

Submitted By
Linda Boggs
Submitted On
3/4/2016 12:46:23 PM
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Proposal 79 – Support

Science is proving more every day that animals feel just like us and for me it's hard to understand how someone could operate in denial of the pain and suffering that an animal caught in a trap for days will go through.

As animal cruelty laws get tougher, that trapping license is the only thing that separates a trapper from being guilty of animal cruelty and it should come with a high level of responsibility, both on the part of the trapper and the body that regulates them.

Submitted By
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Submitted On
3/4/2016 12:53:30 PM
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Proposal 80 – Support

Deadly traps have no place in areas that are frequented by humans and domestic animal. It raises the risk of injury and conflict to a level that is unreasonable for everyone.

State regulations suggest that trappers should avoid high risk areas but with more and more reports of pets being injured in traps it is time

Submitted By
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3/4/2016 11:36:20 AM
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OPPOSE Proposal # 78

I strongly oppose the removal of the existing trapping ID requirement. Not only does it make it difficult to identify trappers who are not following the rules but it will make it very hard to determine if a trap is set legally or illegally.

Trapping an animal without a license is an illegal activity under Alaska Animal Cruelty Laws **Sec. 11.61.140 (a) (1)** "knowingly inflicts severe and prolonged physical pain or suffering on an animal" and is a Class C felony. Without a quick way to differentiate if a trap is legal or illegal, law enforcement and the public are going to be in a difficult situation. If all trapped animals are not reported and investigated it basically gives any unlicensed individual wanting to use a trap to inflict pain on say a neighbor's animal that is prone to stray, carte blanche to do so.

It doesn't seem reasonable for the burden of telling the difference between a legal activity and a felony activity on the shoulders of the public and local law enforcement agencies. All legally set traps should be identified with the name of the trapper and their current license number.



Submitted By
Linda fields
Submitted On
3/2/2016 7:40:57 PM
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I support proposals 79 and 80. I oppose proposal 78.

Submitted By
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Submitted On
3/2/2016 11:55:41 AM
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As frequent visitors to Alaska, drawn to your State by the opportunity to view wildlife in a natural setting, my family and I are urgently concerned for the ethical values involved in the taking of animals for human use.

We are appalled at the evident disregard for the suffering often inflicted by trappers, who wish to remain anonymous; and, to this end, we OPPOSE Proposal 78 and urge the Board of Game to do likewise.

In the same spirit of concern, we SUPPORT Proposals 79 and 80: 79 seems to us to be the most basic obligation of humanity toward a trapped creature doomed to consumption of one sort or another by our species. 80 transforms the common-sense "suggestions" of the Alaska trappers manual into enforceable "regulations"--the least we can do to protect people and their pets.

* * *

Submitted By
Margo Waring
Submitted On
11/15/2015 11:37:29 AM
Affiliation
none

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I am writing in support of Proposal 79 and 80. These proposals would place reasonable safeguards on trapping that would protect pets and wildlife not targeted by the trapper.



Submitted By
Mark Huckel
Submitted On
3/2/2016 10:09:52 AM
Affiliation

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To the Board:

Prop. 78 I voice my opposition.

Prop. 79 I vehemently support.

Prop. 80 I vehemently support.

Submitted By
Mark Stopha
Submitted On
11/12/2015 8:01:07 PM
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Self

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I am opposed to proposal 79 to institute a 24 hour trap check. I trap marten with conibear traps by boat near Juneau and checking traps daily over the distance I cover by boat is not realistic nor necessary. The proposal has a provision for "documented severe weather" but this is a highly subjective provision and Southeast Alaska waters vary considerably regarding the weather and the size of your vessel and the direction of the wind and the shoreline one traps. Frequency of trap checks is best left to the discretion of the trapper for pelt quality and his or her own safety.

Submitted By
mary
Submitted On
3/4/2016 9:41:28 AM
Affiliation

Phone
willson
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5230 terrace place
Juneau, Alaska 99801

Re Proposal 78-5AAC 92.095

I strongly oppose the idea of removing ID tags from traps and snares. When pets are caught, it is essential to be able to track down the owner of the traps. When traps are placed illegally, which happens more often than you might think, again it is essential to know the owner of the traps. It is a form of accountability, and that is absolutely necessary.

Submitted By
mary willson
Submitted On
3/4/2016 9:49:47 AM
Affiliation

Phone
789-1412
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mwillson@gci.net
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5230 terrace place
Juneau, Alaska 99801

Re Proposal 79-5-AAC 92.095(a)

It is totally appalling that there are no requirements for frequent checking of traps. Sometimes animals are left to suffer for a week or more. That is totally outrageous and unacceptable. Try tying a trapper to a tree, out in the woods somewhere, for a week and see how s/he responds! Traps should be checked AT LEAST every two days.

A short trap-check interval would reduce 'by-catch' of eagles and other wildlife and dogs. And the pelt of the trapped animal would be in better condition and usable.

I strongly support this proposal.

Submitted By
mary willson
Submitted On
3/4/2016 9:55:18 AM
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Re: proposal 80

I support this proposal. There should certainly be a regulation that there be no trapping within the stated distances of places where people and their dogs are likely to be. All trap lines near public-use areas should be clearly labelled, so that dog walkers, skiers, and hikers know that traps are nearby and can avoid them.



Jan 11, 2016

ATTN: Board of Game Comments
Alaska Department of Fish and Game Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Dear Board of Game:

Proposal 78 -5 AAC 92.095: I Oppose

This proposal says that Alaskan trappers do not need to attach identification information to their traps and snares. I oppose this proposal because it targets Juneau and 2 Northern areas where ID tags have been deemed reasonable and sensible given the lethal nature of trapping.

Proposal 79 – 5 AAC 92.095(a): I Support

I support having a 24-hour check requirement for all traps and snares. This practical change is humane and responsible. It is a professional way for trappers to do their work. Trappers have a recommended Code of Ethics to provide humane killing. A statewide 24 hour-check would reduce unnecessary animal suffering. I deeply appreciate wildlife, and knowing that traps are faithfully being checked every 24 hours to prevent a lingering dying process for a wounded animal.

Proposal 80 -5 AAC 92.095: I Support

I support having traps and snares moved from populated areas with 1,000 or more people. Some cities have seen the wisdom in prohibiting traps near schools, homes, roads, publically maintained trails, popular trails and recreation facilities. Southeast requires set-backs from some trails, and this creates a stronger safety environment for hikers, skijorers, dog mushers, children, pets and domestic animals. This proposal can minimize the ongoing conflict between trappers and the public. More and more people are questioning why trapping exists, and this proposal allows trappers to show increasing good faith effort to minimize unsafe and inhumane situations. It is clear from recent unsafe situations in the Mat-Su that statewide regulations and enforcement are needed. Suggestions and recommendations have not been effective.

Thank you for a YES vote on Proposals 79 and 80, and a NO vote on Proposal 78.

Sincerely,

Maureen Longworth
3099 Nowell Ave
Juneau, AK 99801

Submitted By
Maxine Franklin
Submitted On
3/4/2016 4:04:04 PM
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Proposal 78: Oppose. Not requiring trap IDs make it easy for unethical trappers to trap in off-limit areas. Anonymity also makes it impossible for wildlife enforcement officers to identify violators. IDs are not expensive, not burdensome, and help verify ownership should that be in dispute.

Proposal 79: Support. Requiring trap checks every 24 hours, with reasonable exceptions, will reduce somewhat the "cruelty aspect" of trapping. Under current regulations, traps should be checked "regularly" which means the range can be daily to monthly, or even never.

Proposal 80: Support. Due to the increasing conflicts between trappers and other recreational trail users, and the increase in trail use by the non-trapping public, it only makes sense to require that traps not be placed where they can be dangerous to people or their pets.

Submitted By
Michelle Anderson
Submitted On
3/4/2016 10:35:23 AM
Affiliation

Proposal 78 (Remove ID from traps and snares) OPPOSE.

The Alaska Trappers Association proposal to remove ID from traps/snares in areas where this is currently a requirement, in addition to asking the Board of Game to make a statement of “legislative intent” in opposition to future implementation of any regulation which would require trap ID tags poses a danger to public safety and removes much needed accountability. There are already countless instances of illegally and hazardly placed traps and snares throughout the state. Removing the accountability of trap ID would surely skyrocket these egregious occurrences. The people of Alaska need to know where these traps are located, to be able to safeguard their family and pets from areas that are used for trapping and snaring. Trappers need to have accountability, just as fisherman are required throughout the state to ID their crab pots, trappers should be required to have ID on traps/snares. Law enforcement needs trap/snare identification to enforce the few trapping regulations we have in this state. Please do not approve this proposal. Removing current trap/snare ID regulations as well as making a statement of legislative intent to oppose future implementation would be irresponsible and a dangerous precedent set by the Alaska Board of Game.

Submitted By
Michelle
Submitted On
3/4/2016 1:20:55 PM
Affiliation

Proposal 79 (Trap check time limit) SUPPORT AS AMENDED

As you may notice when evaluating this proposal, myself along with another resident submitted this proposal as well as number 80 involving removing traps/snare from population centers. My reasoning and suggestions for my SUPPORT AS AMENDED position come at the end of my written comments.

My background as a veterinary technician for over 20 years, as well as a wildlife rehabilitator for the last several years of my career, moved me to proposing the time check limit of 24 hours. My proposal partner and I did a lot of research regarding trap check time limits throughout the United States, and found that over half of the lower 48 has a time limit of 24 hours or within one day.

The American Veterinary Medical Association statement of trapping is referenced on their website: avma.org

"Wildlife populations may exceed the carrying capacity of their habitat and the AVMA recognizes that trapping is a useful and necessary method for managing these populations. Trapping devices that cause instant death or work on the principle of live capture without pain or injury are acceptable. The AVMA encourages the development of trapping devices that meet these criteria and recommends phasing out trapping devices that do not meet these criteria. The AVMA considers the steel jaw leg hold trap to be inhumane."

Traps are indiscriminate, it is much different than hunting where one can find an animal, aim and fire, and most commonly, the animal dies quickly and humanely. The trapper does not set traps/snares and wait to watch to make sure the right species finds the trap it is set for, that the trap/snare functions properly and does what it intends to do, whether that be a kill trap or one designed to grab and keep hold of a leg. There are just so many variables.

Adding insult to injury, the great majority of the state lacks a trap check time limit AT ALL. This is quite dangerous and inhumane, especially with the large amount of variables present with using traps and snares. A non-target wildlife species could be accidentally caught, and by not having a reasonable trap check time limit, that non-target animals chances of survival dwindle down as the clock ticks. For those traps designed to grab a hold of a leg, and restrain the limb until the trapper returns, the animal is subjected to an incredible amount of fear, pain and suffering. Dehydration, Starvation, Predation, Injury, even Self-Amputation are consequences caused by these inhumane devices. Allowing an animal to suffer 24 hours while attached to such devices is cruel. Allowing an animal to suffer while attached to such a device for an unregulated amount of time? Deplorable. Alaska has such pride and respect for its wildlife, yet we allow it to be subjected to such pain and suffering? The thought of these animals going through lengthy periods of suffering saddens and frustrates me.

We asked our local Juneau/Douglas BOG Advisory Committee to comment on this proposal. The trappers on the committee stated publicly that any time limit under A WEEKS TIME was ridiculous and went on to say a trap check time limit of any length was not feasible. That was very difficult to hear, especially for those animals that are caught in a leg hold trap and are forced to wait A WEEK OR MORE for the trapper to return.

In preparation for the comment period, I have spread the word via face book of the importance for Alaska folks to comment on these proposals. The encouraging information about posting comments via the BOG website posted reached over 8,000 Alaskans, was liked by over 160 Alaskans, shared over 45 times and commented by over 20 individuals. Those numbers suggest that many Alaskans are supportive of reasonable trapping regulations. Some of the comments were posted by trappers, and in a positive twist, I was surprised that they seemed to support reasonable trap check time limits, unlike the perception we received from our local Advisory Committee.

An excerpt from one such Alaska trapper: "A good trapper checks their line as often as possible without over running the trail with scent and noise pollution. Typically it's a couple or few times per week. Some lines take two or more days to run however. If a person doesn't



check their lines for a week or more, they're not a real trapper in my opinion." He went on to say: " I can understand the need governing a time-line within a REASONABLE amount of time to check a line. Exceptions to this rule being unchangable and unforeseen inconvenience (such as a sled breaking down & waiting on parts, personal injury etc). I suppose I'm getting at punishing those who deserve it (city folk who make it out once every two weeks to find half their animals eaten and destroyed), as opposed to the true trappers who do what they can, no matter their discrepancies. I believe a competent officer will easily be able to make the distinction."

I asked this individual to please submit his comments on these proposals via the BOG website, and am hopeful he will. It was quite refreshing to hear this perspective.

In my research I also consulted with the Alaska state veterinarian, Robert Gerlach, VMD. I shared proposals 78-80 with him and asked for his take on these trapping proposals. I have asked him to comment and/or testify, and I really hope that he does, as I think his comments are imperative and should be taken seriously by the Board of Game. Here is his response to my email inquiry about these trapping proposals

Gerlach, Robert F (DEC)

2/5/2016 3:13 PM

Michelle,

I apologize for the delay in responding, you are right we are busy dealing with budget issues and information requests from the legislature.

There have been quite a number of public concerns related to location of traps and non-target species being caught. In some cases traps are used to remove nuisance and problem species in areas urban areas but there are method that can be employed to decrease the risk of catching and injuring domestic pets and other wildlife species not intended to be harvested. You may be able to approach the municipal or borough government (Animal Control), local veterinary association or the Alaska Veterinary Medical Association (<http://www.akvma.org>) to discuss the issue of establishing a reporting system as these are the folks that may be dealing with the pets that have been injured.

As for the time to check traps, I know that this is a contentious issue. I do think that there should be a discussion and evaluation of these criteria. There needs to be some agreement about what is the proper time period. The goal of hunting and trapping is to take or harvest game in a humane manner, not intentionally causing excessive pain and suffering. In the case of some trap systems, such as, whole body gripping traps that are intended to kill rapidly, the time to check the trap is not as important as with other types of traps.

As for the requirement for trap ID, I do think it is important for some ID to be available either on the trap on at the site. This will allow accountability for the placement and management of the individual trap and the entire trap line. In addition it helps with ADF&G regulatory oversight of the activity.

Board of Game meetings are directed for public input so Dr Fuller and I do not generally participate unless requested to testify by the board. We do try to review the proposals and help with outreach to the public.

Regards,

Bob

Robert F Gerlach, VMD

Alaska State Veterinarian

I also asked Dr. Gerlach about the possibility of starting a reporting system for domestic animals, mainly dogs, which have been injured or killed in these traps. Noted in his email, he suggested I contact the Alaska Veterinary Medical Association in regards to work on a reporting and tracking system for domestic animals. I have been in touch with the AKVMA board of directors. The executive director responded with a request for more information, which I provided, and am currently awaiting a reply from the board.

Incidental Take, referring to both non target wildlife and domestic animals, is not required to be reported by trappers. As the persistence to acquire reasonable trapping regulations moves forward, and it will continue to be proposed until the Board of Game acts accordingly, it would be quite beneficial for incidental take to be a requirement of trappers. This would be very valid information to monitor what areas of the state have higher instances of incidental take, and to develop an action plan to reduce negative outcomes in relation to trapping non target wildlife and domestic animals.

I have made several attempts to obtain data regarding incidental take, working with one of our local state wildlife biologists. I checked in a few times to remind him of the request, and was told it was not easy information to obtain. As of today, March 4th, I still have not received this data from said biologist after beginning my inquiry in late December of 2015. This information is a critical piece of the complex puzzle that represents trapping regulations in our state. Although reporting is not covered in these statewide proposals, it should be seriously considered by the Board of Game, and should go hand-in-hand when managing trapping in this state.

At the beginning of my comments, I posted my position as SUPPORT AS AMENDED. While my personal beliefs and profession reside with the least amount of animal suffering possible, I understand that the state of Alaska is vast, and that 24 hours may not be a reasonable amount of time for trappers to check their lines in this state. Therefore, I am open to and hope that you will discuss a REASONABLE time check limit in reference to trapping in our state. A week or more is certainly NOT REASONABLE, but maybe there is a length of time that all trappers could adhere to, with offering exception for documented inclement weather or an equally catastrophic-like emergencies that would prevent them from adhering to the designated trap check time limit. In our proposal, we stated that we researched 24, 48 and 72 hour trap check time limits. As Dr. Gerlach stated, it may be best to evaluate time check based on the type/design of trap and snare. Certainly leg hold traps should have the shortest length of time possible, since the greatest potential suffering is posed based on the premise that the trap grabs hold and is designed to keep the animal restrained, alive, until the trapper returns.

Thank you for reading the comment regarding this proposal. I hope that each of you gives it careful consideration and acts accordingly and respectfully on behalf of our wildlife.

Submitted By
Michelle Anderson
Submitted On
3/4/2016 2:38:01 PM
Affiliation

PROPOSAL 80 (moving traps/snares away from population centers) SUPPORT

As you will note when evaluating this proposal, myself along with another Juneau resident submitted this proposal as well as number 79 regarding trap check time limits.

I support moving traps and snares away from population centers. This seems to simply be common sense, as traps and snares can pose a great danger to unsuspecting people and pets. We are quite fortunate in Juneau to have regulations in place providing a reasonable distance from popular trails, roads, homes, businesses, campgrounds and recreational areas. It is unfortunate and alarming that these same regulations aren't in place throughout the populated areas of Alaska.

There are locations in Alaska where folks are literally afraid to go for a walk outside, fearing traps and/or snares that may be around the corner from their child's school, a family business, or even in their own backyard.

Unfortunately, there are countless stories of beloved pets being injured and/or killed in traps/snares. These instances are on the rise. Yes, pet owners do have a responsibility to abide by leash laws and keep their dogs on reliable voice control when off leash. But, the fact is, people's dogs are getting caught in traps while on leashes and while in very close proximity to their owners on popular trails, along with dogs getting caught in traps and snares on the owners private property.

The Trapper's Code of Ethics clearly states promoting trapping methods that will reduce the possibility of catching nontarget animals. It also states that trappers need to obtain landowners' permission before trapping on private property. Certainly moving traps and snares away from population centers would prevent many of these negative interactions with people and pets. These are reasonable suggestions. The time has come to adopt these "suggestions" as regulations in this state.

Conflicts between private property owners, recreationalists, etc., and trappers are growing, and resentment between the groups will escalate unless rules to restrict – not eliminate – trapping are enacted. Specific regulations would benefit both user groups.

Thank you for taking the time to review my comments. I hope that each of you considers them carefully. Regulations need to be adopted to ensure better safety of people and pets throughout the state of Alaska.

Submitted By
Mike Soik
Submitted On
3/2/2016 12:07:53 PM
Affiliation Proposal 78

Chairman Spraker, I support proposal 78.

You can't force unethical people setting traps to become honest. They will simply not put tags on their traps/snares so that they can't be identified.

I do not think law enforcement officers should be checking traps/snares just to see if they have tags. This has been happening where tags are required and is unacceptable. Trappers often have very specific methods for making certain sets and this unnecessary checking for tags may leave unwanted scent, disturb the set location, and result in incorrect positioning of traps/snares.

After reading online social media and Alaska Dispatch News article/commentary comments from people talking about stealing or destroying traps/snares I would be concerned about where traps/snares with tags may end up if someone doesn't like where a trapper is trapping. It would force trappers to report any theft of traps/snares to law enforcement so they could prove they aren't trapping out of season or in closed areas should their traps/snares be moved illegally.

Thank you for your consideration of my comments.

Mike Soik

Submitted By
Mike Soik
Submitted On
3/2/2016 2:32:37 PM
Affiliation
Proposal 79

Chairman Spraker, I oppose Proposal 79.

I have three traplines that I check on foot/snowshoes and it takes me two days to check all of the sets. This proposal would make it impossible for me to keep trapping all of these areas, and it would have a negative impact on the way I trap if passed. Forcing trappers to check all traps/snares daily would not be a logical use of time, fuel, and wear on equipment. Trap check times are best left to the individual trapper to determine based on the species being trapped, weather conditions in the field and travel conditions. The severe weather exception in the proposal is extremely vague and leaves much to interpretation. One trapper may consider certain weather conditions safe to travel in yet someone else may not. Also, each method of travel (snowshoe, highway, snowmachine, airplane, boat, etc.) will have different weather conditions that are safe to travel in. This proposal would severely limit or cause trappers to stop trapping which appears to be the underlying reason behind this proposal.

Thank you for your consideration of my comments.

Mike Soik

Submitted By
Mike Soik
Submitted On
3/2/2016 4:23:30 PM
Affiliation
Proposal 80

Chairman Spraker, I oppose Proposal 80.

There is no reason to ban all trapping in the areas specified in this proposal. A trapper could trap for squirrel, ermine, mink, marten, muskrat, and beaver and pose no threat to people's dogs. This would make it more difficult to introduce kids to trapping some of the smaller furbearers that are available locally. I trap for marten and ermine on two forest service trails that are frequented by dog owners and fall within some of this proposal's restrictions and I have not had any conflicts with dogs. I would challenge the statement that these "conflicts occur frequently". I would say that based on the number of traps and snares set each season that relatively few conflicts occur. How many dogs are injury or killed by vehicles? How many people do loose dogs bite? I wonder if the 27 communities that would be affected by this proposal were asked if they agree with these restrictions. I think some rural communities would like the ability to continue to trap close to their town to control certain furbearer populations. This all inclusive trapping closure is unnecessary.

Thank you for your consideration of my comments.

Mike Soik

Submitted By
Olga Sobko
Submitted On
3/2/2016 12:02:06 PM
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Protect our Wildlife-POW VT

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Dear Commissioners and Members;

As an avid outdoor person, photographer, volunteer for several local organizations; conservation committees, Protect our willife and Humane society.. I am sending this request to you to consider the proper science that demonstrates non lethal managment of predators is the BEST method. Also, trapping is not only a horrific and barbaric option to any kind of managment but is self regulated and NOT monitored allowing any animal to lanqish in a trap is just one of the most inhumane actions we as humans impose. Aerial gunning of wolves, catering to special interests and neglecting to see the value in sustainability, biodiversity and the revenue that wildlife viewing and watching brings to any state is absolutely unaccpetable. A trip planned to visit Alaska one day would certainly be on my agenda IF you do the ethical, scietifically sound and moral thing.by VOTING YES to FREQUENT TRAP CHECKS AND BANNING TRAPS NEAR CITES AND RECREATIONAL AREAS AND VOTE NO TO REMOVING TRAP IDS. IT IS TIME YOU PROTECT THE WILDLIFE AND, THE INTEREST OF THE VIEWING PUBLIC ! thank you .

Submitted By
Pauline N Strong
Submitted On
3/4/2016 6:19:12 AM
Affiliation

I support Proposal 79. Checking non-lethal traps is one of the responsibilities of trapping that should not be left to the trapper's discretion. While ethical trappers may check traps frequently, regulations need to create a level playing field for all trappers. Trapping is a responsibility that requires planning and work. The planning should include provisions for responding to the current knowledge of weather and animal response to being trapped

Submitted By
Pauline N Strong
Submitted On
3/4/2016 8:01:57 PM
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I support Proposal 80. I believe that at least this minimal regulation of placement of traps is needed to maintain safe separation between traps, hikers and pets.

Submitted By
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Submitted On
3/2/2016 5:30:22 AM
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I oppose proposal 78. Trapping is a barbaric torture of animals and should be outlawed completely. Identifying a trap with a small metal tag is not cumbersome to a trapper and it will help to insure trappers are operating within requirements of the law.

I support proposal 79. It is asking little to have trappers limit the time that trapped animals suffer while ensnared in a death grip. Any trapper that does not check his traps at short intervals should be put in an inescapable trap themselves so they can experience suffering from starvation, thirst, and freezing to death.

I support proposal 80. Traps placed close to public use trails are ridiculous and endanger family pets. My wish is that the Alaska BOG should enter the 21st century and outlaw trapping.

Submitted By
Sandy Williams
Submitted On
12/3/2015 9:15:46 PM
Affiliation

Proposal 78-5 AAC 92.095 I am definitely opposed to this. This targets Juneau and 2 Northern areas where ID tags are required. Please do not remove this requirement on identification tags on traps and snares. Thanks Sandy

I support #79-5 AAC 92.095(a)

I support #80-5 AAC 92.095

Submitted By
Sheila Graham
Submitted On
2/18/2016 10:11:57 PM
Affiliation
Ms.

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Please support time limit regulations on trap checking.

Submitted By
Sheila Graham
Submitted On
2/18/2016 10:08:17 PM
Affiliation
Ms.

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Please do not support traps being unidentified. Also please vote for traps to be kept far away from public trails & known recreational areas.



Submitted By
Susan and Pete Vogt
Submitted On
3/1/2016 6:36:40 AM
Affiliation

Vote YES to require frequent trap-checks and ban trapping near cities and recreational areas, and to vote NO to removing trap id requirements. Why is the BOG still screwing the majority of Alaskans who want non-consumptive uses being given the same weight as consumptive?!?!?

Submitted By

Tara walker

Submitted On

3/2/2016 3:55:47 PM

Affiliation

I urge you to vote yes to banning trapping near our cities and I urge you to vote no on removal for restrictions on trapping IDs. I also urge you to vote yes on frequent Bait checkson trapping. Our family is interested and wildlife for viewing purposes not trapping so like the majority of Alaskans we support the sensible regulations

Submitted By
Terry Cummings
Submitted On
3/2/2016 1:33:19 PM
Affiliation

Following are my comments on proposals:

Proposal #78--Oppose - Tags are needed and should be required.

Proposal #79- Support - This proposal is the only humane thing to do for wildlife.

Proposal #80-Support - Concerns of overwhelming residents dictates this must be done and only makes sense.

Thank you.....

Submitted By
Victoria Vosburg
Submitted On
1/13/2016 9:35:52 AM
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1300 Halibut Point Rd
Sitka, Alaska 99835

This comment is in support of trappers being required to regularly check their traps as well as locating their traps away from public areas as addressed by proposals 79 and 80. As a veterinarian, I have seen both pets and unintended wildlife caught in traps and snares. The consequences range from losing a toe, to losing a leg, to losing a life. From the trapper's point of view, this equates to lost income. Moving traps away from public areas will reduce the chance of pets suffering trap injury. Traps should be regularly checked not only to help save innocent victims but also to limit the suffering of the target animal.

Submitted By
william Collins
Submitted On
3/1/2016 7:43:01 AM
Affiliation

Board of Game:

For many years California has required that traps be inspected regularly. If trapping is to be allowed, there's no reason for the animal to suffer needlessly because the trapper has placed more traps than "he" can manage.

Please enact an overdue requirement that all traps be inspected frequently.

I'd love to visit Alaska sometime, but only if I can see wildlife I cannot see elsewhere.

Submitted By
Andrea Chin
Submitted On
3/3/2016 9:32:08 AM
Affiliation

I am writing in support of proposal 80. Proposal 80 offers concrete requirements for trap placement. This will help to ensure safety and alleviate concerns and conflicts between all trail users and outdoor enthusiasts. There is no sound reason to not adopt this proposal. It is just common sense.

Thank you for your consideration,

Andrea Chin

Submitted By
Julie
Submitted On
3/1/2016 9:50:59 PM
Affiliation

I do support the following proposal for peaceful coexistence between trappers and recreation . We cannot ignore the continued increase in population in our cities, and this proposal seems a fair shake.

Proposal 80 - Support. BACKGROUND: This proposal would, within cities of 1,000 or more population, prohibit trapping within one-quarter mile of a publicly maintained road, within 200 feet of a publicly maintained trail, and within one mile of a home, school or recreational facility (such as a boat launch or campground).

Submitted By
Mark Gronewald
Submitted On
3/4/2016 7:47:11 AM
Affiliation
Owner, Trailwerx

Phone
907-745-2453
Email
trailwerx@mtaonline.net
Address
3901 N. Charley Dr.
Wasilla, Alaska 99654

As a professional trail builder and recreationist I have a concern with the proliferation of traps being set along popular trails in the core areas of the Matanuska valley. Many of these trails have been built specifically for hiking, biking, skiing, ATV'ing and other recreational uses. The presence of traps along these trails detracts from the safety and enjoyment of the trail users. Who wants to see a wild animal in a trap when they are just out to get some fresh air and exercise on a popular designated recreational trail? There have also been multiple incidents of people's pets being killed and/or injured while using these trails. I support a setback requirement that would prohibit trapping adjacent to popular recreational trails, especially in the more populated areas of our state.

Thank you for your consideration.

Mark Gronewald

**GATES OF THE ARCTIC NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION**

4175 Geist Road
Fairbanks, AK. 99709
(907) 455-0639 or FAX (907) 455-0601

November 25, 2015

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker,

At our most recent meeting of the Gates of the Arctic National Park Subsistence Resource Commission on November 9-10, 2015 in Fairbanks, Alaska, the Commission took the following positions regarding 2016 Statewide Regulations:

Proposal 85: Remove the exception for harvest tickets and reports for caribou as follows: Delete the exception in 5 AAC 92.010(g) that allows the harvest of caribou without requiring a harvest ticket or harvest report for residents residing north of the Yukon River. All persons hunting caribou north of the Yukon River must have a harvest ticket in possession and have obtained a harvest report.

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. The proposal will create a system that is burdensome to subsistence users in rural communities across Alaska.

Proposal 86: Remove the exception to harvest tickets and reports for sheep as follows: Delete the exception in 5 AAC 92.010(h) that allows hunting of Dall sheep in the Gates of the Arctic National Park without possessing a harvest ticket or obtaining a harvest report.

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. The proposal will create a system that is burdensome to subsistence users in rural communities across Alaska.



The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. The proposal will create a system that is burdensome to subsistence users in rural communities across Alaska.

Thank you for providing the opportunity to comment on Statewide regulations.

Sincerely,

Louie Commack, Gates of the Arctic SRC Chair

Jack Reakoff, Gates of the Arctic SRC Vice-Chair

Louie Commack Jr. (Chairperson), Jack Reakoff (Vice-Chairperson), Taqulik Hepa, Tim Fickus, Pollock Simon Sr., Hugh Bifelt, and Sally Custer

Submitted By
Adam Thomas
Submitted On
3/4/2016 4:54:36 PM
Affiliation

In opposition to Prop 90, and in light of lack of public inclusion, poorly conducted and quoted studies, and Expand and Exclude policies of the WSF, we respectfully request:

Collaboration: We would like to participate in developing solutions with ADF&G to improve the health of all Alaskan animals, wild and domestic.

Representation: We ask for equal representation and a fair hearing within the forums that are discussing this issue (Board of Game Meetings, Dall Sheep Working Group, etc.).

Scientific Integrity: We ask that both sides of the scientific debate be presented and reviewed and that ADF&G creates a thorough risk assessment that adheres to the National Academy of Science's Redbook guidelines.

Alaskan Solutions: We ask that solutions be tailored to address the reality of Alaska's unique habitat.

Language Clarity: Sheep Habitat is an amorphous boundary as opposed to Sheep Preserves. disease states are multifaceted and crucially different from disease agents and testing positive is not an indication of a contagion.

Respect: for the autonomy of production of non-priveledged protien (costs for wild sheep meat can approach 250.00 per pound), on private property.

Submitted By
Debra Blaylock
Submitted On
2/26/2016 7:34:04 PM
Affiliation

Phone
9077466045
Email
kdblayment@ak.net
Address
12287 E Palmer Moose Dr
Palmer, Alaska 99645

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

The requirements will cause severe economic burden to existing owners of sheep and goats, the businesses that provide feed and care products for them, and will also have significant cost impacts to the State of Alaska. The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic.

Unlike the "lower 48", Alaska's domestic sheep and goat population does not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, highways, towns and subdivisions.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition. Requiring permits, expensive double fencing, and unspecified and unproven testing is simply a drastic overreach for a purported crisis that has not occurred, nor been proven to likely occur in the future.

Alaskan families benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions. I ask you to not pass Proposal 90 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individuals cannot afford to comply, nor can the State afford to administer this new compliance program.

Submitted By
Edward Demoss
Submitted On
2/28/2016 4:28:52 PM
Affiliation

Phone
937-414-9019
Email
kuskolady@yahoo.com
Address
3200 E Beal Rd
Jamestown, Ohio 45335

Dear Board of Game,

I am opposed to Proposal 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Jodi Bradison
Submitted On
2/29/2016 6:20:05 PM
Affiliation
None

Proposition 90 if passed, would remove domestic goats and sheep from the so-called “Clean List” of domestic animals. The proposition would devastate the ability of individual Alaskans who are goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners.

Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game. Owners would be required to comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

The economic burden to existing owners of sheep and goats would be shattering. The implementation of Proposition 90 would impact the businesses that provide feed and care products. And the cost impact to the State of Alaska would be significant especially during a time when we are facing a budget short fall. The State of Alaska through the Department of Fish and Game, simply does not have the program staff or financial resources to implement or manage a new regulatory compliance programs, especially one that is unnecessary and fraught with flawed logic.

Unlike the “lower 48”, Alaska’s domestic sheep and goat population do not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to existing natural barriers such as rivers, highways, towns and subdivisions.

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I ask you to not pass Proposal 90 due to the severe impact it will have on individual Alaskans domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individual Alaskans cannot afford to comply, nor can the State afford to administer this new compliance program.

Submitted By
Laura Leath
Submitted On
2/26/2016 9:55:59 PM
Affiliation

Phone
9074149054
Email
alaskaleaths@gmail.com
Address
2301 E Fairview Loop
Wasilla, Alaska 99654

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Lynda J Moon
Submitted On
2/27/2016 1:03:46 PM
Affiliation

Phone
9074412233
Email
lyn.joy@hotmail.com
Address
4241 E Crane Rd.
Wasilla, Alaska 99654

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Monica R. Peck
Submitted On
3/3/2016 9:02:37 AM
Affiliation

Dear Board of Game,

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From: [Rintala, Jessalynn F. \(DFG\)](mailto:Rintala.Jessalynn.F@DFG)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: FW: RE: please respond: proposition 90
Date: Thursday, March 03, 2016 4:01:46 PM

From: pfinch58@gmail.com [<mailto:pfinch58@gmail.com>]
Sent: Wednesday, March 02, 2016 11:22 AM
To: Ely, Kayla L (DFG)
Subject: Other

Paul Finch, phone number: 907-687-0722, has sent you the following inquiry from our website:

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Priscilla Hudson
Submitted On
2/28/2016 7:02:49 PM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Rebekah Bennett
Submitted On
2/26/2016 9:59:13 PM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Shannon Schauermann
Submitted On
3/1/2016 10:23:51 AM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Alaskan families, ours included, benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions. I ask you to not pass Proposal 90 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individuals cannot afford to comply, nor can the State afford to administer this new compliance program.

Sincerely,

Shannon Schauermann

Submitted By
Shawn Daniels
Submitted On
2/29/2016 4:07:13 PM
Affiliation

Phone
907 347-8945

Email
shawshinyday@hotmail.com

Address
685 CARLSON LN
NORTH POLE, Alaska 99705-5020

My comments:

- The health of Alaska's Dall Sheep population is important, but proposal 90 is an extreme approach to deal with something that has not become an issue in Alaska. There is time to approach this issue in a logical manner and form a plan that fits Alaska, without harming the livestock industry.
- Alaska is not a free grazing state. Between fencing and natural barriers there is a low likelihood of close contact between wild sheep and domestic sheep/goats.
- There is no documentation of Dall Sheep deaths due to contact with livestock.
- We oppose any form of permitting for simply owning livestock - this discussion should be limited to activities in Dall Sheep habitat or near enough that there's a high probability of close contact.
- The bacteria of concern (*M. ovipneumoniae* and *M. haemolytica*) are endemic in wild and domestic populations, disease develops when immune systems become depressed.
- Reductions in Dall Sheep numbers due to disease should factor in multiple stressors: weather, predation, avalanches, lambing, parasite load, age and nutrition.
- There should be a livestock-wildlife working group formed to collaboratively work on issues such as this one.

Submitted By
Shelly Weigelt
Submitted On
2/29/2016 7:10:39 PM
Affiliation
None

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

The requirements will cause severe economic burden to existing owners of sheep and goats, the businesses that provide feed and care products for them, and will also have significant cost impacts to the State of Alaska. The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic.

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Submitted By
Tashina Munoz
Submitted On
2/26/2016 10:14:57 PM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Theresa Phillips
Submitted On
2/26/2016 8:49:24 PM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Trevor Walter
Submitted On
2/27/2016 9:25:51 AM
Affiliation

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposition 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Individuals cannot afford to comply, nor can the State afford to administer this new compliance program.

Trevor Walter

Submitted By
Vickey McDonald
Submitted On
2/26/2016 10:21:40 PM
Affiliation

Dear Board of Game,

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Submitted By
Julia c fleming
Submitted On
2/28/2016 8:31:48 AM
Affiliation

Phone
9079523359

Email
juliaclare20@hotmail.com

Address
6521 E. 9th Ave.
unit 2
anchorage, Alaska 99504

Dear Board of Game, I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven. The requirements will cause severe economic burden to existing owners of sheep and goats, the businesses that provide feed and care products for them, and will also have significant cost impacts to the State of Alaska. The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic. Unlike the "lower 48", Alaska's domestic sheep and goat population does not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, highways, towns and subdivisions. To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition. Requiring permits, expensive double fencing, and unspecified and unproven testing is simply a drastic overreach for a purported crisis that has not occurred, nor been proven to likely occur in the future. Alaskan families benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions. I ask you to not pass Proposal 90 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individuals cannot afford to comply, nor can the State afford to administer this new compliance program. Sincerely, Julia Fleming juliaclare20@hotmail.com

Submitted By
Julie Wendt
Submitted On
2/26/2016 7:42:59 PM
Affiliation

Phone
907-252-3980
Email
karlukacres@yahoo.com
Address
50765 Karluk Ave
Kenai, Alaska 99611

Dear Board of Game,

As an owner of a farm with dairy goats that provide part of my family's sustenance and income, I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

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Submitted By
Susan Bickman
Submitted On
3/4/2016 6:35:34 PM
Affiliation

Phone
907 240 0385

4316 Upper Kogru Dr.
Eagle River, Alaska 99577

I am in favor of proposal 90. Due to road conditions I did not get home to my computer until after 5 pm so hope these will still be considered. I think it is a safety measure to insure the longevity of sheep and goats in the state. The double fencing and checking of the domestic animals seems a small inconvenience vs the devastation of an entire herd of animals as has happened in the lower 48 when someone decides to use a domestic goat or sheep for packing into areas where the wild herds are. I support the effort to try and keep the wild herds safe.



March 4, 2016

Alaska Board of Game
Alaska Department of Fish & Game
Sent by email to dfg.bog.comments@alaska.gov

Re: PROPOSAL 90 - 5 AAC 92.029. Permit for possessing live game.

The Department of Environmental Conservation (DEC) Office of the State Veterinarian (OSV) strongly opposes adoption of Proposal 90. As will be discussed below, the Board of Game and the Alaska Department of Fish and Game (ADF&G) do not have the authority over domestic mammals that are confined and under the care of a human being. That authority lies with DEC, and adoption of this proposal would be improper and ineffectual.

The ADF&G regulations at 5 AAC 92.029 address permits for possession of live game. The first section prohibits possession, importation, release, or exportation of live game unless the person holds a possession permit issued by ADF&G. The next section contains a list of species commonly referred to as the "clean list" which includes animals defined in statute as domestic and may be possessed, imported, exported, bought, sold, or traded without a permit from ADF&G, but may not be released into the wild.

Proposal 90 seeks to eliminate domestic sheep and goats from the "clean list" and require a permit for possession, with stipulations if located within 15 air miles of Dall sheep habitat. The permit would require certifications that animals are disease free "when testing becomes available," and require containment in an ADF&G "approved facility." Sheep and goats located more than 15 miles from Dall sheep habitat would still require a permit, which would be issued without stipulations.

ADF&G and the Board of Game have jurisdiction over "game" which is defined in AS 16.05.940(19) as "any species of bird, reptile, and mammal, including a feral domestic animal, found or introduced in the state, **except domestic birds and mammals...**" [emphasis added]. According to this definition, the Board of Game does not have jurisdiction over domestic animals such as sheep and goats. Once domestic mammals are released or escape into the wild and are no longer under the care and husbandry of a human being, then they are considered feral, and only at that time could they fall under the authority of the Board of Game and ADF&G.



March 4, 2016

DEC has clear jurisdiction over regulation of livestock when they are confined and under the care and husbandry of a human being. In accordance with AS 03.05.013, the Commissioner appoints the State Veterinarian to enforce the requirements of AS 03 relating to animals, agriculture, and food. Specifically, DEC and the State Veterinarian have the authority to issue orders and permits and to require the inspection, testing, quarantine, embargo, custody, care, and destruction of animals in order to prevent the spread of pests or contagious or infectious disease (AS 03.05.11).

As part of DEC, the OSV currently regulates the health and importation of livestock, including sheep and goats. In order to prevent the spread of infectious disease, imported livestock must be examined by a licensed and USDA accredited veterinarian, who issues a health certificate certifying the livestock are disease free and also meet species specific vaccination requirements. The State Veterinarian also has the authority to re-test any imported animal if there is a concern about the animal's health, as well as to place animals into quarantine or have them destroyed.

The wildlife resources of the State of Alaska are invaluable, and it is critical that the health of wildlife populations are protected for all residents. Maintaining the health of the wild sheep populations in Alaska can better be addressed through a collaborative effort between ADF&G and DEC, to identify actual health threats and develop strategies to reduce risk of introduction of disease pathogens to these animals, while still allowing the growth and development of agriculture in our state.

I urge the Board to reject Proposal 90, and for ADF&G to take no further action to remove domestic sheep and goats from the "clean list".

Sincerely,

Dr. Bob Gerlach, VDM
State Veterinarian

cc: Bruce Dale, Director, ADF&G Division of Wildlife Conservation



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources

DIVISION OF AGRICULTURE

Central Office

1800 Glenn Highway, Suite 12
Palmer, Alaska 99645-6736
Main: 907.745.7200
Fax: 907.745.7112

Northern Region Office

3700 Airport Way
Fairbanks, AK 99709
Main: 907.374-3716
Fax: 907.328-1951

March 4, 2016

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-526

If approved, Board of Game Proposition 90 would have detrimental effects on Alaskan sheep and goat producers, Alaskan food security, and the agricultural industry in general. The Division of Agriculture recommends against adoption of Proposition 90.

Removing domestic sheep and goats from the "clean list" would have a direct negative impact on wool and fiber sales, meat, milk and cheese sales. The Future Farmers of America (FFA) & 4H programs, Alaskan grain and hay producers, and farm equipment and hardware stores would also be impacted by this proposal.

No Dall sheep deaths have occurred due to contact or interactions with Alaskan domestic livestock and we believe that the suggested buffer zone of 15 air miles harms livestock producers without providing any real benefits to Dall sheep. When livestock get loose, they generally stay close to their home range. The Palmer Alaska State Fair is only 7 miles from Dall sheep habitat, but we do not believe there is a realistic threat of animals escaping their pens, crossing several roads and rivers, and infecting Dall sheep with pneumonia on Pioneer Peak.

The proposed double fence requirement would be a huge financial burden on sheep and goat producers with minimal tangible results. The double fence is being proposed to eliminate "nose-to-nose" contact between wild Dall sheep and symptomatic (sick) domestic sheep and goats. First, there is a low likelihood of Dall sheep leaving their mountainous natural habitat and approaching an active farm. Second, when sheep and goats get pneumonia, farmers typically remove them from the main herd and treat the sick animal in an isolated area such as a barn or animal shed.

The Division of Agriculture is opposed to a requirement to obtain an Alaska Department of Fish and Game permit to own domestic livestock. We believe this is an onerous requirement that is not supported by existing law. Furthermore, the authority to regulate domestic livestock should remain with the Department of Environmental Conservation rather than ceded to the Department of Fish and Game.

Sincerely,

Arthur J. Keyes IV
Director



Submitted By
Amanda Rackliff
Submitted On
3/4/2016 3:11:58 PM
Affiliation

I'm opposed to the state coming in and taking people's livestock



Submitted By
Amy Blum
Submitted On
2/23/2016 10:44:59 PM
Affiliation

To the Board of Fish and Wildlife:

I oppose proposal 90, please do not put this into effect.

Thank you,

Amy Blum

Submitted By
Amy Vik
Submitted On
1/29/2016 12:37:30 AM
Affiliation

We need less government regulations, not more. In a time of extreme budget cuts, who will enforce the inspections and permitting for goats and sheep? Many farmers with secure fencing will need to change their setups entirely under this proposal. We need more food producers in Alaska, and making it more challenging and complicated to maintain farm animals is a step in the wrong direction for Alaska's food security.

Submitted By
Andrew Hamlin
Submitted On
3/4/2016 1:57:30 PM
Affiliation
Frigid Farm

~~Proposal 90 is disastrous to Alaska. I understand that its intent is to protect the Dall sheep from contacting pneumonia via bacterial infection from domestic sheep and goats by removing them from the "clean list", requiring a permit to own them, and building in barriers the separate them. First off, according to 5 AAC 92.029, "The species must be confirmed to be capable of transmitting a disease to a species that is indigenous to Alaska." According to data I was able to find, 51 percent of Alaska's Dall sheep and mountain goats have pasteurilla and M.ovi which is the bacteria they are trying to protect against. We have not had any major die-offs of sheep or goats in Alaska. The major killer is still avalanches, predation, and bad weather. In addition, according to Merck Veterinary Manual, "these bacterium are common commensal organisms of the tonsils (back of the throat) and nasopharynx (nose) of healthy sheep and goats. For these organisms to cause infection, a combination of stressors, including heat, overcrowding, exposure to inclement weather etc. leaves sheep and goats susceptible to respiratory viral infections." Research must be done to confirm that Dall sheep are susceptible to this disease prior to banning sheep and goats in Alaska. The second disastrous part is that on ADFG website, they state that Alaska Regulation 5 AAC 92.029, "If a particular mammal, bird, or reptile species does not appear on (the clean list), it may not be possessed as a pet or livestock in Alaska, and the Alaska Department of Fish and Game cannot issue a permit allowing its importation or possession". For us farmers, this means that our stock "animals," no matter where in Alaska we are, will have two options: become illicit sheep/goat farmer or destroy all our livestock. If we somehow are allowed to keep our animals if this preposterous proposal is passed we will have to permit and disease test our animals. The proposal states at no cost, the issue with that is either it is at no cost to the state or at no cost to the farmer. It has to be paid for somehow. With our current state budget issues I will assume it is referring to no cost to the state. This would mean an unknown cost to the farmer for a test or we lose our animals again. The test that are currently available test for the presence of bacteria, but according to the Washington Animal Disease Diagnostic Lab (WADDL), "The test does not work well to establish infection or immune status of individual animals." So after paying for the test (that is not accurate) to find bacteria that is normally present in domestic and wild sheep and goats, we again only have the two options: underground sheep/goat farms or destroy all our live stock. And now, if as the farmer, we have been able to not outright destroy our animals, paid for the permit process, and paid for the test, we have to double fence our aseptic flocks with a 30 foot break between the exterior and interior fence. For reference, that is three truck lanes wide! The fencing is defined as being at no cost by the preposterous proposal. Again, either that is at no cost to the state or at no cost the farmer and again I am assuming they mean no cost to the State. This (if the farmer has the land to do this) will at minimum double their fencing cost forcing most to operate a felonious flock or kill their animals off again. Just remember most of Alaska's sheep and goat farmers are small operations. Only a small handful of flocks of sheep or herds of goats in Alaska have 40 or more head. Most operations are between 2 – 20 head flocks raised for the experience and to pass on knowledge to our children. Some of the farmers are ten year olds with a single lamb they are raising for 4h, this proposition will kill this. This proposition is supported by people who aren't here to fix a problem that doesn't exist here.

This state has been working on improving our food independence for quite some time. By allowing Proposition 90 to happen, you are taking out an integral part of our budding Farming industry.

Submitted By
Ashia Priest
Submitted On
3/4/2016 4:00:01 AM
Affiliation

Phone
907-631-0631 or 631-1799
Email
paulandashia@gmail.com
Address
2251 N Willow Dr
Wasilla, Alaska 99654

To whom it may concern at the Board of Game,

I am writing to you today to let you know that I am opposed to Proposition 90.

If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep

If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are still undeveloped and unproven.

The demanded requirements will cause SEVERE burden to ALL existing owners of goats and sheep, cripple countless Alaskans who depend on their animals, as well as many businesses that grow and provide feed, and more still, who provide care products for them. It will also have significant cost impacts to the State of Alaska itself... The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and presented with flawed logic.

Unlike the "lower 48", Alaska's domestic sheep and goats do not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no chance of contact due to existing natural barriers such as rivers, highways, towns and subdivisions.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs in the wild sheep population due to disease.

In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition.

Requiring permits, expensive double fencing, and unspecified and unproven testing is simply a drastic overreach for a purported crisis that has not occurred, nor been proven to likely occur in the future.

Alaskan families benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions.

I ask you NOT to pass Proposal 90 due to the severe impact it will have on Alaskan goat and sheep owners, and small farm operations.

The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements.

Individuals cannot afford to comply.

Nor can the State itself afford to administer this new compliance program.

Further more, I find it disturbing that a group of hunters with deep pockets should attempt to push for a ruling which, although providing them no guaranteed benefit, would do IRREPARABLE damage to our food supply, our lifestyle, our livelihood and our passion in the process. Hunters and farmers have been peacefully co-existing for a long time and should be able to continue to do so.



Submitted By
Ashley
Submitted On
3/4/2016 9:19:22 PM
Affiliation

This is not fair. People who you usually own goats use them for food and companionship.

Submitted By
Becky Oviatt
Submitted On
2/28/2016 3:05:50 PM
Affiliation

I am opposed to PROPOSAL 90 - 5 AAC 92.029. Permit for possessing live game. Eliminate domestic sheep (*Ovis aries*) and goats (*Capra hircus*) from the "Clean List" and require a permit for possession with stipulations if located within 15 air miles of all sheep habitat as follows: (et al)

This is why: Domestic sheep and goats have NOT been proven to carry diseases that are devastating to wild sheep populations IN ALASKA. These same domestic herds of sheep and goats within 15 air miles of specifically Pioneer Peak and Lazy Mountain areas would need to traverse subdivisions, cross miles of rough terrain, highways, waterways (specifically the Knik and Matanuska Rivers) and numerous other gauntlets before reaching Dall Sheep habitat.

I am a small business owner. Emphasis on small. I own a fiber shop. My dream has been to process the fiber from my own goats and sheep to sell. I have just begun and invested everything I have into doing this. To remove domestic goats and sheep from the clean list, and effectively outlaw them will destroy my business by putting extra expense that I can ill afford on my operation.

Secondly, the wording in this proposal is ambiguous. It does not outline specific testing or specific containment. { Animals located within 15 air miles of Dall sheep habitat must be contained within a Department approved facility (double fence, etc.) and certified disease free when testing becomes available.} This leaves the farmer open to regulations that can be changed at the whim and will of the Board of Game.

This Proposal is ill thought out and was not approached with the cooperation of hunters and farmers in mind. Many farmers are hunters as well. We want to be equitable.

Again, please drop this proposal, and rethink what it means to the small farmer.

Submitted By
BethAnne Henry
Submitted On
3/3/2016 11:10:07 AM
Affiliation

Comment for Proposition 90

Dear Board Of Game,

My name is BethAnne Henry and I am 14 years old. I was born in Alaska and have been raised here my entire life. I love the beauty and wildlife that Alaska has, and I enjoy it's natural resources. My family and I harvest salmon every year and put in for caribou, moose and sheep tags yearly as well. This is a privilege that I greatly appreciate and wouldn't want to see taken away. This isn't just something I enjoy, it's all I know and is a way of life for me and many other Alaskans as well.

Another thing that is very special to me is our 70 acer farm near the Wrangle St. Elias National Park. We raise a small herd of dairy goats, chickens, and sheep. We also just got into haying and hay many acres of Brome hay as feed for our animals and as an income for my brothers and I. My family and I love the fresh milk, eggs, meat, hay, and fiber that the land and animals produce.

As an animal owner I see it as my full responsibility to care for and nurture those under my care. To make sure they are well fed, watered, in clean pens, safe fencing, adequate shelter, free from parasites, diseases, predators and in the best condition that I can keep them in. That's my responsibility as an animal owner. I am a Christian and believe and take to heart what God instructed us in Genesis, to care for and have dominion over the creatures and resources that He has given to us. As I said before, this isn't just something I enjoy, it's all I know and is a way of life for me, and many others.

Agriculture I believe teaches many important things to the people involved in it. It teaches responsibility, work ethic, endurance and workmanship. It teaches one to think, problem solve and gives many young teens and children, such as myself, life skills that will be remembered throughout life and impact the way one thinks and works. Hard work is something I have come to enjoy. It isn't always pleasant or fun, but at the end of the day when you're tired, you can be proud because you know you did your very best. You worked hard and that is never something to be ashamed of.

Agriculture doesn't only teach adults and young people skills, it also is an income for many people, not only in Alaska but in all of our nation and world. Feed stores, pet supply companies, manufactures of medical equipment and supplies, tractor companies, farm equipment, seed distributors, livestock breeders, hay growers, hardware stores, grocery stores, slaughter houses, fiber mills, fertilizer plants and skin care products are all effected by agriculture. It provides jobs for animal trainers, veterinarians, harvesters and planters of our worlds food supply. This is all affected by agriculture. When you eat meals everyday, that is all in some fashion given to you by the farmer. By the worker of the fields, the carer of the animals, the harvester of the grain, the cleaner of the pens and the maker of the compost. Though these people stay behind the scenes most of the time, they are still there, working hard for an income and to feed our nation. Even some of your clothes are given to you by the farmer, your wool sweater, and cotton T-shirt. It is provided to you by the farmer. Now I want to ask you, is agriculture something worth having? Is the farmer someone worth letting thrive?

All of these things are being threatened by proposal 90. A proposal given to the Board of Game that will take Alaska's sheep and goats off of the list of clean animals in our state. This would mean that importing and exporting of sheep and goats would become illegal in our state. The reason for this law is to help, and protect Alaska's Dall Sheep against pneumonia. Cases in the lower forty-eight have arisen involving wild sheep that are dying. They believe that the cause is pneumonia and it may be being spread by free grazing sheep and goat herds living there. Although no contact between domestic and wild sheep or goats have been made in Alaska and not one case of disease transmission has occurred here, this proposal is still being made.

The Wild Sheep Foundation is an outside interest group. The proposal given by the Alaska Chapter of the WSF would require that all sheep and goat owners to have permits, require special fencing, vaccinations and disease testing for all goats and sheep within 15 air-miles of wild sheep habitat. Yet not one case of disease transmission has occurred here.

In my experience with personally owning sheep and goats many things are a cause to trigger disease. High levels of stress, change, low immunity, injury, nutrition, lambing or kidding, breeding season, living conditions, parasites such as lice and worms, and mineral imbalance. Many times the animal is already carrying the bacteria and it just takes one of the above conditions to give it a chance to take root.

I am concerned with the health and well being of the Dall sheep, but this drastic movement is not only not in the jurisdiction of The Board of Game but it also is assuming that the domestic sheep and goats are the cause of the decline in the Dall Sheep's population. Every state is different and has many different factors to consider when it comes to their own wildlife. Our sheep are not the same sheep or under the same conditions as those living in other states.

All I ask that we do more research here in Alaska with our sheep to find facts that apply here in our state. The Board of Game needs to work with the farmer to find a suitable way that works for both of us. Farming is very expensive, these demands would add even more expense to the farmer's plate. Not everyone has the time or funds to meet these strong requirements. Many hobby farms, 4-H programs, and farm businesses would die if these things were allowed to take place. It would be just as hard and expensive for some of us to double fence our property as it would be for the state to fence all of it's land and sheep habitats. Please remember what this will affect all farming and agriculture in our state.



Before such a big decision is made I believe that a lot of time and research should be done with our sheep to find out the real cause of the decrease in their population. If you are a Christian I ask that you pray for a suitable answer for this problem, and that the Dall Sheep population would be restored and we would find the cause and a workable solution. Remember while you make this decision what is at stake. Is agriculture something worth having in Alaska and is it worth fighting for?

Sincerely,

BethAnne Henry

Submitted By
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Submitted On
3/4/2016 12:24:59 PM
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Dear Board of Game,

I would like to know how many cases of M.Ovi pneumonia in wild Dall Sheep has come up in Alaska caused by domestic sheep or goats? Why not start by looking into the hunting outfitters who take goats as pack animals into the backcountry for their sheep hunts. It's not the local family farmer with goats that is the threat to the wild population. Please to not take it out on the small livestock owners trying to make a living. I disagree with removing sheep and goats from the clean list. Please do not pass Proposal 90.

With best regards, Bianca

Submitted By
Brenda Hanson
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3/4/2016 4:31:03 PM
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As a child I was allergic to cow milk and I was able to enjoy goat milk. As an adult I have enjoyed owning goats for the pleasure of their company. Please consider the impact of Proposition 90 on families throughout Alaska. Goats are a considerable investment, families with allergies depend on the milk, and they are often pets who are dearly loved. My goats stayed close to our home in Anchorage without a fence so double fencing can be a daunting and unnecessary requirement. This proposal looks like it is based on assumptions rather than facts in many different areas.

Submitted By
Bridget Clark
Submitted On
3/4/2016 3:44:08 PM
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To the Board:

I oppose Proposal 90 - 5 AAC 92.029 to remove sheep and goats from the "Clean List" and require a permit for their possession. This proposal is a knee-jerk reaction to a problem that does not yet exist in Alaska and proposed by outside interests. The Alaska Wild Sheep Foundation is an outside entity that does not have the best interests of Alaska livestock owners at heart. This proposal would not only severely restrict goat and sheep ownership but essentially destroy the 4-H Junior Market Livestock program. As a parent of 4-H members and owner of a small herd of dairy and fiber goats, I am extremely concerned about the unintentional consequences this proposal will have on my small farm and my children's ability to participate in such a worthwhile program. To remove sheep and goats from the "Clean List" and do irreparable harm to 4-H and small family farms just to satisfy some outside hunting interests is egregious and irresponsible at best. It is my hope that you will reconsider this proposal and eliminate it from consideration.

Sincerely,

Bridget M Clark



Submitted By
Brittaney Schaerer
Submitted On
3/4/2016 5:00:33 PM
Affiliation

I am opposed to prop 90. I feel it would devastate the people who not only have these animals as pets but as a food and income.

Submitted By
Carlene Speight
Submitted On
3/4/2016 2:08:32 PM
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I am opposed to proposition 90 as it will do virtually nothing to protect Dall sheep while jeopardizing farmers and small animal owners livelihood.

Submitted By
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Submitted On
1/27/2016 9:26:45 PM
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Proposition 90 I OPPOSE the adoption of proposal 90. Reasons 1.Domestic sheep and goats have never transmitted diseases to wild populations in Alaska even when they were legally used as pack animals during hunting. If close proximity did not result in disease transmission, why would disease transmission occur in normal farming activities, where livestock is kept far from possible contact with wild animals (for protection of livestock no less)? 2.Dall sheep very rarely leave their habitat and 15 miles is far too wide of a "safe" zone. I live 7 miles from dall sheep habitat, but 3000 feet lower. It is preposterous to think a wild sheep would brave miles of thick spruce forest and potential wild predators to come in contact with my goats. If an area needs to be regulated it should be much smaller, including only actual wild sheep habitat and maybe up to a mile outside it. And all sheep and goats outside that area should not be regulated. See reason 3. 3. This proposal would cause a huge financial strain on goat and sheep owners. It is assumed there would be fees associated with the permitting process, probably related directly to the number of animals owned. Contrary to the proposals authors, not all sheep and goat owners are "hobby farmers". Some actually keep these animals as a business or to help feed and clothe their own families. Due to state restrictions on the sale of raw milk, it is impossible to obtain this healthy and safe product without owning a dairy animal yourself, and goats are far easier and cheaper to keep in Alaska than cows. Additional fencing g and testing regulations also add undue burden and financial stress. While many goat and sheep owners do their own disease testing, many also maintain closed herds to avoid or lessen this annual hassle and expense. Please do not limit Alaskans' right to pursue a self sufficient lifestyle.

Submitted By
Charlene Carney
Submitted On
3/4/2016 4:03:32 PM
Affiliation

Since there has never been a documented case of wild animals contracting a disease from a domestic animal I would ask Board of Game, Fish and Game, and Lisa Murkowski to investigate Alaska Chapter of Wild Sheep Foundation to scrutinize the logic behind this proposed regulation.

It is my understanding that the proposal is aimed at conservation, but has harvesting limits been set to mitigate that? Are the numbers of sheep dwindling? Has any wild sheep been affected in any way by domestic sheep in Alaska? Has ACWSF taken steps to implement WSF's management policies concerning protecting wild sheep from disease from other wild sheep?

If the answer is NO to any of these questions then I would conclude that ACWSF is simply trying to follow the Wild Sheep Foundation's policy lead but in a heavy-handed, excessive manner that tramples on the rights of citizens to raise sheep and goats. Nowhere in WSF's policy is it advocated to stamp out the citizen's right to own livestock. This policy can be read online at:
<https://www.wildsheepfoundation.org/pdf/documents/1page.pdf> Nowhere in this policy is it stated that domestic livestock actually infected wild sheep, only that it could be a possibility.

I would ask that the determining factor be the rights of the general population over the misplaced desire of ACWSF to mislead the Board of Game into an embarrassing regulation that will surely be challenged in the courts.

Submitted By
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Submitted On
3/4/2016 11:27:24 AM
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I run a small farm on the Kenai peninsula, in anchor point where I have goat milk shares and cheese as well as goat meat available for people in my community. There is no dall sheep nor is there any mountain goats anywhere near where I live they would have to travel hundreds of miles to come into contact with any goats/ sheep in this area. That would cause them to have to cross busy roadways and encounter many predators along the way. My goats do not graze on state lands, they are in a confined area on my 7 acres. Where they free range under supervision They aren't just the typical farm animal they are my pets they are all healthy and disease free, to take the right to own goats/ sheep is just not fair. There is so many children as well as adults that cannot have regular dairy and rely on goats milk lambs milk as well as cheese and meat to live a healthy life. Not only do people share a love and passion for goats and sheep but kids get to learn at a young age to care for an animal and learn the circle of life. I grew up around farm animals and would love to share the same passion with my children someday. So therefore i'am against proposition 90!

Submitted By
Chris Cook
Submitted On
2/24/2016 6:09:51 PM
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February 24, 2016

Ladies and Gentlemen,

My name is Chris Cook, and I am addressing this Board as a long time Alaskan resident who grew up on the Kenai Peninsula hunting, fishing and raising livestock. Since 1959, our family has cherished and nurtured the animals we hunt as well as those we raise. I offer my opinion as being reflective of many other Alaskan livestock producers who cannot or will not avail themselves of the opportunity to address the Board of Game on this matter.

Initially, when I read Proposal 90, I was greatly alarmed that quite unwittingly, we housed animals in our barn that may well have the potential to transmit a disease (any disease) to the Alaskan Dall Sheep populations. I was taught by my dear old dad, a high school biology teacher, to always perform due diligence so over the last several weeks my daughter and I have read almost all the citations and links provided in the WSF's reports and have since changed my mind.

If I understand the Wild Sheep Foundation's reports, they claim to have a "preponderance of evidence" that there is a direct and imminent threat of domestic ruminants transmitting pneumonia to the Dall Sheep herds in Alaska. It is also their contention that because online permitting is simple, it should then, be easily accomplished. Both claims are multi-faceted and while easily claimed; not so easily defended.

Most of the facts listed below are from the same sources cited by the WSF. To date, my daughter and I have found:

- **Fact:** The cause of pneumonia outbreaks in Bighorn sheep populations in the Lower 48 have been studied for decades to little avail. Researchers have not determined the precise causal agent and the etiology of these outbreaks remains unknown. There is a group of scientists who believe that *M. haemolytica* is the primary agent of the pneumonia outbreaks, and more recently, there are those who believe the "most likely primary bacterial agent" is *Mycoplasma ovipneumoniae*. The reality is that "the cause(s) of this disease have been subject to decades of debate and controversy" (Besser et al. 2013).
- **Fact:** While some pneumonia outbreaks and die-offs of Bighorn sheep in the Lower 48 have "spatial and temporal" links to contact between domestic sheep, pneumonia outbreaks and die-offs have also occurred in the absence of contact with domestic sheep or goats (Aune K. et al. 1998; WAFWA 2010). Not all Bighorn sheep die-off events are connected to domestic sheep contact. Correlation does not equal causation and should not form the basis for sweeping legislation.
- **Fact:** Both wild and domestic sheep carry strains of Pasteurellas bacteria (including *M. haemolytica*) in their nasopharynx. Additionally, "the existence of Pasteurella in an individual is not always manifested in disease. Most wild sheep carry small amounts of the bacteria..." (Miller et al. 2011). Likewise, *M. ovipneumoniae*, or *Movi*, is also found in both healthy domestic and wild sheep populations, according to Margaret Highland, DVM, with the USDA's Animal Disease Research Unit and Dept. of Veterinary Microbiology and Pathology at WSU. According to Dr. Highland, "The oddity of this all, is the fact that *Mycoplasma ovipneumoniae* is an endemic agent in North American small ruminants...yet there is a desire to make wild small ruminants completely free and naïve of exposure to this bacterium. It has become policy in some cases to kill (shoot) survivors of herds that experience outbreaks of pneumonia—I know of a case in which just over 200 surviving animals were killed— then bring in new bighorns to repopulate the area, without really understanding all of the factors that caused the first outbreak.'

According to Dr. Highland, rather than attempt to maintain bighorn herds that are mycoplasma free, the agencies should be trying to find ways to help bighorn live with the presence of this bacterium. 'I think the key to the problem lies in understanding why the survivors survive,' she said. She listed possible efforts such as reducing human imposed stress, focusing on nutrition, and controlling population size" (Johnson 2016). In other words, the presence of these endemic agents means the bacteria "is a constant that's not likely to go away, regardless of what wildlife managers do" (Johnson 2016).

Please note; According to ADF&G reports up to 2015, pneumonia has been found in Dall Sheep populations in AK with no documented contact with domestic livestock.

- **Fact:** Dr. Mark Thurmond, Professor Emeritus of Veterinary Epidemiology at the University of California, Davis, School of Veterinary Medicine states that, "transmission of pneumonia between domestic and wild sheep is 'an impossible disease concept.' 'When it comes to infectious diseases, there's a mistake you cannot make: confounding disease transmission with disease agent transmission' 2

“Pneumonia is a complex disease and is due to a complex series of events and exposures, he said. That includes exposure to disease agents such as bacteria, but it also includes stressors such as extreme weather, predation, overpopulation, or nutritional changes. That stress releases stress hormones in the animal, which weakens the immune system.” (Johnson 2016)

Dr. Thurmond explains, ‘Then the bacterial agents—mycoplasma that are normal residents in the respiratory tract and nasal passages—begin to grow unchecked, because the immune system can’t fight them back...’ In short, pneumonia can’t be transmitted; only the agent can be transmitted...There are far more factors at play than simply transmission of agents. This is evidenced by the fact that there have been numerous observed contacts between domestic sheep that weren’t followed by die-offs of bighorns. He added that there have also been numerous die-offs when no contact was observed with domestic sheep or goats” (Johnson 2016). Dr. Highland summarizes this situation by noting that pneumonia is “multifactorial.” Thus, cases of pneumonia in wild sheep cannot be simply attributed to a “transmission” event from domestic livestock.

Fact: According to one Bighorn sheep researcher, die-offs among Bighorn Sheep “are common and have been reported since the 1800s...The exact etiology of die-offs is still poorly understood, but seems to originate from stress, which is not always nutritional...” (Shackleton et al. 1999). Furthermore, “Bighorn sheep are most susceptible to the harmful effects of *Pasteurella* under stressful conditions including periods of low forage quality and quantity, high predation or harassment, or harsh weather (Frank et al. 2006). Under these conditions, the immune system becomes suppressed, and individuals infected with *Pasteurella* are often more susceptible to fatal pneumonia (Festa-Bianchet 1988)” (Malberg 2008). Other studies indicate that wild sheep are more susceptible to pneumonia outbreaks when they experience stress: (i.e. elevated cortisol levels) (Kraabel and Miller 1997; Miller et al. 2012).

Fact: Many of the studies cited to establish that domestic sheep transmit disease to wild sheep were done under “experimental conditions” (i.e. captivity and forced comingling), which add stress, a likely factor in wild sheep contracting fatal pneumonia (Miller et al. 2011). Experiments intended to “prove” that *M. haemolytica* and other bacteria kill wild sheep have required very high doses of inoculations in wild sheep, “resulting in death within days (not like the subacute/chronic disease actually seen)” in wild sheep, according to Dr. Highland. Again, much of the evidence beyond these forced co-mingling studies is based on anecdotal field reports. Although we cannot entirely discount them, these reports do not demonstrate true causation, merely correlation.

Fact: Dr. Mark Thurmond, has highlighted a number of faults found in government risk assessments related to wild sheep and domestic livestock separation (Thurmond 2015). Dr. Thurmond notes that, ‘Review of [the risk assessments] reveals an absence of key steps, ‘best available science,’ and ethics required in [risk assessments] and modeling, and in science in general” (Johnson 2016). He points to “false testimonies” and provides “examples of some of the ‘more egregious issues.’ For example, USFS’ Snow Mesa risk assessment makes several statements claiming domestic sheep transmit disease to bighorn, citing ‘Besser et al. 2012, Cassirer et al. 2013’ as research references. The problem is, neither of those bodies of research actually supports that assertion...’ Such significant misrepresentation of published results is a serious scientific offense and violation of trust” (Johnson 2016). Dr. Thurmond argues that “government agencies would be less likely to continue to operate on faulty science if they were to follow guidelines laid out by the National Academy of Sciences (NAS) for scientific integrity. ‘If the industry groups would rally together and demand that the agencies follow the Redbook guidelines—on every decision— we could avoid much of the damage that results from government policies that lack scientific integrity” (Johnson 2016).

Fact: Wildlife populations ebb and flow. We see “die-offs” in numerous wildlife populations (ie. the recent die-off of common murrelets in the North Pacific). In one bighorn sheep study, the researchers note that, “Our analysis revealed that 88% of pneumonia-induced die offs occurred at or within 3 years of peak population numbers, which implies that density-dependent forces such as food shortage or stress contribute to bighorns’ susceptibility to pneumonia... Both malnutrition and stress are known to affect animal immunity... Our results also suggest that native herds are less likely to experience pneumonia-related disease problems.” (Monello et al. 2001). Researchers have not ruled out natural population fluctuation in the die-off events in Bighorn sheep populations.

Fact: As Miller observes, “interspecies interactions do not invariably result in disease” (Miller et al. 2012). There are states in which domestic sheep and native Bighorn sheep co-exist and continue to thrive, ie. Montana. Additionally, Arizona and New Mexico have thousands of small sheep producers and a healthy bighorn sheep population.

Fact: According to the 2014 ADF&G Wildlife Management Report, Dall sheep population trends appear to be stable or decreasing throughout Alaska, with some areas increasing. Furthermore, the report notes that “high variability in population trends is normal and expected to continue.” Decreases that have been observed (in the Brooks Range, for instance) are believed to be due to harsh winters (ADF&G 2014). As of 2015, Dall sheep are not classified as a “species of concern” or an “at-risk species” in Alaska (ADF&G 2015). There is not one mention of disease transmission from domestic animals to the Dall sheep populations.

· **Fact:** Tom Lohuis, ADF&G Dall sheep biologist, has “found some indication of viruses that have been associated with Lower 48, but he found them at very low levels.” And he notes that, ‘it’s not uncommon for wild sheep to have been exposed to these viruses. Whether they have a pathogenic effect or not is dependent on a lot of different things.’ He also states, ‘It may not be a problem...Just because we have it doesn’t mean it’s a bad thing. The low pregnancy rate is biggest deal for me’ (Woodford, Riley 2009). “The causes of sheep mortality vary from area to area. Predation, avalanches, and starvation appear to be leading causes of Alaska Dall sheep population declines” (ADF&G). Again, no mention of domestic animals transmitting disease to Dall sheep.

· **Fact:** According to a 2010 ADF&G report by Tom Lohuis, ADF&G has tested samples from Dall sheep to “ascertain if these animals carried bacteria associated with respiratory disease and pneumonia in other wild sheep populations.” They found that 51% of the samples “tested positive for bacteria of the genus *Pasteurella*,” and more than 24% tested positive for “bacteria of the species *Mannheimia hemolytica*” (Lohuis, Tom 2010). Alaskan wild sheep are already exposed to these bacteria, despite not having contact with domestic sheep and goats.

· **Fact:** According to the ADF&G, there is currently no evidence that domestic sheep and goats are transmitting diseases to the wild Dall sheep of Alaska. There has not been a report of nose to nose or fence-line contact between domestic sheep or goats and wild sheep in the decades that Alaskans have had domestic livestock. To date, ADF&G has not conducted any research that indicates that domestic sheep and goats are a threat to the wild sheep in Alaska, let alone a primary threat, as claimed by the WSF.

· **Fact:** As those of us who dedicate ourselves to animal husbandry know, our livestock often require vitamin and mineral supplementation in order to maintain optimum health. Alaskan soil is mineral deficient. According to the UAF, “most Alaskan soils and all forages grown in these soils are deficient in selenium...selenium is an essential micronutrient in animal diets, and it should be considered a critical ingredient when feeding only Alaska-based forages” (Jahns and Shipka 2004). Furthermore, “Adequate levels of Se are necessary for ... immune function, reproductive success, and recruitment” (Flueck et al. 2012). Selenium supplementation (especially coupled with vitamin E) is known to improve the immunity of sheep and other livestock (Hall et al. 2013; Ziaei 2015).

· **Fact:** Studies have shown that wild sheep are mineral deficient (Mincher et al. 2007), particularly selenium deficient (Cox 2006; Rosen et al. 2009). In fact, in a study on the effect of selenium supplementation in Bighorn sheep, researchers state, “Bighorns are highly susceptible to pneumonia, and in some cases this susceptibility may be exacerbated by trace mineral deficiencies” (Rosen et al. 2009).

· **Fact:** Alaska is known to be deficient in selenium and other minerals, creating likely mineral deficiencies among Alaskan wildlife. Alaskan moose have been found to be deficient in copper and other minerals, which has been correlated with population decline (Flynn et al. 1977; O’Hara et al. 2001). It is likely that mineral deficiency, including selenium deficiency, is a primary threat to the wild sheep of Alaska. While most domestic sheep and goats of Alaska are given selenium and other mineral supplements (which is one of the reasons our domestic animals have better immunity to diseases like pneumonia), the wild sheep do not have the luxury of receiving these extra minerals. Thus, if our wild sheep are not able to handle naturally occurring pneumonia strains due to depressed immune systems resulting from mineral deficiencies, we could see population declines in the future.

· **Fact:** In the words of ADF&G: “It is essential that we understand the demographics of species [that] we have concerns about, and are able to identify the cause of poor reproductive success, or high adult mortality, before effective conservation actions can be taken. Rudimentary information on numbers, trend, and distribution is lacking for many species in Alaska, and acquiring that information is, in itself, a conservation action. The program has operated in this information-gathering phase for most of the last 10 years, and it will likely be a high priority need in the next 10 years as well. **Alaska’s relatively pristine nature, unlike most states, affords us that time**” (ADF&G 2015).

· **Query:** Clearly, we do not understand the actual cause of pneumonia related die-offs in Bighorn sheep, nor do we understand all the factors that contribute to the increased susceptibility of wild sheep to pneumonia. Why then, the hurry to impose prohibitive regulations on domestic livestock owners when no one fully understands the problem?

In addressing the issue of permitting, I ask the WSF and BOG to consider the logistics and costs of a state permitting process. In light of the State of Alaska’s current budgetary crises, it seems a questionable time to task the ADF&G with the inevitable addition to their administrative and field work load. The cost to livestock owners is not only measured in monetary terms, but in time and the inevitable headaches that any permitting process involves. What does your working model look like?

Continuing along the main points of Proposal 90, I offer a list of steps that many livestock producers, ourselves included, take to ensure healthy herds that are kept separate from wildlife.

- We establish and maintain healthy animals by feeding diets specific to the breed to sustain strong immune systems
- We attend to all signs and effects of ill health (at great expense and effort)
- We test for diseases common to our species
- We cull inferior stock
- We follow a breeding program to improve genetic diversity
- We build and maintains fencing sufficient to deter predators (another huge expense)
- We collaborate with other Alaskan producers to educate and pursue best practices in animal husbandry.

In closing, I urge you to consider the long term and far reaching ramifications of removing domestic goats and sheep from the “clean list”. Some of which are:

- Access to new genetics from Outside will be greatly limited due to the additional expense and the constraints of permits.
- The sale of our livestock will become equally constrained due to the expense and the personal reluctance to permit.
- Export of our animals will be similarly constrained.
- The tenuous biosecurity of our farmland will be infringed if and when state employees are able to access our properties without taking precautions. I.e, Johne’s is known to exist in wildlife populations, and the pathogens are easily transported on shoes and vehicle tires. Once infected with Johne’s a farm is contaminated for a minimum of 7 years.
- The additional expense and hassle of permits will price many people out of owning livestock at all.
- 4H programs will be negatively affected for the same reasons.
- The lack of privacy of proprietary and personal information is a widespread concern. Once in the hands of any government agency, how will this info be used and by whom?
- Lack of sustainability and food security is also a huge concern in this remote state at a time when jobs are scarce and independence is threatened.

This is Alaska, a fact that affects every facet of our daily lives, and it is not possible to approach these issues as they do in the Lower 48. I am confident though, that we can work together to accomplish healthy animal populations, both domestic and wild.

If the Wild Sheep Foundation is truly interested in collaborative efforts in seeking a workable and successful management plan, I can assure you that we are enthusiastic to participate. I state with total transparency and honesty that our (read that, my) animals are not a risk to wildlife, the reverse of which cannot be claimed of Alaskan wildlife.

Respectfully,

Chris Cook

4092 Lupine Dr.

Kenai, Ak 99611

907.252.7929

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Submitted By
christina miller
Submitted On
3/2/2016 6:12:12 PM
Affiliation

Dear Board Of Game,

I am writing in opposition to PROPOSAL 90 - 5 AAC 92.029, removal of goats and sheep from the "clean List".

When we bought our property 10 years ago we were so excited to have the FREEDOM of growing our own food and providing for our family in a way we had not yet been able to. I am afraid this proposition will directly threaten that freedom for us and many other Alaskans who are deeply committed to a life of self- sufficiency and liberty -- it is our heritage and is what has drawn many of us to this State.

I believe the proposition is poorly worded and far too vague. Our state is in the process of state cuts and a budget defecit upward of \$4 Billion. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and full of flawed logic. To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. And unlike the lower 48 there is no open grazing on state land and no nose to nose contact between wild and domesticated animals.

Please do not support this proposition and instead support the freedom of Alaska's agricultural community.



Submitted By
Christina Partridge
Submitted On
1/28/2016 9:38:38 AM
Affiliation

The worry of disease transmission from livestock to wildlife in Alaska is not founded. Livestock raising in Alaska is marginal at the very best. Any permits or regulation of any kind placed on Alaskan livestock raisers will greatly reduce the number of people capable or willing to raise livestock. Reducing the amount of livestock in Alaska greatly reduces the food security of the people in Alaska.

Submitted By

Cindy Koestler

Submitted On

2/19/2016 11:41:46 AM

Affiliation

This comment is concerning the Prop 30-31. It is not a good reason to put every goat or sheep or cow, cattle, livestock under this prop due to the distance of the animals from Dall Sheep Habitat. I do consider this another form of government over reach considering the state is in such a financial distaster from over spending. This would create more spending that we don't have. This also should not be considered at all, due to the people who are trying to create it who are outside hunters, Alaskans voices should matter more than outsiders.. I would think that the state would be glad people are farming and raising livestock to help create a better form of life in Alaska not worry about wild sheep that are hundreds of miles from me, rather it be land miles or air miles. This does not need to be approved. There have been NO cases of transmitted diseases in this state, according to the State Vet.

Submitted By
Cindy Lea
Submitted On
3/2/2016 1:39:48 PM
Affiliation

Phone
907-726-2992
Email
d_lea@earthlink.net
Address
18840 Sarichef Loop
Eagle River, Alaska 99577

March 2, 2016

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.

The requirements will cause severe economic burden to existing owners of sheep and goats, the businesses that provide feed and care products for them, and will also have significant cost impacts to the State of Alaska. The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic.

Unlike the "lower 48", Alaska's domestic sheep and goat population does not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, highways, towns and subdivisions.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition. Requiring permits, expensive double fencing, and unspecified and unproven testing is simply a drastic overreach for a purported crisis that has not occurred, nor been proven to likely occur in the future.

Alaskan families benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions. **Personally, I am a small business owner and use fresh goat milk in my premium handmade soap making. Additionally, I have a health concern that requires me to consume 16 oz. fresh goat milk daily. Without this fresh goat milk my health would decline rapidly.** I ask you to not pass Proposal 90 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individuals cannot afford to comply, nor can the State afford to administer this new compliance program.

Sincerely,

Cindy T. Lea
18840 Sarichef Loop
Eagle River, AK 99577
907-726-2992

Submitted By
Cindy Plantz
Submitted On
3/4/2016 4:28:08 AM
Affiliation

Phone
9122899639

Email
cplantz1963@gmail.com

Address
96 Marsh Trace
Brunswick, Georgia 31525

I stand with Tina Starr Judd and strongly oppose Proposition 90. There has never been a case of disease transmission between wild and domestic sheep and goats in Alaska! Taking sheep and goats off the "clean list" is like putting out a campfire with Niagara Falls. Government overreach at its finest!

If there is a decline in Dall Sheep, I suggest you look for the cause of that decline. Do current farmers' in Alaska have no rights that you would ban domestic sheep and goats? Shame on you!

Do the right thing!

Submitted By
Colleen Button
Submitted On
3/4/2016 8:24:49 PM
Affiliation

Phone
907-317-4995

Email
colleenrlovelace@yahoo.com

Address
808 w 20th Avenue
Anchorage, Alaska 99503

Responsible pet owners should not be singled out and punished in our city. Having a goat in my yard is far less of a nuisance than a cat that is let out to roam freely. Goats, chickens, dogs, cats, it is not the type of pet that is the problem, rather it is irresponsible owners and more rules and regulations will not solve that problem.

Submitted By
Connie Duran
Submitted On
2/29/2016 5:38:55 PM
Affiliation
Private party

Phone
907-357-0557
Email
jocon@mtaonline.net
Address
PO Box 877303
Wasilla, Alaska 99687

Dear Board of Game,

I am opposed to Proposition 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, **Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven.**

The requirements **will cause severe economic burden to existing owners of sheep and goats**, the businesses that provide feed and care products for them, and will also have significant cost impacts to the State of Alaska. The State is currently faced with an almost \$4 BILLION budget shortfall, forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic.

Unlike the "lower 48", Alaska's domestic sheep and goat population does not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, highways, towns and subdivisions.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition. **Requiring permits, expensive double fencing, and unspecified and unproven testing is simply a drastic overreach for a purported crisis that has not occurred, nor been proven to likely occur in the future.**

Alaskan families benefit in numerous ways from the ownership and husbandry of domestic sheep and goats – besides the benefits of milk and milk-related products, meat, and fiber; they are also treasured as family pets, 4-H project animals, and companions. I ask you to not pass Proposal 90 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. **The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Individuals cannot afford to comply, nor can the State afford to administer this new compliance program.**

Submitted By
Coralaine
Submitted On
3/4/2016 3:27:57 PM
Affiliation

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9073307130

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Address
4106 Garfield street
Anchorage, Alaska 99503

Opposition to prop 90

Goats are beautiful creatures that give milk and health and care to families. It is ridiculous that our government thinks they have any right to take away someone's opportunity to well being.



Submitted By
Courtney Lovelace
Submitted On
3/4/2016 4:11:54 PM
Affiliation

Phone
9073514095

Email
Courtneylovelace.n@gmail.com

Address
4106 Garfield st
Anchorage , Alaska 99503

I strongly oppose opposition 90

Attention Board of Game comments, Alaska Dept. of fish & game



PROPOSAL 90 - 5 AAC 92.029. Permit for possessing live game. Eliminate domestic sheep (*Ovis aries*) and goats (*Capra hircus*) from the "Clean List" and require a permit for possession with stipulations if located within 15 air miles of all sheep habitat as follows:

(b) Domestic sheep and goats will be removed from the "Clean List" regulation.

Any person in possession of domestic sheep (*ovis*) or goats (*capra*) must obtain a permit from the department within one year of implementation of this section. Animals located within 15 air miles of Dall sheep habitat must be contained within a Department approved facility (double fence, etc.) and certified disease free when testing becomes available. Animals located more than 15 miles from Dall sheep habitat will be issued a permit without stipulation online.

What is the issue you would like the board to address and why? Domestic sheep and goats have been proven to carry diseases that are devastating to wild sheep populations. This proposal will be a good start to prevent the spread of disease into wild sheep populations. Hobby farming is growing rapidly in Alaska including areas that would be considered Dall sheep habitat. Entire populations of bighorn sheep are presently being eradicated due to these unintentional disease transmissions.

Justification:

- #1 We have a constitutional mandate to manage for sustained yield, this includes doing what we can to maintain healthy native wildlife populations.
- #2 Online permitting has become mainstream and is simple.

PROPOSED BY: Alaska Wild Sheep Foundation (HQ-C15-128)

Will fish and game have authority over all animals in the state from now on. Will they regulate dogs since they can pass diseases to wolves and fox, pet birds because they could carry diseases to grey jays? I live within twelve miles of a range that has dall sheep. I have three goats, it is very unlikely they will ever come in contact. I shouldn't have to register livestock in a rural area. This creates more problems and costs for fish and game. It is difficult enough to raise livestock in Alaska, we don't need the state making it more difficult.

What is the actual purpose of requiring a permit. To deny some from owning or doing something. In this case what is the long term goal of



requiring registration? That if a dall sheep is found with a certain disease that the troopers will inspect all goats and sheep within fifteen miles and fine anyone who's livestock have said disease? We will later be required to have goat insurance to cover the costs of being found liable for a wild sheep dying? It may seem absurd but these kinds of regulations increase over time, not decrease. Will there be requirements for owning a goat, will there be new ones every year until people just give up owning them? Will the permit cost, maybe not now but later? Will it be time well spent to send a trooper to destroy local residents' goats. Will it create a positive attitude for either side? Or will it be a regulation with selective enforcement?

We have a requirement for sustained yield, not by eliminating others opportunity to raise their own animals. Online permitting is fine if you are online, but there are many people who aren't online. This time it's a "minor" inconvenience but later it is many inconveniences which become deterrents. I am against this proposal.

Sincerely, Dan Teague

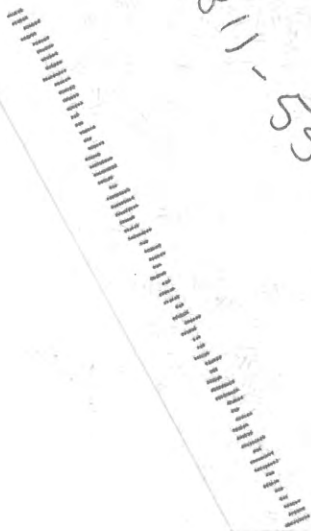
Tok, Alaska



Dan Tague
Box 391
Tok, AK
99780

Attn: Board of Game Comments
Alaska Dept of Fish & Game
Board Support section
P.O. Box 115526
Juneau, AK 99811-5526

998115526 B900



Submitted By
Daniel Campbell
Submitted On
3/4/2016 12:00:11 PM
Affiliation
Private Citizen

I am opposed to proposition 90. The Alaska chapter of Wild Sheep Foundation proposal will cripple or destroy a portion of Alaska's fragile agricultural industry. The Foundation admits there is no recorded instances of transmittion of disease between domestic and wild sheep in Alaska and the testing required to make a sound scientific decision has been miniscule. Yet the Alaska chapter President, Kevin Kehoe, in his editorial to Alaska Dispatch News dated February 11, 2016 says "Alaskans now have the opportunity to exercise science-based management to avoid risking potential loss to their incredible Dall sheep resource while still maintaing a tradional agricultural business or hobby." Where is the science? Nothing in this proposal in it's current form will benefit Alaskans.



Submitted By
Daphni Ryan
Submitted On
3/4/2016 4:35:48 PM
Affiliation

I am opposed to Prop 90 because it will do almost nothing to protect Dall sheep while jeopardizing the livestock industry in this state. My children are active members of 4H and it is vital that they continue their growth through raising livestock, including sheep and goats.

Submitted By
Dawson Henry
Submitted On
3/3/2016 10:59:33 PM
Affiliation

To whom it may concern,

I am writing to you on the matter of Proposition 90. I'm against this proposal because of #1: government overreach, #2: no legitimate basis for carrying it out, #3: government spending on an issue which presently is of little concern and finally #4: the consequences of this proposal. I'd like to comment on each reason, beginning with reason #1.

#1: I believe that the government does not have the authority to impose these kind of measures on how one uses his/her own property on his/her own land. I do believe that sheep and goats should be dealt with responsibly, but also that the government does not have the legal right to issue laws and regulations regarding our own livestock on our own land.

#2: Those who propose this Proposition don't have any legitimate incidents in Alaska of sheep and goats intermingling with Dall Sheep, much less infecting them with any disease/diseases. It would be foolish to accept this proposal on the the grounds of sheep and goats being a threat to the Dall Sheep that generally live in the mountains. We own goats and sheep. They know where to come for food, water and shelter. It's unlikely that they would to decide to climb a mountain one day (If they got loose) and even if they did, the probability that they would be carrying a deadly disease or even find Dall Sheep without coming home makes the probability even slimmer. I realize that not all animals are the same and neither are the owners, but still see this as an illegitimate threat whereby if this proposition is accepted will cause more harm than good.

#3: The government has more important issues to spend its money on than this proposal. As I stated above, issuing this proposal isn't a very legitimate concern and would create more harm than good, so why spend money on enforcing it?

#4: Finally, the consequences of this proposal. If this proposal is accepted it would create a disastrous situation within our state, probably ending up costing the government even more money. Hay farmers would go out of business because of lack of buyers, feed stores would see a major decrease in sales, people who own sheep and goats because of food allergies would be affected, cost for owning sheep and goats would go up substantially because of mandatory vaccination and fencing requirements, 4H projects wouldn't be affordable and finally FDA approved facilities in our state that oversee the processing of Alaskan meat would also be negatively affected as well as those that bring their meat there for processing before they sell it.

All of this (plus much more) could be caused because of Proposition 90. Please consider the consequences of such a proposal before a formal decision is made. This proposal, if accepted, would negatively affect the lives of many Alaskans. For the sake of all Alaskans (including myself and my family) I plead for you to make an honest evaluation of this Proposal and to stand against Proposition 90.

Sincerely,

Dawson Henry

From: [Deanna Chesser](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal 90 - Dall Sheep
Date: Thursday, February 25, 2016 6:21:23 PM

The current proposal that suggests licensing farm animals such as goats & sheep as a method of protecting the Dall Sheep population is absolutely one of the dumbest ideas I've heard from this far over-reaching government that is currently in place. Come on. STOP making it difficult, if not impossible, for people in Alaska to have small farms. Not only is it an idea that would be costly, it is an idea that would be an ineffective as attempting to license non-domestic bees. Seriously? How the hell is a license going to ensure that Dall sheep are protected? There are better ways. This is not the way.

How about we require licenses for every horse, cow, chicken, rabbit, turkey, and pheasant, also. Seriously? Get a life, people.

Deanna Chesser
PO Box 515
Anchor Point, AK 99556

Submitted By
Deanna OConnor
Submitted On
2/25/2016 10:38:33 PM
Affiliation

I vehemently oppose Proposition 90, which would harm domestic sheep and goat owners in the State of Alaska and ask you to oppose it as well.

Alaskans value the ability to provide for ourselves. Many of us work hard to provide food security in a place where most of our food has to be imported from the Lower 48. Proposition 90 would take away our ability to feed and clothe ourselves as we see fit. Not only would Prop 90 remove domestic sheep and goats from the "clean list"- making it impossible to import new bloodlines or sell breeding stock out of state - but it would also negatively impact hay producers, feed store owners and employees, veterinarians, 4H programs, people with dietary issues, and owners who value their animals not only as a meat, milk and wool source, but as beloved family pets. Many sheep and goat owners already voluntarily disease-test their herds, at non-negligible personal expense. Prop 90 would add requirements for additional testing that isn't even available yet, and there is no way to tell for certain how much those tests would cost. The costs for the testing and the permits, multiplied by every animal in the herd, plus additional fencing, would put many smallholders in financial straits.

Alaska, unlike other states, has no open grazing on public lands. There has been no reported case of any wild sheep contracting a viral or bacterial infection from a domestic sheep or goat in Alaska. The allegation that this happens is unfounded. Wild sheep naturally carry these bacteria which can affect the animal in times of stress - such as being hunted. The Wild Sheep Foundation likely causes more illness due to stress than does the domestic animal in its own yard. Hunters and farmers have peacefully existed side-by-side here for decades in Alaska, and a more reasonable solution could be arrived at than threatening our Constitutional rights.

Alaska residents that own domestic sheep or goats as treasured family pets, 4-H projects, or small farm operations are up against this well-funded outside interest group (WSF) who is not concerned with the larger goal of maintaining Alaskan freedoms. This attack on our ability to be self-sufficient in a place where self-sufficiency and independence are treasured ways of life must not be allowed to pass. Protect the rights of Alaskans and say NO to Prop 90.

Submitted By
Deanna O'Connor
Submitted On
1/27/2016 2:34:26 PM
Affiliation

I would like to express my deep concern and outrage over Proposition 90 to remove sheep and goats from the "clean list." This is unnecessary and would be harmful to Alaska as a whole. If the barge delay taught us nothing else, let it teach us that we must protect and encourage Alaskan food producers, not permit them out of business and make it harder for us to peaceably provide for our families. Issues that originate in the Lower 48 should not dictate policy in Alaska; Alaska is different. The diseases killing bighorn sheep in the Lower 48 are not proven to be transmitted by domestic sheep or goats, but more likely transmitted by cats. Are cats going to be removed from the clean list, too? Removing the sheep and goats from the clean list will also make them impossible to import into the state from other areas, making our livestock bloodlines stagnant and with no chance of improvement. Organizations like 4-H would be hurt, as well as small independent farmers trying to provide for themselves. The added financial burden - no matter how "inexpensive" we are told a permit would be, or how "easy" it is to obtain one - is unfair to farmers who would need several permits just to maintain their herds at current numbers. We do not accept the violation of our rights to responsibly own livestock on our own properties without any permitting or inspections. The ONLY solution to Proposition 90 is a veto. NOT a compromise.

Submitted By
Denise Wilhelm
Submitted On
3/4/2016 3:20:28 PM
Affiliation

Phone
907-895-4058
Email
deniseakwof@gmail.com
Address
PO Box 1182
12306 Barley Way
Delta Junction, Alaska 99737

Dear Board of Game members:

I am writing to share my deep concerns about Proposal 90. Please, please do not put such a measure into effect! It would devastate so many small ag producers as well as families who depend on their sheep and goats as an integral part of their lives. My family owns goats. We use their milk to make our own dairy products, personal care products, and we eat the meat. We farm a small acreage to produce hay. We also support local farmers who produce small grains and hay. All that would be impossible under Proposal 90.

While I am sure our personal economic impact is negligible, I am equally certain that if all goat and sheep owners were unable to maintain their operations due to the overbearing cost of complying with regulations such as registering all animals, double fencing, and who knows what else, the combined economic impact would be quite noticeable. I wonder how many tons of grain, hay, and straw are purchased every year by goat and sheep owners? Where would farmers sell the products they are currently selling to us? It seems highly unlikely that another group would step in to fill that gap.

While we are talking economics, what of the economic impact to the state to enforce the measures under the proposal? There would have to be code enforcement officers throughout the state. There are many goats and sheep in quite remote locations; officers would be forced to fly to those locales to check compliance. Who would be responsible for the added costs to state government at a time when we are looking at enormous cuts across the board at the state level?

My family and I are also avid hunters, and we are concerned about the welfare of wild animal populations. But I urge caution in choosing to vilify domestic species as the culprits in dying-off of wild populations when that has simply not been proven.

Furthermore, I am suspicious of an Outside agency coming into the state and taking aim at a large group of Alaskans without a care for what the end result will be of the proposals they push.

The Wild Sheep Foundation has not engaged in any adequate level of collaboration with any of the groups or state agencies that would be affected by Proposal 90. Until forced to recently, they have not met with the Department of Agriculture, ADEC or the State Veterinarian's Office, the Farm Bureau, or the roughly 1,000 or more owners of domestic sheep or goats that would be negatively affected. They have not met with the Alaska State Troopers Wildlife Division to determine their ability to enforce their proposal.

WSF's first move has been to call for draconian regulations on livestock owners (Proposal 90) without any warning, discussion, input, or initial call for cooperation. The president of the AK Chapter, Kevin Kehoe, has published a number of polarizing opinion articles in the state news without any attempt to work with the livestock community. The WSF and Kevin Kehoe have also threatened that they are prepared to make "legal challenges" and to use "legislative means via Alaska's Legislature" to get their way. These threats come without any attempts to work with the livestock community of Alaska proactively and productively.

Animal husbandry and agriculture have long been a part of the Alaskan way of life. I want to protect our right to maintain the Alaskan agricultural lifestyle; our right to raise food for our families; our ability to lessen our dependence on commercial food sources and hunting of wild game; and our ability to teach our children to work hard, live sustainably, and become responsible stewards of the land and animals with which we are entrusted.

I urge the Board of Game not to impose extra burdens on the livestock owners of Alaska, to recognize that there is not a preponderance of scientific evidence that our animals will infect the wild sheep of Alaska with pneumonia, and to consider the significant impact of indirectly forcing us to give up our lifestyle based on the WSF's unsubstantiated claim that there "could" be contact between Dall sheep and our livestock that "could" result in disease transmission. Laws and rules must be based on relevance and reality, not suppositions and suspicions.

We Need More Data & We Have Time: In the words of ADF&G: "It is essential that we understand the demographics of species [that] we have concerns about, and are able to identify the cause of poor reproductive success, or high adult mortality, before effective conservation actions can be taken. Rudimentary information on numbers, trend, and distribution is lacking for many species in Alaska, and acquiring that information is, in itself, a conservation action. The program has operated in this information-gathering phase for most of the last 10 years, and it will likely be a high priority need in the next 10 years as well. Alaska's relatively pristine nature, unlike most states, affords us that time" (ADF&G 2015).

Request for Clarification and Further Study: We request that, prior to implementing any change to 5 AAC 92.029 or i... regulations on livestock owners, the Board of Game and ADF&G:

o Provide a Risk Assessment that strictly adheres to the National Association of Science's published guidelines for the science of risk assessment (the NAS "Redbook").

- o Create more Dall sheep preserves, to protect our sheep from hunting pressure and stress.
- o Present maps of presumed Dall sheep "risk" areas.
- o Determine levels of acceptable risk for the management of Dall Sheep in Alaska.
- o Invite extensive public discussion of how these areas and levels were identified, which pose the greatest threat, and the options to eliminate the risk.
- o Perform a thorough health impact assessment of Proposal 90 on the Alaskan community.
- o Perform a thorough social impact assessment of Proposal 90 on the Alaskan community.
- o Perform a thorough economic impact assessment of Proposal 90 on the Alaskan community.
- o Provide, in reference to *M. haemolytica* and *M. ovipneumoniae*, a "scientifically defensible analysis, specifically on the probability of sufficient contact for pathogen transmission and, if there is transmission, the probability of disease and spread of the disease to the herd in the wild."
- o Provide written documentation from other states imposing such regulations as Proposal 90 on private or commercial landowners and include the rate of success achieved in the wild sheep population by such implementation.
- o Provide a risk assessment of ADF&G officials interacting with Dall sheep during research and unintentional disease transmission to Dall sheep from their interactions with other wildlife.
- o Provide records of instances (date and location) wherein domestic sheep and/or goats and wild sheep co-mingle and have "nose-to-nose contact" in Alaska.
- o Identify the precise locations of Dall sheep habitat in Alaska, define the exact location of every border that is "within 15 air miles of Dall sheep habitat," specify how these borders are defined and determined (state criteria and parameters) and by whom, specify how often these borders will change (e.g. seasonally, yearly, etc.), and detail how each livestock owner will know if their land or a portion of their land is within the nebulous "15 mile air miles" designation.
- o Provide a detailed plan for implementing the permitting system required by Proposal 90, including a cost analysis for the State of Alaska and private and commercial livestock owners.
- o Provide specifications for the "Department approved facilities" that the proposal will force upon livestock owners, including a cost analysis of these facilities for private livestock owners, commercial livestock owners, and a cost analysis for the State of Alaska to enforce these requirements.
- o Provide a plan that details exactly what it means for animals to be "certified disease free," who will perform this testing, how testing will be enforced, what specific diseases these tests must cover, how often tests must to be administered, and the cost of these tests for commercial and private livestock owners.
- o Provide a plan for enforcing the requirements of Proposal 90, including exactly how ADF&G will assess the facilities of each goat and sheep owner throughout the vast geographical terrain of Alaska and the details of what that assessment will entail.
- o Present a documented plan for how ADF&G will ensure bio-security for each farm that ADF&G personnel visit so that they can guarantee their personnel are not responsible for farm-to-farm or wildlife-to-farm disease transmission (e.g. disposable protective clothing and footwear for each farm, personnel sanitation procedures, equipment and transportation sanitation, etc.).
- o Define the ramifications for ADF&G and the compensation to Alaskan livestock owners if it is determined that ADF&G personnel are responsible for disease transmission to private or commercial livestock.
- o Clearly define the parameters that would warrant the destruction of private or commercially owned Alaskan livestock.
- o Determine how ADF&G will oversee disposal of livestock if owners are not able to afford "to obtain a permit to continue owning their livestock," to purchase and construct "approved facilities" for their animals, or procure "certified" disease testing that Proposal 90 would impose.
- o Invest the funds that ADF&G currently receives from the WSF into a program to develop vaccines and other health promoting protocol for the wild sheep of Alaska.
- o Perform research to determine if mineral deficiencies in Dall sheep increases their risk of succumbing to naturally occurring strains of pneumonia, and provide a risk assessment, considering the documented mineral deficiencies in Alaska (copper, selenium, etc.).
- o Provide a public report that can definitively rule out natural population fluctuations in wild sheep.

Thank you for your consideration,

Denise Wilhelm

Delta Junction, Alaska

Submitted By
Diana Estes
Submitted On
2/26/2016 1:05:26 PM
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There are a number of problems with the premises and requirements of Proposal 90, and enactment of this extreme and unnecessary set of costly requirements (both to individuals domestic sheep and goat owners, and to the State of Alaska) would place extreme hardship on all Alaskan sheep and goat owners. There are no commercial goat or sheep operations in Alaska, and Alaska's owners of domestic goat and sheep generally own only a few sheep or goats on small fenced acreage, on a small personal budget, located far from wild sheep habitat. Satisfying Proposal 90's requirements for double fencing, testing, and permitting is completely unreasonable, financially burdensome, and unnecessary. All owners would be hit hard by the inability to import new genetics, as animals not on the "Clean List" may not be imported. Consequences for non-compliance with any of the new rules would include fines and eradication of livestock. For many owners their sheep and goats are not just producers of wool, milk or meat, but are their life's passion and beloved family pets or children's 4-H projects.



Submitted By
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3/4/2016 5:37:49 PM
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I oppose prop 90.

Submitted By
Dick Zobel
Submitted On
2/29/2016 12:55:42 PM
Affiliation

Proposal 90 is another example of an extreme reaction to a undocumented "problem" involving domestic and wild anamils in Alaska. Problems occuring somewhere else in the US simply does not necessitate a permitting process for Alaska.

It would seem a more logical and scientific approach would be to get wildlife and livestock groups together to review any evidence of this precieved "Alaska" problem. Working together the situation could be evaluated and if necessary a process could be formulated to avoid it.

February 26, 2016

To whom it may concern,

I hope that all is well with you and that you've had a great new year so far. Proposal 90 has come to my attention and is the reason for my email today. Even though I do not have goats at this time, my family has been planning on getting a few dairy goats in an effort to become more self sustainable. Living in Southeast can be fickle with the barges and I have 5 little mouths to feed. I know of MANY families that rely on goats and sheep for food, fiber and income. I feel that this proposal is a gross over reach into what people can do on their personal property. Many, many families will suffer because of this, either with having their pets/food eradicated off of their property or receiving so many unreasonable and unnecessary financial burdens or requests, that people will end up starving or moving out of the last state that celebrates being self sufficient. Alaska, the last little piece of wild America. We are not the lower 48, that is what makes it special, that is what makes this work. Please, please don't let Alaskan families and business's suffer because of this. I am begging you to please consider opposing and or dropping Prop 90. Thank you so much for your time.

Have a wonderful day,

Dixie Booker
Wrangell Alaska

Submitted By
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3/4/2016 3:46:33 PM
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none

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i have tried 3 times to submit my objection to proposal 90 regarding domestic goats and sheep

i can understand protecting our wild sheep but the domestic goats will not come in contact with wild

sheep, if there isn't a law there should be to not allow domestic goats or sheep in the mountains and be contained to the yard or barn area. i believe that is sufficient instead of a clean list.

many people must have goats because of allergies to grocery store foods. please do not pass this clean list there must be a better way to accomplish what is needed. i don't believe our sheep is in danger and have not heard of any diseases here. Bears and wolves are worse than disease

i hope i can get this submitted as i have not been able to accomplish this before

Submitted By
Donna Sterling
Submitted On
2/29/2016 9:42:51 PM
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I do not have any live stock. . But my neighborhood has many. My grand kids and myself enjoy watching them and playing with them. We would be heartbroken if they were to be put down.. I really don't think it would be right to cater to one group over another. . Please consider the relationship that some owners have with these animals, and how they impact our community for the better. Hunting is great and having live stock is too.

Submitted By
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3/4/2016 1:21:36 PM
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I send this comment to show my opposition of Proposition 90 I oppose prop 90 for many reasons, but first and foremost because it threatens the health of my children. Like many people, my children have been diagnosed with many food allergies. Goats and sheep have been a saving grace to allow us to accommodate their needs. All three of my children are allergic to all of the following: cow's milk, wheat, oats, soy, beef, commercially available chicken, pork, and eggs. Each child has other specific allergies including: corn, apples, oranges, yeast etc. In addition to this, products produced in a facility that processes these items cause reactions, as well as products from animals that have eaten corn, soy, wheat etc. This severely limits what we can feed our children; in fact it eliminates nearly all processed foods that are available for purchase. We raise, hunt, and fish for all the meat and animal products in our home. Because hunting can be expensive and unreliable, we raise goats for meat and milk. They make up a large part of our children's diet. Removal of goats and sheep from the clean list, and following the provided regulations in prop 90 would be the end of sheep and goats in Alaska. Therefore the end of the small backyard farm as well. The following is copied from prop 90, followed by a portion taken from the ADFG web page regarding the clean list: "Any person in possession of domestic sheep (oviscapra) must obtain a permit from the department within one year of implementation of this section." "#2 Online permitting has become mainstream and is simple." "All mammal, bird, and reptile species that have been specifically approved for entry or possession in Alaska appear on the "Clean List" (Alaska regulation 5 AAC 92.029). If a particular mammal, bird, or reptile species does not appear on this list, it may not be possessed as a pet or livestock in Alaska, and the Alaska Department of Fish and Game cannot issue a permit allowing its importation or possession." I take this to mean that permits will never become available, let alone be an easy online process as stated. "Animals located within 15 air miles of Dall sheep habitat must be contained within a Department approved facility (double fence, etc.) and certified disease free when testing becomes available." - Where is a map providing us with the boundaries considered "dall sheep habitat"? Double fencing is something that is unobtainable for many small farmers, (myself included) it would force anyone with smaller lots to abandon something they do for self sustainability, or to move to where? Out of state would be the only place, seeing as the department cannot issue permits for animals not on the clean list. "What is the issue you would like the board to address and why? Domestic sheep and goats have been proven to carry diseases that are devastating to wild sheep populations. This proposal will be a good start to prevent the spread of disease into wild sheep populations. Hobby farming is growing rapidly in Alaska including areas that would be considered Dall sheep habitat. Entire populations of bighorn sheep are presently being eradicated due to these unintentional disease transmissions." - Most if not all of these studies show that wild populations naturally carry the same pathogens claimed to be transmitted. Pneumonia is what is killing the bighorn sheep, Pneumonia actually is not a transmissible disease, stress causes pneumonia in sheep and goats, stress from lack of nutrition, competition for food, harassment by predators, unethical hunters, maybe even dogs. Not domestic sheep and goats. To finalize my statement: Prop 90 has no business being implemented in its current state. It is poorly written and mainly contains misguided information that is at best untruthful. As someone who hunts and raises animals I believe that domestic goats and sheep are a much needed resource for our state. At the very least they are a way to reduce our dependency on food being shipped to Alaska, and at best they are a lifesaving source of nourishment for those who need it most. Thanks for your time, Donya Mennis

Submitted By
Elizabeth Haus
Submitted On
2/28/2016 7:52:54 PM
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Prop 90 is a **bad idea** based on **bad science!**

There has **not** been an issue but some people with an agenda seems to think that it okay to **make** an issue!

In the Army we had a saying. If it's not broke, fix it till it is. That seems to be the approach the State of Alaska is on course to do. That means **YOU**, Board of Game.

This state has limited resources in regards to food security, and to take sheep and goats off the "clean list" would be to take away residents' ability to feed and clothe themselves, in a very real sense. It would take away our kids' 4H and FFA projects, as well as their pets. Is that what you want to do? Oh, I can't wait to see the headlines in the paper, the videos on youtube of government goons destroying furry animals in front of crying tots. Think of the PR!

Thank you for your consideration,

Elizabeth Haus

Submitted By
Ellen Kane
Submitted On
2/29/2016 12:41:25 PM
Affiliation
sheep farmer

Alaska has lots of space and lots of fresh air. Domestic and wild sheep are not co-mingling. This is making an issue of a non-issue.

Submitted By
Ellen Kane
Submitted On
3/1/2016 11:10:10 AM
Affiliation
sheep farmer

Upon further consideration, it is likely that domestic sheep and goats are healthier than Alaskan wild sheep. Owners feed mineral supplements which include selenium, a naturally deficient mineral in Alaska. Selenium deficiency leads to white muscle disease and death. Too much selenium can also be fatal.

It is true for animals and humans that the organisms for pneumonia are present in healthy bodies and only become a disease process when the body is stressed and stamina is decreased. Fearing the presence of domesticated, cared-for sheep and goats doesn't make sense and borders on paranoia.



Submitted By
Emery Schramm
Submitted On
2/26/2016 8:58:48 PM
Affiliation

Proposal 90 for the Alaska Board of Game needs to be revised. Eliminating the domestic sheep and goat population in Alaska will hurt farmers. There should be a regulation that domestic sheep are not allowed in wild sheep areas but to have a permit to own them is unrealistic. Most of Alaska already has a separation of the two due to where the two populations are generally located.

Submitted By
Esther Huddleston
Submitted On
3/1/2016 11:13:08 AM
Affiliation
Support Goat Farmers

Support Goat Farmers

There is no factual evidence that domesticated goats are spreading diseases to wild goats. Domesticated goats have no physical contact with wild goats. More research needs to be done on wild goats for findings on how and why wild goats are being affected by disease. It's complete ignorance blaming domesticated goats on the spread of disease without the research to support this suggestion. Children use goats for 4H, people rely on goats as a food supply and you're only hurting the farmers and the people who have goats as pets by passing unnecessary regulation without research. Please use common sense and get the facts first before over reacting by passing strict regulation.



Submitted By

gail sterling

Submitted On

2/27/2016 12:36:04 PM

Affiliation

Reject proposal 90. not science based. nor practical.

Submitted By
Garnett Coonrad
Submitted On
2/29/2016 9:43:29 AM
Affiliation

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Please do not place more burdens on owners of livestock in Alaska! Part of living the Alaskan dream, for myself and for many of my fellow Alaskans, is living with freedoms unique to this state. The abilities to live 'off the grid', raise our own food (both animal and vegetable,) and harvest wild plants and animals is a great benefit to living in The Last Frontier. There is no urgent need to protect wild animal populations from their domestic counterparts. There have been no deaths documented of wild sheep or goats due to contact with their sophisticated cousins. Therefore we have time to form a group or board that will advocate and pursue necessary protection for both livestock owners and hunters in our great state. Up to now, the natural geographical boundaries coupled with normal voluntary fencing have been enough to prevent dangerous disease transmission from domestic to wild. Please do not rush to put into effect laws limiting the rights and freedoms of Alaskan livestock owners! Thank you!

Submitted By
Georgiana Gooch
Submitted On
3/4/2016 1:22:55 PM
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None

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Please say no to Prop 90. In a time of economic stress such as we are encountering today, it simply does NOT make sense to deprive farmers of their livelihood. More importantly, it has not been proven through any sort of documentation that domesticated sheep or goats are escaping into the wild and furthermore, there is no proof that wild sheep and goats are contracting diseases from domesticated livestock. This is a proposition that has been generated by a very small group of hunters, with access to a lot of money, to satisfy their narrow interests and unconfirmed concerns. Already, TWO farms in the MatSu Borough have either quit or are selling off their farms due to the scare that Prop 90 could pass. How many will shut down once Prop 90 would be passed? It's unfathomable! Please SAY NO. THANK YOU.

Submitted By
Heather Fair
Submitted On
2/19/2016 1:05:00 PM
Affiliation
livestock owner and breeder

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Proposition 90 is neither science-based nor practical to implement in Alaska. The proponents' claims that respiratory illnesses in domesticated sheep and goats in Alaska are a threat to wild sheep and goat populations in Alaska is erroneous and misleading. To date, I am unaware of a single documented case in Alaska of cross-contamination of respiratory illnesses between domesticated and wild sheep or goats. To implement such a burdensome plan on Alaska's livestock owners would neither identify threats by existing strains in fully-contained domestic populations kept on privately-owned lands nor guarantee reduced transmission of disease to wild populations.

As a livestock owner and breeder, I strive to isolate my herd from the threat of disease carried by various species of wild and domesticated animals. I personally perform regular testing for incurable diseases such as Johne's, Caprine Arthritis Encephalitis, Caseous Lymphadenitis, and Brucellosis and practice biosecurity to increase longevity and marketability of my stock. I make these efforts voluntarily as a responsible farmer with heavy investments in my herd. Pneumonia is a transient illness with many causative factors and I am unaware of any reliable method to permanently identify and declare a herd free of such respiratory illnesses. As such, adopting the proposed regulation change would demonstrate a wasteful and unenforcible overreach of the Board of Game into areas outside the jurisdiction of the Department of Fish & Game.

If Fish and Games wishes to limit contact between domestic and wild animals, it would be more effective and appropriate to work with the Department of Natural Resources' Division of Agriculture to limit grazing permits and enforce unauthorized open ranging of domestic animals on State-owned lands. Still, there are greater demonstrated threats to wild populations where the Board may more effectively concentrate their management efforts. I ask you to reject Proposition 90 in totality.

Submitted By
Ilona Farr
Submitted On
3/4/2016 6:43:51 PM
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Please do not adopt Proposal 90 as this will have a very detrimental impact of farmers in Alaska. I am in the Butte and am interested in raising livestock. The excessive regulations in this proposal will make it impossible to have a farm without excessive costs. We are very limited in Alaska as to what we can do agriculturally and we need the ability to feed ourselves and our families. This bill would make this very difficult. I love the outdoors and wild game but we need the ability to feed ourselves and others in our state and do not need more unnecessary costly regulations.

Submitted By
J Ling
Submitted On
3/4/2016 3:03:08 PM
Affiliation

I am opposed to Proposal 90 because it will do virtually nothing to protect Dall sheep while jeopardizing the livestock industry in this State.



Submitted By
Jacalyn Watson
Submitted On
2/26/2016 11:52:43 PM
Affiliation

The singular, most amazing thing I have done for my health in recent years is making kefir from raw goat's milk. Since ancient times it has been considered the longevity food. Farmer & consumer must stand firmly against government regulation & interference in their trade. Hunting & livestock operations have co-existed for milleniums. Greed & control are most often at the heart of such intrusions. Beware lest you succeed in shutting down the simple farmer who may yet be the only hope of saving your own health from destruction.

Submitted By
jacki
Submitted On
2/1/2016 12:41:30 PM
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On requiring sheep/ goat farmers to register: I can understand requiring those in close proximity to wild populations to conduct their practices to protect wildlife. As a long time Alaskan I am regulated and "feed" enough already. I have not seen any data supporting the intrusion on my personal use of my personal land, fit her more if this is the case must everyone register? Personally, I think it's governmental overreach and unnecessary.