that llamas do not pose a threat, and allowed access for the general public and commercial use of pack llamas. Those determinations were the exact opposite of the Alaska Eastern Interior Resource Management Plan Final EIS determination.**

*** Other Interior Department legal settlement agreements were not considered.**

You might also comment/request:

*** Llamas are much easier on the environment than horses and mules, and pose no more of a disease transmission threat than horses or mules.**

*** No one has ever documented the transmission of disease from a llama to another species of animal, wild or domestic.**

*** BLM has categorized llamas with sheep and goats as a "substantial" disease risk. This reflects BLM's basic ignorance of the tylopod family. Strong species barriers make llamas far less likely to transmit disease to wild sheep than more closely related domestic sheep and goats. BLM's pack llama determination of "substantial" risk if applied to all equally would have to include a ban on humans, dogs, and horses in Dall sheep habitat. What BLM has really defined is a zero risk policy and there is no such thing as zero risk.**

*** The wishes of the locals & private hunters were not considered.**

*** Explain that most all of the federal land jurisdictions, including the BLM, have been successfully allowing llamas for over 40 years and doing so with no problems. For example, Rocky Mountain National Park (RMNP) has been using pack llama for park maintenance for more than 30 years. RMNP has sensitive wild sheep habitat.**

*** Ask to be on their mailing list (or provide your email address) for any and all government issues concerning the use of pack llamas in any of their jurisdictions. We suggest sending your request to BLM via certified mail but it is not absolutely necessary. Acceptance/receipt documentation can be beneficial in perception of seriousness and legality.**

If this ban is successful, there could be repercussions with llamas being banned in other areas of the country. Please do your part & voice your protests.

Sincerely,

International Llama Registry Board of Directors

Harvey Pool, Linda Hayes, Ron Wilkinson, Mark Smith & Sean Hart

January 08, 2018

SEND COMMENTS TO:

Karen Mouritsen
BLM-Acting State Director
222 W 7th Avenue #13
Anchorage, Alaska 99513
Phone: 907-271-5080
Fax: 907-271-4596
Email: kmourits@blm.gov

and

Geoff Beyersdorf
District Manager
222 University Ave
Fairbanks, AK 99709
Phone: 907-474-2200
Fax: 907-474-2280
Email: gbeyersd@blm.gov

Want to help?

You can help by donating to the International Llama Foundation (ILF). Please specify that you would like your donation to help with the Alaska Llama Ban.

*Please note, the ILF Board of Directors will make sure your donations go to education on this issue and the use of llamas in the packing industry, not for direct political activism on the BLM ban.



Donations to ILF can be mailed to the ILR office at
PO Box 8, Kalispell, Montana 59903
