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U.S. Fish and Wildlife Services  
Public Hearing Webinar re:  
Arctic National Wildlife Refuge  
Proposed Domestic Animal Regulation

Date: May 13, 2020

Time: 3:00 p.m.

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P R O C E E D I N G S

(On record)

**NATHAN HAWKALUK, ANWR DEPUTY REFUGE MANAGER:** All right.

Well, good afternoon. Welcome, everyone, who called in today to the U.S. Fish and Wildlife Services Public Hearing Webinar. My name is Nathan Hawkaluk. I'm the deputy refuge manager for the Arctic National Wildlife Refuge.

This afternoon, we'll be holding a public hearing to receive comment on a proposed regulation that would prohibit certain domestic animals on the Arctic National Wildlife Refuge. Thank you, all, for your participation today.

This is the first time holding -- we're holding a public hearing remotely using this platform, so please be patient if we do experience some technical difficulties. Today, we will be -- not be taking questions during this hearing today. Rather, it is an opportunity for public participants to provide comment on this proposed regulation. Instructions on how to provide comments on this webinar will be provided into the overview presentation.

Once again, thank you for your participation today. And I will now get started on a brief overview of this presentation. Next slide, thank you.

So, first, we'll take a loo -- we'll provide a bit of background on National Wildlife Refuge System and Arctic

1 National Wildlife Refuge and what makes it a unique and  
2 important place. We'll then go over the draft language of the  
3 proposed regulation and the purpose of the proposed regulation.  
4 Next, we'll briefly discuss the Arctic Refuge's Revised CCP and  
5 how it addresses the proposed regulation. When I say CCP, as  
6 it says there, it's the Comprehensive Conservation Plan, the  
7 guiding document for the Refuge. And we'll also talk, briefly,  
8 about the regulations inclusion of the National Hunt/Fish  
9 package.

10 That will conclude the short presentation, and we'll move  
11 into the public hearing process. After that, there will be a  
12 series of slides instructing participants on the process and  
13 guiding those who wish to comment during the hearing. And,  
14 finally, after that process is wrapped up, we'll close it out  
15 and share some additional ways that others who have joined can  
16 comment if they choose to.

17 Next slide. All right, so we'll start at the national  
18 level. So national wildlife refuges are managed by the Fish  
19 and Wildlife Service for the conservation, management, and  
20 where appropriate, restoration of fish, wildlife and plant  
21 resources and their habitats within the United States for the  
22 benefit of present and future generations.

23 So refuges provide habitat for thousands of species and  
24 access to world class recreation for fishing and hunting to  
25 wildlife watching and nature photography. As it says there,

1 the refuge system now includes 568 national wildlife refuges  
2 nationwide, and in some (audio cuts out) 38 wetland management  
3 districts, five marine national monuments. There's a refuge in  
4 every state and one within an hour's drive of most major  
5 metropolitan areas. That is not the case, as you will see,  
6 with the Arctic National Wildlife Refuge.

7       Next slide. So at 19.6 million acres, the Arctic Refuge  
8 is the largest refuge in the nation. This is -- this map is  
9 really -- it's tough to tell the scale, but it does show kind  
10 of its relative position in Alaska in the far northeast corner  
11 of Alaska. It's bordered on the east by Canada, to the north,  
12 by the Beaufort Sea. The Dalton Highway and the Trans-Alaska  
13 Pipeline run along the -- much of the western boundary. To put  
14 it in context, it's roughly the size of South Carolina.

15       It includes the seven-million-acre wilderness area  
16 depicted in the green outline on the center of the Refuge.  
17 Also has three designated wild and scenic rivers, and there's  
18 no road access. It's only accessible by foot, boat, or  
19 aircraft.

20       The nearest large community is Fairbanks, Alaska, which  
21 is still 175 miles away -- air miles away. This large  
22 landscape refuge encompasses five unique habitats. The boreal  
23 forest dominate kind of the southern end of the Refuge. The  
24 Brooks Range comprised the middle section as shown there on the  
25 map. Arctic Coastal Plain, coastal lagoon waters, and Barrier

1 Island habitats kind of fill out the rest of the habitats that  
2 you find on the Refuge.

3 The Refuge is home to all three species of North American  
4 bears; black, brown, and polar bears. Dall sheep, moose, a  
5 diverse sweep of migratory birds, muskox, and the international  
6 caribou herd called the Porcupine Caribou herd.

7 Next slide, please. So in addition to the previously  
8 mentioned mission of Fish and Wildlife Service and the Refuge  
9 System, the man -- the Arctic Refuge management is directed by  
10 the Alaska National Interests Lands Conservation Act or ANILCA.  
11 ANILCA established many of the refuges, if not most, of the  
12 refuges in Alaska, and expanded others. And it set forth the  
13 mandates for managing refuges in Alaska, including, as we  
14 stated here, to conserve fish and wildlife populations and  
15 habitats in their natural diversity, including, but not limited  
16 to, and we've mentioned Dall sheep here, because it is a focus  
17 species of this regulation.

18 The Arctic Refuge is recognized worldwide and is widely  
19 regarded as the nation's finest example of wilderness.  
20 Management's intent is to preserve the pristine qualities of  
21 the Refuge. This proposed rule attempts to do that.

22 Next slide, please. So what, specifically, is being  
23 proposed is a change to a code of federal regulation;  
24 basically, the 50 CFR Part 36.39 regulates public uses and  
25 accesses on refuge lands in Alaska. So this simple language,

1 as you see it here, is what you're proposing. All domestic  
2 sheep, goats, and camelids are prohibited on the Arctic Refuge.  
3 The revised 2015 Arctic Refuge CCP, which we've referenced  
4 briefly, and we'll talk about again, adds direction for the  
5 development of this regulation. As I mentioned before, we'll  
6 talk about it in a couple more slides.

7         So next slide, please. So why are -- why is Arctic  
8 Refuge proposing this regulation to prohibit these specific  
9 domestic animals? The single purpose -- or the sole purpose is  
10 to mitigate disease transmission to wild ungulates,  
11 particularly Dall sheep consistent with laws, mandates, and  
12 policies directing management of the Arctic Refuge.

13         So we did look a little further -- we looked further for  
14 professional direction beyond just the CCP that we had, and we  
15 pulled some guidance from Western Association of Fish and  
16 Wildlife Agency; they have a Wild Sheep Working Group. I'm  
17 going to read from that document they have, just really  
18 briefly. It's a recommendation for domestic sheep and goat  
19 management and wild sheep habitat.

20         It starts with: Many anthropogenic and environmental  
21 factors influence demographics and viability of wild sheep  
22 populations. Some factors affecting wild sheep population  
23 performance can be managed while others cannot. Nevertheless,  
24 the guiding principle of our effort has been to seek effective  
25 separation between wild sheep and domestic sheep or goats.

1           We recommend that wild sheep managers design and  
2 implement management strategies that take -- by taking the  
3 first step of assessing and prioritizing conservation value and  
4 relative importance of wild sheep population. The greater the  
5 conservation value and the greater the risk of association  
6 with domestic sheep or goats, the more aggressive and  
7 comprehensive a strategy to ensure effective separation  
8 should be.

9           And I would submit that the conservation value is  
10 the -- really the focal point of the Arctic National Wildlife  
11 Refuge for wildlife.

12           It provides further guidance by stating: It is generally  
13 acknowledged that thinhorn sheep in Alaska and northwest  
14 Canada, Dall sheep in this case, are likely naive to exposure  
15 to many organisms commonly carried by domestic species compared  
16 to wild sheep occurring in southern Canada and the continental  
17 U.S. Until this is confirmed and the effects of exposure to  
18 infectious organisms are clearly understood, it is essential  
19 that no occur -- association occurs between thinhorn sheep and  
20 domestic sheep or goats.

21           So moving down to the next bullet point, it does say  
22 domestic sheep, goats, and camelids have either demonstrated  
23 the threat of disease transmission to wild sheep or have been  
24 documented to harbor diseases that potentially could negatively  
25 affect naive wildlife and environments; fairly consistent with

1 the last statement that we read from the WAWFA recommendations.

2       So there is -- the body of evidence is less developed as  
3 it relates to camelids; however, they have been documented  
4 carrying diseases of concern for naive wildlife and  
5 environments such as we mentioned for Dall sheep and the Brooks  
6 Range.

7       Next slide, please. So I just wanted to add a few  
8 reference materials that have been cited in the past. I don't  
9 want to go into great detail into these, because there's a  
10 considerable amount of information here. Note the top one is  
11 the Garde 2005 examination; that's the one that you'll see  
12 referenced in the 2015 CCP. Without going into great detail,  
13 it also recommend those that are interested can reference our  
14 frequently-asked-questions document that we have housed on our  
15 website if they haven't had a chance to review that yet.

16       So these public -- these three publications aren't the  
17 only ones that are out there, but they are supported by studies  
18 referenced therein, describing the disease risk potential of  
19 domestic sheep, goats, and camelids. Bacterial diseases such  
20 as Pasteurella species are of high concern for causing  
21 pneumonia in wild sheep, particularly from domestic sheep, but  
22 potentially, also, from goats and camelid.

23       Also of great concern for disease transmission to wild  
24 ungulates are -- try to say this right -- Mycobacterium avium  
25 subspecies paratuberculosis or the bacterium that causes

1 John's disease. (Indiscernible - voice lowered) as I  
2 mentioned references John's disease. Also of greater concern  
3 is Mycoplasma [sic] -- plasma, excuse me, ovipneumoniae or  
4 commonly referred to as MOV. These organiza -- organisms can  
5 be carried by domestic sheep, goats, or camelids and,  
6 subsequently, run the risk of being transmitted to wild sheep.

7 So considering the available science and taking into  
8 account, numerous risk assessments, it is in our best  
9 professional judgment that these domestic pack animals be  
10 prohibited from Arctic National Wildlife Refuge in order to  
11 prevent potential disease transmission to Dall sheep.

12 Next slide, please. I talked about the CCP or  
13 Comprehensive Conservation Plan a few times. This is a passage  
14 from that in chapter 2, the referencing disease prevention and  
15 control. And as you can read there, it says, in particular,  
16 domestic sheep, goats, and camelids; in this case, llamas and  
17 alpacas, for example, are recognized as being at high risk for  
18 carrying disease organisms, often asymptotically, and they  
19 can be highly contagious and cause severe illness or death.  
20 And then I added emphasis to that last passage: Therefore,  
21 domestic sheep, goats, and camelids are not allowed on Arctic  
22 Refuge. This restriction is subject to promulgation of  
23 regulations for non-commercial uses. And that's guiding the  
24 effort that we're going through right now.

25 Okay, next slide, please. So this -- as I mentioned

1 before, this regulation is part of a broader regulation package  
2 that's being conducted nationally. It was originally published  
3 back in April 9th of 2020. The intent of the national  
4 hunt/fish package, nationwide, is primarily to align federal  
5 regulations with state regulations, where appropriate, in an  
6 effort to streamline reg -- those regulations, and also to  
7 provide more hunting and fishing opportunities on refuge lands,  
8 nationwide. I'll add that this, in part -- not completely, but  
9 in part, aligns with an Alaska state regulation prohibiting  
10 pack sheep and goats while pursuing specific wildlife species,  
11 such as Dall sheep, mountain goats, and muskox.

12 That pretty much concludes the brief presentation portion  
13 of this public hearing. I'll provide a little more detail, in  
14 closing, about the additional ways that you can comment, if you  
15 don't comment today or if you haven't had a chance to comment,  
16 to this point, before the June 8th deadline. But for now,  
17 we'll get it started -- get the public hearing portion started,  
18 then I'll turn it over to Amanda to guide that part of the  
19 process. Thank you.

20 **AMANDA BIEDERMANN, FACILITATOR:** Hello, everyone. My  
21 name is Amanda Beidermann, and I'm going to be leading you  
22 through the public hearing portion of the webinar today. So  
23 we're now officially starting the public hearing to receive  
24 comments on the draft regulation. It is 3:15 Alaska time. So  
25 let's get started.

1           Again, this public hearing, along with your comments, is  
2 being recorded as part of the official record. As a reminder,  
3 your camera and mic control settings are going to be restricted  
4 during this time, so you're only going to be able to talk if  
5 and when I unmute you. So please remember to speak whenever I  
6 prompt you to.

7           So I'm now going to walk you through the order in which  
8 we will accept public comments from participants. So, first,  
9 we will call on participants who requested to offer a comment  
10 when they pre-register using that registration link that you  
11 saw on the website.

12           After allowing these participants to offer their  
13 comments, we will then open the public hearing to anyone who  
14 would like to offer a comment. So we're, first, going to go  
15 through those participants who request to comment using the  
16 Zoom web platform or Zoom app, and we'll, then, move on to  
17 participants who are calling through the phone who would like  
18 to offer a comment.

19           All right, so, now, I'm going to read through some  
20 instructions for those participants who indicated they wanted  
21 to offer a comment when they pre-registered. And I have a list  
22 of these participants with me. So when it is your turn to  
23 comment, I'm going to read your name aloud from this list and  
24 display your name on the next screen in the presentation.

25           When you hear your name called out, please use the

1 raise-hand feature so that I know that you are available and  
2 ready to offer your comment. And you can access the raise-hand  
3 feature by going to your participants' list at the bottom of  
4 your Zoom screen, and then if you don't see the participants'  
5 list, just kind of wave your mouse back and forth across the  
6 bottom of your screen, and the participants' list button should  
7 appear. And at the bottom of that participants' list, you're  
8 going to see that raise-hand feature. So whenever it is your  
9 turn to comment, or whenever you're ready to offer your  
10 comment, if you can just use the raise-hand feature, we will be  
11 able to unmute you, then.

12         And as I said, you know, once you've raised your hand,  
13 I'm going to unmute you, and I'm going to have a stopwatch on  
14 the next screen, and so I'll prompt you whenever you can begin  
15 to offer your comment. And before you offer your comment,  
16 please spell out your first and last name, for the record, so  
17 that we can know who you are when you provide your comment.

18         And as you can see from this slide, you will have three  
19 minutes to offer your comment. Again, you will see a stop  
20 watch on the screen showing you how much time you have  
21 remaining to offer your comment. And please keep your comment  
22 limited to these three minutes. We may have time to allow for  
23 additional comments at the end of the meeting, but once we have  
24 allowed everyone the opportunity to offer their comment.

25         And as I mentioned, previously, once we have gone through

1 our list of pre-registered applicants who offer their comments,  
2 we'll open up the public hearing to anyone who would like to  
3 offer a comment, either through the Zoom web portal or app or  
4 over the phone. So please stand by for those instructions.  
5 We'll get to those in a couple of slides.

6 And, again, if you do not feel that you are able to  
7 complete your comment within the allotted time frame, the Fish  
8 and Wildlife Service also encourages you to submit your full  
9 comments in writing.

10 All right, so we're now going to go to the first  
11 participant that I have on my list who is going to offer a  
12 comment, and that participant is Scott Woodruff. So, Scott, if  
13 you are on the call today, can you please use the raise-hand  
14 feature, so that I know that you're available to offer your  
15 comment. We'll just give Scott a few minutes.

16 Again, Scott Woodruff, if you're on the call and ready to  
17 offer your comment, you were the first on our list of people  
18 requesting to make a comment. If you could use the raise-hand  
19 feature, and you can access that raise-hand feature if you go  
20 to the bottom of your participants' list at the bottom of your  
21 Zoom screen, and you can access that raise-hand feature.

22 Okay, Scott, yep, I see you. And it looked like you have  
23 raised your hand, so I'm going to bring our stopwatch over, and  
24 I will restart the time. Okay, great. Scott, I'm now unmuting  
25 you. Hi, Scott, you're now unmuted. And so I --

1           **SCOTT WOODRUFF, COMMENTER:** Okay.

2           **AMANDA BIEDERMANN, FACILITATOR:** -- (indiscernible) the  
3 timer. And when I start the timer, that indicates that you can  
4 offer your comment. Again, please spell out your first and  
5 last name, for the record. And I'm going to start the timer  
6 now.

7           **SCOTT WOODRUFF, COMMENTER:** My name is Scott Woodruff. I  
8 wish we would have known about the three minutes. Can you hear  
9 me? Okay.

10          **AMANDA BIEDERMANN, FACILITATOR:** Uh-huh (affirmative).

11          **SCOTT WOODRUFF, COMMENTER:** The proposed prohibition  
12 published in the federal register on April 9th was accompanied  
13 by a more public detailed U.S. Fish and Wildlife Service  
14 website, and request for comments in an additional paper called  
15 Questions and Answers on Proposed Regulation to Protect Dall  
16 sheep in the Arctic National Wildlife Refuge.

17           Based upon this new public information for the issue of  
18 this historical process in the Arctic National Wildlife Refuge  
19 revised Comprehensive Conservation Plan, I'm requesting the  
20 U.S. Fish and Wildlife Service does not enact this proposed  
21 regulatory change that would include the specie and the words,  
22 camelids, llamas, and alpacas. It is harmful to our industry,  
23 sets precedence, and is arbitrary and capricious.

24           This request to take out this domestic species, llamas,  
25 is based upon the following: The public, more specifically on

1 this issue, the pack llama user group and breeders, were not  
2 allowed meaningful opportunities to present their views on the  
3 revised Comprehensive Conservation Plan, which this proposed  
4 regulation change defers to from management action.

5         From the Notice of Intent in 2010 to the end of 2012, the  
6 Arctic Refuge draft revised Comprehensive Conservation Plan  
7 included and recognized the historical llama along with horses  
8 and mules for public access. It was approved for all of the  
9 alternatives.

10         From that point forward, the pack llama industry had no  
11 reason to comment or be concerned, as our user group was  
12 rightfully included. That is until today. We want to know how  
13 and what information and research of the internal staff used on  
14 the Arctic National Refuge to exclude, take out, and separate  
15 our established and approved user group, the pack llama, from  
16 horses and mules, and, inexplicitly, add them to a new species  
17 of unapproved sheep and goats with a prohibition on the Arctic  
18 Refuge.

19         Referring to a letter submitted to the Greater  
20 Appalachian Llama and Alpaca Association, dated April 10th,  
21 2020, from Nathan, Deputy Refuge Manager, this letter was  
22 introduced -- new information relative to the revised draft CCP  
23 and, apparently, the revised CCP and Record of Decision that  
24 this proposed regulatory action seems to be based upon and  
25 refers to a prohibition.

1           This needs to be addressed. This letter references a  
2 paper called A Risk Assessment on the use of South American  
3 Camelids for Back Country Trekking in British Columbia. We  
4 call it the CCH. We're very familiar with it, as it was a  
5 paper that was hired from a private business in Canada called  
6 The Center for Coastal Health. It was released in October  
7 2017. It was promoted and funded by the Wild Sheep Foundation,  
8 the British Columbia Ministry of Forest Lands, Natural  
9 Resources, and Rural Development, and the Alaska Department of  
10 Fish and Game.

11           A letter from ANWR on April 10th, 2020, states the CCH-17  
12 is a peer-reviewed published document. That is incorrect. It  
13 is not a peer-reviewed, nor has it been -- has the preceding  
14 camelid referenced documents used in creating the CCH-17 been  
15 peer-reviewed. It is, however --

16           **AMANDA BIEDERMANN, FACILITATOR:** Hi, Scott, I think it's  
17 about 10 seconds to wrap up your comment.

18           **SCOTT WOODRUFF, COMMENTER:** Pardon me?

19           **AMANDA BIEDERMANN, FACILITATOR:** You've reached the three  
20 minutes, so can you wrap up your comment, and we can move on to  
21 the next --

22           **SCOTT WOODRUFF, COMMENTER:** Yeah, that's too bad.

23           **AMANDA BIEDERMANN, FACILITATOR:** Okay.

24           **SCOTT WOODRUFF, COMMENTER:** That's really too bad. I'll  
25 get it -- I'll get it -- I'll get you on the end, so --

1           **AMANDA BIEDERMANN, FACILITATOR:** Sure. Yeah, we may have  
2 time to come back at the end. We'll just have to see, you  
3 know, after --

4           **SCOTT WOODRUFF, COMMENTER:** You'll want to hear it.

5           **AMANDA BIEDERMANN, FACILITATOR:** Okay.

6           **SCOTT WOODRUFF, COMMENTER:** You'll want to hear it.

7           **AMANDA BIEDERMANN, FACILITATOR:** Thank you. So I'm going  
8 to put you back on mute, and we're going to move on to our next  
9 participant. Great. And so our next participant that we have  
10 who pre-registered is Phil Nuechterlein. So, Phil, if you are  
11 on the call and ready to provide your comment, if you could  
12 please use the raise-hand feature. And, again, you can access  
13 the raise-hand feature if you go to the bottom of your  
14 participants' list and select the raise hand. We'll give Phil  
15 a few seconds.

16           Okay, also, as an alternative to the raise-hand feature,  
17 as Scott did, you can click that yes button, and that yes  
18 button will appear by your name. So let's see if people can  
19 use that. So I'm not seeing Phil is raising their hand or  
20 using the yes feature. And I, also, don't believe I see him on  
21 the meeting right now.

22           So, okay, let's see. So if you go to the more button,  
23 and you can see, I believe, a raise-hand feature there, so you  
24 might also want to try to access it that way. But I, currently  
25 don't see Phil on the meeting, so we're going to move on to our

1 next participant. And our next participant is Linda  
2 Nuechterlein, so let's see if Linda is on the meeting today.  
3 Linda, if you're on the meeting today, you can either click  
4 that yes button, go to the more button to raise your hand at  
5 the bottom of your participants' list so that we know that you  
6 are on the call. And we'll give it a few seconds to see if she  
7 is on the call today.

8         So, Linda, if you potentially called in instead of using  
9 the Zoom web meeting portal, if you could press star 9, we'll  
10 see if you actually called in, and we can also circle back to  
11 Phil and see if maybe he called in. So to raise your hand,  
12 Linda, if you're on the call, please use the star 9 feature,  
13 and then I can unmute you so that you can offer your comment.

14         Okay, well, I'm not seeing Linda raise her hand, so we'll  
15 just go back to Phil, briefly. Phil, if you're on the call  
16 that you're calling in through your phone, if you can use the  
17 star 9 on your phone to raise your hand so that we know that  
18 you're ready to offer your comment. And we'll see if you  
19 called in using your phone.

20         Okay, I don't see any raised-hand features or yes  
21 features, so we are just going to go ahead and move on to our  
22 next pre-registered applicant who indicated that they wanted to  
23 offer a comment, and that participant is Stan Ebel. So, Stan  
24 Ebel, if you're on the line, either -- if you called in through  
25 your phone, you can press star 9 to indicate that you'd like

1 to -- or you are ready to offer your comment, or you can use  
2 one of the Zoom features. Okay, so it looks like, Stan Ebel,  
3 you are phone caller with the last four digits, 5707. I see  
4 that you've raised your hand. So I'm now going to unmute you,  
5 and since you can't see the screen, Stan, I'm going to give  
6 you -- when I -- I'm going to tell you when I start the timer,  
7 and then I'm also going to give you a one-minute and 30-second  
8 warning, so just so that you have a heads up. So I'm now  
9 unmuting you. Hi, Stan, can you hear us?

10 **STAN EBEL, COMMENTER:** I can. Can you hear me?

11 **AMANDA BIEDERMANN, FACILITATOR:** Great. Yes, we can hear  
12 you, Stan. All right. So I'm going to restart our timer, and  
13 I'm going to start the timer right now.

14 **STAN EBEL, COMMENTER:** Okay, my name is Stan Ebel. I  
15 will go ahead and pick up where Scott left off. He was  
16 addressing the CCH-17. The basis that you're using for  
17 including llamas in this prohibition are scientifically  
18 unmerited. I think that you've taken extensions of  
19 the -- these are actually risk assessments that have been done.  
20 They're not scientific. They're hypothetical and states that  
21 in the studies themselves. They're hypothetical. They're not  
22 based on actual disease inci -- incidents or documentation.

23 The WAWFA that you referred to, specifically, references  
24 sheep and goats. And the thing is that you're making the same  
25 mistake that the RAs did in that they, by extension, assuming

1 that llamas are the same as sheep and goats -- or camelids are  
2 the same as sheep and goats, that those diseases apply. They  
3 do not. They are separated taxonomically, and those diseases  
4 do not occur in any inci -- level of incidents in camelids.  
5 That is an incorrect projection and use of those risk  
6 assessments, and they are hypothetical.

7 I noticed that in some of your documentation and  
8 requests, press releases, you go so far as to say that to  
9 include llamas or camelids with sheep and goats as being  
10 documented as carrying. This is not documented. They are very  
11 careful in those risk assessments to state that they are  
12 hypothetical, and this is unproven. It is simply a --

13 **AMANDA BIEDERMANN, FACILITATOR:** This is your one-minute  
14 warning.

15 **STAN EBEL, COMMENTER:** -- projection. Okay. So your  
16 basis, scientifically, it has some serious flaws in it. The  
17 other thing is that the Alaska Fish and Game Department or  
18 Department of Fish and Game actually wrote a letter after they  
19 were contacted as sponsoring part of this CCH, and they  
20 separated from any agreement with what came out of that, and  
21 they said they did not support any level of banning of  
22 camelids. They were moving onto other species. They felt like  
23 they had spent \$5,000 needlessly on that, and that the llamas  
24 were not going to be subject to any bans, so your policy is in  
25 direct opposition to those.

1           The other thing is that there is a statement from the  
2 American Association of Small Ruminant Practitioners. This is  
3 an association of over 1,000 veterinary practitioners that work  
4 with all the domestic ruminants, all the camelids, and many  
5 wild cervid groups. They have intimate knowledge of these  
6 species, their diseases, the interaction of them, and they have  
7 a statement that --

8           **AMANDA BIEDERMANN, FACILITATOR:** Stan, your time is up,  
9 so if you could wrap up your comment, and we can come back at  
10 the end.

11           **STAN EBEL, COMMENTER:** Okay, well, I'll go get that for  
12 reading. But it basically refutes everything, every disease  
13 that is put forth in those risk assessments as not being a  
14 factor and that they shouldn't -- camelids should not be banned  
15 on that basis. Thank you.

16           **AMANDA BIEDERMANN, FACILITATOR:** Great. Thank you, Stan.  
17 I'm going to put you back on mute. We appreciate your comment.  
18 Okay. So we will now move on to our last pre-registered  
19 applicant who indicated that they wanted to offer a comment,  
20 and that applicant is Michelle Kutzler. So, Michelle Kutzler,  
21 if you could please use the raise-hand feature if you're using  
22 the Zoom web platform or app, or if you called in through your  
23 phone, you can press star 9. Okay, great. So I see that  
24 Michelle has raised her hand. So, Michelle, I'm going to  
25 unmute you.

1           **MICHELLE KUTZLER, COMMENTER:** Thank you.

2           **AMANDA BIEDERMANN, FACILITATOR:** Yeah, so I'm going to  
3 restart the timer. And so, again, I'll prompt you when I begin  
4 the timer, and if you could offer your comment, at that time,  
5 we will move forward. And I'm going to start the timer now.

6           **MICHELLE KUTZLER, COMMENTER:** Hello, my name is Michelle  
7 Kutzler. I'm the Region IV director for the American  
8 Association of Small Ruminant Practitioners. The Region IV  
9 area of the United States includes Alaska, Washington, Oregon,  
10 California, Idaho, Montana, North and South Dakota, Colorado,  
11 Wyoming, Arizona, and New Mexico, Nevada. So the region that I  
12 represent is a -- certainly the largest region within the  
13 United States.

14           On this -- through my representation of the American  
15 Association of Small Ruminant Practitioners, I definitely  
16 concur with excluding the -- excluding camelids from this  
17 particular ban. Sorry, I'm -- my mouse is lagging here and I'm  
18 trying to get to my talk.

19           Specifically, I want to comment -- follow up with the  
20 comment that Stan was mentioning or the position statement for  
21 the American Association of Small Ruminant Practitioners, and,  
22 like I said, I apologize for my lag in my -- come on. Here we  
23 go, sorry. Just to reiterate this and, again, this is  
24 available through our website. This is our policy statement  
25 concerning camelid bans in national parks.

1           There exists concern that the entity of camelid pack  
2 animals such as llamas and alpacas on public lands poses  
3 potential risk to endanger -- to resident endangered,  
4 threatened ungulate populations including that of the Dall  
5 sheep. These disease concerns by National Parks and Wildlife  
6 managers including pathogens such as MOV, that the truth is  
7 that there has been no pop -- no evidence to support the risk  
8 of transmission of these species.

9           And I, especially, want to make a point regarding the  
10 initial presenter's comments during the initial presentation.  
11 There was a comment that was made that -- I believe the speaker  
12 was Chad -- that camelids can become infected with Mycoplasma  
13 ovipneumoniae, but, to date, there's been no evidence to  
14 support this. And according to Tom Besser who is a  
15 microbiologist from Washington State University, he reported  
16 that Mycoplasma ovipneumoniae has never been reported in  
17 camelids.

18           So there exists quite a bit of misinformation in these  
19 unpeer-reviewed documents that is, unfortunately, propagated  
20 from one group to another, which is why it's very important  
21 that scientists are included in this conversation. I would  
22 completely agree with the Garde document that says -- and I  
23 quote, the risk assessment from the Garde, et al., document,  
24 indicates that contact between domestic sheep or goats and wild  
25 Dall sheep or mountain goats would likely result in significant

1 disease in the wild species.

2           And that particular document advises -- and, again, this  
3 is a direct quote -- that domestic goats not be used as pack  
4 animals and domestic sheep and goats not be pastured anywhere  
5 near Dall sheep. But then goes on to speculate that an  
6 additional association would also occur with camelid species.  
7 And as I reiterated, the risk of the disease transmission,  
8 especially (audio cut out).

9           **AMANDA BIEDERMANN, FACILITATOR:** Hi, as I mentioned  
10 before, we're going to try to go back to people. Sorry, I  
11 believe I was on mute there and I was trying to give warnings,  
12 so I apologize for that. Michelle, we will try to loop back in  
13 to pre-registered applicants before -- you know, who gave  
14 comments before, if we can, at the end.

15           But we're now going to try to move forward into opening  
16 it up to anybody who would like to offer a comment. So we're  
17 going to now move forward into that phase of the hearing. So  
18 if you'll just give me a second.

19           So I'm now going to move forward to our next slide. And  
20 I'm going to go over how to offer a comment if you are calling  
21 in. And, right now, we're just going to do people who are  
22 using the Zoom web platform or Zoom app. As I said before,  
23 we'll get to phone participants later, and I'll provide  
24 instructions for that. But, for now, we're just going to focus  
25 on people who are using the Zoom web platform or a Zoom app.

1           So, at this time, if anybody would like to offer a  
2 comment using the Zoom web platform or Zoom app, please use the  
3 raise-hand feature at the bottom of your participants' list.  
4 And I'll try to go in the order that I see hands raised. And,  
5 again, when it is your turn, I will call out your name and  
6 display your name on the next screen. I will then unmute you  
7 and start the timer. And, again, please spell out your first  
8 and last name for the record before you provide your comment.

9           So if anybody would like to offer a comment at this time,  
10 please use that raise-hand feature and we will do the  
11 three-minute timer, again, on the screen. And, right now,  
12 we're just going to focus on people who have not yet had the  
13 opportunity to comment. You know, as I said before, we will  
14 try to get back to those people who pre-registered who selected  
15 they wanted to offer a comment. So, right now, we're just  
16 going to focus on anyone in the meeting using the Zoom web  
17 platform or Zoom app who would like to offer a comment.

18           So I'll give people a few minutes to access that  
19 raise-hand feature. And you can access that if you go to the  
20 more button, and you should be able to see the raise-hand  
21 feature there. And if you can't quite access your raise-hand  
22 feature, you can do as Scott did earlier and click that yes  
23 button, and that can let me know that you would like to offer a  
24 comment, as well, but we prefer that you use the raise-hand  
25 feature. And, again, this is just for people who are using the

1 Zoom web platform or Zoom app. We will get to phone  
2 participants after we get through anyone else who wants to  
3 offer a comment using the Zoom web platform or app. And we'll  
4 give people a couple minutes, see if anybody would like to  
5 offer a comment.

6       Okay, so it looks like we don't have anyone who wants to  
7 offer a comment, so we are now going to skip ahead and move  
8 into phone participants. So I'm going to read those  
9 instructions now.

10       So if you are calling in through the phone and would like  
11 to offer a comment, please press star 9 to raise your hand.  
12 And, again, I will try to call on people in the order that you  
13 raise your hand. When it is your turn to offer a comment, I  
14 will read the last four digits of your phone number, and I'll  
15 display it on the screen. I will then unmute you and start the  
16 timer for you to offer your comment. I will let you know when  
17 I start the timer. And, again, I'll give you a one-minute and  
18 a 30-second warning.

19       And once we -- again, once we are finished with the phone  
20 participant, we can circle it back around, see if anybody else  
21 wants to offer a comment. And, at that time, we can include  
22 those people who pre-registered who selected they wanted to  
23 offer a comment. So it looks like we have two phone callers  
24 who would like to offer a comment. So I'm going to move into  
25 that screen. And so the first person that we have, we have

1 phone caller with the last four digits, 1922. And so I'm now  
2 going to unmute you.

3 **PHIL NUECHTERLEIN, COMMENTER:** Hi.

4 **AMANDA BIEDERMANN, FACILITATOR:** Hello.

5 **PHIL NUECHTERLEIN, COMMENTER:** Can you hear me now?

6 **AMANDA BIEDERMANN, FACILITATOR:** Yes, I can hear you.

7 And so I'm now -- I'll prompt you in second when I'm starting  
8 the timer, and you can give your comment. And, again, I'll  
9 give you a one-minute and a 30-second warning. And so I'm  
10 going to start the timer now.

11 **PHIL NUECHTERLEIN, COMMENTER:** Hi, my name is Phil  
12 Nuechterlein, N-u-e-c-h-t-e-r-l-e-i-n. My wife, Linda, and I  
13 live in Eagle River, Alaska. We've used our pack llamas in the  
14 Arctic National Wildlife Refuge dating back to before the 1988  
15 Comprehensive Conservation Plan recognized pack llamas as  
16 approved animals for use throughout ANWR. Our access in the  
17 mid 80s into the Sag and Ivishak headwaters and was achieved by  
18 acquiring a permit from Alaska Department of Natural Resources  
19 to travel the Haul Road before it was opened to the general  
20 public.

21 ANILCA provisions require that you provide public access  
22 in the absence of scientific evidence that we don't proceed --  
23 present a disease threat to wildlife there. The U.S. Fish and  
24 Wildlife Service' false and misleading portrayal of pack llamas  
25 as a disease threat to wildlife provoke -- promotes public

1 disdain for the activity that my wife and I routinely engage  
2 in.

3         We have actually experienced this on the trail. This is  
4 not deserved. Linda and I have never packed with our llamas  
5 for profit. This grossly-misstated U.S. Fish and Wildlife  
6 Service policy implicating pack llamas as a disease threat,  
7 unnecessarily harms all of us that use pack llamas, including  
8 commercial llama packing enterprises in the Lower 48.  
9 Rumormongering has no regional boundaries. These businesses,  
10 currently, need all the economic stimulus they can get. The  
11 American public expects U.S. Fish and Wildlife to make  
12 decisions based on their purported goal. They state, our goal  
13 is prom -- in promulgation of any regulations is to ensure the  
14 use of the best scientifically-based information possible in  
15 decision-making.

16         U.S. Fish and Wildlife is apparently having trouble  
17 reaching that stated goal. Science is not surfing the internet  
18 to look only for information in support of a theory, i.e., pack  
19 llama disease threat, while ignoring all evidence that is not  
20 in support of that theory.

21         So the references that you're using as the basis for this  
22 decision, three Canadian references, I'm going to quote what  
23 they say. Garde, et al., 2005 on page 2, states: There is  
24 insufficient data available to clearly assess the role of  
25 camelids as a source of disease, at this time. Number 2

1 Canadian publication that you're using: Schwantje, et al.,  
2 2003, page 5, executive summary states: Risk from Camelids to  
3 wildlife in British Columbia remain hypothetical after this  
4 risk assessment, as no direct evidence was found to implicate  
5 camelids as sources of significant diseases in wildlife  
6 (indiscernible - simultaneous speech) --

7 **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible -  
8 simultaneous speech).

9 **PHIL NUECHTERLEIN, COMMENTER:** -- or elsewhere.

10 **AMANDA BIEDERMANN, FACILITATOR:** You've reached the end  
11 of the three minutes, so if you could wrap up, and we'll move  
12 on to our next (indiscernible - simultaneous speech).

13 **PHIL NUECHTERLEIN, COMMENTER:** Okay. Okay, I'll wrap up.  
14 The last publication, Center -- it's not a publication; it's a  
15 paper: Center for Coastal Health, 2017, paragraph 3, executive  
16 summary says: We found no peer-reviewed publications  
17 documenting pathogen transmission from camelids to wild  
18 ungulates or domestic sheep and goats for the identified  
19 pathogens.

20 These are all hypothetical risk scenarios. And when U.S.  
21 Fish and Wildlife Service says this is science, that it's  
22 peer-reviewed, that's a false statement. These have not been  
23 peer-reviewed.

24 **AMANDA BIEDERMANN, FACILITATOR:** Great, Phil. Thank you  
25 for your comment, and we're now going to move on to our next

1 phone caller, so I'm going to put you back on mute. Okay,  
2 we're now going to move on to our next phone caller, and that  
3 phone caller has last four digits of 7373. And so I'm now  
4 going to unmute you.

5 **LINDA NUECHTERLEIN, COMMENTER:** Are you able to hear me?

6 **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible) you  
7 might want to take off speaker. Okay. I think that fixed it.

8 **LINDA NUECHTERLEIN, COMMENTER:** Yeah, is that better?

9 **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible) helped a  
10 little bit better. Okay. So I'm about to start the timer,  
11 but, again, I'm going to give you that one-minute and then the  
12 30-second warning. And so, please, when I give you, you know,  
13 the 30-second warning and then the time ends, and I ask you to  
14 wrap up, please end your comment, so that we can move on to the  
15 next phone participant. And, all right, so --

16 **LINDA NUECHTERLEIN, COMMENTER:** Yeah, I'm sorry. I  
17 didn't hear you. Did you say I only have one minute or do I  
18 have three minutes?

19 **AMANDA BIEDERMANN, FACILITATOR:** You have three minutes,  
20 but I'm going to give you a one-minute and a 30-second warning,  
21 so --

22 **LINDA NUECHTERLEIN, COMMENTER:** Oh, okay.

23 **AMANDA BIEDERMANN, FACILITATOR:** -- (indiscernible -  
24 simultaneous speech). Okay, so --

25 **LINDA NUECHTERLEIN, COMMENTER:** All right, I got it. Do

1 you want the spelling of my name or did you get that, the last  
2 time from Phil?

3 **AMANDA BIEDERMANN, FACILITATOR:** If you could do that,  
4 that would be great.

5 **LINDA NUECHTERLEIN, COMMENTER:** Yeah,  
6 N-u-e-c-h-t-e-r-l-e-i-n.

7 **AMANDA BIEDERMANN, FACILITATOR:** Okay, great. Thank you.

8 **LINDA NUECHTERLEIN, COMMENTER:** And first name is Linda.

9 **AMANDA BIEDERMANN, FACILITATOR:** Great. Okay, Linda,  
10 (indiscernible - simultaneous speech) --

11 **LINDA NUECHTERLEIN, COMMENTER:** Okay.

12 **AMANDA BIEDERMANN, FACILITATOR:** -- start your time.

13 **LINDA NUECHTERLEIN, COMMENTER:** Yeah, I'm -- I'm  
14 going -- yeah, I'll go ahead and finish up here. I'll pick up  
15 where Phil left off. But before I do that, I just want to go  
16 on the record to say that it appears that U.S. Fish and  
17 Wildlife Service has short-circuited the NEPA planning process  
18 surrounding the camelid prohibition. It looks -- it appears  
19 that from what we can tell, that in the draft CCP 2011, there  
20 was no prohibition against llamas. As a matter of fact, they  
21 were -- they were actually recognized as a historical pack  
22 animal. They had pack -- historical pack animal status in  
23 ANWR.

24 And then with the final CCP, I believe was signed off in  
25 2015, they were prohibited. So we would like to find out how

1 that happened, what the process was, and, you know, why -- that  
2 would be more the NEPA process.

3 To continue on, then, where Phil left off with the  
4 comment -- let's see, regarding the statement, USWFS [sic] is  
5 guided by their own unique set of mandates and policies that  
6 may differ from ADF&G and WAWFA. This is illogical and  
7 misleading. Taxonomy and disease epidemiology are the same in  
8 ANWR as they are elsewhere. Does the U.S. FWS know something  
9 that ADF&G or WAWFA doesn't know? If so, then USWFS [sic]  
10 should reveal what it is and open the conversation with these  
11 other agencies.

12 If not, we ask that FWS refrain from identifying pack  
13 llamas as a disease threat and refrain from prohibiting pack  
14 llamas unless FWS also prohibits horses, dogs, and humans. Any  
15 real or perceived mandate --

16 **AMANDA BIEDERMANN, FACILITATOR:** One minute warning.

17 **LINDA NUECHTERLEIN, COMMENTER:** -- supplied for  
18 cautionary principle should be applied to all equally. It  
19 appears that FWS is construing their own unique mandates and  
20 policies as license to arbitrarily place an impossible burden  
21 of proof on pack animals in the absence of scientific evidence  
22 that they are a threat. Meanwhile, FWS is granting horses,  
23 dogs, and humans access to ANWR free gratis.

24 And then regarding the USFWS statement --

25 **AMANDA BIEDERMANN, FACILITATOR:** 30-second warning.

1           **LINDA NUECHTERLEIN, COMMENTER:** -- the proposed  
2 prohibition better aligns the service with ADF&G hunting  
3 regulations, we are also seeking to align 2012 WAWFA  
4 recommendations. This also is misleading with respect to  
5 camelids. The statement is in direct conflict with the  
6 regulation and recommendations of those agencies. They have no  
7 regulations or recommendations that prohibit pack llamas, and  
8 they have studied this issue extensively. Fish and Game even  
9 helps fund the CCH-17 study --

10           **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible -  
11 simultaneous speech) --

12           **LINDA NUECHTERLEIN, COMMENTER:** -- that FWS cites as a  
13 reference --

14           **AMANDA BIEDERMANN, FACILITATOR:** -- (indiscernible -  
15 simultaneous speech).

16           **LINDA NUECHTERLEIN, COMMENTER:** -- in support of this  
17 proposal.

18           **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible -  
19 simultaneous speech).

20           **LINDA NUECHTERLEIN, COMMENTER:** Fish and Game has stated  
21 that CC --

22           **AMANDA BIEDERMANN, FACILITATOR:** Your time is up.

23           **LINDA NUECHTERLEIN, COMMENTER:** -- H-17 has no new  
24 information and they will continue to focus their wildlife  
25 disease surveillance on species other than camelids.

1           **AMANDA BIEDERMANN, FACILITATOR:** Hi, Linda, your time is  
2 up. So we're now going to move on to our next phone  
3 participant.

4           **LINDA NUECHTERLEIN, COMMENTER:** Oh, okay. Yes.

5           **AMANDA BIEDERMANN, FACILITATOR:** Thank you for your  
6 comment.

7           **LINDA NUECHTERLEIN, COMMENTER:** Thank you.

8           **AMANDA BIEDERMANN, FACILITATOR:** And I will now put you  
9 back on mute. Okay, so we have wrapped up Linda's comment.  
10 And so if anybody else calling in through the phone would like  
11 to offer a comment, please use the star 9 on your phone to  
12 indicate that you would like to offer a comment. And we'll  
13 give folks a few minutes to see if anybody on the phone would  
14 like to offer a comment. Okay, so it looks like we have  
15 another phone caller who wants to offer their comment.

16           And, let's see, it looks like Stan, you're calling in  
17 again. And we also have Scott. So we'll go to you. And we're  
18 going to do an additional three minutes, and it's only going to  
19 be an additional three minutes, as a reminder. So we'll go  
20 ahead -- and, let's see, we'll go with Stan; I saw your hand  
21 first. So I'm going to type your last four digits into the  
22 screen. Okay, and so, again, three minutes, and I'm going to  
23 give you that 30 -- one-minute and 30-second warning. So,  
24 Stan, I'm now going to unmute you. Hi, Stan, can you hear us?

25           **STAN EBEL, COMMENTER:** I can.

1           **AMANDA BIEDERMANN, FACILITATOR:** Okay, great.

2           **STAN EBEL, COMMENTER:** Thank you.

3           **AMANDA BIEDERMANN, FACILITATOR:** Okay, so I have three  
4 minutes up on the clock, again. Again, I'll give you a  
5 one-minute and then a 30-second warning. And so I'm going to  
6 start your time now.

7           **STAN EBEL, COMMENTER:** Okay, thanks. While we're on the  
8 subject of precedence, it's been brought up that the ADF&G  
9 doesn't have a prohibition against llamas. It's important to  
10 note that there's hardly any agency -- in fact, we know of no  
11 land management agency or wildlife agency in the United States  
12 who has a prohibition on the use of pack llamas that is  
13 specific to llamas and based on disease. That precedent stands  
14 against this effort that you're currently engaged in.

15           And the other side of it is that, should you pass this  
16 prohibition, there is a great deal of visibility in an agency  
17 such as yours, a U.S. Fish and Wildlife entity and the biggest  
18 wildlife refuge in the country is banning llamas based on  
19 disease; that demands the attention of other agencies.

20           And it has a chance of creating a domino effect, which is  
21 really dangerous, because there is no merit to it, and you're  
22 going to create a lot of extra effort on the part of agencies  
23 exploring this, looking at it. And it -- this happened in  
24 Canyonlands in 1995, when they first -- the first attempt to  
25 ban llamas came through. And there was a domino effect. It

1 took three, four years to tamp down.

2 And it's something that you really want to watch, because  
3 it has the implications for many other domestic species. You  
4 know, you've got a lot -- you've got all kinds of grazing  
5 interests. Those animals all carry higher disease potential  
6 than llamas. Llamas have no endemic diseases. They actually  
7 present --

8 **AMANDA BIEDERMANN, FACILITATOR:** One-minute warning.

9 **STAN EBEL, COMMENTER:** Okay. They present no danger or  
10 probably the lowest risk of any animal that you can put in  
11 a -- in the middle of wildlife populations. They have no  
12 endemic diseases. They're extremely healthy, and they're very  
13 hardy. So the health of the wildlife is going to be enhanced.  
14 Management goals are easily --

15 **AMANDA BIEDERMANN, FACILITATOR:** 30-second warning.

16 **STAN EBEL, COMMENTER:** -- more easily (indiscernible -  
17 simultaneous speech) low impacts. And so it's something that I  
18 think you really want to look at, because they're really  
19 regarded as a -- an exemplary back country pack animal in the  
20 agencies and land management units that they're being used in.

21 **AMANDA BIEDERMANN, FACILITATOR:** Okay, great. And it  
22 looks like time is just about out. Yep, and the time has  
23 stopped. So thank you, Stan, for your follow-up comment. I'm  
24 going to put you back on mute now and lower your hand. And  
25 we're going to move on to our next raised hand, which is

1 actually Scott Woodruff. So, Scott, I'm going to unmute you  
2 now and I'm going to restart the clock first. Okay, I'm now  
3 going to unmute you. Hi, Scott, can you hear us? I've unmuted  
4 your phone, which I think you've called in through, but I'm  
5 going to mute that, and I'll unmute you through the other.  
6 Okay, hi, Scott, can you hear me?

7 **SCOTT WOODRUFF, COMMENTER:** Yes, I can. Can you hear me?

8 **AMANDA BIEDERMANN, FACILITATOR:** Yes, I can hear you,  
9 Scott. Okay, great. Thank you. So I'm now going to -- okay,  
10 so I have the clock restarted. And can you see it on the  
11 screen, or do you need me to give you a one-minute and a  
12 30-second?

13 **SCOTT WOODRUFF, COMMENTER:** I -- I can see it.

14 **AMANDA BIEDERMANN, FACILITATOR:** You can see it? Okay,  
15 great. All right, so then I'm going to start the clock now.

16 **SCOTT WOODRUFF, COMMENTER:** Okay. So I left off to where  
17 I was. I wish we would have known it was three minutes,  
18 because we all could have probably crafted our comments faster.  
19 I would like to hear from Michelle, again.

20 In any case, I'm going to whip through some research that  
21 has not been covered in the CCP, the draft CCP, the CCP or  
22 currently. So here they are. It's not limited to the  
23 following; ANWR needs to follow up with these:

24 The Western Association of Fish and Wildlife Agencies;  
25 the Alaska Department of Fish and Game, which is the wildlife

1 managers that are charged with your jurisdiction of managing  
2 wildlife; Dr. Murray Fowler; Dr. LaRue Johnson; the American  
3 Association of Small Ruminant Practitioners; The Wildlife  
4 Society and the American Association of Wildlife Veterinarians  
5 joint issue statement, 2015; you should look that up. Numerous  
6 federal and state jurisdictions that manage public land and  
7 wild sheep, including Dall sheep; lots of them.

8       Also, inexplicitly, nowhere in the process until now has  
9 the public been informed of this new information that excludes  
10 llamas on public land access approved animal and allowed  
11 meaningful opportunities to present their views.

12       Therefore, I present a list of this research, following:  
13 Foreyt 1994, Schommer, Woolever 2001; Schommer, Woolever 2008;  
14 Besser, Wolf (ph) 2012; and really important, Western  
15 Association of Fish and Wildlife agencies Wild Sheep Working  
16 Group, Recommendations for Domestic Sheep and Goat Management,  
17 2012. Your documents reference that every once in a while, and  
18 the proceeding documents, up to 2012, which was 2007, 2015.

19       And most importantly, wi -- Western Association of Fish  
20 and Wildlife agencies -- a document called the Thinhorn Sheep  
21 Conservation Challenge and Management Strategies for the 21st  
22 Century, 2016; specifically, page 15, it says: Effective  
23 separation is defined as spatial or temporal separation between  
24 thinhorn sheep and domestic sheep or goats. Reducing the  
25 potential for association between those taxa -- taxa. They're

1 not including camelids; they're not including equids; they're  
2 including sheep and goats, okay, for the likelihood of  
3 transmission of pathogen organisms of parasites between  
4 species; critically important. I agree with that, but it  
5 doesn't include camelids.

6         Inexplicitly, ANWR arbitrarily put the llama in with the  
7 Bovidae family, the rumination suborder of taxa group. This is  
8 significantly wrong. ANWR wants to apply any level of disease  
9 scrutiny to llamas, it will have to then apply the same level  
10 of disease scrutiny to domestic animals, including horses,  
11 dogs, and humans. Please do not eliminate our user group, pack  
12 llamas, on this huge piece of public land based upon false  
13 science in the arbitrary application.

14         My comments will be much more detailed written. I would  
15 like to hear from Michelle and some of the others. Thank you.

16         **AMANDA BIEDERMANN, FACILITATOR:** Great. Thank you,  
17 Scott. I'm going to put you back on mute now. I appreciate  
18 your comment. I'm going to lower your hand, again. And it  
19 looks like we have another raised hand. And I believe I  
20 mistook that phone number. I think that is actually Phil's  
21 number. And so, Phil, it looks like your hand is raised, so  
22 I'm going to unmute you. And since you're one of our, you  
23 know, pre-registered applicants, we're going to work our way  
24 kind of down back through the list. And so since Scott and  
25 Stan have already given their additional three minutes, we're

1 going to also allow you an additional three minutes. So I'm  
2 going to unmute you now. Hi, Phil, can you hear me?

3 **PHIL NUECHTERLEIN, COMMENTER:** Can you hear me now?

4 **AMANDA BIEDERMANN, FACILITATOR:** Yes, I can hear you.

5 **PHIL NUECHTERLEIN, COMMENTER:** Hello? Okay.

6 **AMANDA BIEDERMANN, FACILITATOR:** Hi.

7 **PHIL NUECHTERLEIN, COMMENTER:** All right, so I think, you  
8 know, there's --

9 **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible -  
10 simultaneous speech).

11 **PHIL NUECHTERLEIN, COMMENTER:** -- a fundamental  
12 misunderstanding with taxonomy. That's been stated, but -- and  
13 how that relates to disease epidemiology, but cam -- camelids  
14 are camels. They're in the Camelidae family. Both domestic  
15 and wild sheep and goats are bovids. They're in the Bovidae  
16 family. Consequently, strong species barriers make Camelidae  
17 highly unlikely to transmit diseases to Bovidae. And I think  
18 that's fundamental flaw here by lumping us in with sheep and  
19 goats and considering us to be a disease threat. That's really  
20 important.

21 The statement that U.S. Fish and Wildlife Service makes,  
22 the risk of disease transfer may be low, but the potential  
23 impacts could be significant, and, therefore, represent  
24 unreasonable risk, this is misleading with respect to pack  
25 llamas. The potential impacts of disease transfer from any

1 mammal, including horses, dogs, and humans are just as  
2 significant.

3         The same case could be made by U.S. Fish and Wildlife to  
4 arbitrarily prohibit horses, but you -- but U.S. Fish and  
5 Wildlife Service has arbitrarily chosen to prohibit pack llamas  
6 instead, because the references being used don't provide  
7 scientific evidence of this alleged threat. There is no such  
8 thing as zero risk.

9         So the lack of scientific studies investigating  
10 pathen -- pathogen transmission between camelids and wild sheep  
11 does not mean that transmission does not or cannot occur;  
12 that's another misleading statement with respect to pack  
13 llamas. The same statement can be made regarding virtually  
14 every animal on earth. So why have you arbitrarily chosen pack  
15 llamas to apply this --

16         **AMANDA BIEDERMANN, FACILITATOR:** One-minute warning.

17         **PHIL NUECHTERLEIN, COMMENTER:** -- this to? You're  
18 ignoring the wealth of U.S. scientific information. You're  
19 ignoring the disease research involving (indiscernible) with  
20 wild sheep. University of Washington -- you're saying there's  
21 a consensus among wildlife biologists and veterinarians. We've  
22 made a point of saying that's untrue; that's false. We've  
23 pointed out there's, you know, over 1,000 --

24         **AMANDA BIEDERMANN, FACILITATOR:** 30-second warning.

25         **PHIL NUECHTERLEIN, COMMENTER:** -- professionals that

1 disagree with you. But the statement that Dall sheep in Alaska  
2 are free of domestic livestock disease is false. Go to that  
3 Alaska Department of Fish and Game website, and they point out  
4 that Alaska's Dall sheep has -- in Alaska have contagious  
5 ecthyma and MOV. Certainly, llamas don't present a threat of  
6 that to --

7 **AMANDA BIEDERMANN, FACILITATOR:** Phil, we've reached  
8 (indiscernible - simultaneous speech) --

9 **PHIL NUECHTERLEIN, COMMENTER:** -- the llama  
10 (indiscernible - simultaneous speech) in ANWR which has been  
11 stated.

12 **AMANDA BIEDERMANN, FACILITATOR:** Okay, Phil, so we've  
13 reached the end of your time. And it sounds like you're  
14 wrapped up. And we have Michelle waiting, so I'm going to put  
15 you back on mute, and we're going to move on to Michelle.  
16 Thank you, Phil. Okay, great. As I said, we're going to move  
17 on next -- I'm going to put back on the screen, that we are  
18 going to move back Michelle Kutzler. She was one of our  
19 pre-registered applicants. And so I'm going to restart the  
20 time on the screen.

21 **MICHELLE KUTZLER, COMMENTER:** Thank you very much.

22 **AMANDA BIEDERMANN, FACILITATOR:** Hi, Michelle, I've now  
23 unmuted you. I apologize earlier. I think I was on mute  
24 myself when I was prompting you that your comment had reached  
25 the end, so I apologize for that. But we're going to allow you

1 an additional three minutes to offer your comment, and you can  
2 see it here on the screen. So I'm going to start your time  
3 now.

4 **MICHELLE KUTZLER, COMMENTER:** Thank you very much. While  
5 there is abundant scientific evidence to support transmission  
6 of disease between domestic sheep and goats and wild Dall sheep  
7 and mountain goats, there is no direct evidence in the  
8 peer-reviewed scientific literature to support any assertion  
9 that disease transmission occurs between camelids and wild  
10 sheep or goat populations.

11 Indeed, one of the most important pathogens to Dall  
12 sheep, *Mycoplasma ovipneumoniae* or, simply, MOV, has never been  
13 reported in camel -- in camelids. It's also important to  
14 emphasize, as been mentioned by others, that horses are  
15 actually a greater risk than camelids to wild Dall sheep and  
16 mountain goats, as horses have several endemic diseases that  
17 can be transmitted to those wild species.

18 And it's also important to consider that humans develop  
19 infections that can also be transmitted to wild sheep. So if  
20 the intent of this prohibition is to protect these wild  
21 species, then it must also include preventing human and horses  
22 be in these areas, as well. Considering that this will not be  
23 included in the prohibition, there's no reason to also include  
24 camelids.

25 As I mentioned before, I'm the Region IV director for the

1 American Association for Small Ruminant Practitioners, and this  
2 organization was founded in 1968 to study, specifically, small  
3 ruminants, and that includes sheep and goats, elk, deer,  
4 camelids, and other related species. We currently have just  
5 under 1,000 members. We just did a census. And one of the  
6 main roles of AASRP is to serve as the national authority for  
7 small ruminant issues. Of all the issues that AASRP has  
8 reviewed, our organization has seven posted policy statements,  
9 and one of these is on banning camelids in national parks. And  
10 the policy statement was just revised, again, in February 2020,  
11 and I'm going to read it now:

12       There exists concern that entry of camelid pack animals,  
13 llamas, and alpacas, onto public lands poses potential risk to  
14 resident endangered or threatened ungulate populations  
15 including the Boreal caribou, Northern Mountain caribou,  
16 Central Mountain caribou, Southern Mountain caribou, Bighorn  
17 sheep, Mountain sheep, Dall sheep, Stone sheep, and Roosevelt  
18 elk. These diseases by national parks and wildlife managers  
19 include MOV, Mannheimia haemolytica, Mycobacterium avium  
20 paratuberculosis, Mycobacterium bovis, Pasteurella species,  
21 contagious ecthyma, bovine viral diarrhea virus, and bluetongue  
22 virus. Transmission of pathogens from cattle and sheep to wild  
23 ungulates under natural conditions has been well documented in  
24 the literature. Examples include respiratory disease and fatal  
25 pneumonia following contact between domestic and bighorn sheep

1 as published by Schommer and Woolever in 2008 --

2 **AMANDA BIEDERMANN, FACILITATOR:** (Indiscernible -  
3 simultaneous speech) your comment. So we're going to wrap up  
4 now. But we, again, strongly encourage everyone to submit  
5 their comments in writing. So I'm now going to put you back on  
6 mute and lower your hand, but we really appreciate your  
7 comment.

8 And so I think the last person that we have on our  
9 pre-registered list who hasn't yet offered another additional  
10 three-minute comment is Linda Nuechterlein. So, Linda, I see  
11 that you've raised your hand. So you're the last of our  
12 pre-registered applicants that we're going to allow that  
13 additional three minutes for. And then we're going to move on  
14 and see if anybody else has any other comments that they would  
15 like to offer. So I'm going to now unmute you, Linda. Hi,  
16 Linda, can you hear --

17 **LINDA NUECHTERLEIN, COMMENTER:** Yes, I can hear you. Can  
18 you hear me?

19 **AMANDA BIEDERMANN, FACILITATOR:** Yes, I can hear you,  
20 Linda. Okay, so since you're calling in through the phone,  
21 I've restarted the three minutes. And, again, I'll give you  
22 that one-minute and that 30-second warning so that you can wrap  
23 up your comment. And I'm going to start the timer now.

24 **LINDA NUECHTERLEIN, COMMENTER:** Yes. Okay, so one thing  
25 I wanted to mention was that this package that you're reopening

1 here for comment is supposed to, you know, enhance hunting and  
2 fishing opportunities in ANWR, and I don't see how  
3 (indiscernible) prohibiting pack stock which is llamas is doing  
4 that. So that actually goes against the intention. It's in  
5 direct opposition to the intent of these proposed regulations.

6 I think it would stifle hunting and fishing  
7 opportunities, because as somebody -- as I believe one of the  
8 speakers mentioned at the beginning of presentation here, is  
9 that ANWR is really mostly or all -- or totally only  
10 accessible -- you know, it's not road accessible. But you  
11 really do need pack stock to access ANWR.

12 And the other thing, if you -- you know, if you're using  
13 pack stock, one of the great advantages of a llama, a pack  
14 llama, is that it has far less impact on the environment than a  
15 horse or -- or a mule. The traditional pack stock is now  
16 allowed in ANWR is -- is quite -- it leaves much more of an  
17 impact on the environment than a llama. A llama has a padded  
18 foot. They leave really no more impact than a human walking  
19 into an area, where the horse will be leave ruts and does a lot  
20 of damage to the environment, actually; horses and mules.

21 So that's -- I think that's really an important  
22 consideration that's being overlooked lately, because there's  
23 such an emphasis on this perceived disease issue, which doesn't  
24 even exist. It's been pointed out, llamas are taxonomically  
25 separated just as a horse presents less -- probably less

1 disease spread than a horse and, yet, they're being banned.  
2 And they're much easier on the environment than a horse,  
3 leaving much, much less intact.

4 **AMANDA BIEDERMANN, FACILITATOR:** One minute.

5 **LINDA NUECHTERLEIN, COMMENTER:** So that concludes my  
6 comments. And one last thing here is that we have initiated an  
7 inquiry into this matter, and I believe this has to do with the  
8 NEPA process. As I mentioned earlier -- I went on the record  
9 mentioning that the NEPA process, we believe, has been  
10 violated, and we don't want to have to wait until the end of  
11 the regulatory process for an answer from the U.S. Fish and  
12 Wildlife Service.

13 **AMANDA BIEDERMANN, FACILITATOR:** 30-second warning.

14 **LINDA NUECHTERLEIN, COMMENTER:** So this -- this question  
15 is a CP planning process issue and not really a regulatory  
16 issue. And that -- yeah. And, also, I request that Fish and  
17 Wildlife remove all false and misleading propaganda about pack  
18 llamas from their website that we -- that we identified and  
19 also other speakers. We would like that actually removed as  
20 soon as possible, because that's -- you know, that is really  
21 preventing -- that is damaging the reputation of llamas, and  
22 it's not --

23 **AMANDA BIEDERMANN, FACILITATOR:** All right, Linda, you've  
24 reached --

25 **LINDA NUECHTERLEIN, COMMENTER:** -- really right for that

1 to be out there.

2 **AMANDA BIEDERMANN, FACILITATOR:** Great, thank you.

3 You've reached the end of your time, so I'm going to put you  
4 back on mute and lower your hand. So, at this time, we have  
5 now gone through our list of pre-registered applicants who  
6 requested they wanted to offer a comment, and we've each given  
7 you two rounds of three minutes to offer your comments. And so  
8 we're not going to offer a third round, at this time. We  
9 really encourage you to submit your comments in writing if you  
10 have any additional follow-up comment that you feel that you  
11 weren't able to say within your allotted time.

12 And so we're going to move on and see if anybody else  
13 using the Zoom web platform, Zoom app, or calling in through  
14 the phone, if you're, you know, not on that list of  
15 pre-registered applicants, if you would like to offer a  
16 comment, we're going to allow just a little bit of additional  
17 time to see if anybody else has a comment they want to offer.  
18 Again, you can use the raise-hand feature to indicate that you  
19 would like to offer a comment.

20 And we'll give folks just a couple of minutes to see if  
21 anybody feels like they want to make a comment, and I'll be  
22 looking for that raised-hand feature, again, from anyone who  
23 has not already offered a comment. And I'm not seeing any  
24 raised hands, but, again, if you want to offer a comment, you  
25 can either use the raise-hand feature in the Zoom web platform

1 or Zoom app or, again, you can press star 9 to offer your  
2 comment if you're calling in through the phone. And so if  
3 we'll all just sit tight and hold on and see if anybody else  
4 has any comments.

5 (Pause)

6 Okay, so I'm not seeing that there are any other  
7 participants who would like to offer a comment, so we're going  
8 to close the public hearing portion of this webinar. Let's  
9 see, it's about 4:17 Alaska time, and so I'm now going to  
10 officially close the public hearing. But, again, Fish and  
11 Wildlife Service really appreciates your participation in this  
12 public hearing webinar, and we strongly encourage you to submit  
13 any additional comments you have in writing through some of the  
14 avenues that Nathan is going to talk about. So I'm now going  
15 to turn it back over to Nathan to lead us through our closing  
16 remarks.

17 **NATHAN HAWKALUK, ANWR DEPUTY REFUGE MANAGER:** All right,  
18 thank you, Amanda, and thank you to everyone that provided  
19 comment this afternoon. Really appreciate your participation  
20 and involvement in this public process, so that's much  
21 appreciated.

22 As you can see on the screen in front of you, there's  
23 additional documents and more information found on the website.  
24 Ar -- it's Arctic National Wildlife Refuge's website. You can,  
25 also, of course, send written comments to the address you see

1 in front of you. Again, a reminder, the comment deadline is  
2 June 8th, 2020, and, finally, you're able to comment online at  
3 the website posted at the bottom on the third bullet item.  
4 That website is also available if you just simply go to the  
5 Arctic Refuge website, as well.

6           So, although this public hearing is wrapping up, there's  
7 still plenty of opportunities to provide additional comments.  
8 So, again, I thank you for your participation today, and I  
9 think we will close up the hearing for now. And, thank you,  
10 again.

11           (Off record)

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**TRANSCRIBER'S CERTIFICATE**

I, Marci Lynch, hereby certify that the foregoing pages numbered 1 through 50 are a true, accurate, and complete transcript of the U.S. Fish and Wildlife Services Public Hearing Webinar re: Arctic National Wildlife Refuge Proposed Domestic Animal Regulation transcribed by me from a copy of the electronic sound recording to the best of my knowledge and ability.

May 25, 2020

*Marci Lynch*