

## Still Hasn't Found What She's Looking For!

In 2003 Helen Schwantje, BC provincial wildlife veterinarian embarked on a campaign to ban llamas from wild sheep ranges by casting them as a disease threat to wild sheep. Convinced the llamas carried a disease that would support her strategy she conducted a survey testing local llamas in BC. Finding no disease, she did a hypothetical risk assessment to buy time, certain that a suitable disease would emerge. She's now been at this task for 20 years and is still without a disease as a vehicle to ban llamas. She has done subsequent risk assessments (all hypothetical), manufactured science, and advocated political maneuvers and enlisted NGO support. All these strategies have been thwarted by the simple fact she still has no disease(s) identified.

She has ultimately enlisted the entire wild sheep industry (notably WSF, and now the WSI) to help find such a disease. Kevin Hurley has been her most dedicated colleague leading a cohort of WSF members to support Dr. Schwantje's conjecture. Kevin is political, pseudo-scientific and has campaigned for legislation and regulation based on conjecture, distortion, and misrepresentation of scientific facts, aided by the economic resources of WSF. Still, no credible disease threat has been identified and now WSI is trying to convince the llama industry to prove that diseases they've not been able to identify in llamas really don't exist. As ridiculous as this sounds, you can trace the following chronology which shows the disease threat Dr. Schwantje began as a hypothetical projection in 2003, remains hypothetical in 2024.

-2003 **Schwantje** hypothetical [\(RA'03\)](#) based on a cooperative study with BC Llama owners. documented no disease yet recommended separation of llamas from wild sheep habitat.

-2005 **Schwantje/Garde** hypothetical [\(RA'05\)](#) assigning diseases of domestic sheep and goats to llamas attempting to associate actual disease with llamas.

-2013 Herriges AK The Wildlife Society paper based solely on hypothetical RA'03, RA'05. [\(AK-TWS\)](#)

2013 Hupp letter to all AK-Federal Agencies based on Herriges unsupported paper. [\(Hupp-AK-TWS\)](#)

-2015 AK NPS proposed compendium llama ban fails after thorough research correctly separated pack llamas from domestic sheep and goats as a threat.

-WSF 2015 Thinhorn sheep action plan update of 2014 THS summit assigning failure of the NPS bans to lack of cohesive support rather than the lack of disease. [\(THS'14-15\)](#)

[The Kevin and Janine Rinke Thinhorn Initiative-WSF's 2014 Thinhorn Sheep Summit Action Plan Update - March 2015 Update Prepared by: Jeremy Ayotte \(04/06/2015\) and edited by Kevin Hurley \(04/07/2015\)](#)

*“AK: A 2015 Alaska National Park Service Compendium published in mid-March determined the likelihood of disease transmission between llamas or alpacas to wild sheep or mountain goats was “probably low, although still possible”. After a public comment period in February, domestic sheep and goats were banned from Alaska’s National Parks, but pack llamas and alpacas were allowed to continue to be used to access alpine areas. (WSF-AK Chapter currently at 114 members, as of 4/7/2015).”*

*“ (AK): Consider whether input to NPS public forum on using llamas and alpacas in Alaska National Parks could have been better supported. Although the key focus must be on domestic sheep and goats, we should all be “on the same page” when it comes to discussing camelids as pack animals in the alpine. Continue to work with Wayne Heimer/Kevin Kehoe to support their work to develop a Brief for 2016 Alaska Legislature. Any relevant briefing notes from other jurisdictions should be sent to Kevin K.”*

With the WSF moto “NO CONTACT IN THE NORTH” Legislation is part of the solution” The llama ban attempt by WSF for llamas was in progress in 2014 and a part of the NPS ban attempt in 2015. They are dismayed the ban attempt failed and they are now going to focus and get everyone “on the same page”. To them, the ban attempt failed because of their failed strategy, not the fact that the ban on the basis of disease had no merit. This response is a strong indication they have respect for science only as it serves their agenda.

-2016 BC legislation banning llamas for hunting while allowing for trekking undercutting the validity of a disease threat.

**2017 THS Synthesis: Dr. Schwantje to produce CCH’17 to support disease as basis for BC legislation and to blunt grower pushback.**

THS’17 Summit displays WSF active agenda, both legislative and regulatory, to ban llamas from sheep ranges. Excerpts from the synthesis expose strategies and who is involved. The Wild Sheep Foundation has declared they are in active pursuit of a ban of llamas in all wild sheep ranges.

In their document, [North American Conservation Vision 2020 \(N.A. CV2020\)](#) pg 4 sec. 2.6 Goal #2: “Based on recommendations of the September 2017 BC Camelid Risk Assessment, advocate for no use of domestic sheep, goats, llamas, alpacas, etc. as pack animals used in thinhorn sheep range for hunting, trekking, weed control, or other purposes.” This statement is repeated under the Big Horn Sheep Goals: Page 6 sec 2.6, Goal #2

The September Camelid Risk Assessment refers to the CCH Risk Assessment (CCH’ 17) that was supposedly released October 24, 2017. WSF is trying to create the appearance that seeking the llama ban is a byproduct of the Risk Assessment recommendations. The April, 2017 WSF THS Summit transcript contains inquiries to Dr. Helen Schwantje regarding the

assessment's release. She indicated it was in draft stage at that point. As part of the WSF cohort, she likely had the assessment well ahead of the actual release. She stressed the need for the assessment to turn public sentiment and to pursue legislation to ban llamas. The assessment is manufactured science, custom built as a base from which WSF can pursue a llama ban. It's interesting to note "etc." is included in the ban they are seeking. Is "etc." a disease risk? Or is this just an indication of how precise and well-documented they are as they apply this decidedly lacking reference document. It's suggestive that the WSF is not done with banning species and user groups and is leaving their options open.

### -THINHORN SHEEP SUMMIT II SYNTHESIS & SUMMARY (THS'17)

**Pg 22:** This is a false statement.by **Kevin Hurley:** *"In AK, per BOG regulations, you cannot use pack goats or llamas for hunting, but you can use them for non-hunting recreation. WSF would like to see these domestic animals banned from THS range on all federal lands in AK year-round."* (Llamas were not banned.)

Page 3 THS '17 Synthesis: WSF is pursuing llama and alpaca bans in concert with sheep and goat bans.

*"All jurisdictions reported significant progress toward maintaining or achieving effective spatial and/or temporal separation between domestic sheep, domestic goats, alpacas, and llamas (collectively referred to as DS) and THS. Action items completed for all jurisdictions combined include: draft regulations, formation of sheep disease workgroups, development of disease-sampling protocols for DS, implementation of disease surveillance for DS and THS, development of a no DS-pack use regulation for hunting, completion of disease risk assessments, outreach to DS growers, development of a DS/THS contact response plan, and consultation with Co-management Boards on regulations. Next steps for effective separation for all jurisdictions combined includes: identification of DS growers, evaluation of high-risk contact areas, continued disease sampling, drafted or finalized regulations, education of DS growers and politicians, re-authorization of bylaws, and production of Movi-free DS. All jurisdictions indicated they have little influence with government officials and legislators; hence, the most important action NGO's (non-government organizations) can accomplish for THS is to continually push for creation and implementation of effective separation regulations, in each jurisdiction."*

In BC, Dr. Helen Schwantje with the Ministry of Forests, Lands, and Natural Resources Operations (MFLNRO) indicated we don't know a lot about THS pathogens. Dr. Schwantje believes Movi could be very important, but it has never been found in Stone's sheep. Thirteen sheep (10 ewes, 3 rams) from the Dease Lake area (captured/tested in February 2017) were all found to be negative for Movi; that information will be used to compare THS pathogens with BHS. Dr. Schwantje and colleagues are currently updating a 2003 Risk Assessment for Camelids. They are looking at opportunities for legislation that removes flocks in some high risk areas.

Page 15: **Kevin Hurley** and Gray Thornton

WSF Tag auction revenue is explained per **Hurley/Gray Thornton**. This exchange is with **Mike Cox** and other WSWG members in attendance. This seems to be the initiation of the courtship that's led to the current marriage of WSI/WSF to supply funds for WAFWA/WSWG wild sheep research projects.

**Kevin Hurley:** *"How can WSF help your agency in funding THS projects? Gray: Special Governor's or Minister's tags and permits really are part of the North America Model for Wildlife Conservation. Non-resident license fees generate the majority of funds for wild sheep conservation and management. About 74% of all wild sheep management funds west-wide come from auction and raffle of special permits and tags. Since WSF sells the majority of those tags, our involvement is very important, as WSF raises and directs approximately 40% of all wild sheep revenue in the U.S. and Canada. If we do not have non-resident license fees, and if we don't auction or raffle special tags, we simply won't have the wild sheep conservation programs we have today, or need. Much of a jurisdiction's application fee is considered an administrative fee, and is not necessarily used for wild sheep management. Using 2014 information, WSF found that in Montana annual resident revenue for BHS conservation was only about \$20,000. Funds from the unlimited areas and miscellaneous other hunts generates about another \$100,000 in license revenue each year; \$120,000 is not much money for BHS management for a state as large as Montana. In 2014, the Montana statewide BHS auction tag sold for \$480,000, with 90% of those funds being returned to MT Fish, Wildlife, and Parks for their BHS program. So, special tags are critical. Besides raising wild sheep management funds, WSF can be a catalyst for generating funds which can then be multiplied into a 3:1 match, via P-R. For example, WSF and AK-WSF helped turn \$50,000 of Safari Club International Foundation funds into \$200,000, for ADF&G to write a comprehensive Dall's sheep management plan for AK.*

**Kevin Hurley:** *on average, WSF retains a 7% commission from auction tag revenues, the remainder is returned to the state, provincial, tribal or First Nations wild sheep management agency. WSF's focus is to raise and direct \$\$ to be put back on-the-ground, to directly benefit wild sheep management"*

Page 21 (2 & 3) THS'17 Synthesis: Re: seeking ban on Chugach NF. **Hurley, Carrothers, Schwantje.**

2. **Kevin Hurley:** *"In 2016, BLM came out with strong direction toward ensuring effective separation between DS and wild sheep. The USFS had some very effective separation policies in 2011, but backed off of them in recent years, due to politics. WSF would sure like to see the Chugach NF implement 22 similar restrictions in their final land/resource management plan. Aaron Bloomquist: the Cooper Landing area on the Chugach NF is the most vulnerable area in Alaska for DS and THS disease transmission; distances of separation are only a few hundred vertical feet, not miles. Any help the USFS could do with the Alaska WSF Chapter's effort would be appreciated. Cheryl Carrothers: I agree. Action Item #2: Cheryl Carrothers will pass on concern of high-risk disease transmission between DS and THS to USFS decision makers on the Chugach NF."*

Page 22: **Helen and Kevin**

3. **Helen Schwantje:** *“In BC, we are working to update a 2003 Camelid Risk Assessment; hopefully, this update will give us some resolution to the camelid question. **Kevin Hurley:** In AK, per BOG regulations, you cannot use pack goats or llamas for hunting, but you can use them for non-hunting recreation. WSF would like to see these domestic animals banned from THS range on all federal lands in AK year-round.”*

Page 23: Dr. Peregrine Wolff and Dr. Tom Besser

The only disease related information shared at the summit regarding llamas and it confirms llamas as not a disease threat.

MOVI IN WILD SHEEP: MANAGEMENT-RELEVANT RESEARCH Dr. Peregrine Wolff and Dr. Tom Besser: *“There have been numerous pen studies over the past 25 years that have mixed domestic sheep with BHS; greater than 95% of co-mingled BHS have died. When other studies mixed cattle, horses, and llamas with BHS, less than 10% of the BHS died. Tom repeated some of these same pen studies with Movi-negative DS, and found no die-offs in BHS.”*

Dr. Wolff from the 2017 THS Synthesis: *“The new molecular technology has cleared up what has been going on the past decades. When pathologists have gone back to old tissues from die-offs many years ago, M. ovi was always present. Interestingly, the same strain that led to the first die-off, was still virulent ten years later. M. ovi is not new.”*

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6. Chris Barker: *“Can llamas and alpacas which are with domestic sheep and goats transmit Movi to wild sheep, and will that be addressed in the Camelid Risk Assessment revision? **Helen:** We do not know at this time, but it needs to be researched; I expect that it is possible.”*

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5. Bill Jex: *“From our BC perspective, legislation is a very complex and time-consuming process; it is very hard to get passed. Our regulation to ban use of domestic animals for packing while hunting took about 14 intense months to get passed, and was very challenging.”*

6. Wayne Heimer: *“Between the outfitters, ADF&G employees, and an army of Alaska hunters, we have been able to keep the domestics out of THS range; that will continue until any regulations are developed”*

1. **Helen Schwantje:** *“The BC Government doesn’t put high emphasis on wild sheep; other species and issues such as moose and caribou often take higher priority. **Kevin Hurley:** There are several examples of BHS advocacy groups taking a stand and forcing change through political support. A recent example was the WSF pushing to make the BC THS management plan a priority. Due to changing priorities, NGO’s will need to continue this push. How do we make sure any delays don’t happen again? Chris: We have a new director of F&W in BC, and we need to keep urging the need for finalization of the BC THS management plan. **Kevin:** Using*

*BC as an example, we have the Wild Sheep Society of BC, BC Wildlife Federation, Guide and Outfitters Association of BC, First Nations, and others who share common values and goals; pooling together all these NGO's should be quite a force in getting wild sheep priorities to the top. Joining forces on what you agree on is a strong coalition."*

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Aaron Bloomquist: *"He would like to see collaboration between jurisdictions on management of THS along the borders. In addition, he would like to see better collaboration between government and hunters in AK, on all issues. **Kevin Hurley:** On the wild sheep disease issue, the jurisdictions are already collaborating very well together; there is also a lot of collaboration with Troy, Tony, Darren, and others on THS management. **Helen:** When one of us has a good idea for wild sheep, make sure we are sharing reports and or data with other jurisdictions; it would be really good for each of the State/Provincial/ Territorial-level veterinarians to talk together about DS grower pushback, regulation details, and political support. Bringing Dr. Bob Gerlach into this group would be a good idea."*

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24. Gray Thornton: *"AK Chapter WSF and AK Chapter SCI need to pool their efforts, and push for separation legislation."*

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29. Mark Richards: *"Preventing contact between DS and THS will take legislation. RHAK feels we will need to hire our own lobbyist to work with our legislators in Juneau; we would be happy to work with WSF and others. For management plans, we want a diversity of harvest management strategies across AK. The BOG has final authority for those ram harvest strategies. The management plan should involve the public up front, in order to define plan direction. Tony: You can talk to me any time, and public participation will be a huge effort. We can make changes through drafts and BOG anywhere in the process. The draft THS operational plans are scheduled to be at ADF&G headquarters by August 2017."*

30. **Kevin Hurley:** *"WSF has been trying to raise funds for jurisdictions to do their wild sheep work; let's use BC for an example. At convention, we have auctioned the Minister's special permit for at least 12 years; those funds go into a Habitat Conservation Trust Foundation special sheep account. There is a special committee assigned with the task of directing where that money is spent. WSF wants to inform its members on where the money raised was spent on, and periodically report that information in Wild Sheep magazine. WSF plans to query the agencies that we sold auction tags for, and report the results. Does anyone have suggestions on where WSF can help fund or support their priority THS work?"*

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Kevin Kehoe: *"For the camelid risk assessment update that Helen talked about, could it possibly be funded through Kimberlee in AK?"*

**CCH'17 was used to influence the identified NGO's to make statements supporting llamas as a disease threat to wild sheep. WSF is using NGO's for political clout.**

Theodore Roosevelt Conservation Partnership (TRCP):

WSF spoon fed disinformation and convinced this NGO to publish a letter to the Arctic National Wildlife Reserve during their final EIS's process, suggesting disease risk from llamas to wild sheep. Author Christy Plumber, Chief Conservation Officer regurgitating disinformation from the WSF wrote the following: ([Full letter attached here](#))

Backcountry Hunters and Anglers (BHA): **Kevin Hurley** spoon fed disinformation to the BHA to develop a policy titled "2021 NORTH AMERICAN POLICY STATEMENT: REDUCING CONFLICT BETWEEN WILD SHEEP AND DOMESTIC SHEEP AND GOATS ON PUBLIC LANDS" that wrongly included pack llamas to be in the same category as pack goats and domestic sheep. Our Public Lands Access Committee made personal contact with this organization, held a meeting with executives, and explained the disinformation. BHA edited this policy to NOT include pack llamas for arbitrary inclusion to their policy, and their BOD approved. Thank you, BHA!

AK-Wildlife Society (affiliate of The Wildlife Society): In 2013 Published with co-author AK-BLM-Eastern Interior employee Jim Herriges the opinion paper "[REDUCING DISEASE RISK TO DALL'S SHEEP AND MOUNTAIN GOATS FROM DOMESTIC LIVESTOCK POSITION STATEMENT](#)". Once again, it arbitrarily included pack llamas with domestic sheep and goats. This document was solely based upon Dr.Helen Schwantje 03' and 05' RA's and promoted by **Kevin Hurley** and the WSF with orchestration at the Thinhorn Sheep Summits.

-CCH'17 used for USFS-Chugach NF Land Management Plan to recommend banning llamas in the final draft. Numerous comments from the llama industry and professional veterinarian commentary caused CNF to [reverse the DROD](#).

Final ROD states: "*Also, the FEIS lacked rationale as to why llamas were the only domestic livestock species, aside from sheep and goats, which was identified as a potential vector for pathogens to Dall sheep and mountain goats. it would be arbitrary to ban llamas because of disease when the threat of disease from horses is greater.*"

-**Kevin Hurley**, WSF officers and BOD submitted a comment letter to USFWS advocating a ban of llamas from the refuge based on a disease threat to wild sheep. CCH'17 was the sole reference used to support the letter and was the document ANWR relied on to ultimately impose the ban. Hurley used the same misinformation and hypotheticals that were employed in the current Final Brief we are commenting on. It's instructive that the officers and BOD of WSF signed off on this composite display of WSF pseudo-science. See comments in the text of the comments below. Full letter here: [Kevin's Arctic National Wildlife Refuge \(ANWR\) llama ban](#)

Public Comments Processing  
Attn: FWS-NWRS-2020-0013  
U.S. Fish & Wildlife Service

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MS-PRB/PERMA (JAO)  
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Dear USFWS:

On behalf of the Wild Sheep Foundation (WSF), please accept this comment letter on the Proposed Regulation by the Arctic National Wildlife Refuge (ANWR) to Protect Dall's Sheep. WSF supports this proposed regulation. The regulation is based on the ANWR Revised Comprehensive Conservation Plan (approved 2015), directing that "domestic sheep, goats, and camelids are not allowed on the Arctic Refuge (Chapter 2, 2.4 12.9 Disease Prevention and Control)". The promulgated 50 CFR 36.39 (k) ANWR regulation fulfills and follows up on that 2015 planning directive, and should be supported.

For evidence in support of the regulation, we refer to the *Risk Assessment on the Use of South American Camelids for Backcountry Trekking in British Columbia* (2017). British Columbia's Ministry of Forests, Lands, Natural Resources Operations, and Rural Development contracted the Centre for Coastal Health in 2017 to update a previous disease risk assessment on South American camelids [SACs] (e.g., llamas, alpacas). The Alaska Department of Fish and Game assisted the project with funding. (After seeing the information from the RA, ADF&G abandoned it and they will not focus on llamas as a disease risk to any wildlife.) Based on this most recent and comprehensive published risk assessment, South American camelids can serve as host to at least 7 pathogens that could potentially impact wild sheep. (These 7 pathogens were specifically identified as without prevalence in llamas by [AASRP 2020 statement](#)). Thinhorn sheep, such as Dall's sheep, are generally immunologically naïve to many pathogens compared to bighorn sheep in the lower 48 states. While some of these pathogens may not be commonly found in SACs, there is very little evidence on their presence or prevalence in SACs, and precaution around contact between the species was advised until a better understanding of risk could be developed. The relative vulnerability of Dall's sheep to respiratory pathogens/challenges has no doubt played a significant role in regulations developed in recent years by Alaska's Board of Game and the Alaska Region of the National Park Service. (Misinformation. The AK-NPS and BOG: after considering restricting llamas, neither agency imposed the restrictions on llamas and limited those restrictions to domestic sheep and goats.)

WSF, and other organizations, have repeatedly called for well-designed experiments and pathogen surveillance programs to specifically test/assess llamas and other camelids that are used (recreationally or commercially) in occupied wild sheep range. Out of an abundance of caution, and given the uncertainty of which pathogens camelids may carry, the CCH 2017 assessment concluded (highlighting added): (Who were these requests sent to? The llama industry has no record of requests prior to 2021, well after this comment was submitted. To that point in 2021 WSWG had ignored all attempts by the llama industry to share disease information.)

***...there is high uncertainty about the probability of pathogen transmission from SACs to wild ungulates. We found no peer-reviewed publications documenting pathogen transmission from camelids to wild ungulates or to domestic sheep and goats for the identified pathogens. However, because there was almost no research examining the shedding and transmission dynamics for pathogens in camelid herds, or between camelids and other ruminants, a lack of peer-reviewed evidence should not be considered proof that transmission has not, or could not, occur.***



**Overall, we assessed the composite disease risk posed to wild ungulates by SACs accessing backcountry areas as medium-high with medium associated uncertainty. This assessment was driven primarily by the high impact and the medium-high risk posed by the respiratory pathogens *M. haemolytica* and *Pasteurella* spp., the medium-high risk posed by CE, and the medium risk posed by Johne's Disease. Mitigation could be undertaken to partially reduce risk posed by respiratory pathogens, although mitigation for CE and Johne's Disease is much more challenging. It is important to note that over time, new pathogens might emerge in SACs that create significant new risk not discussed in this report. In particular, risk would increase significantly if SACs are documented to be susceptible to infection with *Mycoplasma ovipneumoniae* (*M. ovipneumoniae*) or *Mycoplasma conjunctivae* (*M. conjunctivae*).**

**Uncertainty surrounding the probability of disease transmission from SACs to wild ungulates as a result of camelid trekking activities in BCs backcountry could be reduced with more research into prevalence and transmission dynamics for identified pathogens in llamas and alpacas; and into SAC health status and movements, with particular focus on SAC herds used for trekking in BC.**

**Until more information is available, banning camelids from key wild ungulate habitat is the most effective risk reduction strategy. However, where access is permitted, careful diagnostic screening for pathogens of concern and mitigation activities might be beneficial in partially reducing risk.**

(The necessity of this vague and meandering statement is posed behind the claim there is no disease documentation in llamas “precipitating a high level of uncertainty”. CCH and Helen Schwantjes admittedly failed to look at the bulk of disease information and research available. She limited her search to B.C. that had a small llama population at the inception of the RA survey. By the time the RA was published in 2017 the BC llama industry was virtually extinct because of the negative image her RA's created. WSF has continued this willful ignorance ploy and failed to engage llama researchers and information offered by their research community.)

Much like the North American Pack Goat Association (NAPgA) <https://www.napga.org/> has done, including a collaborative August 2018 workshop with WSF/wild sheep representatives, it would be beneficial if individual or collective llama packers or their associations worked with other stakeholders on development of comprehensive standardized health assessment guidelines and implementation of a comprehensive testing protocol. In fact, NAPgA has developed a set of Best Management Practices <https://www.napga.org/resources/best-management-practices-psr/> that pack goat users should, and do, adopt and implement. In addition, NAPgA has developed a popular-format training video <https://www.napga.org/bmp-video/> that pack goat users voluntarily watch; perhaps the llama packers associations could duplicate these approaches, customized for their animals. Furthermore, WSF and associated wild sheep representatives helped NAPgA develop a Health Passport that assists small ruminant veterinarians or other veterinary practitioners as they conduct health inspections/assessments of pack goats to be used recreationally.

(Goat packers that are now eliminated from a number of wilderness areas by this supposed collaboration, take strong exception to this characterization of this treacherous and severely limiting protocol. The expense and complexity of the protocol came unilaterally from the WSF/WSI and has greatly reduced goat packing. The inference is, that refusing to join this disaster, makes llama packers irresponsible. In reality, to agree to it would be arbitrary and suicidal and would do nothing to protect wild sheep.)

In conclusion, for the safety, benefit, conservation, and future management of Dall's sheep in Alaska and specifically on ANWR, the USFWS should move forward with implementation of this proposed

regulation. The Wild Sheep Foundation and the Alaska Wild Sheep Foundation stand ready to assist the USFWS and other federal land managers. Thank you for proposing this reasoned, and reasonable, approach. We look forward to further involvement with this issue, on ANWR, and elsewhere in wild sheep range in North America.

Sincerely,

Kevin Hurley

Vice-President for Conservation & Operations

cc: Gray N. Thornton, WSF President & CEO

Dr. Peregrine Wolff, WSF Chair

WSF Conservation Staff

WSF Professional Resource Advisory Board

Kevin Kehoe, Alaska WSF President