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2017/2018 Alaska Board of Game (101) Proposals

Statewide Proposals: (51 Proposals)

Definitions (5 Proposals)

PROPOSAL 1 – 5 AAC 92.990(a)(6) Definitions. By Jack Frost. Modify the definition of bag limit as follows:

The definition of "bag limit" should be as follows:

5 AAC 92.990(a)(6) "bag limit" means the maximum number of animals of any one game species a person may **kill or harvest** [TAKE] in the unit or portion of a unit in which the **killing** [TAKING] occurs; an animal disturbed in the course of legal hunting does not count toward a bag limit;

Comments:

We oppose Proposal 1 to change definition for bag limit to **kill or harvest** to strengthen definition. When taking a wild game animal, the method or means of its demise inferred and clearly understood through interpretation of the regulation. Pursuing a wild game is considered to be killing a wild game and is counted towards harvesting an animal. A less restrictive definition will allow hunters to hunt in the field without wild game being counted against his/her bag limit.

PROPOSAL 2– 5 AAC 92.990(a)(87). Definitions; 92.010. By Joseph Mattila. **Harvest tickets and reports; and**

92.003. Hunter education and orientation requirements. Modify the definition of youth hunt, allow youth hunters to obtain their own harvest ticket, and remove the hunter education requirement for youth hunters as follows:

There are three areas in current regulation that would need to be adjusted to accomplish change:

1) I recommend the Board of Game (board) change the definition of youth hunt to accommodate hunters starting at eight years of age (this is the minimum age allowed by state statute). Regulation:

a. Youth Hunt – a hunt limited to a child aged **8** [10]–17 and an accompanying adult that is a licensed resident hunter 21 years of age or older. If the child is a nonresident, the accompanying adult must be a resident parent, stepparent, or legal guardian of the child. The bag limit counts against both the youth and the accompanying adult.

2 Additionally, I recommend allowing hunters from the ages of eight to seventeen to obtain their own harvest ticket or drawing tag that would allow them to participate in youth hunting seasons. The current regulation specifies the need for youth ten to seventeen obtain a harvest ticket or drawing tag for youth hunts. In conjunction, I also ask the board to consider waiving the

requirement that the youth have completed a hunter education course before partaking in youth hunts, since immediate adult supervision is required for all "youth hunts". Regulation:

a. Hunters under age 10 may not have their own big game bag limit, so they may not obtain harvest tickets or permits **with the exception of youth hunters hunting in a youth hunting season.** (See "Youth hunts only" pg. 13 of the Alaska Hunting Regulations booklet.)

b. Youth hunts only: Hunter education is **not** required for youth hunters participating in "youth hunts[.]" **under the required supervision of an accompanying adult that is a licensed resident hunter 21 years of age or older. Additionally, participants in a "youth hunt" may obtain their own harvest ticket/draw permit.** (See page 35 of the Alaska Hunting Regulations booklet for "youth hunt" definition.)

Comments:

We oppose Proposal 2 to change the age to 8 years of age to participate in "Youth Hunts" and to eliminate hunter education requirement for youth. Alaska Board of Game has the authority to determine what age hunting may occur. Eight years of age is too young to participate in a youth hunt. Safety of a child hunting with a large caliber rifle should be considered, and eight-year-old child will have difficulty handling powerful rifles. Eliminating hunter education for youth to participate in youth hunts would take away the necessary safety precautions for all in the field.

PROPOSAL 3– 5 AAC 92.990(a)(68). Definitions. By Joseph Waters. Modify the definition of regulatory year as follows:

Replace regulatory year with calendar year regulations or define regulatory year such that it matches the definition for a calendar year. There would need to be an unusual regulatory year to transition from July 1 to January 1.

Example:

Regulatory Year 2018 (7/1/2018–6/30/2019) would become (7/1/2018–12/31/2018)

Regulatory Year 2019 and future years would run January 1 to December 31

For the purposes of hunts which might cross regulatory year boundaries, pick a simple definition such as "the regulatory year of the hunt will be the year of the normally scheduled open date of the first season" so that emergency season adjustments do not change the regulatory year of a hunt.

The shortened regulatory year for transitioning should prevent any hunts from having to occur twice in a regulatory year. Some hunts will "skip" a regulatory year but would still be held at their usual time. In the example above there would be no 2018 DB132, however it would still occur and be listed as a 2019 hunt.

Comments:

We oppose Proposal 3 to change Regulatory Year to calendar year. Changing regulation to calendar year would make it difficult to monitor and/or modify hunting/trapping bag limits since their season runs through the winter, Proposal 3 would also cause confusion to hunters, disrupt to State management practices as their fiscal year mirrors the regulatory year, but it would also be costly to the State of Alaska. Since the Alaska Board of Game does not have authority to make regulatory changes that require the State to incur additional costs, we oppose Proposal 3.

PROPOSAL 4 – 5 AAC 92.990(a)(26). Definitions. By Native Caucus of the Alaska Migratory Bird Co-Management Council. Change the definition of edible meat for large game birds as follows:
Regulation change:

5 AAC 92.990. Definitions.

(26) "edible meat" means, in the case of a big game animal, except a bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and hindquarters; in the case of a bear, the meat of the front quarters and hindquarters and meat along the backbone (backstrap); in the case of small game birds, except for cranes, geese, and swan, the meat of the breast; in the case of cranes, geese, and swan, the meat of the breast, **back, wings, gizzard, and heart** and meat of the femur and tibia-fibula (legs and thighs); however, "edible meat" of big game or small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably lost as a result of boning or a close trimming of the bones, or viscera;

Comments:

We support Proposal 4 to change the definition of edible meat for large game birds to add back, wings, gizzard and heart to the list. There is prized edible meat on back of large game birds, and the heart and gizzard are edible. Wings should be used for dancing feathers, and other traditional adornment practices. Excluding back, wings, gizzard, and heart from the definition of edible meat in large game birds, a lot of meat and other harvestable parts of the birds are wasted.

PROPOSAL 5 – 5 AAC 92.990. Definitions. Alaska Department of Fish and Game. Change the definition of a moose antler point/tine as follows:
5 AAC 92.990(a)(13) "brow tine" means a tine emerging from the first branch or brow palm on the main beam of a moose antler; the brow palm is separated from the main palm by a wide bay; a tine originating in or after this bay is not a brow tine; **an antler point or tine originating within two inches from the base, and less than three inches in length, will not be counted as a brow tine;**

5 AAC 92.990(a)(46) "moose antler" definitions:
(A)"50-inch antlers" means the antlers of a bull moose with a spread of 50 inches or more measured in a straight line perpendicular to the center line of the skull;
(B) "spike-fork antlers" means antlers of a bull moose with only one or two tines on at least one antler; [AN ANTLER POINT OR TINE ORIGINATING WITHIN TWO INCHES FROM THE BASE, AND LESS THAN THREE INCHES IN LENGTH, WILL NOT BE COUNTED AS A

TINE,] male calves are not considered spike-fork bulls; **spike-fork bulls can be either spike and/or fork configuration;**
(C) "spike" means antlers of a bull moose with only one tine on at least one antler; for the purposes of this subparagraph, male calves are not considered spike bulls;
(D) "fork" means antlers of a bull moose with only two tines on at least one antler;

5 AAC 92.990(a)(61) "point" means any antler projection that is at least one inch long, and that is longer than it is wide, measured one inch or more from the tip; **an antler point or tine originating within two inches from the base, and less than three inches in length, will not be counted as a tine;**

5 AAC 92.990(a)(80) "tine" has the same meaning as "point";

Comments:

We support Proposal 5 to change antler tine and spike-fork bull definition to make it easier for hunters to distinguish legal bull moose from an illegal bull moose. Tines should be more three inches in length and two inches from the base so that hunters can easily determine antler size. The spike-fork bull definition will add clarity to the definition when adding that the antlers "can be either spike and/or fork configuration", rather defining legal configuration based on the current tine definition.

Unlawful Methods

PROPOSAL 6– 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.
By Copper Basin Fish and Game Advisory Committee. Allow the incidental take of up to two furbearers per year during an open season for other furbearers as follows:

Either:

"Allow two (2) total incidental furbearer catch by trapping per licensed trapper per year for any species that have a "no limit" bag limit. The incidental closed season catch must have been taken in traps set for a species that still has an open season.

Or:

"If a trapper incidentally takes a furbearer during a closed season in a trap that is set for a furbearer species that is still open, the Department of Fish and Game (ADF&G) may issue a total of two (2) incidental take tags per licensed trapper per year only for species that have a "no limit" bag limit. The trapper must report these within 30 days to ADF&G for tagging, and sealing if required. The trapper may then keep the incidentally taken furbearer.

Comments:

We support Proposal 6 to allow trappers to keep up to two incidentally caught furbearers while using a trap. Sometimes trappers incidentally catch furbearing species whose season is closed while trapping for those with an open season. Not only does Proposal 6 reduce wanton waste, the income from trapping supplements the trapper's household and allows them to provide for

themselves and their families. Trappers in rural areas need to have the extra income. If the fur is not sold for cash, the incidental harvest could be used for clothing.

PROPOSAL 7– 5 AAC 92.095 Unlawful methods for taking furbearers; exceptions. By John Frost. Allow the use of bow and arrow to harvest beaver under a trapping license statewide as follows:

Allow harvest of beaver with bow and arrow statewide.

Comments:

We oppose Proposal 7 that seeks to allow the use of a bow and arrow to harvest beaver under a statewide trapping license. Litters of beavers may be incidentally injured when arrows are shot into water. Arrows may not be recovered which poses a risk to other resource users (i.e. summer outdoor enthusiasts). The unrecovered arrows may also harm beavers, migratory birds, and wild game who use the waterways.

Note: Alaska Statute 16.05.783 only allows same day airborne taking of wolves and wolverine as part of a predator control program authorized by the Board of Game.

PROPOSAL 8 – 5 AAC 92.095. Unlawful methods for taking furbearers; exceptions. By John Frost. Remove the same day airborne restrictions for taking wolf and wolverine with a trapping license as follows:

Allow shooting a wolf or wolverine during trapping season on the same day airborne as long a person is more than 300 feet from his airplane and has a trapping license.

Comments:

No comments. Alaska Board of Game does not have authority to adopt this proposal.

PROPOSAL 9 – 5 AAC 92.090. Unlawful methods of taking fur animals; and 92.095. Unlawful methods of taking furbearers; exceptions. By

Upper Tanana/Fortymile Fish and Game Advisory Committee. Modify the land and shoot requirements for harvesting coyotes as follows:

5 AAC 92.090. Unlawful methods of taking fur animals …

(3) a person who has been airborne may not take or assist in taking a fur animal, **except coyotes,** until after 3:00 a.m. following the day in which the flying occurred; this paragraph does not apply if the person is at least 300 feet from the airplane at the time of taking.

and

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions …

(8) a person who has been airborne may not use a firearm to take or assist in taking a wolf or wolverine until after 3:00 a.m. on the day following the day in which the flying occurred; or in

taking [A COYOTE,] arctic fox, red fox, or lynx, unless that person is over 300 feet from the airplane at the time of the taking; this paragraph does not apply to a trapper using a firearm to dispatch an animal caught in a trap or snare;

Comments:

We support Proposal 9 to "modify the land and shoot requirements for harvesting coyotes".

The Department does not count coyotes, however, as of late, hare populations have been favorable to abundant coyotes populations. Hare and coyote populations can be correlated and, since hare populations are now at a peak, it is likely that coyote populations are as well.

PROPOSAL 10 – 5 AAC 92.085(8). Unlawful methods of taking big game; exceptions. By Mike McCrary. Repeal the restrictions on the use of aircraft for taking big game as follows:

Repeal 92.085(8) or Repeal (A), (D), and (G).

Comments:

We oppose Proposal 10 to repeal 92.058(8) or repeal (A), (D), and (G) as a Statewide proposal. Each region has different regulations regarding same day airborne take of big game. This proposal should not be a statewide proposal. Taking of wolverine and wolf with use of aircraft while hunting or trapping will be eliminated with the way this proposal is written.

PROPOSAL 11 – 5 AAC 92.085(8). Unlawful methods of taking big game; exceptions. By

Alaska Professional Hunters Association.

Modify the restrictions on the use of aircraft for sheep hunting as follows:

5 AAC 92.085 Unlawful methods of taking big game; exceptions….(8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00 a.m. following the day in which the flying occurred, and from August 10 – September 20 aircraft may not **intentionally approach any sheep or group of sheep closer than 1000 feet, or repeatedly approach them in a manner that results in them altering their behavior.** [BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING THE OPEN SHEEP HUNTING SEASON, HOWEVER, AIRCRAFT OTHER THAN HELICOPTERS MAY BE USED BY AND FOR SHEEP HUNTERS TO PLACE AND REMOVE HUNTERS AND CAMPS, MAINTAIN EXISTING CAMPS, AND SALVAGE HARVESTED SHEEP.] **This prohibition does not intend to prohibit any flight maneuvers that are necessary to make an informed and safe landing in the field.**

Comments:

No comment, see comments under Proposal 12.

PROPOSAL 12 – 5 AAC 92.085(8). Unlawful methods of taking big game; exceptions. By Jack Frost. Remove the restrictions on the use of aircraft for sheep hunting as follows:
Simply rescind the regulations created by passing the Board of Game generated Proposal 207.

Comments:

We support Proposal 12 to "repeal 92.085(8), restrictions on the use of aircraft for taking sheep because law enforcement would be challenged to enforce the use of aircraft while hunting for sheep. Transporting hunters to sheep hunting camps or to leave their sheep hunting camps with an aircraft is allowed. No one will know if hunters are hunting sheep or not, this regulation cannot be enforced. Pilots may have to circle several times to land aircraft safely, which could be determined to be a violation. To law enforcement officials, it may appear that the hunters are spotting sheep and it would difficult to determine an illegal act in court.

PROPOSAL 13– 5 AAC 92.080(7). Unlawful methods of taking game; exceptions. By Alaska Wildlife Troopers. Clarify the regulation that prohibits the use of a "cellular or satellite telephone" to take game as follows:

Current regulation states that you may not use a "cellular or satellite telephone" to take game. Possible solutions might be that the use of cellular or satellite devices are exempted for certain use. Other possibilities might include re-affirming that cellular or satellite phones cannot be used for any reason to take game.

Comments:

We support Proposal 13 to clarify "regulation that prohibits the use of a cellular or satellite telephone to take game". . Community Subsistence Hunters have to report a moose harvest within 24 hours so they should be allowed to call ADF&G to report, if they want to continue to hunt for other species.

Since law enforcement currently has a problem interpreting this regulation, it can be assumed that hunters do as well. Making regulations clear to everyone would make this regulation understandable by all and therefore enforceable.

PROPOSAL 14– 5 AAC 92.080(7). Unlawful methods of taking game; exceptions. By Stephanie McCabe. Prohibit the taking of bears in dens as follows:

The solution would be to stop the innocent slaughter of bears and their cubs in their dens.

Comments:

We oppose Proposal 14. While we do not kill cubs and female bear with cubs during winter months, Interior Athabascans do as a customary and traditional practice. The Interior Athabascans should be able to continue their way of life to harvest bears during the winter months.

PROPOSAL 15– 5 AAC 92.260. Taking cub bears and female bears with cubs prohibited. By

Alaska Chapter One Protest
Remove the exception for taking cub bears and female bears with cubs as follows:

Taking cub bears and female bears with cubs prohibited: A person may not take a cub bear or a female bear accompanied by a cub bear**.** [, EXCEPT THAT A BLACK BEAR CUB OR A FEMALE BLACK BEAR ACCOMPANIED BY A CUB BEAR MAY BE TAKEN BY A RESIDENT HUNTER
(1)UNDER CUSTOMARY AND TRADITIONAL USE ACTIVITIES AT A DEN SITE
(A)FROM OCTOBER 15 THROUGH APRIL 30 IN (I) UNIT 19(A);
(II) UNIT 19(D), THAT PORTION OF THE KUSKOKWIM RIVER DRAINAGE UPSTREAM FROM THE SELATNA AND BLACK RIVER DRAINAGES; (III) UNITS 21(B), 21(C), AND 21(D); AND
(IV)UNIT 24; AND (B) FROM DECEMBER 1 THROUGH THE LAST DAY OF FEBRUARY IN UNIT 25(D); AND
(2) FROM JULY 1 THROUGH NOVEMBER 30 AND MARCH 1 THROUGH JUNE 30 IN UNIT 25(D).]

Comments:

We oppose Proposal 15. While we do not kill cubs and female bear with cubs during winter months, Interior Athabascans do as a customary and traditional practice. The Interior Athabascans should be able to continue their way of life to harvest bears during the winter months.

PROPOSAL 16– 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Val Gamerman, Allow the use of high-powered air guns during regular firearms and muzzleloader big game hunting seasons as follows:

Define high-powered air guns as the following:

- "Air gun" means a device that launches a pellet or bullet or other projectile like an arrow through the use of compressed air.
- Minimum .357 minimum caliber
- Minimum muzzle energy of 100 foot pounds (FPE)

Expressly allow using high powered air guns during regular firearms and muzzleloader hunting

seasons.

Comments:

We oppose Proposal 16 to "allow the use of high-powered air guns during regular firearms and muzzleloader big game hunting seasons". Air guns, defined as a minimum .357 minimum caliber muzzleloader rifle, should not be hunting rifles. Other high powered rifles are more than sufficient for hunting. Wounding large game will occur if high-powered air guns are allowed when hunting.

PROPOSAL 17– 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By The Alaskan Bowhunters Association**.**

Prohibit the use of airbows for taking big game as follows:

You may NOT take big game with an "airbow,"

Or, "Airbows" are not legal for use in any archery only area, archery season or special archery hunt.

Comments:

We support Proposal 17 to "prohibit the use of airbows for taking big game". Another method of using bow and arrows isn't necessary for hunting hunt big game and air bows may cause wounding of big game, in which wanton waste will become more prevalent. Allowing more archery will create additional special weaponry hunts.

Falconry (Proposals 18-23)

Hunting Permits & Harvest Tickets (9 Proposals)

PROPOSAL 24– 5 AAC 92.044(10). Permit for hunting bear with the use of bait or scent lures. By Aaron Bloomquist. Define the term "equipment" for bear baiting as follows:
5 AAC 92.044. Permit for hunting bear with the use of bait

(10) a permittee must remove bait, litter, and equipment from the bait station site when hunting is completed; **for the purposes of this section "equipment" is defined as barrels, tree stands, game cameras, and other items that may be left in the field for use at a bear bait station. Tree stands may be left in the field year-round with permission of the landowner or land manager.**

Comments:

We oppose Proposal 24 to determine define **"**equipment" as barrels, tree stands, game cameras, and other items that may be left in the field for use at a bear bait station. Tree stands may be left in the field year-round with permission of the landowner or land manager". All equipment must be removed from bait station. Garbage will soon be left in the field if the Board of Game passes this proposal. Bear baiters shouldn't be allowed to leave barrels, tree stands and game cameras or other items in the field.

PROPOSAL 25– 5 AAC 92.010. Harvest tickets and reports. By Dan Montgomery. Require harvest tickets for all brown bear hunts statewide as follows:

Create a harvest ticket for brown bear and require it to hunt them statewide.

Comments:

We oppose Proposal 25 to "require harvest ticket for brown bears on a statewide basis". Permits work fine. Each region in the State is different and regulations should be flexible to fit the resource and management in each region.

If the regulation were revised, it would State funding would be needed to set up a statewide harvest ticket system for brown bears. ABOG doesn't have authority to pass regulations that cause the State to incur costs.

PROPOSAL 26– 5 AAC 92.050. Required permit hunt conditions and procedures. By Frank Noska IV. Animals harvested under auction and raffle permits will not count against the regular bag limit as follows:

Amend 5 AAC 92.050 to include a new subsection to read:

Permits issued under AS 16.05.343 do not count against the regular bag limit for nonresidents or residents for any big game species.

Comments:

We support Proposal 26 with amendment to allow "permits issued under AS 16.05.343 do not count against the regular bag limit for residents for any big game species". Auction and raffle permits should not count against regular bag limit for residents. Auction and raffle permits should, however, count against nonresidents. Nonresidents make a decision to purchase hunting harvest tickets and they do so for the pleasure they take in hunting. The great majority, if not all of the Lower 48 hunters take their wild game trophy home with them and leave the meat here in Alaska. They do not need the meat (as evidenced by their practice), which means they don't need to have more than one opportunity to harvest wild game in Alaska.

(Proposal 27-28 Drawing permit proposals)

Note: The Board of Game repealed this requirement at the February 2017 Interior/Northeast Arctic Region Meeting.

PROPOSAL 29– 5 AAC 92.130. Restrictions to bag limit. By Christ Harper. Remove the bag limit restriction for resident relatives accompanying nonresident relatives within the second degree of kindred as follows:

I ask the Board of Game to remove this "shared bag limit" restriction.

Comments:

No comments on Proposal 29, ABOG took action on "shared bag limit" at the February 2017 Interior/Northeast Arctic Regional Meeting.

PROPOSAL 30-37/40 Drawing Permit Proposals

PROPOSAL 38 – 5 AAC 92.130. Restrictions to bag limit. By Lewis Bradley. Implement a sliding scale bag limit for Dall sheep hunting for residents as follows:

I propose a resident sliding scale harvest based on age of the ram harvested such as: A Resident Ram Harvest Age Index. If a harvested ram is ten years or older, the hunter may hunt sheep the following year. If the ram is nine years old, the hunter cannot hunt sheep the following year (sits out a year). If the ram is eight years old, the hunter cannot hunt sheep for the next two years (seasons). If the ram is seven years old, the hunter cannot hunt sheep for three years. If the ram is six years or younger, the hunter cannot hunt sheep for five years. In each case, age is the criterion for when they may get a tag to hunt sheep again, regardless of whether it is full curl or not. Full curl would still apply for a legal sheep and because of the sliding scale penalizing hunters for taking younger rams even though legal by full curl standards or the eight annuli requirements, hunters would be more selective in order to be able to hunt without a break. This does not directly diminish hunter opportunity, but requires hunters to select towards older rams that are more likely to succumb to winter mortality.

The positives from such a system are: 1. Creates more selectivity, 2. Leaves more sheep on the mountain, 3. Encourages shooting older rams, 4. Strongly discourages shooting of sub-legal and younger rams, 5. Those that choose to harvest a young ram that is legal by full curl standards, shoot knowing that if it has less than ten annuli, they will have to sit out X number of years depending on the age of the ram. This will help towards leaving more mature rams on the mountain and allow some rams that become large at a younger age to possibly survive another year or two. 6. It still allows opportunity based on choice by the hunter and may help with crowding since some will be sitting out for having harvested a younger ram. 7. It could also be managed such that when a hunter harvests a sub-legal ram which is his first ram ever harvested, he could keep the ram provided it was over 7/8 curl and at least seven years of age. This is more lenient than the current regulation, but would only apply for a hunter's first ram. This would cut down on litigation for the state, help keep from having rams left in the field, create better relations with new hunters and at the same time be restrictive since they will have to sit out a number of years based on the ram's age. To further cut down on hunters leaving sheep in the field, convicted offenders of such an offense would receive a lifetime ban on hunting Dall sheep in Alaska.

If this Age Index Harvest Scale seems too harsh, the age side could be slid up one notch to read: If a hunter harvests a nine year or older ram, the hunter would be eligible to hunt sheep the following year, etc., but I personally would prefer the original scale. If this scale approach appears to have merit, relaxing it would be better than discarding it altogether.

Finally, and this has nothing to do with this proposal, but does address nonresidents harvesting fewer rams than they currently harvest, which is 45% some years. It is time that the GCP (Guide Concession Program) be resurrected and supported by such organizations as RHAK (Resident Hunters of Alaska), APHA (Alaska Professional Hunter's Association) and WSF (Wild Sheep Foundation), and get HB 158 passed. This would give the needed control of too many guides in an area and unlimited harvest by nonresidents. I believe the only way to avert going to an all draw for sheep is to go to the age index I am proposing and having a Guide Concession Program. If we do nothing and go to an all-draw for sheep, everyone loses. Nonresidents will go to a

percentage allocation and residents will seldom draw the area they really would like to hunt. We have all been too selfish and the time has come to act responsibly for the sake of the resource and quit being greedy.

Comments:

We do not support Proposal 38 to "Implement a sliding scale bag limit for Dall sheep hunting for residents". Proposal 38 is too complicated and isn't necessary. Furthermore, it is doubtful that this regulation modification will help the Dall sheep ram populations or hunters. Age of rams will not alleviate complications, it will only ambiguity to the regulations and confusion in the field.

PROPOSAL 39– 5 AAC 5 AAC 92.130. Restrictions to bag limit. By Aaron Bloomquist. Implement a sliding scale bag limit for Dall sheep hunting for residents and nonresidents as follows:

5 AAC 92.130. Restrictions to bag limit

Modify the statewide Dall sheep bag limit as follows

(k)Statewide Dall sheep bag limit, unless otherwise provided in 5 AAC 85-92: One "full-curl ram" ten years old or older annually, however, if the ram taken is under ten

years old	**Years off from sheep hunting**	**Residents**	**Nonresidents**
9 year old	**1**	**4**	
8 year old	**2**	**6**	
7 year old	**3**	**8**	
6 years or younger	**4**	**10**	
Any sub legal	**5**	**lifetime**	

Comments:

We do not support Proposal 39 to "Implement a sliding scale bag limit for Dall sheep hunting for residents". Proposal 39 is too complicated and isn't necessary. Furthermore, it is doubtful that this regulation modification will help the Dall sheep ram populations or hunters. Age of rams will not alleviate complications, it will only ambiguity to the regulations and confusion in the field.

(Proposal 40 Drawing Permit Proposal)

PROPOSAL 41 – 5 AAC 92.012. Licenses and tags. By Native Caucus of the Alaska Migratory Bird Co-Management Council. Exempt rural subsistence hunters from the requirements for obtaining a waterfowl conservation tag as follows:

The Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC) would like the Alaska Board of Game to consider establishing an exemption from the regulation requiring all hunters under the age of 18 to purchase an Alaska Waterfowl Conservation Tag (State Duck Stamp). This would exempt rural Alaska subsistence hunters from having to purchase the waterfowl conservation tag in order to participate in the federal spring-summer subsistence harvest season for migratory birds.

Comments:

We support Proposal 41 to exempt rural subsistence hunters in certain areas in the State of Alaska who are over the age of 18 from the requirement to purchase a waterfowl conservation tag where spring/summer subsistence hunts occur. Alaska Natives have customary and traditionally hunted migratory birds to supplement food sources. Under federal management Alaska Natives do not have to purchase waterfowl conservation tags so the State of Alaska should change their regulations to regulations mirror the federal regulations and to exempt rural hunters from purchasing duck stamps in certain areas in the State of Alaska, where summer/spring hunt occurs.

PROPOSAL 42 – 5 AAC 92.069. Special provisions for moose drawing permit hunts; 92.XXX. New regulation. By Resident Hunters of Alaska. Remove the nonresident guide requirement for moose and black bear hunts as follows:

Remove moose and black bear from the list of must-be-guided species.

Comments:

We oppose Proposal 42 to "remove the nonresident guide requirement for moose and black bear hunts". Nonresident hunters should have a guide to hunt moose and black bear. Nonresident hunters need to have a guide to hunt large game with to ensure safety of other hunters in the field as well as the safety for the nonresident hunters and the resources sought after.

PROPOSAL 44 – 5 AAC 92.011. Taking of game by proxy. By Becky Schwanke. Allow the take of moose by proxy in moose hunts having antler restrictions as follows:

Allow proxy hunting for antler restricted Bull Moose hunts statewide.

Comments:

We oppose Proposal 44 to allow the take of moose by proxy in moose hunts having antler restrictions on a statewide basis. Proxy hunting in some regions of the State of Alaska could be allowed, but not in Game Management Unit 11 or Game Management Unit 13.

Hunters that drive to rural hunting areas to hunt may abuse the system by over-harvesting moose. Proxy hunting regulations were changed several years ago because hunters proxy hunted for many people, and often over-harvested caribou and moose.

In 2017 the BOG decided not to repeal the regulatory requirement that Tier I caribou hunters in GMU 13 may only hunt for moose in GMU 13. Many people proposed eliminating this restriction because they thought that it would reduce moose hunting crowding and pressure in GMU 13. Data showed that it was the opposite. Allowing proxy hunters in GMU 13 to harvest moose will not alleviate hunter impact in GMU 13. It will undoubtedly increase hunters in the field.

Possession & Transportation (5 Proposals)

PROPOSAL 45– 5 AAC 92.171. Sealing of horns and antlers. By Homer Fish and Game Advisory Committee. Require antlers be sealed for all antler restricted hunts as follows:

All moose hunters in areas where there are antler restrictions must have horns sealed and measured by ADF&G or authorized representative within (x) days of harvest.

Comments:

We oppose Proposal 45 to "require antlers be sealed for all antler restricted hunts" on a statewide basis. Only in sub-regions of the State of Alaska where regulations are in place for antler restriction hunts should hunters be required to have antlers sealed by the Department of Fish and Game. Each region in the State of Alaska has different hunting regulations that is suitable for their region. This proposal is one that is not a fit for all regions in the State of Alaska.

PROPOSAL 46 – 5 AAC 92.135. Transfer of possession. By Upper Tanana/Fortymile Fish and Game Advisory Committee.

Modify the transfer of possession regulations as it pertains to guided and transported hunters as follows:

Add a section (d) to 5 AAC 92.135: (d) When a licensed guide or transporter, who is under contract by a person (hunter), possesses game taken by that person (hunter), for the purpose of transportation, that game will be considered to remain in the possession of that person (hunter).

Comments:

We are neutral on Proposal 46 to "modify the transfer of possession regulations as it pertains to guided and transported hunters. Big Game Commercial Services Board (BGCSB) has regulations in place regarding transporting wild game meat. Proponent should work with BGCSB to refine regulations on transporting wild game.

Under Big Game Commercial Services Regulations, 12 AAC 75.440. (8) Professional Ethics Standards for Providers of Transportation Services, it states that Transporter shall "endeavor to transport all meat of animals taken by clients, in accordance with state statutes and regulations".

PROPOSAL 47 – 5 AAC 92.135. Transfer of possession. By Alaska Professional Hunters Association.

Modify the transfer of possession regulations as it pertains to guided and transported hunters as follows:

(a) Unless the person who took the game is accompanying the person possessing the game, until all salvage is completed as required under this chapter, a person who gives or receives game or a part of game shall immediately furnish, upon demand by a peace officer a statement signed by [BOTH] **either** [PARTIES] **party** describing the following:

(1)The names and addresses of each person who gave or received the game;

(2)When and where the game was taken;

(3)What game or part of game was transferred; and

(4)The hunting license number of the person who took the game.

(b)Upon receipt of game or a part of game, the recipient shall then be responsible to salvage the edible meat for human consumption.

(c)A person giving, shipping, or receiving game or parts of game shall allow inspection of that game or parts of game upon request from a peace officer of the state or a federal fish and wildlife agent.

Comments:

See comments under Proposal 46.

Note: The Board of Game does not have authority to impose regulations upon guides.

PROPOSAL 48 – 5 AAC 92.135. Transfer of possession. By Resident Hunters of Alaska. Modify the transfer of possession regulations to include reporting requirements as follows:
We would like the Board of Game to consider other options as well, but here is one solution:

Amend 5 AAC 92.135 to include a new subsection:
(d) if the meat from a guided hunter is transferred, a record must be kept by the guide of all transfers and turned into the Department of Fish & Game within 30 days of the close of the season.

Comments:

No comment, guided hunts are under authority of Big Game Commercial Services Board.

PROPOSAL 49– 5 AAC 92.031. Permit for selling skins, skulls, and trophies; and 92.200. By Alaska Department of Fish and Game. **Purchase and sale of game.** By Alaska Department of Fish and Game.

Require a permit before brown bear skulls and hides with claws attached can be sold as follows:

5 AAC 92.031 is amended by adding a new section to read:

(g) a person may sell, advertise, or otherwise offer for sale a brown bear skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two bears per regulatory year only after obtaining a permit from the department.

5 AAC 92.200(b)(1) is amended to read:
(1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear**;** [,] and except skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year **by permit issued under 5 AAC 92.031**;

Comments:

We support Proposal 49 to "require a permit before brown bear skulls and hides with claws attached can be sold by permit issued under 5 AAC 92.031(g) - a person may sell, advertise, or otherwise offer for sale a brown bear skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two bears per regulatory year only after obtaining a permit from the department.

Loop hole in regulations should be changed so Alaska Department of Fish and Game can keep track of brown bear's hides and skulls that are sold. Unlawful selling of brown bear's skull and hides may occur if regulations are not changed.

Intensive Management & Predation Control Areas (2 Proposals)

Note: The Board of Game cannot adopt a regulation that is inconsistent with state statute. Alaska Statute 08.54.750(e) states that guides can only conduct hunts for the big game species identified by the Board of Game as the cause of the depletion or reduction of productivity of a big game prey population.

PROPOSAL 50 – 5 AAC 92.116. Special provisions in predation control areas. By Aaron Bloomquist. Provide clarification for allowing guides to register additional guide use areas for taking predators, and to restrict the take of predators in those guide use areas as follows:

Provide clarification for the "extra guide use area provision" in AS 08.54.750 as follows:

5 AAC 92.116. Special provisions in predation control areas.

…

(e)A guide may register extra guide use areas under AS 08.54.750(f) in all IM program areas, and for all predator species within the "game management unit or portion of a game management unit where the Board of Game has identified predation by wolf, black bear, brown bear, or grizzly bear as a cause of the depletion of a big game prey population or a

reduction of the productivity of a big game prey population"; unless the board specifically eliminates an area or species within an area from this provision.

(1)Unit 9, brown bear may not be taken in an extra guide use area under AS 08.54.750(f)

(2) Units 7 and 15, brown bear and black bear may not be taken in an extra guide use area under AS 08.54.750(f)

Comments:

No comments. Alaska Board of Game does not have authority to change "extra guide use area provision in AS 08.54.750.

PROPOSAL 52 – 5 AAC 92.106. Intensive management of identified big game prey populations; 92.110. Control of predation by wolves; and 92.115. Control of predation by bears. By Resident Hunters of Alaska. Prohibit nonresident hunting of moose and caribou under intensive management until harvest and population objectives are met as follows:
Nonresident hunting shall not be allowed for any moose or caribou population under a current Intensive Management Predation Control Program until the minimum Intensive Management population or harvest objectives for that population has been reached.

What is the issue you would like the board to address and why? Nonresident hunting opportunity in areas under Intensive Management Predation Control Programs.

Intensive Management (IM) Predation Control Implementation Programs to restore the abundance of prey species as necessary to achieve human consumptive use goals are intended to benefit resident Alaskans.

Resident Hunters of Alaska supports IM efforts to achieve these goals.

Comments:

We oppose Proposal 52 to prohibit nonresident hunting of moose and caribou under intensive management until harvest and population objectives are met. It is unlawful for ABOG to consider opening a subsistence hunt, after determining that IM population has been met. We have customary and traditional uses and subsistence preference over moose and caribou. Also moose and caribou hunting seasons in Alaska are longer just for residents than Nonresidents. Resident hunters have less moose antler restrictions than Nonresident moose hunts.

Cultural & Subsistence Uses (7 Proposals)

PROPOSAL 53 – 5 AAC 99.025(a)(12). Customary and traditional uses of game populations. By Alaska Department of Fish and Game. Reevaluate the customary and traditional use finding for migratory game birds statewide as follows:

The proposal requests that the Board of Game (board) review the information provided in the customary and traditional use worksheet provided by ADF&G as well as other available information, including information from the public, to determine if populations of migratory game birds (ducks, geese, swans, snipe, and cranes) statewide support customary and traditional subsistence uses. If a positive determination is made, the regulation would read as follows:

5 AAC 99.025. Customary and traditional uses of game populations (a)

SPECIES & UNIT	**FINDING**	**AMOUNT REASONABLY NECESSARY FOR SUBSISTENCE USES**
(12) Small Game		
(X)Migratory game birds positive		
All units with a harvestable portion except within the nonsubsistence areas as defined in 5 AAC 99.015.		

Comments:

We support Proposal 53 to have the ABOG determine a positive finding for migratory birds on a statewide basis, except within the non-subsistence areas as defined in 5 AAC 99.015.

Geese, ducks and swans and other migratory birds are customary and traditional food sources to all Alaska Natives. We have hunted and killed migratory birds to supplement food sources. We use feathers for dancing, eat the gizzards, heard and meat of migratory birds.

PROPOSAL 54– 5 AAC 92.070. Tier II subsistence hunting permit point system. By Kenneth Manning. Modify the Tier II subsistence hunting permit point system as follows:

Eliminate the Tier II eligibility rural preference application point-scoring questions on:

1. Location of purchase of most of applicant's gasoline and groceries during the last year; and

2. Number of days in the local hunt area spent on subsistence activities.

Change to: (1) Eligibility questions on number of the applicant's related **living**-generations that have and will benefit from applicant's subsistence harvests; and

(2) applicant's total reliance and dependency on all their subsistence use activities no matter where applicant does subsistence hunt-fish-pick berries in the state; and

(3) the number of years the applicant has hunted or applied for this particular Tier II hunt; based on the following:

(1)Count each living generation as one each for applicant and spouse, plus one generation for children, plus one for grandchildren, plus one for parents of applicant, plus one for grandparents, plus one for great grandparents, plus one for great grandchildren, plus one for generation of

living nieces and nephews, and plus one great nieces and nephews. This will help assure compliance with 5 AAC 99.010 defining long-time customary and traditional subsistence use of at least one generation, i.e., ten years or more.

(2) Consider all the subsistence activities use days for all hunt-fish-pick berries subsistence reliance and dependency of the applicant, no matter where applicant lives in the state or exercised subsistence use rights.

(3) Consider applicant's number of years for hunting or applied for the Tier II species hunt being applied for, along with any other Tier II and Tier I general hunts for other big game species hunted or applied for and used for subsistence reliance and dependency.

Comments:

We oppose Proposal 54 to modify Tier II questions on "location of purchase of most of applicant's gasoline and groceries during the last year and number of days in the local hunt area spent on subsistence activities".

ABOG must implement Tier II for a wildlife population when there is not enough harvestable surplus to provide a reasonable opportunity for all subsistence uses of that population. The subsistence statute requires that eligibility for a Tier II permit shall be based on 2 criteria: (i) the customary and direct dependence on the Tier II game population by the subsistence user for human consumption as a mainstay of livelihood; and the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated. The scoring system in this proposal would not accurately, fairly or legally measure these statutory criteria.

We oppose allowing points for each living generation to apply to Tier II subsistence hunting permit point system. The current regulatory scoring system measures "customary and direct dependence on the game population by the subsistence user for human consumption as a mainstay of livelihood" far more accurately than how many living relatives an applicant has.

Obtaining points for living relatives for Tier II subsistence hunting permit points just doesn't make sense. It would be unfair, if grandparents have passed on for a few individuals, while other households may still have living grandparents. Or if a parent or parents have also passed, some applicants would not receive points for deceased relatives.

The proposal's suggestion to "consider all the subsistence activities use days for all hunt-fish-pick berries subsistence reliance and dependency of the applicant, no matter where applicant lives in the state or exercised subsistence use rights" does not measure the customary and direct dependence for subsistence uses on the wildlife population that is the subject of Tier II scoring. Measuring dependence on a moose population in a different hunting GMU does not measure dependence for the moose population that is the subject of the application. Moreover, the proposal mistakenly asks that the current scoring system be applied no matter where an applicant lives and that is of course exactly how the regulations are implemented now, residence is not a factor.

The proposal's third suggestion suffers from the same problem in suggesting that hunting for any population statewide should count for measuring dependence on the particular moose population

at issue. Considering how many years an applicant has applied for Tier II and other Tier I or Tier II hunt does not prove reliance and dependency upon the resource, it just proves that an individual has filled out a Tier I or Tier II application for an indiscriminate number of years. Also, the suggestion that only hunting be counted for scoring ignores the fact that many subsistence users fully depend on a population for their mainstay of livelihood, but may not be able to do the hunting for that population, for example elders, widows and the disabled. Instead they share in the other parts of the subsistence way of life, such as processing, sharing knowledge, teaching the youth, and in turn they share in the harvest that others in their communities provide.

Proposal 55 – 5 AAC 92.019. Taking big game for certain religious ceremonies. By Fairbanks Fish and Game Advisory Committee. Combine the regulations allowing the take of big game for religious ceremonies and ceremony potlatches as follows:

Amend: 5 AAC 92.019. Taking big game for certain religious ceremonies **and ceremony potlatches** [CEREMONIES].

(a) The hunting and taking of game specie having a positive finding in 5 AAC 99.025, outside the seasons or bag limits established in 5 AAC 85, for use in this state as food in customary and traditional Alaska Native funerary, [OR] mortuary religious **or potlatch** ceremonies [WITHIN 12 MONTHS PRECEDING THE CEREMONY IS AUTHORIZED IF] consistent with sustained principles.

(b) ….

(c) A written permit from the department is [not] required for taking **big** game under this section, [except that in nonsubsistence areas, described in 5 AAC 99.015, and the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah Community Harvest Area defined in 5 AAC 92. 074(d),] a ceremonial **or potlatch** harvest report form, provided by the department, must be obtained and jointly completed by the hunter and the tribal chief, village council president, clan leader, traditional Native head of family, or clan leader's designee for the village associated with the customary and traditional Alaska Native funerary, [or] mortuary religious ceremony, **or potlatch.**

(d) the department may limit the amount of big game to be harvested

(1) by unit or area

(2) by sex

(3) females with offspring

(4) amount of big game

(5) time frame

(i) reporting of harvest big game will be reported no later than 15 days after harvest or permit requirement.

(ii) Permit must be in possession of hunter/hunters and upon request from a peace officer of the state or authorized department person. A permittee may not refuse to present it or any big game in possession.

[(D)] Eliminate all of D…….`

(e) keep as is…..

(1) keep as is….

(2) the person must possess a valid hunting license.

[(2)] **(3)** the hunting or taking was authorized under this section and the meat was used in a customary and traditional Alaska Native funeral [OR] mortuary religious **potlatch** ceremony; and

[(3)] **(4)** if the person took big game, the requirement of (d) of this section have been met.

(g) keep (g) as is written…

Comments:

We oppose Proposal 55 to combine the regulations allowing the take of big game for religious ceremonies and ceremony potlatches. The take of big game for religious ceremonies needs to be kept separate from other ceremonial potlatches. Regulation 5 AAC 92.019 has special meaning to Alaska Natives. A potlatch is an honor a deceased person. This regulation is protected under the First Amendment of the US Constitution and Article 1, Section 4 of the Alaska State Constitution. Both laws protect the free exercise of religion. This regulation should not be combined with other ceremonial potlatches, 5 AAC 92.017, 5 AAC 92.053 and 5 AAC 92.055, each of these regulations serves a purpose, that is different from 5 AAC 92.019.

Note: The following proposal requests regulatory changes that are both statewide and specific to the Central/Southwest Region (see Proposal 98). The board will take public testimony at the November 2017 Statewide Regulations Meeting, and may defer taking final action on the proposal until the February 2018 Central/Southwest Region Meeting.

PROPOSAL 56 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By Ahtna Tene Nene'.

Modify the community subsistence harvest permit conditions as follows:
Amend 5 AAC 92.072. Community subsistence hunt area and permit conditions:

Throughout the regulation the term/phrase "a resident of a community or member of a group" is used to define those participating in the community subsistence hunt (CSH). The regulations should be amended to clarify that the CSH is for "communities", not simply any "group" of individuals who are Alaska residents. The use of the term "group" diminishes the "community" aspect of the hunt. A "group" can be those who only get together over the internet. A "group"

can consist of those who only get together once a year for a potluck that includes a dish or two containing a little moose or caribou taken by a member of the group. The use of the term "group" encourages the kind of abuse that has occurred in the CSH. It takes a "community" to practice the community pattern of C&T (customary and traditional) uses that the Board of Game (board) has set as a condition for participating in the hunt for the Copper Basin area (5 AAC 92.074(d)). Therefore, the term "group" should be stricken from the regulation and replaced when necessary with "community."

The term "resident" should also be stricken, because a "community" of subsistence users may not all be residing in the same physical location. For example, the community composed of the eight Ahtna villages includes some Alaska residents who do not live in the area, but who continue to hunt, fish and gather subsistence resources in the area and to participate in the Ahtna customary and traditional hunting way of life, including widespread sharing, teaching traditional knowledge and values, potlatches, etc. Therefore, the term "community members" should be uniformly applied throughout the regulation when describing who is eligible to participate in the CSH. The term "residents" should be stricken.

Likewise, when describing the CSH administrator, the term "community administrator" should be used throughout the regulations. The term "group" should be deleted when the regulation references CSH administration.

Additionally amend 5 AAC 92.072. Community subsistence harvest hunt areas as follows:

(a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074. **Prior to issuing a permit and harvest reports for the community hunt area described in 5 AAC 92.074(d), the commissioner or designee shall determine, on the basis of an application form developed by the department, that the community applying for the permit conforms with the definition of "community" set forth in section (i) of this regulation.**

…

(c) If the board has established a community harvest hunt area for a big game population, [RESIDENTS] **members** of the community [OR MEMBERS OF A GROUP] may elect to participate in a community harvest permit hunt in accordance with the following conditions:

(1)(D) make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition, if any, is observed by subscribers [INCLUDING MEAT SHARING]; the applicable board finding and conditions will be identified on the permit; this provision does not authorize the community [OR GROUP] administrator to deny subscription to any community **[RESIDENT OR GROUP] member who agrees to practice the applicable customary and traditional use pattern as practiced by the community;**

…

(c)(3) in addition to the requirements of (1) of this subsection, the community [OR GROUP] representative must submit a complete written report, on a form provided by the department, for the community [OR GROUP] participating in the community harvest hunt area described in 5AAC 92.074(d), that describes efforts by the community [OR GROUP] to observe the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit; in completing the report, the representative must make efforts to collect a complete report from each household that is a member of the community [OR GROUP] that describes efforts by the household to observe the customary and traditional use pattern using the eight elements described in this paragraph; a copy of all household reports collected by the community [OR GROUP] representative shall be submitted to the department as a part of the representative's written report; complete reports must include information about efforts to observe the customary and traditional use pattern of the game population, as follows:

(A)Element 1: participation in a long-term, consistent pattern of noncommercial taking, use, and reliance on the game population: the number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and use of areas other than the community subsistence hunt area for harvest activities;

(B)Element 2: participation in the pattern of taking or use of the game population that follows a seasonal use pattern of harvest effort in the hunt area: the months and seasons in which noncommercial harvest activities occur in the hunt area;

(C)Element 3: participation in a pattern of taking or use of wild resources in the hunt area that includes methods and means of harvest characterized by efficiency and economy of effort and cost: costs associated with harvests; and methods used to reduce costs and improve efficiency of harvest; and number of species harvested during hunting activities;

(D)Element 4: participation in a pattern of taking or use of wild resources that occurs in the hunt area due to close ties to the area: number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and variety of harvesting activities that take place in the hunt area; and evidence of other areas used for harvest activities;

(E)Element 5: use of means of processing and preserving wild resources from the hunt area that have been traditionally used by past generations: complete listing of the parts of the harvested game that are used; and preservation methods of that game; and types of foods and other products produced from that harvest;

(F)Element 6: participation in a pattern of taking or use of wild resources from the hunt area that includes the handing down of knowledge of hunting skills, values, and lore about the hunt area from generation to generation: involvement of multiple generations in the taking and use of the game population; and evidence of instruction and training;

(G)Element 7: participation in a pattern of taking of wild resources from the hunt area in which the harvest is shared throughout the community: amount of harvest of the game population that is shared; and evidence of a communal sharing event; and support of those in need through sharing of the harvest of the game population; and

(H)Element 8: participation in a pattern that includes taking, use, and reliance on a wide variety of wild resources from the hunt area: the variety of resource harvest activities engaged in within the hunt area; and evidence of other areas used for harvest activities.

(c)(4) the department may waive the annual reporting requirement and institute a five-year reporting period for any community which has demonstrated, through reports submitted annually over a five-year period, a high degree of participation in the customary and traditional community use pattern described in board findings for the area.

…

(f) The department may disapprove an application for a community subsistence harvest permit from a community [OR GROUP] that has previously failed to comply with requirements in (c)(1) and (3) of this section. The failure to **submit a** report by the community [OR GROUP] representative under (c) [(1) AND] (3) of this section **which demonstrates, pursuant to criteria and a scoring system established by the department, that the community is observing the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit shall** [MAY] result in denial of a community subsistence harvest permit for the area during the following **two** regulatory years **for all members of the community.** The department must allow a representative the opportunity to request a hearing if the representative fails to submit a complete report as required under (c) (l) and (3) of this section. A community [OR GROUP] aggrieved by a decision under this subsection will be granted a hearing before the commissioner or the commissioner's designee, if the community [OR GROUP] representative or **a member of the community** makes a request for a hearing in writing to the commissioner within 60 days after **receiving notice from the department that the community will be denied a community subsistence harvest permit for the following year.** [THE CONCLUSION OF THE HUNT FOR WHICH THE PERSON FAILED TO PROVIDE A REPORT]. The commissioner may determine that the penalty provided under this subsection will not be applied if the community [OR GROUP] representative **or member** provides the information required on the report **sufficient to satisfy the department's requirements** and if the commissioner determines that

(1) the failure to provide the report was the result of unavoidable circumstance; or
(2) extreme hardship would result to the community [OR GROUP] **or member.** …

(h) Nothing in this section authorizes the department to delegate to a community [OR GROUP] representative determination of the lawful criteria for selecting who may hunt, for establishing any special restrictions for the hunt and for the handling of game, and for establishing the terms and conditions for a meaningful communal sharing of game taken under a community harvest permit, **except that a community representative shall require participating community**

members to observe the customary and traditional use pattern described by board findings for the game populations hunted as that pattern of use is practiced by the community. …

(i) In this section,

(2) a "community" [OR "GROUP"] is "a group **of 25 or more individuals** [OF PEOPLE] linked by a common interest in, and participation in **a consistent pattern of noncommercial taking, use, and reliance on a wide diversity of subsistence resources in** [,] an **identified** area [AND THE WILDLIFE POPULATIONS IN THAT AREA,] that **provides substantial economic, cultural or social, and nutritional elements of the subsistence way of life of the community and its members** [IS CONSISTENT WITH THE CUSTOMARY AND TRADITIONAL USE PATTERN OF THAT WILDLIFE POPULATION AND AREA AS DEFINED BY THE BOARD].

Comments:

We support Proposal 56 to change 5 AAC 92.072 to remove the terms "group and residents" add community and member, conforms to with the definition of "community" in section (i) of this regulation, require annual reporting and 5 year reporting for a community that has demonstrated C&T use patterns as found in board findings for the hunt area, scoring system and approval by Department, community failing to submit a report that meets C&T use patterns shall not participate in CSH in the following 2 years and provides for an appeal process, if a community demonstrates C&T use patterns that community will be exempted for 5 years to submit a CSH report.

Amending the regulation to clearly require participants to be a community will help ensure that the intent of the regulation, to provide a reasonable opportunity for community subsistence patterns and needs, will be met. A group of 25 that meets over an internet meet-up group will no longer be eligible. Community adds more strength to the regulation in that it shows interaction between members conforming to C&T patterns of use found in Board of Game Findings.

Community Administrators that consistently over a number of years show C&T use patterns in their annual reports should only have to report once every 5 years. Substantial evidence of conforming to 8 criteria listed in 5 AAC 92.072 should prove that community have reliance upon a variety of resources, hunt, fish and gather seasonally within the community hunt area identified by the BOG, continue to pass down knowledge on preserving, processing wild game, fish and plants, have sharing patterns, stories, and lores that are passed down from generation to generation, and use moose and caribou parts listed as listed in community subsistence hunt conditions.

There must be a means for the Department to enforce the hunt conditions if this hunt is to succeed and meet the needs of many communities in Alaska that practice this community way of subsistence life. The abuse caused by not enforcing the hunt condition erodes support for the hunt and allows abuse and "gaming" of the regulation. Enforcing the condition that an applicant is a "community" as that term is defined by the BOG is essential to prevent any group of 25 from applying and automatically participating in the CSH no matter whether there is any relationship

at all between the members. The condition that a participating community must demonstrate that is engaging in the C&T pattern of use identified by the BOG in establishing a community hunt must also be enforced, otherwise a community can simply thumb its nose, file a report that shows no compliance with this condition and hunt again next season without penalty. The failure to enforce the condition the BOG has established for this hunt has undermined the intent of the hunt and resulted in the failure to provide a reasonable opportunity for those that practice the community pattern of C&T uses. The conditions the BOG has established for the CSH should be enforced just like the conditions for all other subsistence and general hunts.

PROPOSAL 57 – 5 AAC 85.072(i)(2). Community subsistence harvest hunt area and permit conditions. By Board of Game. Change the definition of "community" or "group" for community subsistence harvest hunts as follows:

5 AAC 92.072(i)(2) is entirely repealed and readopted to read:

(2)a "community" or "group" is a mutual support network of people who routinely (at least several times each year) provide each other with physical, emotional, and nutritional assistance in a multi-generational and inter/intra familial manner to assure the long-term welfare of individuals, the group, and natural resources they depend on.

Existing 5 AAC 92.072(i)(2)

(2) a "community" or "group" is a group of people linked by a common interest in, and participation in uses of, an area and the wildlife populations in that area, that is consistent with the customarily and traditional use pattern of that wildlife population and area as defined by the board.

Comments:

We support the Board's effort to redefine the term "community" in a way that will make it clear that a participating group is genuinely a "community" and not a sham group put together to abuse the community hunt opportunity. We suggest getting rid of the term "group" as it is unnecessary and detracts from the intent of the new definition – to clarify that participants are a "community." We also suggest including a provision that the community members routinely interact in person rather than just through facebook to prevent the "internet community" from meeting the definition.

PROPOSAL 58 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions; and 92.220. Salvage of game meat, furs, and hides. By Denali Fish and Game Advisory Committee. Modify the salvage requirements for moose and caribou taken under community subsistence harvest hunts as follows:

Community harvest hunts for caribou and moose must have all meat stay naturally attached to the bone.

Comments:

No comments this is already in regulation.

Note: The Board of Game does not have authority to change the Tier II scoring criteria to include nonconsumptive use per Alaska Statute 16.05.258.

PROPOSAL 59 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions; and 92.070. Tier II subsistence hunting permit point system. By Kenneth Manning. Consider all customary and traditional uses as eligibility criteria for Tier II and community subsistence harvest hunts as follows:

Consider all customary and traditional (C&T) uses as eligibility criteria preferences for all Tier II and community subsistence harvest (CSH) permit applications.

Comments:

We oppose Proposal 59. See comments above to proposal 54. It is difficult to understand the intent of this proposal and how it would be implemented.

Tier II applies to those who have dependence on reliance upon the resource for food. It does not apply to handicrafts made from inedible parts. Making handicrafts out of inedible parts of wildlife is not a CSH hunt condition, nor should it be.

Hunter Education (1 Proposal)

PROPOSAL 60– 5 AAC 92.003. Hunter education and orientation requirements. By John Kaiser. Require hunter education for hunters 12 years of age or older, and those under 12 to be accompanied by someone who has successfully completed the course as follows:

Under 5 AAC 92.003 Hunter education and orientation requirements, and on page 13 of the Alaska Hunting Regulations it should read:

Beginning July 1, 2018, **ALL Hunters** 12 years of older must have completed a Basic Hunter Education course to hunt in the State of Alaska. Hunters under 12 years of age must be accompanied by someone who has successfully completed a Basic Hunter Education course.

Comments:

We oppose Proposal 60 to require all hunters aged 12 years and older must complete a Basic Hunter Education course to hunt in the State of Alaska. Residents of Alaska who have hunted for many years shouldn't be required to take a hunter education course. Non-resident hunters' and alien nonresident hunters should be required to take a hunter education course to protect themselves and others in the field.

Proposal 60 will increase cost to the Department, they will have to set up educational hunter course throughout the State of Alaska. Department's budget is already constrained as it is.

Permits for Possessing Live Game (4 Proposals)

PROPOSAL 61 – 5 AAC 92.029. Permit for possessing live game. By Billie Wilder. Add Lesser Hedgehog Tenrec to the list of animals allowed to be possessed without a permit as follows:

Under 5 AAC 92.029. Permit for possessing live game, section (b), I would like to see the Lesser Hedgehog Tenrec listed.

Comments:

We oppose Proposal 61 to add the Lesser Hedgehog Tenrec to the list of animals allowed to be possessed with a permit. Lesser Hedgehog Tenrecs are 5 to 6.8 inches long and weigh about 7 ounces. They could easily escape from their owner's home. One of their favorite spots is under a log which makes them difficult to find, should they escape. Since they are inactive in winter months, they would be hard to find.

Just because other similar species are on the list of animals allowed to be possessed without a permit does provide good reasoning to add them to the list as well. More and more species are being added to the list each year without good reason, other than being similar to one that is already on the list.

PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. By Mojo's Hope/Alaska's KAAATs. Allow the release of sterilized, feral cats into the wild as follows:

This proposal is a request to change Alaska Administrative Code 5 AAC 92.029, Permit for Possessing Live Game, to remove the regulatory barrier to implement Trap-Neuter-Return (TNR) programs to manage community cat populations. Specifically, I am requesting that 5 AAC 92.029 be changed to exempt "sterilized feral cats" (under Cats/Felis catus) from the list of species that are prohibited from being released into the wild.

5 AAC 92.029. Permit for possessing live game.
(a) Except as otherwise provided in this chapter, or in AS 16, no person may possess, import, release, export, or assist in importing, releasing, or exporting, live game, unless the person holds a possession permit issued by the department.
(b) The following species, not including a hybrid of a game animal and a species listed in this subsection, may be possessed, imported, exported, bought, sold, or traded without a permit from the department but may not be released into the wild:

Common Name	**Scientific Name**
Dog	*Canis familiaris*
Cat **(except sterilized feral cats)**	*Felis catus*
Sheep	*Ovis aries*
Goat	*Capra hircus*
Cattle	*Bos taurus*

Oxen	*Bos spp.*
Horse	*Equus caballus*
Guinea pig	*Cavia porcellus*
Reindeer (except feral reindeer)	*Rangifer tarandus* Var.
Llama	*Lama peruana*
Alpaca	*Lama pacos*
One-humped camel	*Camelus dromedarius*
Ass	*Equus asinus Var.*
Mule	*Equus asinus x caballus*
Swine	*Sus scrofa Var.*
European ferret	*Mustela putorius furo*
European rabbit	*Oryctolagus cuniculus* Var.
White rat albinus	*Rattus norvegicus* Var.
Mice: white, waltzing, singing,shaker, piebald	*Mus musculus* Var.
Fat-tailed gerbil	*Pachyuromys duprasi*
Gerbil	*Gerbillus spp.*
Hamster (golden)	*Mesocricetus auratus*
Chinchilla	*Chinchilla laniger*
Cavy	*Cavia aperea*
Hedgehog, African Pygmy	*Erinaceus albiventris*
Chicken	*Gallus* Var.
Pigeon	*Columia livia* Var.
Any Turkey species	Subfamily Meleagridinae
Any Pheasant, Junglefowl or Coturnix species	Subfamily Phasianinae
Any Guineafowl species	Subfamily Numidinae
Canary	*Serinus canaria* Var.
Parrot, parakeet, cockatiel, macaw, and other members of the Family Psittacidae not prohibited by federal or international law	Family Psittacidae
Toucan	Family Ramphastidae
Any New World Quail species (including Bobwhite)	Subfamily Odontophorinae
Mynah	*Acridotheres* spp.
Any Peafowl species	*Pavo* spp.
Any duck, goose, swan, or other migratory waterfowl which the U.S. Fish and Wildlife Service determines does not require a federal permit for private ownership	
Chukar partridge	*Alectoris chukar*
Button “quail” Family	Turnicidae in the order Gruiformes
Any nonvenomous reptile (crocodile, alligator,	Class Reptilia

snake, turtle, or lizard) Members of the bird families Fringillidae, Turdidae, Zosteripidae, Pycnonotidae, Timaliidae, and Ploceidae of non- Holarctic origin. Members of the bird families Columbidae and Trogonidae of non-Nearctic origin.	
Elk (except feral and wild elk)	*Cervus elaphus*
Bison (except feral and wild bison)	*Bison*
Muskoxen (except feral and wild muskoxen)	

Comments:

We adamantly oppose Proposal 62 to allow Trap-Neuter-Return (TNR) programs to manage community cat populations. See comments under Proposal 63.

PROPOSAL 63– 5 AAC 92.029. Permit for possessing live game. By Frederick Minshall. Prohibit the release of feral or stray domesticated cats into the wild as follows:

Put simply, to specifically and by name outlaw “Trap, Neuter, Release” (TNR) and all other "no-kill" programs predicated on trapping and treating feral domesticated cats and then returning them to the wild, or feeding and maintaining colonies of such cats unconfined, anywhere in the state of Alaska. An example of my proposed textual additions are given below in ***bold, italicized, underlined*** font:

Example: **AAC 92.029 Permit for Possessing Live Game** (d): Under this section, and in accordance with the definition of "game" as in AS. 69.05.940 (which includes feral domestic animals), a game animal defined as deleterious exotic wildlife or nonindigenous gallinaceous bird is feral if the animal is not under direct control of the owner, including being confined in a cage or other physical structure, or being restrained on a leash***; feral animals shall not be maintained unconfined in Alaska under the aegis of "no-kill" management programs such as TNR, TVNR, RTF or any other such program not providing for secure and continuous confinement of such animals at all times. Owners of such animals shall apply for permits issued by the department for all animals in their care, and shall abide by all conditions required by said permits.***

In support of the above I include text from **AAC 92.029 Permit for Possessing Live Game** (h): "Upon application" (for temporary release for hunting, field trials, etc.) the board will add a species to the list in (b) of this section if there is clear and convincing evidence that the species is (1) *not capable of surviving in the wild in Alaska*; (2) is not capable of causing a genetic alteration of as species that is indigenous to Alaska; (3) *is not capable of causing a significant reduction in the population of a species that is indigenous to Alaska*; (4) *is not capable of transmitting a disease to a species that is indigenous to Alaska*; (5) *does not otherwise present a threat to the health or population of a species that is indigenous to Alaska*; (6) is not captured from the wild for use as a pet; (7) does not present a conservation concern to the species' native habitat outside of this state; (8) can reasonably be maintained in good health in private

ownership; and (9) *does not present a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences for captive animals*.

The *underlined, italicized* font in items (1), (3)-(5) and (9) clearly disqualifies feral cats from being considered as a species suitable for even temporary release into the wild.

The alternative solution I propose would be to reclassify feral cats as "vermin" and allow unlimited take, year-round.

Comments:

We support Proposal 63, and adamantly oppose Proposal 62. Releasing feral cats into the wild will cause a host of problems. Disease will spread to wild game, eventually to humans and water sources from trapped, neutered, released cats into the wild.

Alaska does not need to have cat colonies in the woods. Cats will only increase in population and spread to other parts of Alaska. Keep Alaska clean. Animal activists should consider well-being and health to humans, rather than being overly concerned about feral cats. Do the humane, right thing, put them to sleep.

Note: The Board of Game deferred this proposal from the 2016 Statewide Regulations Meeting. It was previously numbered Proposal 90.

PROPOSAL 64– 5 AAC 92.029. Permit for possessing live game. By Alaska Wild Sheep Foundation. 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.

Comments:

We support Proposal 64 to remove domestic sheep and goats from the "Clean List" and require a permit for possession with stipulations if located within 15 miles of all sheep habitat.

Domestic sheep and goats carry diseases which will spread to wild sheep and wild goats. Domestic sheep and goats should be well-tended to by owners and kept in pen so they will not stray into the wild. Diseases from sheep have been known to spread to wild sheep in the Lower 48 states.

Miscellaneous Topics (4 Proposals)

PROPOSAL 66 – 5 AAC 92.005. Policy for changing board agenda. By Alaska Department of Fish and Game. Update the Board of Game's policy for accepting agenda change requests to make it more consistent with the Joint Board Petition Policy as follows:

5 AAC 92.005. Policy for changing board agenda.

(a)The Board of Game (board) may change the board's schedule for considering proposed regulatory changes in response to an agenda change request, submitted on a form provided by the board, in accordance with the following guidelines:

(1) an agenda change request must be to consider a proposed regulatory change outside the board's published schedule and must specify the change proposed and the reason the proposed change should be considered out of sequence. An agenda change request is not intended to address proposals that could have been submitted by the deadline scheduled for submitting proposals;

(2) the board will accept an agenda change request only

(A) [FOR A CONSERVATION PURPOSE OR REASON;] **repealed;**

(B) to correct an error in a regulation; [OR]

(C) to correct an effect of a regulation that was unforeseen when a regulation was adopted; **or**

(D) if the request identifies a biological concern for the population or a threat to meeting objectives for the population;

(E) if the request identifies an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f): or

(F) if the request identifies an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future;

(3) the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling;

(4) a request must be received by the executive director of the boards support section [AT LEAST 60 DAYS BEFORE THE FIRST REGULARLY SCHEDULED MEETING] **by November 1st of that year;**

(5)if one or more agenda change requests have been timely submitted, the board shall meet to review the requests within 30 days following the submittal deadline in subsection (4), and may meet telephonically for this purpose**;**[.]

(6) when considering an agenda change request, the board should take into consideration 5 AAC 96.625(d) and 5 AAC 96.625(e);

(7) if the board accepts an agenda change request, the board will develop and consider proposals for all agenda change requests for those specified regulations.

(b)The board may change the board's schedule for consideration of proposed regulatory changes as reasonably necessary for coordination of state regulatory actions with federal agencies, programs, or laws.

Comments:

We support Proposal 66 to update the Board of Game's policy for accepting agenda change requests to make them more consistent with the Joint Board Petition Policy.

By repealing 5 AAC 92.005.(1)(a) and replacing it with more definitive terms will enable public to understand the Agenda Change Request (ACR) policy.

ACRs, however, should be based on a real-time threat to or biological concern or threat to meeting objectives for the population. It should not be based on a preconceived notion or on a forecast.

If customary and traditional uses will be effected by an unforeseen, unexpected event or outcome that would restrict or reduce a reasonable opportunity, then the ABOG should take an ACR to protect subsistence uses of wildlife. Through an ACR, the Board of Game should take action to attempt to fix the problem if an unforeseen, unexpected event or effect that would negatively cause restriction or opportunity to harvest wild game, such as low population numbers of caribou or moose that would cause adverse conditions to reasonable opportunity to harvest a moose or caribou.

A regulation should be made to address the concern, restriction, or unexpected event at the ABOG's Work Session, if it will affect C&T uses for wildlife.

If it is necessary that a joint board meeting of Alaska Board of Game and Alaska Board of Fisheries be called to protect customary and traditional uses, a notice for 30 days to call for a joint meeting should be issued when calling for the joint meeting.

PROPOSAL 67 – 5 AAC 92.003 Hunter education and orientation requirements; 92.012. Licenses and tags; 92.039. Permit for taking wolves using aircraft; 92.044. Permit for hunting bear with the use of bait or scent lures; 92.052. Discretionary permit hunt conditions and procedures; 92.072. Community subsistence harvest hunt area and permit conditions; 92.130. Restrictions to bag limit; and 5 AAC 92.530, Management areas. By Alaska Department of Fish and Game. To comply with recent statutory changes, review and update regulations with minimum hunting age requirements as follows:

The Department of Fish and Game (department) recommends the Board of Game (board) examine the age requirements of all existing regulations given action taken by the legislature to raise the minimum age requirement for Alaska residents to purchase licenses from 16 to 18 years of age. Some of the age requirements in regulation are region specific and the board may prefer to deal with those at the appropriate regional meeting, however they are shown below to illustrate all of the age requirements currently in regulation.

5 AAC 92.003. Hunter education and orientation requirements. (a) Beginning August 1, 2002, a person born after January 1, 1986 that is

(1) required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 7, 13, 14, 15, and 20;

(2) not required to have a hunting license, and who has not successfully completed a certified hunter education course, must, in order to hunt in Units 7, 13, 14, 15, and 20, be under the direct immediate supervision of a licensed hunter who
(A) is **18** [16] years of age or older and has successfully completed a certified hunter education course; or

(B) was born on or before January 1, 1986

(b) not withstanding (a) of this section, A resident hunter who is 10 through 17 years of age at the start of the hunt, and has successfully completed a certified hunter education course, is allowed to hunt on behalf of a permit holder who is at least **18** [16] years of age, under the direct immediate supervision of that permit holder, who is responsible for ensuring that all legal requirements are met.

5 AAC 92.012. Licenses and tags. (a) No hunting or trapping license is required of a resident under the age of **18** [16]. An appropriate license and big game tag are required of nonresidents, regardless of age, for hunting and trapping. No person **18** [16] years of age or older may take waterfowl unless that person has a current, validated, federal migratory bird hunting stamp or "duck stamp" in possession.

5 AAC 92.039. Permit for taking wolves using aircraft.
(d) The department may apply any of the following conditions to a permit issued under this section:
…

(7) the department may require an applicant for a permit to possess minimum qualifications, including
…

(E) that the applicant is at least **18** [16] years old;

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.
…

(b) In addition to any condition that the department may require under 5 AAC 92.052, a permit issued under this section is subject to the following provisions:
…

(3) a person must be at least **18** [16] years of age to be issued a permit;

5 AAC 92.052. Discretionary permit hunt conditions and procedures. The department may apply any or all of the following additional conditions to a permit hunt, when necessary for management of the species hunted:
…

(15) the permit applicant must hold a valid Alaska hunting license; however, this does not apply to a resident under the age of **18** [16]; an applicant's hunting license number must be entered on the permit application; a resident under the age of **18** [16] shall enter his or her age instead of a license number;

5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

…

(c) If the board has established a community harvest hunt area for a big game population, residents of a community or members of a group may elect to participate in a community harvest permit hunt in accordance with the following conditions:

(l) a person representing a group of 25 or more residents or members may apply to the department for a community harvest permit by identifying the community harvest hunt area and the species to be hunted, and by requesting that the department distribute community harvest reports to the individuals who subscribe to the community harvest permit; the community or group representative must

(A) provide to the department the names of residents or members subscribing to the community harvest permit and the residents' or members' hunting license numbers, permanent hunting identification card numbers, or customer service identification numbers, or for those residents or members under **18** [16] years of age, the resident or member's birth date;

5 AAC 92.122(b)(4)(D)(vii). Unit 16 Intensive Management Plan.

(vii) taking of bears by foot snaring by permit only from April 15 through October 15; permittees must be accompanied by another person, age **18** [16] or older, when conducting foot snaring activities in the field; foot snaring permits will be issued at the discretion of the department based on previous trapping experience, ability to help train other participants, and length of time available for participation in a snaring program; a selected foot snaring permittee must successfully complete a department-approved training program, must be a resident **18** [16] years of age or older, and report all animals taken by the permittee to the department within 48 hours of taking;

5 AAC 92.130. Restriction to bag limit.

(d) A hunter who is under 10 years of age may take big game only under the direct, immediate supervision of a licensed hunter who is at least **18** [16] years of age. The supervising hunter is responsible for ensuring that all legal requirements are met. The big game animal taken will count against the supervising hunter's bag limit. This section does not relieve an individual from complying with big game tag requirements, but does require a supervising hunter to validate the hunter's harvest ticket, or permit, in accordance with 5 AAC 92.010, immediately following the taking of big game under this section.

Comments:

We support Proposal 67 to change regulations to age requirement to 18 years of age to adhere to Alaska Statutes for the following regulations: 5 AAC 92.003. Hunter education and orientation requirements, 5 AAC 92.012. Licenses and tags. (a), 5 AAC 92.039. Permit for taking wolves using aircraft, 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures, 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, 5 AAC 92.130. Restriction to bag limit, and 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Legislative action was taken to change age requirement from 16 years of age to 18 years of age for all State regulations. This housekeeping proposal will change regulations to meet mandatory age requirement.

PROPOSAL 68– 5 AAC 92.XXX. New regulation. By Dave Leon. Create a new regulation to allow season openings and increased hunting opportunities in-season by emergency order as follows:
Create regulation that will allow ADF&G to open or increase hunting opportunities in-season based on best available science when additional harvest can be supported.

Comments:

No comment regulation is already in place.

Proposal 69- 5 AAC 92.003. Hunter education and orientation requirements. By Homer Fish and Game Advisory Committee. For all antler restricted hunts, require hunters to view an educational video for identifying legal moose as follows:

All moose hunters in areas with antler restrictions must watch an ADF&G video on how to judge moose.

Comments:

We oppose Proposal 69 requiring all moose hunters in areas with antler restrictions to watch an ADF&G video on how to determine legal status based on antler configurations. Hunters could ask ADF&G what a legal moose is, or get other educational materials from ADF&G. A few hunters that do not know how to tell the difference between a legal moose and Bull Moose should not make the rest of the hunters watch videos on what a legal moose is.

Comments Submitted by

Ahtna Tene Nene'

October 25, 2017

Submitted By
Thor Stacey
Submitted On
10/27/2017 7:26:37 PM
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October 26th, 2017

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the November meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *"Economic Impacts of Guided Huntin in Alaska."* More recently (2017), APHA partnered with SCI to add to and update McDowell's 2014 seminal work. *"The Economic Importance of Hunters Visitin Alaska; Alaska's Guided Huntin Industry 2015"* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

• 87.2 Million total economic output (2015)	• 52.5 Million **new** dollars to Alaska (2015)
• More than 50% economic benefits occur in **rural** areas (2012, 2015)	• 1,550 people directly employed, total employment with multipliers; 2,120 (2015)
• 89% Active Guides are AK Residents (2012)	• Visiting hunters (guided & non-guided) purchase 13% of total Alaska hunting licenses (2015)
• Guided hunters are approx. 3% of total hunters in the field (2015)	• Visiting hunters (guided & non-guided) contribute 72% of total revenue to the ADFG wildlife conservation fund (2015)

Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or "Bush Alaska." APHA worked with McDowell to quantify what some of the benefits Alaskans reap from Guided Hunting. In 2015 30 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 20 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 230,000 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2015.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Statewide regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all of its members to participate in the drafting of these comments. Our teleconferences were well attended with good representation from guides who conduct hunts in every Region in the state. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal 11- Support

APHA supports the Board of Game's efforts to encourage the ethical use of airplanes and to work towards a quality sheep hunting experience for all, but thinks the current regulation is excessively broad and restrictive. This regulation has caused division among hunters, and causes concern to most pilots of being suspect of comitting a violation. Also, crowding is a big problem especially during the early part of sheep season, and the current restrictions prevent one from looking around to make sure they don't drop in on top of someone already there, without being suspect of operating illegally.

A strong segment of the public credits the passage of the current restrictions in large part to the guide industry and claims that it favors guides over resident hunters. We disagree. We have members on both sides of this issue, but have not gone on public record as an organization, in support of the restrictions in their current form. Prior to the adoption of these restrictions, APHA cautioned the board about the divisiveness of this issue, and since have offered amendments to correct many of the concerns that we feel the public and many guides have concern with.

APHA believes that prohibiting airplanes from approaching sheep closer than 1000' will effectively abolish the historic use of airplanes to canvass the mountains looking for legal or exceptionally large rams during the hunting season. Additionally, hunters on the ground will not have their hunts disrupted by over flights or airplanes approaching sheep closer than the proposed distance of 1000'. We have suggested that including something in the regulations to encourage pilots leaving on a hunt, to fly around the pattern at 1000 feet a couple times so as to get a feel for what 1000 feet is. We feel this will go a long way towards compliance.

APHA sees Prop. 11 as a reasonable compromise that promotes Fair Chase hunting practices while respecting the hunting experience of others.

Proposal 26- SUPPORT

APHA supports this proposal based on its given merits. Enhancing the value of Governor's tags to support conservation is good policy.

APHA agrees with the Department and encourages the Board to fix this administrative error that is resulting in hardship to the general public.

Proposal 28- OPPOSE

General Position Statement-

"The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to chan e non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biolo ical parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans."

APHA opposes the suggested language-

"Allocations to nonresident hunters will be based on a subunit by subunit basis so that resident hunters always have a definitive hunt and harvest priority."

Proposal 28 does not address conservation nor does it describe an improved formula or methodology for deriving the maximum benefit of the resource for ALL Alaskans. We remain strongly opposed to idea of allocating success (harvest priority). Proposal 28 is flawed and unnecessary because non-resident hunter participation hovers around 10% statewide for all species. Guided hunter allocation is less than 3% of hunter effort. Proposal 28 is poorly constructed and not necessary.

Proposal 30- SUPPORT

Problem Statement-

Alaskans are not receiving the maximum benefit from extremely limited non-resident drawing hunt allocations offered for sheep, brown/grizzly bear and mt. goat.

Proposed Solution-

APHA proposes to reform non-resident drawing hunt allocations to maximize the benefit of the resource while enhancing wildlife conservation.

APHA proposes to allow any Alaskan resident who draws a sheep, brown/grizzly bear or mt. goat tag to take their non-resident 2DK relatives hunting with them. Either resident or non-resident relative will be allowed to harvest the one animal afforded by the resident's hunt opportunity. The bag limit will not be shared; either the resident or 2DK relative, depending on who harvested the animal, will punch their tag. 2DK relatives will still be required to purchase a non-resident hunting license and locking tag.

APHA proposes that the extremely limited “non-resident” allocation for drawing hunts for sheep, brown/grizzly bear or mt. goats will be allocated to non-residents hiring a guide.

2DK relatives will be prohibited from applying for a drawing hunt for sheep, brown/grizzly bear or mt. goat.

Discussion

After careful consideration, discussion and collaboration with the Department and other groups, APHA authored *Proposal 30* to address *Second De ree of Kindred* (2DK) allocations for **DRAWING HUNTS ONLY**. Prior efforts by APHA to address 2DK allocations in both drawing and general season hunts have been frustrated by a lack of hunter effort/harvest data and ill-defined conservation benefits. As such, we have narrowed the scope of our proposal to address drawing hunts only. Proposal 30 is offered as a benefit to the Resident who would like to hunt with their 2DK relative and the hunting guides who must rely on meager non-resident allocations in areas managed by drawing hunt. Proposal 30 will generate more revenue for conservation, add value to the non-resident allocation and provide more opportunity for Alaska residents to hunt with their 2DK relatives.

Scope of the Proposal:

- Affects hunts for brown/grizzly bear, sheep and mt. goat ONLY
- Applies to hunts managed by drawing ONLY
- Resident hunters bag limit is NOT AFFECTED
- 2DK relatives will be required to purchase license & locking tags to participate
- Does NOT reduce drawing odds for resident hunters
- Does NOT apply to drawing hunts for moose, caribou, deer, bison

Drawing Hunts Strictly Limit Non-resident Allocation:

Drawing hunts impose strict limits on non-resident hunter participation, usually around 10% of the hunter opportunity. Drawing hunt opportunities without strict caps on 2DK participation are increasingly being awarded to 2DK relatives. It is statistically probable that guided non-resident allocations will become a minority of hunt opportunities in certain drawing hunts in the near future.

Guided Hunt Allocations are More Valuable than 2DK Allocations:

On average each guided hunt opportunity, with multipliers, is worth $26,900 to Alaska’s economy (McDowell, 2017). This average incorporates all guided hunt opportunities from the most valuable hunts for sheep and brown bears to the less valuable hunts for deer and black bears. Proposal 30 addresses hunts for Alaska’s most valuable species. It is safe to estimate the value of each guided non-resident allocation addressed by Proposal 30 to be, at a minimum, $30,000 to Alaska’s economy.

2DK hunt opportunities have an unknown value to Alaska’s economy. 2DK opportunities contribute at the same rate to wildlife conservation (hunting licenses and tags) as guided non-resident hunts. 2DK opportunities support wildlife conservation but where they replace guided hunter effort they are a loss to the economy.

Enhancing Conservation:

Proposal 30 will enhance conservation by allowing for more 2DK relatives to take the field with their resident relatives. The additional hunting licenses and tags that will be purchased will promote resource conservation.

2DK- An Unequal Benefit:

The 2DK provision is an un-equal benefit that is not enjoyed by ALL Alaskans. Most native Alaskans, for instance, do not have non-resident relatives. Many non-native Alaskan hunters do not have 2DK relatives either. Of course it goes without saying that the vast majority of non-residents do not have Alaska residents as relatives. Special youth hunts, on the other hand, provide an equal benefit to all Alaskan and non-resident children. Similarly, all residents and non-residents have an equal ability to hire a guide. 2DK allocations only benefit some Alaskans and a very, very few non-residents.

Drawing Hunt Allocations- Differences Statewide:

2DK allocations are handled differently across the state in different drawing units. Guided non-resident hunter allocations have all but evaporated in areas such as 14C sheep hunts because there is not a restriction on the number of 2DK hunters or a discreet allocation for guided non-residents. In these scenarios 2DK non-residents can be awarded all of the non-resident tags, in some hunts in some years this has happened in 14C and in other chugach sheep hunting opportunities. Some areas such as Tok give “up to” a certain number of 2DK tags. The 2DK tags in Tok are fully used every year. Kodiak caps the number of 2DK hunts island-wide, leaving the majority of non-resident opportunity for guided non-residents. Unit 4 brown bears are similar though in unit 4 2DK hunters participate in a separate drawing for the allocation. There is a need to clarify how 2DK drawing hunt opportunities are handled statewide while recognizing 2DK allocations are less valuable than guided non-resident allocations.

Conclusion:

APHA has identified an opportunity for the Board of Game to uniformly reform a hunt structure to derive the maximum benefit from a limited game resource. We ask that the Board of Game simplify and reform non-resident drawing hunt allocations for sheep, brown/grizzly bear and mt. goat statewide.

Proposal 33- OPPOSE

APHA opposes proposal 33 because it fails to describe how the use of the resource (moose) will be enhance by its passage. Proposal 33 should also fail because it allows for hunt structures where there is adequate harvestable surplus to support non-resident take but zero opportunities are provided. Providing zero opportunity to non-residents unnecessarily reduces the value of the resource without justification.

Proposal 33 should fail because it undercuts resource conservation diminishes the value of the resource and reduces the ability of future boards to manage diverse moose hunts across Alaska.

Proposal 34- OPPOSE

Introduction:

Proposal 34 offers a false narrative of the *uide required law*(AS 16.05.407/408). Alaska’s guide requirement existed in the *Territory* and required that visiting hunters pursuing all species of big game be accompanied by a licensed guide. Statehood and the post WWII era

brought a new set of challenges and legal requirements to state lawmakers. Alaska's guide requirement was put in place to ensure the safety of visiting hunters pursuing dangerous bears and sheep in treacherous terrain. 2DK provisions were added as a response to concerns from the newly arrived military population. Lawmakers threaded the needle by satiating military advocates concerns while still protecting visiting hunters thus minimizing the costs to Alaskans for search and rescue and medivac efforts. Proposal 34 draws on an interesting revision of history on the origins of the guide required law.

Allocation:

The Board has broad statutory authority to allocate between types, classes or categories of wildlife users. Allocation schemes commonly separate bow hunters from rifle hunters while controlled use areas allocate access to certain users. There is no statutory barrier or command that disallows the Board from allocating between types of non-resident hunters.

Proposal 34 is Ille al:

Various legal authorities, most importantly the state Constitution, command the Board to develop allocation schemes that derive the maximum benefit from Alaskan's commonly owned wildlife. If proposal 34 was to pass it would contravene Constitutional and statutory commands the Board derives its authority from. Unless explicit in statute; the Board of Game must allocate between types of resident and non-resident hunters to derive the maximum benefit from the game resource.

Proposals 36 & 37

Introduction:

Guided hunters are allocated less than 3% of the hunting opportunities in Alaska (McDowell, 2017). APHA opposes *Proposals 36 & 37*.

Conservation:

Neither *proposal 36 or 37* directly addresses a stated conservation concern. This is buttressed by the Department's comments stating that these proposals are allocative in nature. *Proposal 36 & 37* would reduce the amount of money the Division of Wildlife receives from the sale of non-resident licenses and tags. *Proposals 36 & 37* do not address stated conservation or management goals while reducing funding for wildlife conservation.

Allocation:

Neither *proposal* 36 or 37 identifies how they will enhance the value of the sheep resource. In fact, both proposals can be shown to cause significant hardship and economic loss from the reduction in guided non-resident opportunity. *Proposals 36 & 37* cause unnecessary economic hardship and loss to Alaskan's and our economy.

Guide Concessions:

Proposals 36 & 37 propose to create huge drawing units on a subunit-by-subunit basis on tracts of Federal land already managed by guide concessions. Passage of these proposals would unnecessarily destroy business viability in areas that already limit the number of hunting guides and non-resident opportunity.

Summary:

Proposals 36 & 37 appear to be offered in bad faith. Both propose to destroy guide business viability in areas with existing limits on commercial activity. Neither proposal addresses a stated conservation goal or coherently describes how the value of the resource will be elevated. Proposals that diminish the value of the resource at the expense of conservation merit little debate and should be quickly voted down.

Proposal 42- OPPOSE

Introduction-

APHA opposes *proposal 42* and supports the Board's authority to allocate between types or categories of hunters to derive the maximum benefit from a limited resource.

"Must be uided" vs. Reality-

Proposal 42 suggests that the Board has somehow exceeded its statutory authority by allocating hunting opportunities to those choosing to use a guide in certain moose and black bear hunts. The Board of Game does not require a guide to hunt either moose or black bear anymore than they require all hunters to "walk in for sheep" because there is a "walk in only" area in the eastern Chugach Mountains. Proposal 42 is based on a misleading and false premise.

-Black Bears

Black bears in portions of SE Alaska are highly prized by resident and non-resident hunters alike. Black bears are not a guide required species thus local lodges and transporters began to heavily advertise the open access to the resource to non-resident hunters. The local hunting guides in these areas cannot increase their take because their land use permits do not allow for growth. The growth in non-guided black bear hunts caused a conservation concern to develop. The board responded to the conservation concern while providing a distinct allocation for local guides. This allowed for a MORE valuable, value-added commercial service to maintain its access while protecting the resource by addressing the unregulated growth sector. Resident hunters supported the new hunt structure and the guide allocation.

-Moose

Certain portions of the state are extremely remote and expensive to access. When conservation concerns cause one of the areas to be managed by a drawing hunt for moose, guides can inadvertently lose all their clientele while the hunts go under utilized. Non-residents will put in for a draw only to be drawn and then discover the area is too expensive for them to access with our without a guide. By breaking out a guided moose allocation conservation goals are addressed while the local guides remain in business and the maximum benefit of the resource is realized.

-Summary

APHA opposes *Proposal 42* because it seeks to devalue limited non-resident allocations for black bear and moose in areas with stated conservation concerns. All residents of the areas affected by this proposal will lose as stable hunt structures based on logical management

and allocation compromises evaporate.

Proposals 47- SUPPORT

Problem Statement-

Transfer of possession of meat may happen between parties more than once removed from the hunter and the initial recipient. Current transfer forms require signatures from both parties which can be extremely difficult to obtain.

Solution-

Proposal 47 simplifies the requirements to transfer meat or animal parts between parties by allowing the signature of **either** the recipient or the transferee. All other information currently required for transfer remains in effect.

Proposal 48- TABLE

APHA agrees with the Department of Law that the Board of Game is not the entity that regulates guides. Proposal 48 should be tabled without debate.

Proposal 52- OPPOSE

Proposal #52 would contravene legislative intent and should be summarily rejected.

AS 16.05.255 is clear that residents have a statutory allocation priority (AS16.05.255(d)) but that intensive management (IM) should

"….*restore the abundance or productivity of identified bi ame prey populations as necessary to achieve human consumptive use oals of the board"* (AS16.05.255(e))

Nothing in AS 16.05.255 suggests that the *"human consumptive oals of the board"* may not include a non-resident allocation. Aside from the long-term human consumptive goals alluded to in AS16.05.255, the legislature had the opportunity to clarify in plain statutory language its intent to close non-resident participation during an IM program. Nowhere in Alaska statue does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 52 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer resident hunter preference in times of resource shortage. The legislature and the Board of Game have done a good job describing their goals and implementing IM programs, while giving preference to Alaskan residents. The Board of Game does not need an additional layer of regulation to convey clear preference to Alaska residents in times of resource shortage. APHA supports the legislature's intent outlined in AS16.05.255 that provides for IM and a strict resident preference for moose, caribou, deer and elk.

Intensive Management Population Thresholds Change

An important aspect of how the IM population objectives are set is that they are flexible and can be changed depending on a variety of criteria. Certain areas in the state initiate IM when populations are not severely depleted but are more at a midpoint in their cycle. These areas often times have non-resident opportunity allocated even when IM is being considered. Non-residents should not be excluded from allocation schemes where the population thresholds for IM are well above population low points. Proposal 52 could have the unfortunate and unintended effect of lowering population threshold for considering IM in GMUs and Regions that have done the work to make IM a more proactive rather than a reactive management tool.

Non-Residents Harvest Predators While Hunting for Ungulates

Guided non-residents harvest predators in remote areas of the state while hunting for “prey species.” Often times these harvest patterns can show a “net gain” where the effects of secondary predator harvest not only compensate for ungulate harvest but are a net gain where predator:prey is concern. Guided non-resident hunters can be another tool in ADFG’s toolbox, especially in remote areas, where additional harvest of predators is desired. Passing a blanket exclusion on non-resident participation when IM plans are in place will take a tool out of ADFG’s tool box at a time when we are trying to give ADFG more options, not less.

Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

ADF&G
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526
ATTN: BOG COMMENTS

October 25, 2017

Dear Chairman and Members of the Board

The ATA appreciates the opportunity to offer the following comments on proposals you will be considering at your November Statewide meeting in Anchorage.

Proposal 6 – With all due respect to the Copper Basin Fish and Game Advisory Committee, we do not support this proposal. We feel that it would offer too great an opportunity for abuse of existing regulations.

Proposal 7 – We do not support this proposal. Our standing position is that trapping and snaring should remain the primary means of harvest for furbearer species. In addition, we feel that the recovery rate for beaver shot with bow and arrow would not be adequate. One ATA Board member with extensive experience in nuisance beaver notes a high wounding rate and loss of animals when shot with firearms. We believe that wounding loss would be even greater with archery equipment.

Proposal 8 – ATA is opposed to this proposed regulation. We defer to the Board of Game's current wolf management policy as it relates to predator control. We do not feel it should be extended to statewide (as recommended in this proposal) and it certainly should not be extended to wolverine. This method of harvest could be devastating to wolverine populations in some parts of the state.

Proposal 9 – While it is the position of the ATA that trapping and snaring should be the primary means of harvest for furbearer species, and with all due respect for the Upper Tanana / Fortymile Fish and Game Advisory Committee, we defer to the judgement of the Board of Game regarding this proposal.

Proposal 62 – We strongly oppose this proposal. Feral cats are destructive to the natural fauna as they prey on birds and small mammals. By doing so, they displace native species that belong in that niche. Feral cats also present the potential for the spread of parasites and disease to native species as well as to humans. They should not be protected in an environment in which they do not belong.

Proposal 63 – ATA supports this proposal for all the same reasons we oppose proposal #62.

Thank you for this opportunity to comment on these proposed regulations.

Sincerely,

Randall Zarnke

Randall Zarnke, president

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OCT 27 2017
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Submitted By
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Submitted On
10/27/2017 4:34:50 PM
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Proposal #57. Amend and adopt.

Amend to read. 5 AAC 92.072(i)(2) is entirely repealed:

The proposers, the Alaska Board of Game, argue that "it's necessary to modify the definition of community/group to more accurately reflect the intent of the community subsistence harvest hunt regulations and further clarify how the community hunt is distinguished from the individual Tier I."
The actual intent of the creation of the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area for moose and caribou was just what the title says, to have separate hunting regulations for members of the named 8 villages.

Article VIII, Section 3. Common Use does not allow the Alaska Board of Game to create criteria to differentiate among Alaskan moose and caribou hunters during times of abundance just because a past Board of Game policy created two different patterns of use for the game. One pattern of use over any number of "other" patterns is discriminatory.

AOC has recommend that the Board of Game repeal 5 AAC 92.074(d) for many years. Once the actual intent of the creation of the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area for moose and caribou was blocked by the Alaska State Courts it could never legally achieve its intended purpose. All attempts by the board to regulate a special moose and caribou hunt for members of Ahtna Inc has been costly and ineffective at achieve Ahtna's stated goal at the time of its creation. AOC believes there is no justifiable reason for the Alaska Board of Game to continuing trying to administratively create a priority use pattern for the harvest of moose or caribou in the Nelchina Basin during times when the harvestable surplus of moose and caribou are greater than the ANS for each species.

Submitted By
allen f barrette
Submitted On
10/27/2017 4:36:41 PM
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27 Oct. 2017

Mr. Chairman and members of the Board of Game.

My thoughts on statewide proposals.

Proposal 2.

I support this and would be within the intent of the statue.

Proposal 4.

Do not support this. The BOG should enact minimal standards of what is edible meat, via what most reasonable consumptive users eat. It should also be pointed out, that there are other uses besides consumption of large birds back, wings, gizzard, and heart. This change would impact subsistence C&T uses by trappers.

Proposal 5.

I support this. This should benefit users and less citations issued or self-turn-ins.

Proposal 6

Do not support. Making a new line in the sand will not change anything that currently that is already in codified.

Proposal 13.

When new technologies come to the fore front. It would be nice to see discussion on how or if there will be a biological impact on the resource. Not just a discussion on if it is ethical. Many, many of methods and means thought out the state may not be seen as ethical. Roping and shooting caribou from a boat and using snow-gos to position caribou to be harvested, just two examples.

New technologies could affect subsistence, for the positive. “Economy of effort” comes to mind.

I should also point out the current regulation states; “radio commutation” is prohibited. My research has proved. That all devices that communicate such as cell phones, sat phones, texting devices, and internet, ect. All use “radio” air waves to transmit and receive. So currently the regulation prohibits any of this uses for taking game.

But land line telephones are not prohibited from use in taking game. There does not seem to be an ethical or biological issue with this communication. Though not as popular as it was 15 years ago, it was not an issue back then. A lot of game harvested was with in the areas that have land line connection both rural and urban, but the use of the telephone was never prohibited in the taking of game, interesting enough. Lastly how enforceable is restricting use of communication? Law enforcement is limited to what, how and when they can monitor communications by laws that dictate that stuff.

Proposal 16.

The proposer asks to allow the use of high power air guns to take big game. Currently this is already allowed. I do not know why this proposal was accepted, as it is not asking for a change/clarification. Nor did it have the italics lettering above the proposal stating "this is already allowed" like other proposal found in the book. I support this method and means.

Proposal 19.

Support. The proposer has made excellent justifications.

Proposal 20

Support. This would allow unsuccessful nonresident falconers, to have a better opportunity to possible take a raptor.

Proposal 22.

Do not support. I would like to see the current plan on non-resident take on raptors be completed before changes are made. So everyone can evaluate data.

Proposal 45.

Do not support. An unjustified burden on the hunter and the Department. The proposal does not address how long a seal has to remain on the moose antlers. The current seal that the Department uses is an eye sore if it has to remain on antler any longer than when it is sealed. So this proposal is just a glorified check station.

Proposal 46.

Has some merit. Guides and transporters are put in unique positions at times. For example: if a transporter arrives for a moose pick-up and the transporter believes the moose meat is on the verge of spoiling or has soured. They have some sort of responsibility to transport the meat out of the field. Currently this is done by a transfer of possession. Now the transporter is accepting responsibility of the condition of the meat. If contracted by AWT the next day, where the meat is being stored and the transporter is still in possession, AWT would contend the transporter is the responsible person for spoiled meat.

Current regulations do put a guides and or transporters in fickle of regulations and possible citations in uncontrollable situations.

Whatever changes if any, transfer of possession should be equally applied, through all users.

Proposal 49.

Do not support.

I see no value in this. The sale of brown bears and skulls has been going on for at least a decade with little to no issues from the current process. Furthermore the Department has been selling brown bears at auction for much longer time than induvial. They have plenty of data and no permits.

Proposal 52.

Do not support.

The proposer asks to eliminate non-resident participation until population or harvest objections have been reached.

It should be clarified that when Alaskans have priority over non-residents is found in AS 16.05.255(d). This applies to deer, moose, elk, and caribou that have a positive finding of C&T. When the harvestable surplus is below the ANS. Alaskans do have a priority in an IM program. But when moose, deer, elk, or caribou do not have a positive C&T finding of C&T or has a harvestable surplus above the ANS, the definition of IM applies AS 16.05.255(4). The definition uses the language "provide for higher levels of human harvest". This definition states "human harvest" and not resident harvest. Thus it includes non-resident uses. The two situations have to be dealt with separately and not one size fits all.

Proposal 55

Support.

This proposal was submitted only to consolidate regulations with like applications, account for game being harvested, and accountability of individual/group participating in the harvest. It was not intended to allow more/less game to harvest outside the normal seasons. The Department still has discretionally authority and must comply by sustain yield principles.

What needs to be address is why is the Department authorizing the taking of big game for certain religious ceremonies for big game species that don't have a positive finding of C&T? this has been happening largely in non-substance areas.

5 AAC 92.019. Taking of big game for certain religious ceremonies

1. The hunting and taking of game species having a **positive finding in 5 AAC 99.025**, outside the seasons or bag limits established in 5 AAC 85, for use in this state as food in customary and traditional Alaska Native funerary or mortuary religious ceremonies within 12 months preceding the ceremony is authorized if consistent with sustained yield principles

Proposal 56 and 57

Do not support. We should stop "gaming the system" with laws and regulations that were never intended for road system communities. We should not keep trying to circumvent Supreme Court decisions on rural priority. Use the current law AS 16.05.258 as intended and with a correct interpretation. Seems to work in all other game units in the state. Why should there be an acception for unit 13 users. Remember the game has the C&T and not the people, just food for thought.

Proposal 60

Do not support.

The BOG and the Department should be working requiring all areas/units of the state to be in compliance with this regulation before adding more requirements to just 5 out of 26 units.

Proposal 65.

Do not support

There are currently several laws/regulation that already exist that address the issues of the proposer. I don't see how more restriction will resolve any of the issued mentioned, but may just push the issues to a different location. Not solving anything there. As far as wounding loss/wrong sex taken and left. It happen this year on the Steese Hwy. Not in the ditch or within ¼ road but, further out. Approximately a dozen caribou were from dead after the fog had lifted and the hunt was ended. No corridor would have prevented this or the amount of person concentrated in key access points.

Proposal 66

As I reviewed this proposal, I found that an ACR and a petition are essentially the same.

ACR's can be submitted, but will be denied and not scheduled for hearings unless the problem outlined in the petition justifies a finding of emergency.

This found in regulation 5 AAC 96.625

(f) The Boards of Fisheries and Game recognize that in rare instances circumstances may require regulatory changes outside the process described in (b) - (d) of this section. Except for petitions dealing with subsistence hunting or subsistence fishing, which will be evaluated on a case-by-case basis under the criteria in 5 AAC 96.615(a), it is the policy of the boards that a petition will be denied and not scheduled for hearing unless the problem outlined in the petition justifies a finding of emergency. In accordance with state policy expressed in AS 44.62.270, emergencies will be held to a minimum and are rarely found to exist. In this section,

an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future

Reviewing this regulation (5 AAC 96.625) in context and ACR would be the same as a petition. The Joint Boards petition policy further clarifies that in (e) of this section**; The Boards of Fisheries and Game recognize the importance of public participation in developing management regulations, and recognize that public reliance on the predictability of the normal board process is a critical element in regulatory changes. The boards find that petitions can detrimentally circumvent this process and that an adequate and more reasonable opportunity for public participation is provided by regularly scheduled meetings**.

This is what the Departments proposal is wanting to do. To limit persons from circumventing the normal scheduled process. By using language already existing in regulation.

I contend that it has been an oversight for years on how ACR's were used. 5 AAC 96.625 clearly addresses ACR petitions and repeal of 5 AAC 92.005 is justified.

Thanks for your review of my comments.

Al Barrette

/Scanned 10/19/17

PC006
1 of 3

CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

HC 52 Box 8999, Indian, Alaska 99540 Phone: 907-345-5014 Fax: 907-345-6982

Attn: Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

RECEIVED
OCT 17 2017
BOARDS

October 9, 2017

Re: November 2017 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding regulatory proposals that will affect Chugach State Park. Please consider these comments during the upcoming Alaska Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

1. To protect and supply a satisfactory water supply for the use of the people;
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
3. To protect areas of unique and exceptional scenic value;
4. To provide areas for the public display of local wildlife; and
5. To protect the existing wilderness characteristics of the easterly interior area.

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska's Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. The 15-member advisory board is appointed by the director of state parks and intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the November 2017 Board of Game regulatory proposals that will affect the park's wildlife and users. Our recommendations passed during our October 9, 2017, meeting.

Proposal 62 – Oppose. This proposal would allow the release of sterilized feral cats into the wild by removing them from 5 AAC 92.029 "Permit for Possessing Live Game." Chugach State Park is on the outskirts of the state's largest city and portions of the city extend into the park like fingers. Feral cats undoubtedly hunt birds as large as grouse and small mammals ranging in size from shrews to snowshoe hares in the park. In fact, domestic cats, primarily feral cats, kill an estimated 1.3 to 4 billion birds and 6.3 to 22.3 billion mammals annually in the contiguous United States. These species of wildlife are at the base of the food chain for weasels, marten, foxes, lynx and many other predatory mammals and birds; thus, feral cats compete with furbearers and other predators. Because many feral cats are fed by humans or eat garbage, they

are not limited by food shortages and often maintain populations far in excess of wild predators. Feral cats are vectors of diseases such as rabies and toxoplasmosis, both of which can infect wildlife and humans. The organizations who submitted this proposal believe that feral cat numbers can be controlled by trap-neuter-release programs, which have never been proven to work despite decades of attempts. Adopting this proposal would inevitably increase numbers of feral cats as people dump their cats into the wild and maintain large outdoor cat colonies. The fact that the proposal is asking to allow release of only "sterilized" feral cats is small consolation. There is no way to prove a cat has been sterilized without capturing it, and sterilized cats cared for in outdoor colonies can live a decade or more. Even well-fed cats kill wildlife.

Proposal 63 – Support with amendment. This proposal advocates the status quo with regard to the release of domesticated cats into the wild: that it continue to be prohibited. We would amend this proposal to **add feral cats to the state's list of deleterious exotic wildlife (5 AAC 92.990[a][52])** which would automatically add feral and stray cats to the list of animals that may not be intentionally or negligently fed by a person (5 AAC 92.230). Unconfined or unrestrained feral cats are listed by the Invasive Species Specialist Group of the International Union for Conservation of Nature (IUCN) as one of the world's 100 worst invasive species along with rats, starlings, and rabbits, which are already listed as deleterious exotic species in Alaska. Domestic cats, primarily feral and stray cats, kill an estimated 1.3 to 4 billion birds and 6.3 to 22.3 billion mammals annually in the contiguous United States. Furthermore, food left outdoors for feral cats – a necessary component of maintaining outdoor cat colonies for trap-neuter-release programs – would also attract bears, foxes, coyotes, and deleterious exotic wildlife such as rats, rock doves, and starlings.

Proposal 64 – Support. This proposal would remove domestic sheep and goats from the list of species that may be possessed in Alaska without a permit from the Alaska Department of Fish and Game. If adopted, the proposal would require any person in possession of sheep or goats to obtain a permit. Any person who wishes to keep sheep or goats within 15 miles of Dall sheep habitat would be required to maintain the animals in a department-approved facility and certify the animals as disease free. Chugach State Park contains hundreds of Dall sheep that might be at risk from diseases transmitted by domestic sheep and goats kept in the Municipality of Anchorage and the Matanuska-Susitna Valley.

Proposal 156 – Support. This proposal would reauthorize the antlerless moose hunting seasons for Joint Base Elmendorf-Richardson (JBER), Birchwood, and Anchorage management areas, and the upper Ship Creek drainage in Chugach State Park, all in GMU 14C. While only the last area is within Chugach State Park, moose from the park use all of the management areas seasonally. Antlerless moose are harvested primarily to prevent the moose population from increasing above carrying capacity. According to the department, moose numbers currently appear to be within the population objective; however, recent winters have been mild and moose numbers are likely to exceed population goals without antlerless harvests, to the detriment of winter range.

Thank you for the opportunity to respond to the regulatory proposals submitted for the November 2017 Board of Game meeting. Please let me know if you have any questions

regarding these comments and recommendations. I can be reached at geo3poll@gci.net. Thank you for your consideration.

Sincerely,

George Pollock
Chair

cc: Dave Battle, ADFG

From: Larry Dalrymple
Sent: Sunday, October 22, 2017 9:30 PM
To: dfg.bog.comments@alaska.gov
Subject: Comments on Statewide BOG Proposals for meeting 10/10/17

Proposal #28—I support this proposal

Proposal #36—I support this proposal

Proposal #37—I support this proposal

Proposal #42—I support this proposal

Proposal #45—I oppose this proposal

Proposal #47—I oppose this proposal

Proposal #48—I strongly support this proposal. I don't know if the process being proposed is the ultimate answer, but I do know that something must be done to curb the waste of thousands of pounds of game meat from animals harvested usually by nonresident hunters on guided hunts. As stated, and I agree, that a large majority of nonresident hunters have no interest in keeping, let alone shipping, hundreds of pounds of meat back to their hometown. The guide tells the clients not to worry about it, as the meat will be donated to a nearby village and used by the grateful villagers. The client then departs the state, believing he, or she, has done a good thing by donating the meat to the villagers. The result is, and I have observed it firsthand at various villages around northern Alaska, if the meat in fact does get recovered, it is left on an airstrip, that sometimes is a mile or more from the village. I have personally observed piles of game meat at village airstrips, and more often than not, it is black, and covered with flies. This is a shameful waste of a resource, and there must be tighter controls on the process of "Transfer of Possession".

Proposal #52—I support this proposal

Proposal #56—I oppose this proposal

Proposal #60—I oppose this proposal

Proposal #65—I support this proposal, or some version of it. I agree with the proposer, that something must be done with this hunt before someone is killed. It is an unbelievably out of control hunt, and there are not enough enforcement officers in the State, to control it, and prevent a hunter or bystander death.

Proposal #69—I oppose this proposal

Larry Dalrymple

Larry Dalrymple
767 Chena Hills Drive
Fairbanks, AK 99709
907-388-1975

Submitted By
Jason Faris
Submitted On
10/24/2017 11:38:42 AM
Affiliation
Resident

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Address
650 Lowell Rd.
Fairbanks, Alaska 99712

Regarding Proposal #38;

I agree with this proposal and think the positive and long lasting impacts to the individual bands as well and the herd as a whole will be healthier, stronger, increase population, and ensure that Residences as well as Guides will have a future with opportunities, while protecting the States economic interest in this most valuable resource. If we stay the current course, agruably the numbers will continue to decline due to natural causes that can not be avoided as well as ill-informed persons that take either too many or too young of an animal from the greater environment.

Jason Faris

Submitted By
Richard
Submitted On
10/24/2017 5:39:00 PM
Affiliation

Phone
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richardflanders@compuserve.com
Address
1870 Becker Ridge Rd
Fairbanks, Alaska 99709

I would like to express support for the passage of proposals 28, 32, 33, 37 and 52. A few comments on each.

28: I strongly agree with this proposal. Every other state that I know of has a resident preference in drawing hunts. The Alaska State constitution calls for fish and game resources to be managed primarily for the benefit of residents. This proposal would make that a reality.

32: I really really like this one. This is something that every other western state that I know of and hunt in does. Here you apply year after year without success and never have a better chance of being drawn; it's like sending money down the drain. Bonus points for residents is an excellent idea and should be a slam dunk as a new regulation.

33: I also strongly support this proposal. There are so many hunters vying for moose draw perimits that is almost seems a waste of time to apply for one. Limiting non residents to 10% would bring the state in line with the constitutional requirement and would make it much more likely that I and other residents could fill my freezer with much-needed and healthy moose meat.

37: This one is also an excellent idea and also addresses the greatly increasing pressure on sheep resources by non-resident hunters. There is so much non-resident pressure for sheep drawing hunts that I would never even bother to apply for one. It just doesn't seem like a good gamble as my chances of getting one would be so low. Limit non-residents to 10% and maybe I'd actually get to hunt sheep while I'm still able to do it.

52: This one seems to make a lot of sense. If we are to manage fish and game resources primarily for the benefit of residents, why let non-residents hunt in an area that is thought to be stressed due to excessive predation? Give Alaska residents a priority on this.

In conclusion, most of these proposals are attemtps to deal with the issue of there just being too many hunters vying for too small a game resource pool. When there was a seemingly infinite amount of resource, it didn't make the difference it makes today. The resident preference for fish and game resources in the State constitution is pretty clear; it's time to adhere to what it says and to put the needs of resident hunters before that of non-residents.

Submitted By
Chris Gossen
Submitted On
10/27/2017 9:26:15 AM
Affiliation
Mr.

PROPOSAL #12

I suggest the not allowing of spotting of sheep during the sheep season needs to be recended due to the missunderstanding of the intent and the abuse of hunters calling in a complait that is totally false.

Proposal #38,39

This issue needs to not even be considered due to the half thought out issues it involves.

Boards of Game Comments
PO Box 115526
Juneau AK 99811-5526

Krista Holbrook
P.O. Box 83864
Fairbanks AK
99708

Dear Board of Game,

I support Proposal 52

Intensive Management Predation Control Implementation Programs to restore abundance of prey species should only be undertaken to benefit residents of Alaska who hunt for food. Only resident should benefit it should not be undertaken to increase non resident trophy hunt success.

I am opposed to 71. Special hunts like roadside "targeted hunts" are over crowded with many trained individuals participating. Bow & Arrow and muzzleloaders are meant to be a close range hunt where hunters attain proficiency needed. There is no place for more technology.

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OCT 25 2017
BOARDS

I oppose proposal 47 Transfer of Possession, Waste of meat is a terrible thing - we should take every possible measure to see that it does not occur! Dont water down this important tool.

The state is over crowded with guided non resident Trophy hunters. In all situations first consideration should be given to meat hunting residents.

Thank You

Gretta Holbrook

ADF&G Boards Support Section
ATTN: Board of Game Comments
PO Box 115526
Juneau, AK 99811-5526

Robert S Holbrook
PO Box 83864
Fairbanks, AK 99708

Dear Board of Game,

Listed below are my comments concerning proposals submitted for the next meeting.

Opposed: 10, 12, 16, 38, 39, 40, 42, 47, 62, and 71.

Support: 17, 17, 28, 31, 32, 33, 34, 36, 37,42, 44, 48, and 65.

Even the most remote areas of Alaska are becoming crowded with hunters and conflicts between residents and non-residents and guides are commonplace. Something has to be done to address this issue. It is not going away but getting worse. Guiding in Alaska is an old and respected business but I am afraid greed by many is destroying this respect. This past season I attempted to hunt caribou from a river bar in unit 25A. When I arrived in the area I picked a bar 15 miles down steam from an area where I knew a guide had set operation and camp in the past. No one else was near me at this time. Later a non-resident assistant guide was dropped off with clients, to be followed by two more guided groups so I departed. When asking about options to move I was told the guide had 5 camps in the area. Four different air transporters dropped here besides the guide over the next few weeks, which pretty much tie up any possible landing areas.

I then moved 700 miles to the south in unit 19 where with my plane tied down, a wall tent and tarp set up on a small bench we have moose hunted for 40 years, a guide came in with several loads and two non-resident floaters who spent the day walking back and forth through our camp. This was our second year here where we experienced different guides or assistant guide coming in on top of us where they had not operated before. In 2015 I had an assistant guide make 10 Cessna 180 loads in during moose season and informed me I needed to move my camp as he was establishing a guide operation here. I held my ground and he eventually floated away with one client and rafts full of gear, but left two non-resident hunters camped 20 yards from me. They were unprepared for reality of Alaska and when a plane finally came for them they abandoned a plastic wall tent and piles of gear. I burned their trash and hauled out what I could as the area is special to my group. Neither commercial operation had operated from this site before.

Several proposals fairly address this problem among them I support Proposal 33, 34, 36, and 37

The guides are running out of room also and the only recourse I see is to limit non-residents as is done is the lower 48. Commercial interest seem to believe they have a priority on game in Alaska but by the State constitution residents have preference after subsistence. Besides the loss of wild meat dear to Alaskans, we are also losing the cultural value of the hunt.

RECEIVED
OCT 25 2017
BOARDS

I am a pilot and use my plane to access hunting areas, but believe it should be parked and hunting done from camp. There is too much spotting and assisting hunters from the air. Leave the 5 AAC 92.085 in place.

I am also opposed to the introduction of any more technology in archery only hunts. It has reached the point that archery hunting is a sad joke due to technological advances. I support Proposal 17 and do not support Proposal 71. The crossbow is just another example of industry pushing technology into archery to negate the skills need to be an archer and ethically hunt with the bow. I have bow hunted all over Alaska and the United States for 50 years and learned long ago that just being able to hit a target is a long way from being knowledgeable enough to pursue game with an arrow. We do not need any more instant Bowhunters.

I am strongly in agreement with Proposal 52 as supporting the intent of the predator control program. I do not believe the people of Alaska will continue to support this program just to provide more trophies for non-residents.

It is no secret that the majority of guided non-resident hunters leave their meat with the guide, hunting only for trophies. This places the responsibility of determining if the meat was legally cared for and then taking responsibility of dealing with it on the guide. Obviously in spite of the guides promoting "feeding the villages" it is in their fincial best interest to leave the meat in the closest village rather than multiple long flights and/or airfreight. We need to maintain accountability of our game meat. I strongly support Proposal 48 and do not support Proposal 47.

Thank you for your consideration on these comments.

Robert S Holbrook

Submitted By
Robert Jahnke
Submitted On
10/14/2017 6:13:54 AM
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Trapline Supplies

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Proposal 6; I agree with this . Proposal 8; I agree with this, makes sense. Proposal 62; absolutely not. Proposal 63; yes. Proposal 68 Yes I believe this would be an important tool for responsible game management along with the fact that it could help with pedator control when prdator numbers are under estimated during any given season. With cut backs with in the state buget on the horizon this would be an important tool to protect our game and those of us who utilize the game to feed our families.

Submitted By
Kevin james
Submitted On
10/24/2017 11:25:03 AM
Affiliation

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Penalizing a resident for shooting a legal sheep is outrageous! Not to mention unfair. This proposal was written by a guide as to lighten the local hunting pressure on Dall Sheep. If for some reason this becomes law. The guides should be held to the same standard. ie.. if a client shoots a sheep under the listed guidelines. Then that guide service cannot guide a client for the said amount of years. Most out of state clients do not return year after year leaving the guides open to shoot rams that residents are penalized for. Where's the fairness in that? Just because they get paid for the sheep doesn't give them the right to follow local laws as the residents. Not holding guides to the same standard just gives them unlimited sheep.. with that being said. Just making it 1 sheep every 4 years across the board and limit the number of sheep a guide can kill. Would help the sheep population and hunters. While guides can still make a good profit on their business.

Submitted By
Diane Jewkes
Submitted On
10/25/2017 12:10:57 PM
Affiliation

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Address
1891 Blackburn Way
North Pole, Alaska 99705

Good morning,

As 49 year residents of Alaska, we support most regulations that prioritize hunting opportunities for Alaskans. Alaska's game should be managed 1st for present and future Alaskans. We are unable to attend this years meeting.

We support #12, 28, 32, 33, 34, 36, 37, 42, 48

We oppose #30, 38

Leonard Jewkes
Diane Jewkes
1891 Blackburn Way
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Submitted By
Daniel Jirak
Submitted On
10/24/2017 7:49:04 PM
Affiliation

I am a resident of 12 years and am married to a life long Alaska resident and am commenting on the following proposels. I would like to add that I have been to the BOF meetings and would like to see the BOG adopt the commitee of the whole process like the BOF. I feel it adds additional public input/participation for the board to make better decisions. The public feels more a part of the process at BOF meetings than at the BOG meetings.

#8 - I support this proposal and do fly out to conduct predator calling hunts in the winter. It would be nice to able to shoot a wolf if I called one in.

PROPOSAL 26 – 5 AAC 92.050. Required permit hunt conditions and procedures - I strongly oppose this proposal, how greedy does one hunter need to be?? I also believe the entire governors tag system is wrong if not illegal. The wildlife is the property of the public to be managed by the state/feds, not sold to the highest bidder.

PROPOSAL 28 – 2007-173-BOG. Nonresident drawing permit allocation policy - I support this proposal and think residents should have greater drawing odds than non-residents

PROPOSAL 30 – 5 AAC 92.050. Required permit hunt conditions and procedures, and 92.130. Restrictions to bag limit - I oppose this proposal, this is just another money grab for the guide industry. For every non-resident that hunts with their family member the APHA sees a revenue loss of $15-20K to its members. I believe hunting is more than how much money can be made. Family hunts can be the best quality time one can spend with relatives. Lets make guides start using their harvest tags for non-resident hunts, effectively only allowing a few hunts per year per guide, that would be the same as what the APHA would like to see to 2DK non-residents and their resident relatives.

PROPOSAL 34 – 5 AAC 92.057. Special provisions for Dall sheep drawing permit hunts; 92.061. Special provisions for Unit 8 brown bear permit hunts; 92.069. Special provisions for moose drawing permit hunts; and 92.050. Required permit hunt conditions and procedures. - I support as for reasons stated above.

#33 and #36 - I support these two proposals. In any current draw hunts in the state I support a much higher resident allocation of tags and a 10% cap of non-residents. This is similar to most other big game hunting states.

PROPOSAL 37 – 5 AAC 92.008(5). Harvest guideline levels. Limit nonresident sheep harvest to no more than ten percent of total harvest per subunit as follows: - I support this proposal in sub units that need a decrease in harvest pressure. I think 19C and 20A need to see a decrease in non-resident sheep hunters. I think 10% is to big of a cut though. Start reducing non-resident hunters but caping at 10% where historic numbers have been 80% is a huge cut and might not be needed in all units.

Proposal #38 &39 -**PROPOSAL 39 – 5 AAC 5 AAC 92.130. Restrictions to bag limit.** Implement a sliding scale bag limit for Dall sheep hunting for residents and nonresidents as follows: - I strongly oppose these two proposals. If we need to decrease the sheep hunting pressure than starting with decreasing the non-resident hunters is the first step. These two proposals would mostly negatively affect resident sheep hunters and have little effect on non-residents. The fact that over 40% of sheep taken statewide are by nonresidents and over 80% in units like 19C and 20A is the biggest allocation issue of our current "sheep wars".

PROPOSAL 42 – 5 AAC 92.069. Special provisions for moose drawing permit hunts; 92.XXX. New regulation. Remove the nonresident guide requirement for moose and black bear hunts as follows: - I support this proposal. I would like to see all guide required species go to a full draw for non-resident hunters and remove the guide requirement. This will be the only fair/legal way to reduce hunting pressure and guide area overcrowding. The guide requirement is not a safety issue, its a forced state subsidy forced on out of state hunters. You dont see a forced guide requirement for more dangerous activties such as climbing Denali, but you still have a climbing guide industry.

Submitted By
Loren J Karro
Submitted On
10/27/2017 4:55:15 PM
Affiliation

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Thank you for this opportunity to comment on the Statewide Regulation proposals. I will comment further in person at the meeting.

Proposal 11: I strongly support this proposal as a workable compromise. I believe the so-called "Proposal 207" should never have been submitted by the board according to an existing signed agreement of when board proposals are in order, and I believe the existing regulations arising from it unfairly target airplane users. It also has the strong potential to increase crowding at the beginning of the sheep season, a problem identified by sheep hunters in the board questionaire. This new proposal will keep hunters from harassing wildlife (which is already illegal under current wildlife harrasment regulations) by prohibiting airplanes from approaching sheep closer than 1,000 feet. This will also restrict the possibility of having sheep 'spooked' by low flying airplanes during the open season, when hunters might be on a stalk; however one must bear in mind that sheep might still be spooked by sightseers and even government helicopters.

Proposal 25: I support this proposal. It comes at no cost to any hunter, but could provide significant data as to the extent of bear hunting, the bear harvest levels and other information currently not available through much of the state.

Proposal 30: I support this proposal. I have already seen very limited non-resident draw opportunities be very compromised by the number of 2DK applicants who were awarded opportunities. This can be a severe disservice to guides opporating in these already restrictive areas, and takes away money for guided hunts which enrich the Alaskan economy. This proposal is very limited in that it would affect Sheep, brown/grizzly bear and mountain goat hunting by 2DK residents in drawing hunts only.

Proposals 36 & 37: I strongly oppose these proposals. They will have the effect of severly cutting the conservation funds received by the state through license and tag sales and the significant allocation of Pittman-Robert funds. They will also put many Alaskan guides out of business and effect the state economy. I refer you to the APHA written comments. As a guide who works in the bush, in and around the village of Port Heiden, I can properly testify to the economic benefits that the guide businesses provide there, and in other such rural areas with already restricted economic bases. These proposals do not address conservation concerns while greatly restricting wildlife conservation funding, and they would put many guides out of business and take away the economic benefit that guide businesses bring to the state, often in rural areas.

Proposal 52: I oppose this proposal. The legislature has never enacted a restriction of non-resident hunting in areas with IM programs, and this was apparently never their intent. Existing statute provides for a strict resident preference for moose, caribou, deer and elk in IM areas, and I believe that this existing statute adequately covers concerns for acheiving "human consumptive use goals of the board". I also might mention that many of our hunters actively look to harvest predators while on hunts for other species.

Kodiak/Aleutians Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road M/S 121
Anchorage, Alaska 99503

RAC 17022.KD

OCT 2 3 2017

Kristy Tibbles
Executive Director
Alaska Department of Fish and Game
Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Comments on the Board of Game Proposals, Statewide

Dear Ms. Tibbles:

I am writing on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) to provide the Council's comments on a statewide Board of Game proposal.

The Council is one of ten regional advisory councils formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Kodiak/Aleutians Region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to Federally qualified subsistence users, whom the Council represents.

The Council held a public meeting on September 26 and 27, 2017 in Cold Bay, during which it discussed various proposed changes to the State of Alaska hunting and trapping regulations. Specifically, the Council discussed and voted on:

- **Proposal 43.** Taking of Game by Proxy. Allow the taking of Emperor geese by proxy hunting. This statewide proposal would allow proxy hunters to take geese for elders, the disabled and others who are unable to hunt them. The Council is particularly interested in providing elders the opportunity to subsist on a long-standing traditional bird. **The Council voted to support Proposal 43.**

If you have any questions regarding this correspondence, please contact Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3586 or at karen_deatherage@fws.gov.

Thank you for your consideration.

Sincerely,

Della Trumble

Della Trumble
Vice-Chair

cc: Kodiak/Aleutians Subsistence Regional Advisory Council
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director,
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Jennifer Hardin, Subsistence Policy Coordinator, Office of Subsistence Management
Carl Johnson, Council Coordination Division Supervisor,
Office of Subsistence Management
Pippa Kenner, Acting Anthropology Division Supervisor,
Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management
Eric Taylor, Chief, Division of Migratory Bird Management, U.S. Fish and Wildlife Service
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Administrative Record

Submitted By
Wayne Kubat
Submitted On
10/27/2017 4:57:01 PM
Affiliation
self

Proposal 11 - Support. The current regulation is much too extreme. It has severely divided hunter groups. This is a good middle ground that supports fair chase and respect for game animals and hunters in the field without being excessively punitive to one method of access.

Proposal 26 - Support. This proposal will increase funding for conservation.

Proposal 27 - Support.

Proposal 30 - Support. This proposal offers many advantages to both residents and nonresidents.

Proposal 47 - Support on the merits of the proposal. Current transfer of possession requirements are especially hard to comply with in remote areas and bad weather, especially when dealing with large animals like moose which may require several trips. Hunters who are doing their utmost to comply with the main intent of the law - which is to salvage all the meat in good condition, may be subject to penalties because they got in a hurry and forgot or missed some paperwork.

Proposal 50 - Support on the merits of the proposal.

Proposals 28,33, 34, 36, 37,42, 48, 52. These are all pretty much "one size fit all" proposals by RHAK and are excessively punitive toward non resident allocation, which is only 13% of the total effort and pays for 72% of the bill. Alaska is a big state with lots of unique variables. Most of these concerns that RHAK has are better handled on a region or GMU basis.

Submitted By
David Lorring
Submitted On
10/8/2017 7:09:31 AM
Affiliation
self

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Address
3530 Holden Road
Fairbanks , Alaska 99709

I support proposal #11 which provides for the removal of the total ban for using aircraft for spotting sheep during the open sheep season.

I believe proposal #11 submitted by the Alaska Professional Hunters Association goes directly to the heart of the problem created by unethical aircraft users and also provides a solution to allow ethical aircraft users to continue to operate in the least intrusive way possible.

I would like to suggest that Proposal #11 be amended to include the dates of the youth sheep hunt. This amendment to proposal #11 addresses the fairness issue that prevents general season users to use aircraft while still allowing unrestricted aircraft use during the youth hunt season. The amendment to proposal #11 directs the same set of ethical uses on all sheep hunters.

To: Alaska Board of Game:
Attached are written articles in pdf format for inclusion review in the comments for the BOG Statewide Nov. 2017 meeting.
Thank you.
Kenneth Manning, J.D.
PO Box 775
Kasilof, AK 99610

Kenneth H. Manning, J.D.
P.O. Box 775
Kasilof, AK 99610
907-394-4377

IN THE SUPREME COURT FOR THE STATE OF ALASKA

KENNETH H. MANNING, Appellant/Cross-Appellee, Vs. ALASKA DEPARTMENT OF FISH & GAME, Appellee/Cross-Appellant, AHTNA TENE NENE, Appellee.	Case No. S-16461 **MOTION TO RECONSIDER JUSTICE WINFREE'S ORDER DENYING MANNING'S MOTION TO DISQUALIFY JUSTICE WINFREE**

Trial Court Case No.3KN-11-00367CI.

I, Appellant Kenneth Manning, in accordance with Appellate Rule 503(h)(2)(b) request the full court to reconsider the Order of Justice Winfree dated Sept. 13, 2017, denying the motion to disqualify Justice Winfree, based on the following:

1. Justice Winfree again failed to comprehend the claims of ADF&G racial discrimination regulations that limit and bar Manning and hundreds of Alaskans from the CSH permits hunting eligibility, as primary basis for disqualification. He erroneously contends there must be "personal bias against him." This is the third order from Justice Winfree that totally ignored claims of ADF&G racial discrimination regulations.[1]

[1] Appeal *Manning v. State, Ahtna,* 355 P.3d 530 (Alaska 2015) claims of racial discrimination regulations ignored "*unanimously*" by the Court; and Order Sept. 7, 2017 Denying Disqualification S-16511/S-16531; and Order dated Sept. 13, 2017 Denying Disqualification S-16461.

2. A motion to disqualify must be distinguished from a motion for recusal.[2] Recusal only requires "if the *judge officer believes* a fair and impartial decision cannot be given." (Order at p.1-2; fn 2, referencing AS 22.20.020(a)(9)).

3. Justice Winfree has again failed (intentionally and totally ignored) claims of racial discrimination eligibility criteria in ADF&G regulations 5 AAC 92.072 *et seq* (Exc 103, 225). His order erroneously assumes his alleged personal racial bias and prejudice against Manning. He does not comprehend his failure to conduct proper *de novo*[3] strict scrutiny standards of review of ADF&G regulations imposing racial discriminatory intent and effect that limits and bars Manning and many others from participation in the CSH user group,[4] and denial of individual constitutional equal rights. His order denying motion to disqualify, obviously fails to comprehend the issues indicating an impaired or diminished capacity to be able to recognize and understand the claims and averments on racial discrimination imposed by the challenged state ADF&G regulations 5 AAC 92.072 *et seq*. (Exc 103, 225).

4. Pursuant to Judicial Canon 2, Commentary:

> The test for appearance of impropriety is whether the conduct would create in **reasonable minds** a perception that

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[2] Judicial Canon 3E(1)(a).

[3] *Gilbert v. State, Dep't of Fish & Game, Bd. of Fisheries*, 803 P.2d 391, 394 (Alaska 1990) (citing *Southeast Alaska Constr. Co. v. State, Dep't of Transp.*, 791 P.2d 339, 342 (Alaska 1990); *Grand v. Municipality of Anchorage*, 753 P.2d 141, 143 n.3 (Alaska 1988)).

[4] *Adarand Constructors, Inc. v. Pena, 515 U.S. 200 (1995)*, "All racial classifications, imposed by whatever federal, state, or local governmental actor, must be analyzed by a reviewing court under strict scrutiny." P.10-29; 34-37.

> the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence **is imp**

Here, Judge Winfree's total ignoring claims of racial discrimination in ADF&G regulations (i.e., holding it only affects the moose and caribou![5]), whether by intent or by diminished mental capacity, racism,[6] and/or impaired judicial competence to comprehend the issues for proper *de novo* appellate review, is still "impaired competence" in reasonable minds, especially where racial discrimination is "unanimously" ignored (approved) by the entire Court.

5. Pursuant to Judicial Canon 3(E)(1) Disqualification, Commentary:

> A judge should disclose on the record information that the judge believes the parties or their lawyers might consider relevant to the question of disqualification, even if the judge believes there is no real basis for disqualification.

Justice Winfree's order failed to disclose or comprehend the stated reasons in the motion to disqualify, which included: (A) failure to conduct *de novo* standard of appellate review;[7] (B) failure to conduct strict scrutiny compelling state interest standard of review[8] on: (1) claims of racial discrimination in ADF&G regulations; (2) regulations mandating one race (Ahtna) aboriginal primitive local customs and traditions (C&T) are imposed on all community subsistence harvest (CSH) applicants, no matter what their race C&T or their location of residence

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[5] *Manning v. State ADFG, Ahtna*, 355 P.3d 530 (Alaska 2015).
[6] The BOG finds that only Ahtna racial C&T matters, that all other White man's and non-Athna races must practice or convert to Ahtna aboriginal racial local primitive customs and traditions for eligibility for a state-issued CSH priority preference hunting permit. Exc 103, 225.
[7] *Manning v. State ADFG, Ahtna*, 355 P.3d 530 (Alaska 2015).
[8] "The relevant standards of review are **critical** to the outcome of the case." *Walsh v. Centeio*, 692 F.2d 1239, 1241 (9th Cir. 1982).

(i.e., invidious discrimination[9]); (3) CSH eligibility limitations and bar to the CSH user group, at a Tier-hunt,[10] requires analysis under "decisional law"[11] and constitutional equal protections analysis;[12]

(C) failure to review the administrative record (DVD) of Board of Game (BOG) Meetings on-the-record audio recordings and transcripts submitted in the trial court and appeal record; and (D) failure to consider or apply "decisional law" case precedents (i.e., *McDowell, Id; Morry, Id; Adarand Id; Zobel v. Williams*, 455 U.S. 55 (1982)).

6. Pursuant to Judicial Canon 2:

> A Judge Shall Avoid Impropriety and the Appearance of Impropriety in All the Judge's Activities.
> A. In all activities, a judge shall exhibit respect for the rule of law, comply with the law,* avoid impropriety and the appearance of impropriety, and act in a manner that promotes public confidence in the integrity and the impartiality of the judiciary.

Justice Winfree's total ignoring challenges to racial discrimination eligibility criteria in regulations, and failure to conduct proper relevant strict scrutiny *de novo* appellate standard of review,[13] no matter what his cause for judicial

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[9] The common judicial definition of invidious discrimination "is a classification which is arbitrary, irrational and *not* reasonably related to a legitimate purpose." *McLaughlin v. Florida*, 379 U.S. 184 (1964).

[10] *State v. Morry*, 836 P.2d 358 (Alaska 1992), held there is no statutory authority to put eligibility requirements at the Tier-1 level; AS 16.05.258 *et seq.* The CSH is a Tier-1 level hunt.

[11] Judicial Conduct, Terminology: "Law" means court rules as well as statutes, constitutional provisions, and decisional law."

[12] *McDowell v. State*, 785 P.2d 1 (Alaska 1989); Any limitation and bar to participate in a user group implicates constitutional equal protections analysis. Manning and hundreds of others are barred CSH participation.

[13] Standard of review must comport to and be relevant to the claims presented. Here challenges to racial discrimination regulations, requires strict

incompetence, is clear impropriety and destroys the public confidence in the integrity of the judiciary, the law constitutions.

7. Justice Winfree's contentions of perceived personal racial actions by him against Manning (Order at p.1-2), evidences his failure to comprehend the reasons for his disqualification, such that his impaired competence "is so prejudicial that further participation would be unfair to the parties,"[14] to Appellant Manning and hundreds of others, including present and future generations of Alaskans.

8. Pursuant to Canon 3(C)(2)(a):

> A judge shall maintain professional competence in the law.* (b) A judge shall be faithful to the law.* A judge shall not deviate from the law to appease public clamor, to avoid criticism, or to advance an improper interest.
>
> * "Law" means court rules as well as statutes, constitutional provisions, and **decisional law**.

9. Justice Winfree's statement that he "vacated" attorney fees against Manning, erroneously insinuates fees were completely vacated, where the remand only required clarification of fees for non-constitutional defense work. Manning contends it is **gravely unjust** to award any fees and costs on remand where the trial court and appellate court failed to address claims of racial discrimination, failed to review the ADF&G BOG agency administrative record (DVD BOG audio records; transcripts of

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scrutiny compelling state interest standard of *de novo* review. See *Adarand Constructors, Inc. v. Pena, 515 U.S. 200 (1995).*

[14] *Grace v. State Dept. Health & Soc.Servs*, 329 P.3d 980, 988-89 (Alaska 2014) A very contentious divorce child custody case.

records), and failed to conduct proper *de novo* appellate strict scrutiny compelling state interest standard of review challenges to state-imposed racial discrimination CSH permit eligibility regulations.[15]

Justice Winfree, and this Court, failed to maintain professional competence in the law by totally ("unanimously") ignoring racial discrimination claims, failed to consider the continued compounding of irreparable harms to Manning and hundreds of others, failed to conduct *de novo* appellate standards of review, and failed to uphold statutes, constitutional provisions, and failure to consider controlling decisional case law precedents.

Based on obvious bias, prejudice, racial improprieties, and impaired judicial competence, Justice Winfree must be disqualified from all appellate review in this matter.

WHEREFORE, based on all the above, Appellant Manning's motion to reconsider the motion to disqualify Justice Winfree, must be granted.

Date: Sept. 18, 2017

Respectfully submitted:

/s/ Kenneth H. Manning

Kenneth H. Manning, J.D.

Appellant

cc: Governor Bill Walker
Alaska Commission On Judicial Conduct
Alaska Senate Judiciary Committee
Alaska House Judiciary Committee
Alaska Fish & Wildlife Conservation Fund/AOC

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[15] *Adarand, Id.*

THE SUPREME COURT OF THE STATE OF ALASK

KENNETH H. MANNING, Appellant v. STATE OF ALASKA, DEPARTMENT OF FISH & GAME, and AHTNA TENE NENE, Appellees	Supreme Court No. S-16461 Superior Court No. 3KN-13-00367 CI **JUSTICE WINFREE'S ORDER DENYING MR. MANNING'S RECUSAL MOTION** Dated: September 13, 2017

It is hereby **ORDERED**:

Kenneth H. Manning has moved for my disqualification in this appeal after remand, arguing that because I authored the opinion in the original appeal, joined unanimously by the other justices, ruling mostly against him in *Manning v. State of Alaska, Department of Fish & Game*,[1] I must be — or perhaps at least appear to be — racially biased against him and therefore have a conflict of interest requiring recusal. Before ruling on Mr. Manning's motion, I note that he prevailed on the attorney's fees issue in the original appeal, which is why the issue was remanded to the trial court for further proceedings.

I do not know Mr. Manning. I have not received any information about Mr. Manning from any source other than his case files, and I have not made any statements to anyone about Mr. Manning except in connection with working on his case files. I have no extrajudicial personal bias or prejudice against Mr. Manning that would

[1] 355 P.3d 530 (Alaska 2015).

EXHIBIT NO. A
PAGE 1 OF 3

cause me to believe I cannot give a fair and impartial decision in his case.[2]

The questions then are whether my participation in the original decision somehow rendered me racially or otherwise biased or prejudiced against Mr. Manning, or — because "[a] judicial officer must disqualify himself or herself in any proceeding in which the judicial officer's impartiality might reasonably be questioned"[3] — somehow created that appearance. Generally a judicial officer has no obligation to recuse from a case merely because that judicial officer presided over a related case involving the same party.[4] And generally a judicial officer's decision against a party in a prior proceeding does not reflect judicial bias or an appearance of impropriety requiring recusal in later proceedings "unless the [judicial officer] hears something or does something so prejudicial that further participation would be unfair to the parties."[5] The exception to the general rule would rarely occur at the appellate level, and Mr. Manning has made no

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[2] *See* AS 22.20.020(a)(9) (stating that recusal for cause is appropriate when a judicial officer believes that "a fair and impartial decision cannot be given"); Alaska Code Jud. Conduct Canon 3E(1)(a) (regarding recusal for personal bias or prejudice).

[3] *Hanson v. Hanson*, 36 P.3d 1181, 1184 (Alaska 2001) (citing *Amidon v. State*, 604 P.2d 575, 578 (Alaska 1978); *Perotti v. State*, 806 P.2d 325, 327 (Alaska App. 1991)) (crafting rule statement under AS 22.20.020 employing language from Alaska Code of Judicial Conduct Canon 3(E)(1)(a)).

[4] *See Jerry B. v. Sally B.*, 377 P.3d 916, 925 (Alaska 2016).

[5] *Grace L. v. State, Dep't of Health & Soc. Servs., Office of Children's Servs.*, 329 P.3d 980, 988-89 (Alaska 2014) (citing *Lacher v. Lacher*, 993 P.2d 413, 420-21 (Alaska 1999); *R.J.M. v. State, Dep't of Health & Soc. Servs.*, 946 P.2d 855, 869-70 (Alaska 1997); *Cook v. State*, 36 P.3d 710, 728-29 (Alaska App. 2001); *State v. City of Anchorage*, 513 P.2d 1104, 1112 (Alaska 1993)).

EXHIBIT NO. A
PAGE 2 OF 3

showing whatsoever — other than his personal disagreement with the resolution of the previous matter and his continued assertion that existing hunting regulations violate constitutional equal protection guarantees and constitute unconstitutional racial discrimination — that something of such significance occurred here; I conclude that the exception to the general rule does not apply in his case. In my view, my participation in the resolution of Mr. Manning's previous matter did not create on my part an actual personal bias against him, or even a reasonable appearance of racial or any other bias against him. Finally, I note that I have an obligation to participate absent good reason not to do so.[6]

I therefore deny Mr. Manning's motion for my recusal from his appeal. I hereby refer my decision to the full court for review pursuant to AS 22.20.020(c).

Entered by direction of Justice Winfree.

Clerk of the Appellate Courts

Marilyn May

Marilyn May

cc: Supreme Court Justices

Distribution:

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[6] *See DeNardo v. Maassen*, 200 P.3d 305, 310-11 (Alaska 2009) (quoting *Amidon*, 604 P.2d at 577); Alaska Code Jud. Conduct Canon 3B(1) ("A judge shall consider and decide all matters assigned to the judge except those in which the judge's disqualification is required.").

EXHIBIT NO. A
PAGE 3 OF 3

Kenneth H. Manning, J.D.
P.O. Box 775
Kasilof, AK 99610
907-394-4377

IN THE SUPREME COURT FOR THE STATE OF ALASKA

KENNETH H. MANNING,)
Appellant/Cross-Appellee,)
Vs.)
)
ALASKA DEPARTMENT OF FISH & GAME,) Case No. **S-16461**
Appellee/Cross-Appellant,)
v.)
AHTNA TENE NENE,)
Appellee.)
Trial Court Case No. 3KN-11-00367CI.

CERTIFICATE OF SERVICE

I, Kenneth Manning, hereby certify that a true and correct copy of the MOTION TO RECONSIDER JUSTICE WINFREE'S ORDER DENYING MANNING'S MOTION TO DISQUALIFY JUSTICE WINFREE, was mailed by pre-paid U.S. Postal Service on September 18, 2017, to the following parties of record:

SAAG Cheryl Brooking
Alaska Dept. of Law
1031 W. Fourth Ave., #200
Anchorage, AK 99501

Clerk of Court
Alaska Supreme Court
303 K Street
Anchorage, AK 99501

John Starkey, Ahtna Attorney
LANDYE BENNETT BLUMSTEIN, LLP
701 W. 8th Avenue, Suite 1200
Anchorage, AK 99501

I further certify the foregoing motion was typed in Courier New font size 12.

Kenneth H. Manning, J.D.

SPORTS & OUTDOORS

Alaska Dispatch News | www.adn.com SUNDAY, OCTOBER 8, 2017 Section B

Additionally, in units 11 and 13, there is a Memorandum of Agreement between the Department of the Interior and the Ahtna Intertribal Resource Commission that states "federal wildlife proposals will be written to accommodate Ahtna customary and traditional ways of harvesting large wild game."

That doesn't mean snowshoes and spears. Federal definition indicates that mountain sleds and .300 Winchesters have also become "traditional."

Proposal number WP18-18, which will be in front of the Federal Southcentral Subsistence Advisory Board in Homer on Nov. 5-6, is an effort to achieve the fairy tale.

AITRC has proposed a registration bull moose hunt that would run from Aug. 1 through March 31. Unit 13E would get one bull moose permit per household. The proposal for the remainder of Unit 13 reads "one antlered bull." AITRC would issue permits to Ahtna tribal members and BLM would issue the permits to "other federally qualified subsistence hunters."

Bull moose hold their antlers at least through December, sometimes much longer. A neophyte would instantly realize that an unrestricted snowmobile winter hunt would decimate the bull moose population in the wintering areas along the Gulkana, Delta

See B3, SCHANDELMEIER

Some of the Unit 13 game proposals need a reality check

A couple of decades back, in a movie called "Pretty Woman," Julia Roberts said to Richard Gere: "I want the fairy tale." She gets it, and they live happily ever after.

As with all fairy tales, the story only concerns the chase. The reality of living happily ever after is left to the imagination.

Some of the current game proposals for Unit 13, the most heavily utilized hunting area in Alaska, read like fairy tales.

The "I want" and "I must have" framework in which they are written will baffle the concepts of biology and fairness of allocation. If you are a hunter, or someone who uses any fish or game resource, make no mistake: fish and game management in our state is more concerned with allocation than biology.

JOHN SCHANDELMEIER
OUTDOORS

The Alaska constitution tells us our fish and game resources are to be utilized equally by all residents, regardless of who they are and where they might live. Allocation, done at the State Board of Game level, should attempt to make sure that happens. The Federal Subsistence Council, which controls hunting on federal lands within Alaska, is unhampered by such scruples and works with a rural-preference mandate.

SCHANDELMEIER: Unit 13 game proposals

Continued from B1

and Gakona River drainages. The bull-to-cow ratios in many areas of Unit 13 would be reduced to a point where we would need years of recovery.

Do you hunt Unit 13? If so, be at that meeting in Homer. A hunter need not be federally qualified to be heavily affected. The fairy tale is "I want a moose."

The state hunt proposal book offers a few fairy tales of its own. The community hunt, contentious since its inception in 2009, is back in front of us.

This hunt worked for its authors in 2009 because hardly anyone was aware of it. The communities eligible were all Copper Basin communities.

That concept was successfully challenged in court and the original eight communities have grown tenfold. This translates into more than 2,000 hunters in the field from Aug. 1 forward. One hundred of them have "any bull" permits.

It is time for the Prince (the Alaska Board of Game) to

rationale of the Ahtna communities and I sympathize. Communities are struggling to not be overrun with urban hunters.

However, it has become obvious that keeping this hunt in place and making continuous attempts to tweak it is not going to work. Urban hunters will always be able to meet any new requirements that are implemented as well as rural folks. And they generally have more toys to hunt with.

Reality is that the Ahtna have 3.7 million acres of their own on which they are the only hunters. There are also more than a million acres of federal land in the area open to rural users. A reasonable suggestion is to make these lands work for the locals and go back to a general hunt that is fair for all users.

Last winter, a special Board of Game meeting was held in Glennallen to address the community hunt issue. One hundred percent of the Fish and Game Advisory Committees advocated eliminating the

in favor of the hunt and accepted it. Whatever happened to a Board of Game that is supposed to "rely heavily" on the advice of its advisory committees?

The Board of Game meets Feb. 2 in Dillingham. The meeting is in Southwest Alaska because that area has proposals that are also up for discussion.

I encourage all advisory committees, independent hunting organizations and local Native groups to attend. I honestly believe that if all affected user-groups sit down together for an open discussion, some sort of compromise could be hammered out.

Like Julia Roberts of the movie, I think the Princess is a reasonable gal. If she can come up with the right line, maybe we can all put a little pressure on the Prince and achieve a true happily ever after.

John Schandelmeier is a lifelong Alaskan who lives with his family near Paxson. He is a Bristol Bay commercial fisherman

Submitted By
Christofer Miller
Submitted On
10/24/2017 9:53:23 PM
Affiliation

I would like to specifically address proposal 39. As a resident sheep hunter I think this is an extremely bad method to use for legally harvesting rams. Allowing this type of latitude in animal harvest would be even more detrimental to the sheep population. I believe biologists already see this and that is why we have the harvest standards we do now. I have seen many sub legal rams in the years I have hunted sheep. And I believe a lot more young rams will be taken under these rules. The individual proposing this method of harvest restriction is also a guide. So he would benefit from the fact that most non-resident hunters would definitely take something small home rather than leave empty handed after spending upwards of $15k-$25k. Im sure most cannot afford to pay the steep price for this hunt more than once and do not plan to return anyway. I also believe that residents should not suffer because of a business. And these guides do not care about the people of this state. They only care about their pocket books. I believe the board has done what is neccessary to properly manage the sheep population of the state and changing the harvest requirements is unneccessary and again only benefits the guides. Most people I am assuming do not find a 10+ year old ram every year. So now they begin to move down the scale. What about broomed rams? How will this be scientifically judged? I have seen a lot variance over the years on aging rams. And my experience is unless you are a biologist you are most likely going to get it wrong more often then not. Thats why I believe most look for full curl or double broomed. Its just to difficult to age a ram in the field effectively. But under these ridiculous rules you will be punished if you do not get it right. My family and I like to go sheep hunting every year. We dont always harvest animals but it is a family tradition. So now I should surrrender these traditions for a guides motivation to make money? Adopting this proposal is a bad idea for the state, the residents and the sheep population. I humbly request you deny this proposal and see that it is not the right thing to do.

Submitted By
Daniel Montgomery
Submitted On
10/27/2017 4:56:55 PM
Affiliation

Phone
907-373-4898
Email
akta@mtaonline.net
Address
p.o. box 874492
wasilla, Alaska 99687

My name is Dan Montgomery. I'm a 35 year resident of Alaska and have been a Registered guide in Alaska since 1993 and I have either hunted sheep myself or guided hunters to sheep every year since 1983. Thank you for considering my comments.

I support the following proposals:

I support proposal 11. This is a good compromise. It elimanates" Buzzing " of sheep during the sheep season and replaces the overly broad language that the board adopted in Proposal 207 that makes it illegal to intenually see a sheep from an aircraft at any distance and if you inadvertently you see a sheep during the season it makes it illegal to talk about it to anyone that intends to hunt sheep that year. One of the real joys of flying through sheep country is pointing out all the sheep on the distant moutains and hearing how exited the hunters get at seeing them. It was a big part of a sheep hunt that is now illegal.

Proposal 12: I support this proposal if the board does not adopt proposal 11

Proposal 25: I think requiring a harvest ticket for hunting Brown/Grizzly bears is the right thing to do to have good informed management of this spieces.

Proposal 30: I support this proposal. It allows 2dk hunting as it was intended without them getting a high percentage of the draw permits that alot of them never use.

Thank you BOG for your consideration of these comments and all the work you do.

United States Department of the Interior

NATIONAL PARK SERVICE
Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
1.A.2. (AKRO-RD) 20171014

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

OCT 2 0 2017

Dear Chairman Spraker,

The National Park Service (NPS) appreciates the opportunity to comment on statewide proposals being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS preserves.

As you review our comments, please realize that NPS statutory & regulatory requirements differ from the State of Alaska and other federal agencies. Hunting activities in preserves sometimes require different management approaches consistent with enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's primary stewardship role in wildlife management, while ensuring that preserves continue to comply with applicable laws and regulation.

Proposal 8, 9 10: NPS Recommendation: Oppose.

These proposals would remove same-day airborne restrictions on wolves and wolverine for those harvesting with a trapping license (#8), allow land and shoot requirements for harvesting coyotes (# 9), and repeal restrictions on the use of aircraft for taking big game. These activities are prohibited on national preserves by regulatory language found in 36 CFR 13.42 (f). Should the Board adopt any of these proposals, the NPS requests that park exemptions be reflected in State hunting regulation.

Proposal 19: NPS Recommendation: Oppose.

This proposal changes the nonresident season for taking passage raptors. These activities are prohibited on NPS-managed lands (36 CFR 13.42 (j)). Should the Board adopt any of this proposal, the NPS requests that park exemptions be reflected in State hunting regulation.

Proposal 25: NPS Recommendation: Support.

This proposal would require harvest tickets for brown bear hunts statewide. NPS supports this proposal. Requiring a harvest ticket would be another way to collect brown bear harvest data, and would have the added benefit of providing data on hunter effort.

Proposal 49. NPS Recommendation: Oppose.

This proposal requires a permit be obtained before brown bear skulls and hides with claws attached can be sold. NPS regulations prohibit the sale or commercial use of natural products taken from NPS areas, as described in 36 CFR 2.1 (c)(3)(v). Should the Board adopt this proposal, the NPS requests that park exemptions be reflected in State hunting regulation.

Proposal 50: NPS Recommendation: Oppose.

This proposal would allow more guided hunts in Intensive Management areas for all predator species. Because this proposal conflicts with 36 CFR 13.42 (f), which prohibits predator reduction efforts on national parks and preserves; additional guided opportunity for NPS hunt guide concessions would be prohibited by concession contract. If the Board adopts this proposal, the NPS requests that the Board exempt NPS lands and that the exemption be indicated in State hunting regulation.

Proposal 54: NPS Recommendation: Oppose.

This proposal would modify the Tier II subsistence hunting permit point system by emphasizing dependency on subsistence resources over rural preference on some point-scoring questions and would consider customary and traditional subsistence resource dependence in all areas of the State as eligibility criteria for Tier II and community subsistence harvest hunts.

The NPS is hesitant to comment on proposals that have largely to do with State allocation issues; however, the NPS has a responsibility to support subsistence opportunity for federally-qualified subsistence users. The NPS does not support Proposal 54 for the following reasons: 1) if adopted it may adversely impact local subsistence users relying on local resources by increasing harvest competition; and 2) the proposal has the potential to make coordination between state and federal systems more challenging in those hunt areas where the two systems currently share overall allowable harvest and strive to ensure identical seasons and individual harvest limits.

Proposal 64: NPS Recommendation: Support.

This proposal would eliminate domestic sheep (*Ovis aries*) and goats (*Capra hircus*) from the State's "Clean List" and require a permit for possession with stipulations if located within 15 air miles of wild sheep habitat. The NPS supports this proposal as a best management practice for conserving wild sheep and mountain goats, whose populations are experiencing a decline in some parts of the state.

Domestic stock may carry diseases that their wild counterparts have little immunity to, as well as contribute to cumulative effects of other disease agents and environmental stressors. Currently, we have relatively disease-free wild sheep and mountain goat populations in Alaska. This is not the case in the continental US where populations of wild sheep have experienced population declines due to transmission of disease, primarily pneumonias, from domestic livestock. While the risk of exposure may currently be low in Alaska, the consequences of exposure could be quite significant. Immunologically naïve wild populations of sheep and goats in Alaska living within large blocks of contiguous habitat are at greater risk of population-level effects as a result of disease transmission. This proposal, if passed, would be a positive step towards long-term protection of wild sheep and mountain goats in Alaska.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact myself or Mary Hake, Wildlife Management Biologist and liaison to the Board of Game at (907) 644-3576.

Sincerely,

Debora Cooper
Associate Regional Director
National Park Service

cc: Sam Cotten, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Chief, Division of Wildlife, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
Bert Frost, Regional Director, NPS
Greg Siekaniec, Regional Director, USFWS
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management

Submitted By
Israel Payton
Submitted On
10/25/2017 10:18:00 AM
Affiliation

Chairman Spraker and fellow Board Members,

Proposals 38 and 39 want to adopt some type of sliding scale limit for Dall Sheep based on age. Please oppose both of these, they do not make any biological or social sense. My hunting partner this year harvested a 7 year old ram that was 38 inches and 14 inch bases, a "trophy" ram by all accounts. My friend harvested and 8 year old that was 45 inches and made the record book. Both of these hunters would be penalized if these proposals were to pass. The ADFG has finally developed a good guide to judging legal sheep, adopting these proposals would confuse hunters and add regulation complexity.

As for all the other Dall sheep proposals I would like to point out in the summary of the BOG Sheep Working Group meetings, one of the concepts that the group agreed to was- "Residents should have priority for sheep hunting"

I support repealing of proposal 207 and support the State Troopers comments on it-

"Proposals 10, 11, 12 These proposals seek to change the regulation on the use of aircraft for spotting sheep during open sheep hunting seasons. The Alaska Wildlife Troopers are the primary enforcement for regulations created by the Alaska Board of Game. The board should avoid creating regulations that are extremely difficult to enforce. While some in the public will choose to follow these regulations, the others that choose to not follow the regulations will not be held accountable. This creates a scenario where law abiding citizens are held to a different standard than law breakers. The long term outcome will be that the regulation will be ineffective. The Alaska Wildlife Troopers ask that the board carefully review the benefit of the current regulation and compare that to enforceability."

Thank you for your service and consideration.

Israel Payton

October 23, 2017

Board of Game Statewide proposals November 10-17, 2017

Koyukuk River AC
Jack Reakoff Chair

Board support and I tried to convene a conference call regarding the Statewide proposals for your up coming meeting. Due to various issues with Committee members, including AFN the Committee could not meet.
As Chair I feel comfortable speaking to some of these proposals from my perspective, and also the position the Koyukuk River has taken previously on these issues.

I **appose proposals 10, 11, and 12** to repeal or modify spotting Dall sheep with the use of aircraft from August 10 to September 20.

The current regulation allows hunters to access areas by aircraft. No pilot has been sited for looking a strip over before landing. Hunters are just precluded from searching all the mountains to find sheep then landing near by to pursue sheep, during the season.

The current regulation is working to promote fair chase hunting through out all users groups during the season. White animals in open terrain can hardly avoid detection. There are still plenty of rams being taken with the current legal methods employed.

We are still not out of the woods yet from the die off from the winter icing and late spring of 2013. Most yearlings' winter killed that year, almost all lambs died at birth and the surviving ewes produced few lambs in 2014.
When I am out glassing and observing sheep in the Central Brook Range, I see very few young rams entering ram groups. There are few rams between 1/4 curl to just below 7/8 curl. Legal rams are going to get very scarce, meaning there will be few breeding rams. There have been excellent lamb productions in 2016 and 2017. The 2016 yearling cohort survived well. We will see several ¼ curl rams entering ram groups this next summer.
Conservation of rams recruited before 2011 needs to be considered as the breeding population moves through the three missing cohorts (2012, 2013, and 2014).

I appose proposals 14 and 15 To repeal the very Customary and Traditional practices of taking Black Bears in the den from October 15 to April 30.
The Koyukuk River AC was very appreciative to the Board of Game recognizing the practice of bear harvest in dens from time immemorial. There is an involved

practice of finding the den, taking the bear under difficult conditions, and use of bears as a significant food source.
The Koyukkon Athabaskan and Inupiat hunters of the GMU have deep-seated tradition with these harvests. I as a non-native have also taken Black Bear from the dens when meat was needed. I will just say from my experiance it is not shooting a fish in a barrel. Dens that may have neonate cubs are avoided by their characteristics. Sows that have bigger cubs are taken and used. The Black Bear population is very healthy and can easily sustain this limited harvest from dens. Harvest of Black Bears from dens is not a predator control method and should never be construed to be.

Thank you for your thoughtful deliberation on these proposals,

Jack Reakoff

RHAK
Resident Hunters of Alaska
unapologetically FOR ALASKAN RESIDENTS
PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

October 27, 2017

Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game

Statewide Meeting

November 10-17, 2017

Proposals we support: 7, 12, 20, 28, 31, 32, 33, 34, 36, 37, 42, 44

Proposals we oppose: 30, 38, 39,

Proposal 28 – 2007-173-BOG. Nonresident drawing permit allocation policy. Modify the Board of Game nonresident drawing permit allocation policy

SUPPORT

The intention behind this RHAK proposal is for the Board of Game's nonresident allocation policy to *not* allow a priority to nonresident hunters for any big game species under a draw permit system.

For example, over the last ten years, there are consistently more nonresident guided sheep hunters in Unit 19C than there are resident sheep hunters. Using the Board's current nonresident allocation policy, if the area went to draw-only hunts, nonresidents would have a clear priority over residents. The same is true for Unit 20A in terms of nonresident harvest rates over the last ten years that are consistently >50% of total harvests.

The Board needs a revised nonresident allocation policy to address these potential scenarios.

Proposal 30 – 5 AAC 92.050. Required permit hunt conditions and procedures, and 92.130. Restrictions to bag limit.

OPPOSE

This proposal would eliminate 2DK nonresident draw tags entirely so that all 2DK hunters in the future will only be allowed to hunt with a resident

relative who has drawn a *resident tag*. The resident relative would essentially forfeit his or her tag and give it to their nonresident relative. It's no different really than Proposal 51 from the guide industry that the Board passed and has since been rescinded. This continued push by the guide industry to gain more clients at the expense of resident hunters is shameful.

Please don't make the same mistake again; we urge you to fully consider our counter proposal # 34 that asks that all nonresident draw permits, regardless if they are guided or 2DK hunters, be put in the nonresident pool of tags. Don't prevent Alaskan hunters from the chance and opportunity to hunt with their nonresident relatives on draw permit hunts where both are currently eligible to draw.

Proposal 33 – 5 AAC 92.069. Special provisions for moose drawing permit hunts. Establish a ten percent nonresident moose drawing permit allocation

SUPPORT

This is a RHAK proposal asking the Board of Game to prioritize any moose drawing permit hunt anywhere in the state to give resident moose hunters a clear priority as our constitution intended.

Our other proposal (#42) ties in with this one because the two are intertwined. The only areas where residents do not receive a clear allocation priority for moose draw permit hunts are where the Board of Game has made moose a must-be-guided species for nonresidents. Even though the Board classifies these hunts more of a "trophy" hunt, that does not justify allocating 50 percent of the permits to nonresidents (DM 809/810/811).

Every resident moose hunt is a "meat" hunt, whether one takes a 65" bull or a paddlehorn. Moose is what we eat for dinner and what gets us through the winter. Residents should have a clear and substantial allocation priority for any moose hunt that is draw-only for all.

If the Board deems our 10 percent nonresident allocation recommendation as too harsh or too low, we ask that you step back and think if a nonresident 50 percent allocation is too high. Certainly it doesn't comport with our state constitution:

Article 8 - Natural Resources

- § 1. Statement of Policy

- It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.
- § 2. General Authority:
- The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.
- § 3. Common Use
- Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.
- § 4. Sustained Yield
- Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

Article I – Declaration of Rights.

§ 23. Resident Preference

- This constitution does not prohibit the State from granting preferences, on the basis of Alaska residence, to residents of the State over nonresidents to the extent permitted by the Constitution of the United States. [Amended 1988]
-

Resident hunters of Alaska *are* "the people" our Founders were referring to. When and where restrictive drawing hunts for all are necessary, resident Alaskans should receive a maximum benefit to any hunting opportunity.

Proposal 34 – 5 AAC 92.057. Special provisions for Dall sheep drawing permit hunts; 92.061. Special provisions for Unit 8 brown bear permit hunts; 92.069. Special provisions for moose drawing permit hunts; and 92.050. Required permit hunt conditions and procedures.
In drawing hunts with a separate allocation for residents and nonresidents, all nonresident permits will be issued from the nonresident allocation

SUPPORT

Please see our comments regarding Proposal 30. All nonresident draw permits should always be in the nonresident pool of tags. There was never any intention by the legislature to separate out one group of nonresident hunter from another within AS 16.05.407.
In terms of draw permit allocation policy, all nonresident hunters, regardless of whether they will hunt with a resident relative or a guide, should be placed in the same nonresident pool of available tags.

Proposal 36 – 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts. Change nonresident general sheep hunts to drawing permit hunts with a ten percent permit allocation cap

SUPPORT

This is a RHAK proposal based on recommendations included in the DNR Guide Concession Program "Alternatives" list, which are actions that can be taken by the Board of Game to address the issue of "too many guides":

"The first BOG alternative to the GCP is for the board to further restrict non-resident hunting opportunity. This could be accomplished by expanding the drawing and/or registration permit systems for non-residents, while simultaneously reducing or eliminating non-resident general harvest seasons and bag limits. This alternative would help to address the issues of quality of experience and conflicts between users by decreasing the number of non-resident hunters in the field. It may also address wildlife conservation concerns in cases where overharvest is an issue."

It's past time for the Board of Game to place limits on nonresident sheep hunters!

Proposal 37 – 5 AAC 92.008(5). Harvest guideline levels.

Limit nonresident sheep harvest to no more than ten percent of total harvest per subunit

SUPPORT

This is a RHAK proposal based on recommendations included in the DNR Guide Concession Program "Alternatives" list, which are actions that can be taken by the Board of Game to address the issue of "too many guides":

"The second BOG [Board of Game] alternative to the GCP is for the board to establish a specific harvest level for non-resident hunters. The BOG would allocate a percentage of the harvestable surplus, such as 10%, to non-residents, potentially statewide and for all species, and the vehicle for this

system would likely be drawing permits. This is different than the first alternative in that the allocation to non-residents would be fixed at a percentage of surplus rather than just reducing opportunity as needed."

It's past time for the Board of Game to place limits on nonresident sheep hunters!

Proposal 38 – 5 AAC 92.130. Restrictions to bag limit. Implement a sliding scale bag limit for Dall sheep hunting for residents

and Proposal 39 – 5 AAC 5 AAC 92.130. Restrictions to bag limit. Implement a sliding scale bag limit for Dall sheep hunting for residents and nonresidents

OPPOSE

As this Board knows, sheep genetics differ by area, and so does available browse and minerals. In some areas of the state rams tend to grow horns faster and become full-curl earlier in age than in other areas. In some areas it's hard to find a full-curl ram over 8 years old. It's hard to imagine penalizing a sheep hunter who takes a full-curl 38" ram that turns out to be seven years old. But that's what would happen if either of these proposals pass.

These proposals also advocate for sheep hunters to count annuli along with judging full curl, which is difficult at best even for experienced sheep hunters.

The Department has consistently said that the full-curl/8-year-old harvest regime is fully sustainable and does not lead to sheep declines or negatively impact sheep populations. And in the Department A&Rs they say there are no biological concerns that would support these proposals.

As RHAK has argued in the past and currently, we believe that too many sheep are being taken in some areas by nonresident hunters annually, and it negatively impacts resident hunter opportunity, success, and hunt quality. If any new restrictions or penalties on sheep hunters are to be enacted, they should fall squarely on the nonresident hunter.

Proposal 42 – 5 AAC 92.069. Special provisions for moose drawing permit hunts; 92.XXX. New regulation. Remove the nonresident guide requirement for moose and black bear hunts

SUPPORT

This is a RHAK proposal that ties in with our Proposal 33 addressing nonresident moose draw permit allocations of up to 50 percent of available permits. Such an allocation scenario only happens in areas where the Board of Game has made moose a must-be-guided species for nonresidents. Similar scenarios are possible in Southeast Alaska where the Board has also made black bear a must-be-guided species for nonresidents.

The legislature never intended for the Board of Game to add species to the list of must-be-guided species in AS 16.05.407. The Board of Game has added moose and black bear (in certain areas) to the must-be-guided list for reasons contrary to our must-be-guided law, and it has negatively affected resident hunters and all nonresident hunters want opportunity but who can't afford or don't want to hire a guide.

Proposal 48 – 5 AAC 92.135. Transfer of possession. Modify the transfer of possession regulations to include reporting requirements

Support with amended language:

Amend 5AAC 92.135 to include a new subsection:

(d) if the meat from a hunter is transferred, a record must be kept of all transfers and turned into the Department of Fish & Game within 30 days of the close of the season

There are widespread complaints of spoiled meat ending up in villages, or at food banks, yet we have no real way to track and record where that meat came from and who is responsible for improper salvage of game meat.

We are searching for a way to track where the (unbutchered) donated meat from hunters ends up, in order to hold hunters to a more stringent standard of meat care. The bottom line is that it is the hunter's responsibility, whether they are resident or nonresident, guided or unguided, to ensure the meat is properly cared for and, if donated, is fit for human consumption.

We need a way to track these transfers so there is more accountability and a higher level of meat care.

Proposal 52 – 5 AAC 92.106. Intensive management of identified big game prey populations; 92.110. Control of predation by wolves; and 92.115. Control of predation by bears. Prohibit nonresident hunting of moose and caribou under intensive management until harvest and population objectives are met

SUPPORT

This is a RHAK proposal widely supported by rural Advisory Committees because they understand that Intensive Management predation control programs are to benefit Alaskans who need to fill their freezers with moose and caribou meat.

There has been an ongoing push from guides to allow nonresident hunting of depleted prey species in areas currently under a formal IM predation control program. One example is the Mulchatna Caribou herd, which isn't remotely close as of yet in reaching the low end of the population or harvest objectives. The rationale to allow nonresident hunting of a depleted caribou population such as the Mulchatna herd is that nonresident guided hunters will fly into areas residents and locals can't access, thereby not competing with them for the resource, and it will be a "win-win" because all that meat will be donated to villagers.

But the reality is that every animal taken from a herd we are trying to grow via an IM program is additive mortality, and it makes no sense whatsoever – no matter how many animals are allocated – to allow nonresident hunting for a depleted prey population currently under a formal IM predation control program designed to benefit Alaskan residents.

Proposal 12 – 5 AAC 92.085(8). Unlawful methods of taking big game; exceptions.

Remove the restriction for the use of aircraft for spotting sheep by aircraft.

SUPPORT

RHAK supports repeal of what is commonly known as "Proposal 207."

Spotting or not spotting sheep from an aircraft is a decision for individual pilots to make.

The *process* the Board of Game used to generate Proposal 207 was contrary to the Board's own criteria that defines whether or not to develop a board-generated proposal, and inconsistent with how our public system of wildlife management should function.

Not only did the Board of Game create a new regulation (5AAC 92.085(8)) out of thin air, they did so even though the majority of Advisory

Committees, the public, and our very own Alaska Wildlife Troopers, opposed Proposal 207.

The Board should also take note of the arguments in Proposal 10, that speak to a hypocrisy in how the Board regulates the use of aircraft for hunting. For example, the Board condones the use of aircraft to spot caribou in Unit 22 during the winter season and allows hunters to land and shoot the same day they are airborne (5AAC 92.085 (8)(D)). So as far as an ethics argument on the "controversial practice of hunting for wildlife from aircraft" – which is the Board's rationale for addressing and generating Proposal 207, it's inconsistent to say on one hand it's unethical to spot game from the air if they are sheep, but okay if they are caribou.

Thank you for the opportunity to comment.
Resident Hunters of Alaska – info@residenthuntersofalaska.org

Submitted By
Rose Shearer
Submitted On
9/27/2017 4:32:39 PM
Affiliation

~~Date: September 27, 2017
Tom Lamal, Fairbanks: and the Alaska Board of Game
I am writing about your regulation that states you may not receive a permit to sell a grizzly bear rug in the state of Alaska. I understand the underlying premise that if this were not a regulation, there would be an unscrupulous group of persons that would indiscriminately kill bears for profit.
However, I believe that there should be exceptions as determined by the board that would allow a "permit to sell" to be issued. I was told by your representative that the only way a bear rug could be sold with a permit is if the person killing the bear passed away (the family could then sell the bear rug), the person or family was declaring bankruptcy or the person owning the rug wanted to donate it. This seems very discriminatory toward other persons who own bear rugs and choose to sell them.
In our situation, my husband who killed the bear is 75 1/2 years old. Our child has no interest in the rug. We are in the process of downsizing and choose to sell this bear rug.
My request and proposal to you is thus: A permit be granted under the following conditions
1. Request of the person owning the bear rug the date and place of the kill.
2. I assume that you ask for proof before issuing a permit to the above mentioned criteria you set forth. Can you not determine parameters for the permit that include the following in addition to the criteria previously stated such as the
Age of the person requesting a permit: a suggestion would be 65 years and older
Age of the bear: a suggestion would be the bear rug be 25 years old or older
Years of Alaska residency
Reason for selling. This could be a notarized statement
I appreciate your consideration of my request and a review and amendment of your policies and regulations that will be fair to Alaskans and yet protect our grizzly bears from unfair harm.
Sincerely,

Submitted By
Dusty Spencer
Submitted On
10/24/2017 9:13:46 AM
Affiliation
Resident

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North Pole, Alaska 99705

Proposal 38 and 39 for tiered sheep hunting requirements are slander that caiters to the Guide industry. Vast majority of Non-resident sheep hunters are a one-time affair so they have no reason to pass on a younger full curl legal ram. Putting these penalties on residents without congruently enforcing them on the Guide is a slap in the face to Alaskans who own this resource. If this proposal doesnt add that Guides will have the tiered effect as well IE; Guides hunter takes a 9 year old ram he cannot guide the next season so on and so forth to mirror the residents penalty. This is merely a Guide trying to keep resident hunters out of the area he uses. A bigger issue in my opinion is that state land needs to be concessioned for both Guides and Transporters, too many areas are being decimated by the pressure created by no holds bar of people in the area. Best example is the Wood River drainage are, overrun with 7+ guides all operating out of there and transporters mass dropping clietns on the large strip at the old lodge...

Submitted By
Jeffrey Sperry
Submitted On
10/15/2017 11:59:56 AM
Affiliation

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17151 Vanover Circle
Eagle River, Alaska 99577

I would like to comment on the following propoals:

Proposal #2 definitions - leave the youth age at 10 years of age and require hunter education (the youth hunts should be eliminated, however if you are going to have them then the education is vital.) My two boys and I took the hunter education many years ago and it was invaluable. Additionally, I believe that the adult accompanying the youth should also be required to have completed the hunter education so they can reinforce what the youth has learned in the education course.

Proposal 6 - unlawful take of furbearers - I would oppose this proposal of allowing incidental take. I believe that unscrupulous trappers would claim to be targeting a legal species while truly attempting to take a closed season species. any incidental take should be turned in to Fish and Game

Proposal 8 - I am opposed to shooting wolverines the same day as airborne. The wolverine population is not prolific and there is no reason to allow shooting them the same day as airborn.

Proposals 11, 12, 13 - I am opposed to any changes in the use of aircraft for hunting. Especially in the area of dall sheep. People are still using aircraft to spot sheep but it has gotten better.

Proposal 17 - I support opposing the use of an airbow during archery season - it is more of a firearm than a bow and arrow.

Proposal 26 - opposed - continue to count permits obtained through auction as a regular bag limit

Proposal 33 - I support with amending to nonresidents drawing permits be limited to 5% of the number of ;permits allowed for an area. Residents should have an overwhelming preference.

Proposal 36 - I support with amending to nonresidents drawing permits limited to 5% of the number of permits allowed for an area.

Proposal 38 - I oppose - it creates an extremely cumbersome system and it is unnecessary.

Proposal 39 - I oppose - it creates a cumbersome system and it is unnecessary

Proposal 40 - I oppose - leave the nonresidents as 1 in 4 years.

Proposal 41 - I oppose - the purchase of the waterfowl stamp helps support funding for waterfowl and habitat management, which is something that all waterfowl harvesters should support.

Proposal 43 - I oppose. **I believe all proxy hunting and fishing should be eliminated**. I have personally observed many abuses of this system. It is very easy for people to have their for their own bag limit and then share with others in need. It creates a bond between the individuals or families.

Proposal 44 - I am opposed . I believe all proxy hunting and fishing should be eliminated. People can readily share what they harvest with others in need and it creates a bond between the individuals or their families. You do not need to harvest an animal under someone else's tag just to provide for them. Share what you have.

Proposals 45, 46, 47, 48 I oppose all of those proposals I support the current regulations requiring the appropriate documentation for the transfer of meat.

Proposal 49 - I support this proposal. It is important to monitor the selling of brown bear hides and skulls so it does not become a commercial operation.

Proposal 52 - I support not allowing onresidents to hunt moose or caribou in an intensive managment unit. If the populations are depressed, nonresidents should not be allowed to hunt there.

Proposals 56, 57, 58 I oppose all of these. The community moose and caribou hunts should be stopped. This was started initially to benefit Ahtna - **Ahtna has 3.7 million acres** of their own land to hunt on, additionally they have over 1 million acres of federal land that they can subsistence hunt on. They should be able to harvest plenty of moose and caribou under the regular state hunting seasons and

bag limits on those two areas. There is no need for a community moose or caribou hunt,

Proposal 60 - I would amend this proposal to change the age to the minimum age for obtaining a permit.

Proposal 164 - I oppose this proposal. A crossbow is not a bow and arrow and has no business being included in a archery hunt. It is closer to a firearm than a bow.

Please eliminate the community harvest moose and caribou hunts,

Thank you for this opportunity

Submitted By
Stephen Springer Jr
Submitted On
10/25/2017 2:41:29 PM
Affiliation

Hello, I am a life long hunter and an AK resident for 20 plus years and am commenting on my own behalf representing only myself.

I am in support of Proposal #'s 5,25,27,28,33,34,36,37,42,45,48,

I **oppose** proposal #'s 30,38,39,

Submitted By
Ashley Strupulis
Submitted On
10/26/2017 7:01:56 PM
Affiliation

Please vote no on prop 40

Submitted By
Dustin Tallman
Submitted On
10/27/2017 12:33:25 PM
Affiliation

I support proposal #12 by John Frost because it is the most common sense reason to rescind proposal 207. It has no underlying ulterior motives behind it and gets to the heart of why proposal 207 shouldn't have been enacted in the first place.

I support proposal #28 because I am 100% committed to ensuring that the allocation of big game favors resident hunters

I oppose proposal #30 because this is obviously just another ploy by APHA to limit their competition in certain areas and for certain species

I support proposal #32 because it's a common sense way to potentially reward a hunter who has dedicated funds for many years to drawing one of these tags.

I support proposal #33 as it is a common sense way to ensure resident priority when allocation of moose is being considered for a drawing hunt

I support proposal #34 because it ensures that resident hunters will have priority when it comes to drawing certain tags (ie; Kodiak brown bear). As it is written right now, the second degree of kindred tags fall under the resident pool. They need to fall under the non resident pool.

I support proposal #36 because it's a common sense way to ensure that the allocation of sheep tags favor resident hunters.

I oppose proposals #38 and #39 because there are better ways to ensure the health of the sheep populations state wide. I understand the intent of the proposals, but do not agree with the restrictions put on resident hunters in any form. It goes without saying that guides and their clients harvest a disproportionate amount of sheep statewide, so the proposed restriction should be placed solely on guides and their clients. I could take it a step further and propose that non resident hunters should be limited to one fall sheep permit in their lifetime.

I support proposal #42. Only the legislature should determine which species must be guided for non resident hunters.

I support proposal #48 because this will hold guides and clients accountable for taking care of the meat of harvested animals.

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

OSM 17077.PM

OCT 0 3 2017

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet November 9-17, 2017, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for Statewide Regulations. We have reviewed the 69 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.,
Assistant Regional Director

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Jennifer Hardin, PhD, Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Chair, Southeast Alaska Regional Advisory Council
Chair, Southcentral Alaska Regional Advisory Council
Chair, Kenai Aleutian Regional Advisory Council
Chair, Bristol Bay Regional Advisory Council
Chair, Yukon Delta Regional Advisory Council
Chair, Seward Peninsula Regional Advisory Council
Chair, Western Interior Alaska Regional Advisory Council
Chair, Eastern Interior Alaska Regional Advisory Council
Chair, North Slope Regional Advisory Council
Chair, Northwest Arctic Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game
Jill Klein, Federal Subsistence Liaison Team Leader,
Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Statewide Proposals

November 10 - 17, 2017

Anchorage, Alaska

Office of Subsistence Management (OSM)

PROPOSAL 5 – 5 AAC 92.990. Definitions. Change the definition of a moose antler point/tine as follows:

5 AAC 92.990(a)(13) "brow tine" means a tine emerging from the first branch or brow palm on the main beam of a moose antler; the brow palm is separated from the main palm by a wide bay; a tine originating in or after this bay is not a brow tine; **an antler point or tine originating within two inches from the base, and less than three inches in length, will not be counted as a brow tine;**

5 AAC 92.990(a)(46) "moose antler" definitions:

(A) "50-inch antlers" means the antlers of a bull moose with a spread of 50 inches or more measured in a straight line perpendicular to the center line of the skull;

(B) "spike-fork antlers" means antlers of a bull moose with only one or two tines on at least one antler; [AN ANTLER POINT OR TINE ORIGINATING WITHIN TWO INCHES FROM THE BASE, AND LESS THAN THREE INCHES IN LENGTH, WILL NOT BE COUNTED AS A TINE,] male calves are not considered spike-fork bulls; **spike-fork bulls can be either spike and/or fork configuration;**

(C) "spike" means antlers of a bull moose with only one tine on at least one antler; for the purposes of this subparagraph, male calves are not considered spike bulls;

(D) "fork" means antlers of a bull moose with only two tines on at least one antler;

5 AAC 92.990(a)(61) "point" means any antler projection that is at least one inch long, and that is longer than it is wide, measured one inch or more from the tip; **an antler point or tine originating within two inches from the base, and less than three inches in length, will not be counted as a tine;**

5 AAC 92.990(a)(80) "tine" has the same meaning as "point";

Current Federal Regulation

§100.25(a) Definitions.

Brow tine means a tine on the front portion of a moose antler, typically projecting forward from the base of the antler toward the nose.

Fifty-inch (50-inch) moose means a bull moose with an antler spread of 50 inches or more.

Spike-fork moose means a bull moose with only one or two tines on either antler; males calves are not spike-fork bulls.

Tine or antler point refers to any point on an antler, the length of which is greater than its width and is at least 1 inch.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal may help clarify antler restrictions for Federally qualified subsistence users who also hunt under State regulation.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: State and Federal definitions related to antler configuration are not uniformly consistent. Notably, the Federal definition of *brow tine* does not explicitly exclude drop tines or burr tines, as the State regulation does. This proposal neither increases nor decreases this regulatory complexity, but rather seeks to clarify existing State requirements. Despite continued disparities in Federal and State definitions, the proposed regulatory change may be useful in clarifying antler configurations for Federally qualified subsistence users hunting under State regulation.

PROPOSAL 49 – 5 AAC 92.031. Permit for selling skins, skulls, and trophies; and 92.200. Purchase and sale of game. Require a permit before brown bear skulls and hides with claws attached can be sold as follows:

5 AAC 92.031 is amended by adding a new section to read:

(g) A person may sell, advertise, or otherwise offer for sale a brown bear skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two bears per regulatory year only after obtaining a permit from the department.

5 AAC 92.200(b)(1) is amended to read:

(1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear**;** [,] and except skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year **by permit issued under 5 AAC92.031**;

Current Federal Regulation: There is no equivalent Federal regulation.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP18-44 requests regulations allowing the sale of up to two raw/untanned brown bear hides (with claws attached) and/or skulls per regulatory year from brown bears legally harvested by Federally qualified subsistence users on Federal public lands in Unit 23. Proposal WP18-43 requests that the Unit 23 brown bear harvest limit be increased from one to three bears and that the season be extended to year-round. These proposals will be considered by the Federal Subsistence Board at its April 2018 meeting.

Impact to Federal Subsistence users/wildlife: This proposal may burden Federally qualified subsistence users hunting under State regulations as they would need to obtain an additional permit in order to sell brown bear hides and skulls. However, the burden is outweighed by the management benefit.

This proposal would ensure that brown bear hides and skulls offered for sale came from legally harvested bears and may benefit brown bear populations through more informed management due to the ability to track and quantify the sale of these parts. However, it may also lead to illegal harvest of some populations if commercialization of brown bear products increases as a result of this proposal.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal would ensure the legal sale of brown bear hides and skulls, reduce law enforcement concerns, allow for the tracking and quantification of brown bear hides and skulls, and may clarify conservation concerns associated with possible commercialization of brown bear harvests. However, law enforcement concerns remain associated with the sale of brown bear products and increasing market availability and/or prices of brown bear products may intensify illegal harvest from these populations.

Submitted By
Marty Weatherup
Submitted On
10/23/2017 5:59:04 PM
Affiliation

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Address
601 E Chickaloon Way
Wasilla, Alaska 99654

I have include my support or opposition to the following BOG proposals. Thanks you.

Support - Proposal #12 (John Frost) – Rescind restrictions on the use of aircraft during sheep season

Support Proposal #28 (RHAK) - Modify BOG Nonresident Allocation Policy

Oppose Proposal #30 (Alaska Professional Hunters Assn.) – Nonresident 2nd-degree-of-kindred hunters hunt under resident relative tag

Support Proposal #32 (Brad Sparks) - Establish a bonus point system for bison and muskox draw hunts

Support Proposal #33 (RHAK) - 10% max nonresident allocation for any moose draw permit hunts

Support Proposal #34 (RHAK) - All nonresidents treated equally, all nonresident draw permits in nonresident pool of tags

Support Proposal #36 (RHAK) - Nonresident draw only for sheep statewide, 10% allocation

Support Proposal #37 (RHAK) - Nonresident 10% max harvest of sheep by subunit

Oppose Proposal #38 (Lew Bradley) & Proposal #39 (Aaron Bloomquist)

Support Proposal #42 (RHAK) - Remove moose and black bear nonresident guide requirements

Support Proposal #48 (RHAK) - Transfer of Possession by nonresident guided hunters

Support Proposal #52 (RHAK) - No Nonresident hunting in active Intensive Management predation control areas

Submitted by: Brian West
1000 Oceanview
Anch AK
99515

ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

OCT 25 2017
BOARDS
ANCHORAGE

2017-2018 Proposed Changes to Regulations
Statewide Regulations.

Proposal 5. Against. This proposal will only add to confusion. If hunters have a hard time identifying an antler spread of 50" how can someone believe that they will be able to identify a tine within 2" or more from the base and at least 3" in length? There are also issues with the definitions in the proposal. What is meant by base? Is this the point where an antler emanates from the skull or where the brow palm begins? What is meant by originating? A tine doesn't just protrude from the antler, it sweeps up, so is the point of origination the tangent of the curve between tine and antler or something else? This proposed standard will be impossible to meet and will add to confusion.

Proposal 13. Support

Proposal 16. Against. 100 Foot pounds of energy is a ridiculously low standard. Typical hunting rifles generate several thousand Ft-lbs of energy. A 22 generates nearly 200 ft-lbs of energy. I have doubts that a weapon generating 100 ft-lbs will do any more than wound animals.

Proposal 17. Support.

Proposal 25. Against. A tag is required for most hunts and sealing is required for nearly all bears taken. There is no reason to implement this proposal as the information sought is already obtained.

Proposal 26. Against. If you are allowed one moose, etc., what makes the difference if it is taken on a tag won through a raffle or one you pick up through the Fish&Game?

Proposal 28. Support. Priority for permits should always be given to residents. Only when there are permits in excess of resident applicants should any permit be given to non-residents.

Proposal 32. Against. The fairest way to issue permits is by random draw. By definition, everyone applying for that draw has an equal chance. The odds are the same for all individuals. If there are resident hunters who go wanting for permits because they go to non-residents than no permits should go to non-residents.

Proposal 33. Against. In any hunt limited such that permits are required, no permits should go to non-residents. Game in the state is to be managed for the residents of the state, period. Non-residents are not out to feed their families, but, to have a memorable camping trip. As such, they can easily hunt in an area not restricted to permits.

Proposal 34. Support.

Proposal 36. Against. Where a general hunt is allowed there should be no requirement for non-residents to obtain permits. If non-residents take more sheep than residents I suggest residents utilize the services of guides to improve their chances of success. It is well established that guided sheep hunts are more successful than non-guided. Requiring the use of guides is why the non-residents are so

successful. If non-residents where not required to use guides their success rate will fall.

Proposal 37. Against. I see no reason to restrict non-residents in any area with a general hunt. If the area is limited to permits, then of course no permits should be given to non-residents.

Proposal 38. Against. If a person harvests a legal sheep nothing should prevent them form harvesting a sheep the next year. Just because an individual is having a difficult time hunting sheep does not mean he will increase his chances by limiting the opportunity of others.

Proposal 39. Against. I fail to see how this proposal if adopted would put more old "rams on the mountain". This proposal (and proposal 38) encourage hunters to take older rams. Under this proposal hunters who wish to hunt each year will take older rams. I would guess that soon only younger rams will be left. I also fail to see why those taking sub-legal rams should not have their privilege permanently revoked.

Proposal 41. Against. First, unless they have been hunting illegally for years acquiring a duck stamp should not be alien to any individual. Second all residents should be treated equally. Natives already receive enough special consideration by being able to hunt waterfowl in the spring. Third, contrary to the statement in the proposal obtaining a duck stamp in no way deprives them of customary and traditional harvest opportunities. If they have managed to incorporate, outboard motors, four wheelers, high powered rifles, bombed tipped spears to hunt whales, etc., into their hunting traditions and customs, I fail to see how the purchase of a duck stamp will alienate them from their culture. In short. This caucus does not want to pay for a duck stamp. Too bad. The money generated from duck stamps benefits all Alaskans including those of the Native Caucus.

Proposal 42. Support. The Board overstepped its authority by creating guide requirements for moose. The Board has taken too many steps to insure that guides have clients. The continuation of such action by the Board will result in management by ballot initiative as residents frustrations with the Board boil over. It wont be long before someone proposes a ballot initiative to limit all permits to Alaskans.

Proposal 45. Against. While not an issue for game such as bear and sheep, where a taxidermist will likely be utilized and in many cases take in the required specimen for the hunter this is not the case with moose. In many instances this will require a special trip to an ADF&G office. This is an unreasonable burden.

Proposal 52. Support. Residents should always be the priority.

Proposal 55. Support. This is a reasonable requirement.

Proposal 56. Against. This goes against the Supreme Court decision that a CSH must be open to all residents. This proposal is only a veiled attempt to make CSH available only to members of various native tribes. The entire program should be abandoned it only perpetuates an "us" verses "them" mentality. There is no reason why an individual needs a regulation to practice subsistence hunting. The CSH program in Unit 13 is proving to be detrimental to the moose herd. The CSH is merely a means for one group to gain an advantage over others, it has nothing to do with tradition or custom. The CSH was the result of Native Groups believing they did not get enough permits under the Tier II system. They pressured the Board to devise a scheme by which they would be guaranteed hunting opportunities, hence the birth of the CSH. The court s rightly ruled that the CSH was discriminatory and unconstitutional. This new definition is also discriminatory because it is so vague. The first time a

group application is rejected this issue will again be in court. The native community must realize that all Alaskans have equal rights. Even to subsistence. I see no reason, other than discrimination, to continue the CSH program. Anyone who hunts can share any custom, tradition , etc., with whoever he pleases. The CSH is a bad idea that promotes discrimination and should be abolished.

Proposal 57. Against. Virtually all testimony and numerous proposals desired the elimination of the CSH program. A new definition is not needed, what is needed is the elimination of the CSH program. Any definition that would pass legal muster would easily be met by any group of individuals, not just natives. So as long as any group other than natives are allowed into the CSH program there will be an effort by natives to eliminate those groups.

Proposal 59. Against. This proposal is racially discriminatory. In most cases only natives are allowed to sell such animal parts.

Proposal 60. Against. It is not the State's responsibility to teach hunter education. This is the duty and right of the father of other relative.

Proposal 65. Against. I would support this proposal if it did not include a limitation of the permits.

Western Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

RAC 17023.ZS

OCT 2 6 2017

Ted Spraker
Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Alaska Board of Game Comments

Dear Chairman Spraker:

I am writing to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide comment on some pending proposals before the Alaska Board of Game for its statewide meeting scheduled for November 10-17, 2017, in Anchorage.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

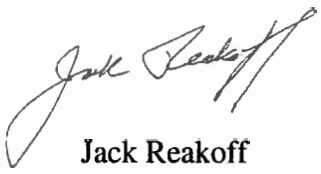
The Council held a public meeting on October 10-11, 2017 in Fairbanks. Among the agenda items discussed were some Board of Game proposals that would impact subsistence users and resources in the Western Interior Region. The Council discussed and voted to submit the following comments to the Board of Game for consideration as it deliberates these proposals:

Proposals 11 and 12
The Council voted unanimously to oppose these proposals. The use of aircraft in spotting Dall Sheep resulted in a high success rate in hunting; however, when it was prohibited, the success rate of guided hunts dropped, which allowed the struggling Dall Sheep population to recover. The practice of using aircraft in spotting of sheep presents a conservation concern in the management of small distinct populations. Maintaining the prohibition, and the status of violating the prohibition as a misdemeanor, is a strong incentive for those operators who wish to seek Federal permits to operate.

Proposals 14 and 15
The Council voted unanimously to oppose these proposals. Denning of bears has been a customary and traditional practice for thousands of years in the region, particularly for the Koyukon people. The locating of dens can be time-intensive, so it is impractical to turn down the harvest opportunity if bears are present. Sows and cubs are not targeted, but if they are in the den, they will be harvested. Sows present a valuable harvest opportunity, and cubs are taken because they may not survive without the sow. Every part of the animal is used – hide, meat, and fat. If adopted, the proposal would restrict subsistence users from harvesting bears in dens according to traditional practices. The current practice does not present a conservation concern, as people only take what they need.

The Council thanks the Board of Game for its consideration of these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Western Interior Region. We look forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Zach Stevenson, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 786-3674 or zachary_stevenson@fws.gov.

Sincerely,



Jack Reakoff
Chair

cc: Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director
Office of Subsistence Management
Jennifer Hardin, Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Theo Matuskowitz, Regulations Specialist, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Lisa Maas, Wildlife Biologist, Office of Subsistence Management
Pippa Kenner, Anthropologist, Office of Subsistence Management
Joshua Ream, Anthropologist, Office of Subsistence Management
Carl Johnson, Council Coordination Division Supervisor
Office of Subsistence Management
Zach Stevenson, Council Coordinator, Office of Subsistence Management
Administrative Record

Wrangell-St. Elias National Park
Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 27, 2017

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

Subject: November 2017 Statewide Board of Game Meeting – Proposal 41

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 28 and 29, 2017. At this meeting, the SRC reviewed Proposal 41, which will be considered at the November 2017 Statewide Board of Game Meeting and would like to provide the following comments:

The Wrangell-St. Elias SRC supports Proposal 41, which would exempt rural subsistence hunters from the requirements for obtaining a waterfowl conservation tag. The commission believes that this exemption should apply year round. The requirement for rural subsistence hunters to purchase a state duck stamp is an unnecessary burden for rural hunters. There is already an exemption for rural subsistence hunters from the federal duck stamp requirement.

Thank you for the opportunity to comment.

Sincerely,

Daniel E. Stevens
Chair

Note: Karen Linnell was not present for the commission's discussion of Board of Game proposals.

Chair: Daniel Stevens; Members: Don Horrell, Gloria Stickwan, Karen Linnell, Jamie Marunde, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy

Submitted By
Birch Yuknis
Submitted On
10/26/2017 10:56:16 AM
Affiliation

Phone
9073179591
Email
byuknis@aol.com
Address
5035 Flying Circus Circle
Wasilla, Alaska 99654

To: Alaska Board of Game Statewide Meeting Novemebr 10-17 2017

Thank you Alaska BOG for taking the time to read my comments.

Proposal 12. I fully support this proposal as even AWT have advised the BOG to stop passing proposals that are unenforceable. I agree with the author and his logic.

Proposal 28. I fully support this proposal. The residents of Alaska should be given the opportunity for priority over nonresidents. Priority not exclusivity. The BOG can figure out a way to give residents the opportunity for priority.

Proposal 30. I do not support this proposal. In my opinion this is the Professional Hunter's attempt to limit a great benefit of being an Alaska resident.

Proposal 34. I fully support this proposal. As an Aalaska resident with limited chances to win a permit in a drawing hunt, I do not feel that a 2DK should lessen my chances of drawing. I do not agree with separating the nonresdient pool into two separate pools. A nonresdient is a nonresdient.

Proposal 38. I do not support this proposal. Mr. Bradley is a past educator of mine. I know he loves his big sheep. ADF&G already has much inconsistency in their aging process for Dall sheep. The State already has some designated trophy sheep areas. ADF&G also does not recomend harvesting a ram based on age.

Proposal 39. I do not support this proposal. Again the aging of rams by ADF&G is inconsstent. Also as an example this year a friend harvested a very nice 6 year old ram. Under this proposal he could not harvest a ram for four years. Sheep hunting is physically demanding and for most, the window to pursue these mountain animals is not as long as they would like. I do not agree with limiting one's opportunity to harvest a ram anymore than is already on the books.

Proposal 41. I do not support this proposal. All waterfowl hunters should want to purchase a waterfowl conservation tag. The money goes to help increase waterfowl numbers. Everyone who hunts waterfowl no matter what classification they want to use for their harvest should be required to purchase a tag.

Proposal 42. I am opposed to this proposal. The guided nonresdient creep to other species needs to stop. There are three species that are required and adding others, even in limited areas is unnacceptible. If a nonresdient wants to hunt a moose or a black bear it should be the nonresdients choice if they want to use a guide or not.

Proposal 43. I do not support this proposal. For the first time in 30 years I was able to harvest an Emperor Goose this Fall. There should not be proxy hunting for this limited resource.

Proposal 47. I do not support this proposal. Being able to create a document at the time of request could easily be abused. The ability to harvest an animal comes with some responsibility for transferring the meat out of the field. Both parties involved, the harvestor and the transporter of the meat should have to sign the form before the transfer begins,

Proposal 56. I do not support this proposal. Removing the term resdients is unnaceptible.

Proposal 57. I know this will fall on deaf ears, but I do not support any proposal that is Board generated. Someone from the public or Department could make the proposal.

Proposal 60. I support this proposal. Education is never something to skimp on. You only have to take it once. ADF&G can figutre out a way to make this work in the more remote areas of the State. If it saves one life/injury it is worth it. I have first hand experience with this as I have been shot in the face with a shotgun by a careless hunter and still have three pellets in my skull.

Again thank you for taking the time to read these comments and thank you for the time and effort you all put into being on the Board.

Submitted By
Bob Abbatecola
Submitted On
10/20/2017 6:19:18 PM
Affiliation

Phone
631-805-420
Email
Babbatec@gmail.com
Address
375 Asharoken Ave
Northport , New York 11768

Lots of killing going on in the world today. People do an awful lot of harm. These bears want the same things we want, to live in safety and raise a family. It's wrong to kill these mothers and babies. It's time to move away from cruelty.

Submitted By
Emilie
Submitted On
10/20/2017 5:37:58 PM
Affiliation

Phone
4049552099
Email
Emilie.aikens@yahoo.com
Address
Po box 952
Kennesaw , Georgia 30156

I do not understand how one person let alone an entire board could feel it is okay to shoot mother bears and their cubs, sleeping or awake. Find better ways to get things done. HUMANE AND ETHICAL WAYS TO GET THINGS DONE. We should be protecting Mother Nature not harming her and taking away her beautiful beings. Until this is fixed I will officially be boycotting Alaska as a whole.

Submitted By
Silke Albus
Submitted On
8/28/2017 9:57:02 AM
Affiliation

Phone
+49 152 22960327
Email
silke.albus@gmail.com
Address
Max-Walraff-Strasse 4a
Cologne, Other 50933

Dear Sirs, I am strikly against the killing of mother bears and cubs and I kindly ask you to put an end to this cruelty. I strongly believe that we humans have the responsibility to protect our wildlife for us and for all future generations. Kind regards, Silke Albus

Submitted By
Patricia Alexakis
Submitted On
8/18/2017 4:27:22 PM
Affiliation
OneProtest - citizen

Phone
805 388-9914
Email
patti4birds@verizon.net
Address
231 North Loop Dr.
Camarillo, California 93010

PROPOSAL 15 - 5AAC 92.26 --- Taking cubs and female bears with cubs prohibited. Please save the bear cubs. Thank you.

Patricia Alexakis

Submitted By
Elizabeth Allen
Submitted On
10/25/2017 11:02:12 PM
Affiliation

Phone
9806229229
Email
harleyanddavidson@msn.com
Address
309 Carrington Green Rd
Salt Lick , Kentucky 40371

PROTECT MOTHERS AND CUBS

Please support OUR PROPOSAL #15 which will ultimately stop the hunting of mothers with cubs and cubs

Submitted By
Mariah Angulo
Submitted On
8/19/2017 12:57:33 PM
Affiliation

Phone
4807721429
Email
mariahnicoleangulo@gmail.com
Address
8729 W Pierson St
Phoenix, Arizona 85037

The hunting of bear cubs most certainly should not be permitted. It is not wise concerning the potential population of bears in the future, nor is it morally acceptable.

Submitted By
Della Attisani
Submitted On
10/22/2017 4:37:18 AM
Affiliation

Phone
954-254-9999
Email
Vcolumbia999@aol.com
Address
8720 Shadow Wood Blvd
Coral Springs , Florida 33071

#15 — please forever ban hunting of mothers and cubs. It is monstrous.

Submitted By
Kathleen Atwill
Submitted On
10/21/2017 1:17:00 PM
Affiliation

Phone
850-607-1517
Email
katloves3@yahoo.com
Address
P.O. Box 87
Bagdad , Florida 32530

I request there should be laws against killing bears and their cubs for recreational hunting. Kathleen Atwill

Submitted By
Kathy Aub
Submitted On
8/10/2017 3:08:56 AM
Affiliation

Phone
555-555-5555
Email
tarponebay@comcast.net
Address
373 NE 30th St
Boca Raton, Florida 33431

Please regulate and ban the hunting of bear cubs in Alsaka. They are deserving of being trated with respect, like us humans are, to grow fully and live on this earth as Higher Power intended. That is why we all have been created, to live amongst each other in peace. Thank you.

Submitted By
Mary Auchter
Submitted On
8/19/2017 6:36:31 AM
Affiliation
Miss

Phone
2184914802
Email
mary.auchter@gmail.com
Address
2234 Woodland Ave Apt 3
Duluth, Minnesota 55803

PROPOSAL 15-5 AAC 92.26: Thank you for your assistance in amending the rule to prevent bear Cubs from being killed in Alaska. Everything we do matters and we are all important. Thank you

Submitted By
Diane Ault
Submitted On
8/14/2017 10:24:51 PM
Affiliation

Phone
2563795489
Email
djcatlady75@gmail.com
Address
461 Fussy Hill Rd
New Market, Alabama 35761

Proposal 15-5AAC 92.26 taking of mother bears and their cubs. I would like to appeal you your humanitarian selves and ask that you please stop allow people to "hunt" these mother bears and their cubs. It cannot be regarded as sport of any kind and is abhorrent. Our planet was made for all of us to live together, yes animals kill, but only for food or if threatened, humans, on the other hand, kill for supposed pleasure and in doing so are slowly wiping out wildlife that has every right to co exist with us. It is not enough that we are taking away their habitats for our own gain, now some feel it acceptable to take them from the homes as babies and nursing mothers. You can stop this happening and I am asking you to please do so.

Submitted By
Stacy Austin
Submitted On
8/19/2017 4:40:34 AM
Affiliation
Mr. and Mrs.

Phone
7086384901
Email
harringtonstacy353@yahoo.com
Address
515 Monterrey Terrace
Mchenry, Illinois 60050

WHEN WILL THE MURDER OF OUR INNOCENT WILDLIFE STOP?? PLEASE STOP THE CUB HUNT ! WE HAVE A MORAL OBLIGATION TO HELP PROTECT THEM NOT EXTINGUISH THEM

Submitted By
Susan Baillie
Submitted On
8/18/2017 4:04:42 PM
Affiliation

Phone
+44 781690231
Email
Susanbaillie@btinternet.com
Address
The Neuk
A85
Connel, Other PA37 1PJ

Proposal 15-5 AAC 92.26 Taking cubs and female bears with cubs prohibited.

I am a resident of Scotland, United Kingdom. I am shocked and horrified at the news of the possible lawful killing of cubs and mother bears. Please do not allow this to happen. Please protect and preserve your beautiful bears.

Submitted By
Ruhee Baltz
Submitted On
8/27/2017 4:18:37 PM
Affiliation
None

PROPOSAL 15 - 5 AAC 92.26

I object to the killing of bears and their cubs. Please stop this cruel and inhumane practice. Thousands of people from all around the world are against this horror. Will you only be satisfied when you've killed off everything? You have the chance to stop this - please do so.

Submitted By
Renee Banks
Submitted On
8/18/2017 6:25:12 PM
Affiliation

Please prohibit the killing of bears and their cubs. Our dwindling wildlife is precious and is already threatened by enivronmental factors. Their protection is vital to their survival as a species.Americans want thier children and grand children to live in a world that is abundant with all living things.Protect these magnificent creatures!

Submitted By
Lorraine Barham
Submitted On
8/22/2017 6:06:41 PM
Affiliation

Phone
252-945-9329
Email
cajunrain@hotmail.com
Address
363 Topping Loop Rd
Pantego, North Carolina 27860

Regarding Proposal15-5 AAC 92.26 We are praying you will not allow the killing of female bears with cubs or cubs alone. There is enough of a habitat in Alaska to allow bears to live a natural free life.

Submitted By
Michelle Barowski
Submitted On
10/21/2017 8:37:16 AM
Affiliation

Phone
2106027274
Email
barowski11@aol.com
Address
4118 GreenValley Rd
Cibolo , Texas 78108

What is the point of killing a Mom and her cubs. This baffles and disgusts me!! So is the plan just to kill any living creature? I quess if you can't control it, then kill it!! PATHETIC!!!

Submitted By
Julia Bartunek
Submitted On
10/27/2017 7:17:17 PM
Affiliation

Phone
7273262646
Email
sashabuddha@gmail.com
Address
2645 meadowood dr.
new port richey, Florida 34655

PROPOSAL 15 – 5 AAC 92.26". I strongly oppose the hunting of Mother bears and their baby cubs. Please stop this cruel hunt and protect our bears.

Submitted By
Catherine Beauchamp
Submitted On
8/20/2017 5:46:28 PM
Affiliation

Phone
2252292559
Email
clhediting@gmail.com
Address
534 MacDonald St.
Pasadena, California 91103

Please stop the hunting of bear cubs in Alaska completely! Preservation and conservation must be the goal.

Submitted By
Crissy Bellandi
Submitted On
8/20/2017 1:18:11 PM
Affiliation

Regarding PROPOSAL 15 – 5 AAC 92.260, I support the removal of Exceptions 1 and 2, which allow for the taking of cub bears and female bears with cubs.

My household cancelled our vacation plans to visit Denali National Park in 2018 after the passage of H.J. Resolution 69/S.J. Resolution 18 sponsored by Rep. Don Young allowing the nonsubsistence taking of wildlife in Alaska's National Wildlife Refuges. We cannot in good conscience patronize a state so willing to destroy its wildlife and we go on vacation specifically to see wildlife that is thriving in healthy populations in intact ecosystems.

Allowing hunters to kill mothers and cubs, especially in proximity to den sites, is frankly disturbing, and no legislature or regulatory body that allows such a thing can be seen as morally upright. My hope is that in spite of the federal law, the state of Alaska will enact protective measures for wildlife under state jurisdiction. Additionally, I hope that the Alaska Department of Fish and Game would consider the horrific reality that these animals face when confronted by hunters in their dens, the place that they find as sanctuary. It seems unnaturally cruel to want to kill an animal's young as it looks on, only to turn and kill that animal as well. Please remove Exceptions 1 and 2 from 5 AAC 92.260 so that the taking of cub bears and female bears with cubs is prohibited without exception.

Thank you for your time and I appreciate your consideration of my comments.

Submitted By
Rose Ann Bellotti
Submitted On
10/25/2017 6:51:33 AM
Affiliation

Phone
6192820686
Email
roseannbellotti@earthlink.net
Address
4611 Ohio St
San Diego , California 92116

The very idea of killing mother bears and their cubs is so offensive and distressing that I can only believe those who want to see such practices allowed have simply not given the issue the kind of thought it deserves. To kill mother bears and cubs for sport is one of the most unfair "contests" that one could think up, only bested, perhaps, by "caged hunts" where the prey has absolutely no chance to survive. Please think about the anti-nature quality of this idea and cancel it before anybody starts bating, shooting or killing mother bears and cubs with arrows. It is cruel, and heartless, and unnecessary. Cultural tradition is one thing, causing defenseless and innocent animals to needlessly suffer is quite another. Thank you for your enlightened consideration of this plea.

Submitted By
Karyn Benjamin
Submitted On
9/1/2017 1:54:57 PM
Affiliation

Totally object to killing of cubs and mother bears!

This is not a civilized society that does this.

Submitted By
Melia Bisbee
Submitted On
10/2/2017 8:41:48 AM
Affiliation
Mrs.

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Amend the Alaskan Administrative Code 92.260 to prohibit the murder of baby bears and moms with cubs of any age.

I've always wanted to visit Alaska, but I can't support a state that would allow such cruel and inhumane, not to mention unscientific, "sport", merely to pander to a tiny segment of the population. Most people do **not** want iconic North American baby animals and their families destroyed for no reason.

Alaska holds the enviable position of guardian of some of North America's most precious resource: intact ecosystems. Your revenues from this incomparable sustainable wealth will far outstrip any short-term gains from its destruction.

Don't be greedy and stupid. Protect your land and wildlife like the unique and irreplaceable treasures they are.

Sincerely,

Melia Bisbee

Submitted By
Karin Bishop
Submitted On
8/10/2017 5:32:26 PM
Affiliation

Phone
2063909950
Email
karinbishop@comcast.net
Address
22903 se 241 pl
Maple valley , Washington 98038

Do not kill bear cubs. It is disgusting disgraceful despicable and vile to think they would be slaughtered with their moms. What humans would suggest much less consent to this evil actions. Do not kill

Submitted By
Nandia Black
Submitted On
10/20/2017 3:43:32 PM
Affiliation

Phone
312-485-4244
Email
nandia@att.net
Address
21678 Hampton Ct.
Killdeer , Illinois 60047

Hunting Mother bears with cubs and hunting cubs is unethical and inhumane. A civilized society must not condone such inhumanity. Alaska do the right thing and protect mother bears and their cubs from Trophy Hunters! Until Legislation is enacted to protect our cherished wildlife, I am morally compelled to boycott your state.

Submitted By
Isabel Boon
Submitted On
8/19/2017 1:16:11 AM
Affiliation

Proposal 15-5 AAC 92.26 Taking female bears with cubs, I am writing to respectfully ask you to change your law on female bears with cubs. We can co-exist with animals in our world, without adding to making it even more out of balance by these killings, this increases as the years go by. You can make a difference by stopping the killing of these beautiful animals. Please change your regulations. Thank You.
Isabel Boon

Submitted By
Jamie Borland
Submitted On
8/10/2017 4:53:05 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26

We must spare the lives of the bear cubs!

Submitted By
Candace Brad
Submitted On
8/11/2017 7:00:36 AM
Affiliation

I am commenting on the State Regulation AAC 5 92.260. Taking cubs and females with cubs should be prohibited. This is not a sustainable practice for any species.

Submitted By
S
Submitted On
8/18/2017 5:25:48 PM
Affiliation
Bradburn

PROPOSAL 15 - 5 ACC 92.26

Please continue protecton for bears in Alaska and do not allow hunting of cubs.

Submitted By
Rachel Bradley
Submitted On
10/21/2017 9:14:04 AM
Affiliation

Phone
318-930-1985
Email
rachelnbradley@yahoo.com
Address
3738 SE 19th
Des Moines, Iowa 50320

Please disregard previous statement. I support and encourage you to support proposal 15. Please stop killing mother bears and their cubs. I will not visit your state as long as this barbaric act continues.

Submitted By
virginia broadbeck
Submitted On
8/18/2017 4:06:37 PM
Affiliation
Ms

Phone
5406722762
Email
ginnybroadbeck1@verizon.net
Address
18078 mountain track road
orange, Virginia 22960

I strongly support the prohibition of hunting bear cubs and female bears with cubs!! We need to responsibly protect wildlife and the natural wonders of our states and our nation--not hunt and kill these animals to the brink of extinction in their natural habitats.

Submitted By
Laura Brown
Submitted On
8/10/2017 1:46:44 AM
Affiliation

Please leave bear cubs alone. They have as much right to be here as anything else. We need to cherish our wildlife and ecosystems, not destroy them!

Submitted By
Kjerstin Bruus-Jensen
Submitted On
8/18/2017 9:17:05 PM
Affiliation

Phone
001498997605033
Email
bruus-j@gmx.net
Address
Zenettistrasse
Munich - Germany, Other 80337

Regarding "PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited. Bears are precious and they should not be killed for fun. Bear cubs are the future of them. Please make sure that you protect your wildlife as much as you can. Wildlife is under enough stress through environmental changes. I wish we would still have such a healthy wildlife in Germany.

Submitted By
Delana Bryant
Submitted On
8/28/2017 7:47:55 AM
Affiliation

Phone
270-597-7334
Email
Ddharp67@gmail.com
Address
482 Sloss Rd
Woodburn, Kentucky 42170

Please stop this heartless killing of precious little cubs.

Submitted By
Lori burkhart
Submitted On
10/25/2017 3:00:12 PM
Affiliation

Phone
5134760938
Email
Lburkhart@embarqmail.com
Address
4234 Hegner avenue
Cincinnati , Ohio 45236

proposal 15 – 5 AAC 92.26". Taking cub bears and female bears with cubs prohibited. Please do not allow the hunting of mother bears and cubs. It is in humane to cause the suffering of so many innocent animals. Babies should not be killed or left orphaned to die of cold or starvation. Let them be!!!

Submitted By
George Burnash
Submitted On
8/18/2017 3:55:14 PM
Affiliation
M

Phone
9163625003
Email
george.burnash@att.net
Address
10541 Malaga Way
Rancho Cordova, California 95670

Please stop the killing of bear cubs. thank you.

Submitted By
Leslie Burpo
Submitted On
8/19/2017 3:31:42 PM
Affiliation

I am writing in support of PROPOSAL 15 – 5 AAC 92.26 that prohibits the taking of cubs and female bears with cubs.

Submitted By
Leslie Burpo
Submitted On
8/19/2017 3:39:12 PM
Affiliation

I forgot to mention that I object to the Exception 1 and 2 in 5 AAC 92.260 which allows for the taking of bear cubs and female bears with cubs. My previous comment only mentioned that I support PROPOSAL 15 – 5 AAC 92.26 that prohibits the taking of cubs and female bears with cubs.

Submitted By
Nancy Burton Miller
Submitted On
8/9/2017 8:56:57 PM
Affiliation

Phone
&14-599-3168
Email
Nbmxx@yahoo.com
Address
106 vosburgh rd
Rainbow Lake , New York 12976

Regarding proposal 15 to amend code AAC 5 92.260, it is my opinion that killing bear cubs is a cruel and unnecessary action. In fact any killing of bears for trophies is a cruel loss of animal life. They have as much right as us to inhabit the earth, raising their families and enjoying life. People must be educated to not attract bears by leaving out garbage. Nuisance bears can be relocated. They are beautiful creatures that should be allowed to live free in the wild. Thank you.

Submitted By
Mrs Caals
Submitted On
8/19/2017 2:11:39 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26

Please stop the hunting of bear cubs in Alaska - completely.

Submitted By
PROPOSAL 15 – 5 AAC 92.26
Submitted On
8/19/2017 10:24:49 AM
Affiliation

I respect all you, and this decision you have in front of you. One of thousands of important decisions you will need to deliberate and decide upon. I promise to be brief. A world without animal is a world without humans. Its really true. The world as whole could survive just fine (may we agree even better?) without a single human being, but humans will never be able to exist without that balance of other fauna and flora. That said, what do a few bear moms and cubs matter? Quite a lot, morally and scientifically. Please decide in favor of life, in favor of these precious animals.
Respectfully yours,

Lisa Beth Cain

Submitted By
Suzanne Campbell
Submitted On
8/10/2017 6:39:20 PM
Affiliation

August 10, 2017

Attn: Board of Game
Alaska Department of Fish and Game
Juneau, AK 99802-5526

Cubs — babes of animals of any kind — are innocents. They will not grow up to be evil leaders of countries, creators of weapons that maim and mutilate millions. They will not mature into rapists or serial killers. Our species wants to ease the laws on hunting them, making them trophies, assurance that many of them will never grow up at all.

I am *not* okay with that.

I am not okay with hunting innocent animals in any manner, no matter how 'merciful' hunters may say their modus operandi is. These creatures deserve to be allowed to live, to thrive, to propagate. Instead we, the vicious ones at the top of the food chain, are turning these beautiful animals into endangered species, one by one.

It is bad enough that the Senate used the Congressional Review Act to overturn the regulation that prohibited certain types of hunting in Alaska national wildlife refuges. That was an ugly day in U.S. law abolishment. I also think President Trump made it abundantly clear that he cares not what happens to the wildlife of any state; that was spelled out for all back in April.

These bears and all wildlife in Alaska are in a crisis situation as it stands: the polar ice caps are disappearing, thus causing major flooding and lack of land mass. Now — evidentiary support that the permafrost is also melting at an accelerated pace. These bears are in serious turmoil and, in the near future, face potential extinction. The last thing that we, as self-appointed keepers of the food chain, should be doing is putting a bullet through their hearts. We don't need them for clothing, food, or weaponry; hunting these cubs is an act of nothing more than cruelty — and insanity.

I stand with all whom stand against hunters of these bear cubs. Killing them is a sickening thought and deplorable action, an action which is happening all over Alaska.

It has to stop. *It has to stop now.*

Proposal #15: OPPOSE

Sincerely,
Suzanne Campbell

Submitted By
Julia Caples
Submitted On
8/15/2017 6:23:22 AM
Affiliation

Phone
894-966-5893
Email
breezyday137@gmail.com
Address
15200 Stage Rd
Lanexa , Virginia 23089

To whom it may concern, I have always loved and admired your state for it's wildness. Alaska brings a feeling of freedom and adventure....this is a positive image that helps promote tourism in your state. If you allow this heartless....mothers and babies...massacre to happen. I'm afraid you will have a different image...one that will push people away. Save your wildlife...it's what makes your state special and exciting.

Submitted By
Cinzia Caporali
Submitted On
8/19/2017 6:39:15 AM
Affiliation
Miss

"PROPOSAL 15 – 5 AAC 92.26

Keep mother bears and cubs protected from hunting please

Submitted By
Donna
Submitted On
10/22/2017 7:56:58 AM
Affiliation

Phone
Carpenter
Email
DCarpenter413@aol.com
Address
3719 Rio Viejo Dr
Bakersfield , California 93313

If you continue to allow hunters to hunt and kill bear cubs, eventually there will be no bears. With hunters hunting the adult bears and the cubs, what bear population will you have in 20 + years?

Let them have a chance at living at least until they are old enough to produce offspring. This is ridiculous. How much sportsmanship does it take to hunt down a family of bears? None. It's not even a sport. It's not hunting to feed your family. It's murder and abuse.

Donna Carpenter

Submitted By
Karen Cavey
Submitted On
8/28/2017 9:58:39 AM
Affiliation

Phone
952 949-2902
Email
Lilykay9@hotmail.com
Address
710 Canterbury Cir
Chanhassen , Minnesota 55317

PROPOSAL 15 – 5 AAC 92.26. I am AGAINST the killing of mother bears and cubs.

Submitted By
Marcy Chamblin
Submitted On
8/27/2017 11:36:47 PM
Affiliation
individual

Phone
203 887 4885
Email
claypoolefineart@gmail.com
Address
P.O. Box 14472
Albuquerque, New Mexico 87191

The slaughter of bear mothers and cubs is unconscionable. As stewards of this earth on loan to us, it is our duty to preserve the Lord's eco-systems.

Submitted By
Marcy Chamblin
Submitted On
8/27/2017 11:41:38 PM
Affiliation
individual

Phone
2038874885
Email
claypoolefineart@gmail.com
Address
P.O. Box 14472
Albuquerque, New Mexico 87191

It is humans' bounden duty to protect the Lord's eco-systems. The slaughter of bear-mothers and their cubs is simply unholy.

Submitted By
Mary Chasin
Submitted On
8/18/2017 5:55:37 PM
Affiliation

Phone
763-999-4954
Email
Mchasin@comcast.net
Address
4721 Adair Ave.
Crystal , Minnesota 55429

PROPOSAL 15 – 5 AAC 92.26 Our country's wildlife and natural resources are one of our greatest treasures, and I am grateful that you are considering prohibiting the taking of bear cubs and female bears with cubs. It's a truly senseless and cruel act, and I encourage you to amend the current code. Thank you.

Submitted By
John Cielukowski
Submitted On
8/28/2017 5:16:17 AM
Affiliation

Phone
321-794-0912
Email
skyblu@cfl.rr.com
Address
9 harbor circle
cocoa beach, Florida 32931

Please do not allow the killing of bear cubs in their dens. This is an egregious offense against innocent wildlife. It is also deplorable that someone would even consider doing this. Please amend Alaskan Administrative Code (AAC 5 92.260) accordingly.

Submitted By
Gail Clark
Submitted On
8/10/2017 5:35:10 AM
Affiliation

Phone
7166791332
Email
Owlcaller@gmail.com
Address
8844 Concord Drive
Fredonua, New York 14063

If there was ever an opportunity to find anything even resembling "common ground" between the agency, hunters and wildlife advocates, it is now. Allowing cubs or sows with cubs to be killed, will forever divide us. Don't allow hunting to morph into an unfair, and unjust, highly unethical activity. We must begin somewhere to simply do, what we know is in all of our hearts, the only right thing.

Thank you,

Gail Clark

Submitted By
Gary Clark
Submitted On
8/10/2017 5:22:34 PM
Affiliation

I haven'nt returned to Alaska since 1999 in part due to the practices of the state in wildlife management. Now states like WY, MT, ID are on the list. I live in the eastern Sierra Nevada and yes we have bears. But we have human education and people to help protect the bears from getting in trouble with stupid humans. Killing sows and cubs is so unconscienciable to me that it looks like I'll die before I ever return to Alaska and their Sarah Palin views of animals.

Submitted By
Eleanor Conroy
Submitted On
8/21/2017 11:21:17 AM
Affiliation

Phone
3307820608
Email
ele630@sbcglobal.net
Address
3048 Louise Rita Ct
Boardman, Ohio 44512

PROPOSAL 15 – 5 AAC 92.26, Taking cubs and female bears with cubs prohibited. What is wrong with people and laws allowing this tio happen? It shgould never happen. Do not allow cubs to be taken from their mother.

Submitted By
Jim Conroy
Submitted On
8/21/2017 11:20:02 AM
Affiliation
Mr

Phone
330-799-1796
Email
conroyjim@sbcglonbal.net
Address
3048 Louise Rita Ct
Youngstown, Ohio 44511

PROPOSAL 15 – 5 AAC 92.26, Taking cubs and female bears with cubs prohibited. No one should ever be allowed to take cubs from their mothers. This is despicable beyond words.

Submitted By
Teddi Converse
Submitted On
10/21/2017 1:19:54 PM
Affiliation

Phone
7757727825
Email
Teddiconverse@earthlink.net
Address
PO BOX 3133
Incline Village, Nevada 89450

Please stop the killing of mother bears and their cubs!

Submitted By
Adrian Cooke
Submitted On
8/18/2017 5:13:24 PM
Affiliation

Phone
0406268928
Email
adriancooke_77@hotmail.com
Address
PO BOX 9221
Wilsonton , Other 4350

"PROPOSAL 15 – 5 AAC 92.26 - Taking cubs and female bears with cubs prohibited" - I wish to thank the Alaskan Board of Game for accepting the proposal to amend Alaskan Administrative Code (AAC 5 92.260) to their agenda!!!

I support the Alaska Chapter 1P Proposal to amend Alaska Administrative Code (5 AAC 92.260) in order to remove exceptions 1 and 2, which allows for the taking of bear cubs and female bears with cubs. A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception!

I urge the Board of Game to protect Mother Bears and their Cubs by enacting this Proposal in November!!!

Submitted By
Karen Cooper
Submitted On
10/22/2017 1:53:45 AM
Affiliation

Phone
07577723108
Email
karenjane16@hotmail.com
Address
120 London road
Derby, Other DE72 2GP

PROPOSAL 15-5 AAC 92.26

I do not agree with this bear hunt.

We are imposing on their land more and more.

They have a right to their lives,, to live them fully and due as nature intended.

Nature did not intend for them to be hunted down and shot, maybe only injured so they die a lingering death.

We have no right to take a mother from her babies

Or to end any life for no good reason.

I protest strongly

Karen Cooper

Submitted By
Russell Dam
Submitted On
10/21/2017 4:48:28 PM
Affiliation

Phone
5732375193
Email
trofast1997@yahoo.com
Address
1003 George St
New Haven, Missouri 63068

Proposal 15-5 AAC 92.26 Taking cub bears & female bears with cubs prohibitaded. I am totally against the taking of mothers & their cubs. This is morally wrong. It seems most of these issues are pushed thru because profit is involved. What good comes from killing mothers & their cubs? Government needs to stand up for once & do the right thing, the compassionate thing. Have Empathy & Respect for life. Nothing justifies these killings. "The Greatness of a Nation & its moral progress can be judged by the way its animals are treated". - Mahatma Gandhi.

Submitted By
hadrian darbellay
Submitted On
8/19/2017 1:32:36 AM
Affiliation

Phone
+1-203-387-1181
Email
darbellayhadrian@gmail.com
Address
21 S bradley road
woodbridge, Connecticut 06525

Taking cubs and female bears with cubs prohibited

WE CAN STOP BEARS CUBS FROM BEING KILLED!

Submitted By
Carrie Darling
Submitted On
8/19/2017 2:28:45 PM
Affiliation

Phone
602-908-7735
Email
carrielynned@gmail.com
Address
18032 N 2nd Street
Phoenix, Arizona 85022

I am writing in support of the proposal to amend Alaskan Administration Code (AAC 5 92.260). Which would prohibit the killing of bear cubs and female bears with cubs.

I have taken and enjoyed two vacations in Alaska over the years and would love to take more trips in the future. The main reason I go to Alaska is to see the wonderful wildlife that your state has. I also know of other people who also visit for the wildlife, so I don't understand why your state would want to kill future generations of bears.

Thank you for your thoughtful consideration on amending this code.

Submitted By
Tara DaSilva
Submitted On
8/15/2017 3:13:22 PM
Affiliation

Phone
321-474-2714
Email
Redmadouc@aol.com
Address
29 Parkway St
Cocoa , Florida 32922

15-5 AAC 92.26

There is no justification for killing bear cubs and this behavior really does not belong in any country, much less a first world country. We have to stop pandering to people who choose killing as a sport or hobby and start taking a stand. We have the ability to be the most civilized country in the world, but we keep choosing unscientific, cruel, and easy ways of "solving" problems. It's time for a change. Let's start treating all living creatures with respect.

Submitted By
Rachel davies
Submitted On
10/21/2017 9:49:52 AM
Affiliation

Hunting Mother bears with cubs and hunting cubs is unethical and inhumane. A civilized society must not condone such inhumanity. Alaska please do the right thing and protect mother bears and their cubs from Trophy Hunters! Until Legislation is enacted to protect our cherished wildlife, I am morally compelled to boycott state.

Submitted By
Mae Davis
Submitted On
8/21/2017 2:04:46 PM
Affiliation
none

Phone
2529642541
Email
samdaviselec@gotricounty.com
Address
530 Burbage Rd
Bath, North Carolina 27808

As it pertains to Proposal 15-5 AAC 92.26 I would like to implore you to not let bear cubs be taken in Alaska under any circumstance. These animals deserve the right to be raised by their "Moms" for the necessary period to become adults at which time they can be lawfully managed. Please do not accept killing these little cubs as a way of life in Alaska. Major respect for your state will be lost around the country with the enactment of a law such as this and it could harm your tourism and your potental population of the state. Thank you for listening to my concerns and I implore you to make the right decision on this matter.

Sincerely,

MaeDavis

Submitted By
Heather Decker
Submitted On
8/21/2017 4:08:25 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26- please stop the hunting of bear cubs. Thank you!

Submitted By
carol deech
Submitted On
8/10/2017 11:27:13 AM
Affiliation
Ms.

Phone
9147412045
Email
carolwthne@netscape.net
Address
po box 53
hawthorne, New York 10532

I am commenting on the Statewide Regulation Prospal 15-5 5 AAC 92.26. I am against the taking of bear cubs and female bears with cubs. This action should be prohibiited.

Thank you,

Carol Deech

Submitted By
Lois DeGaris
Submitted On
10/26/2017 5:32:54 AM
Affiliation

Phone
9412350954
Email
loisdegaris@yahoo.com
Address
2551 Conway Blvd
Port Charlotte, Florida 33952

PROPOSAL 15 – 5 AAC 92.26

I am adamantly opposed to the hunting and killing of bear cubs and mother bears with cubs. No person should be permitted to kill bear cubs or mother bears with cubs, no exceptions.

Respectfully,

Lois DeGaris

Submitted By
Gisele deletraz
Submitted On
8/15/2017 3:34:16 PM
Affiliation

Phone
8133268054
Email
Gisele2007work@hotmail.com
Address
2165 westbay drive
Largo, Florida 33770

Please protect our wildlife respect living beings and our natural resources for future generations protect cubs and mother bears in alaska

Submitted By
Gisele deletraz
Submitted On
10/22/2017 3:46:27 PM
Affiliation

Phone
8133268054
Email
Gisele2007work@hotmail.com
Address
2165 westbay drive
Largo, Florida 33770

Let animals live stop killing for vanity!

Submitted By
deborah devine
Submitted On
8/20/2017 8:42:01 AM
Affiliation
PROPOSAL 15 – 5 AAC 92.26

Phone
781-769-3291
Email
dobwaltham@yahoo.com
Address
25 driftwood circle
norwood, Massachusetts 02062

Please stop hunting bear cubs in Alaska. I support the proposal to amend the Administrative Code (AAC 5 92.260) and urge the Alaskan Board of Game to make this ammendment law. I feel very strongly about this issue. Alaska is in a position to step forward and protect the bears of America. Rather than support the hunting and killing of these wild animals, let's work to create a safe haven so they can thrive. The population is decreasing for several reasons. Please support this ammendment to help save the population.

Thank you.

Submitted By
Dobi Dobroslawa
Submitted On
8/20/2017 4:20:12 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26, Taking cubs and female bears with cubs prohibited. Please amend Alaskan Administrative Code (AAC 5 92.260). Please stop the hunting of bear cubs in Alaska - completely.

Submitted By
Mari Dominguez
Submitted On
8/19/2017 12:22:42 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited

Please stop the hunt of the precious bears. They deserve to be here just like all other living beings!

There has to be a more humane way to handle this situation! Please consider and listen to experts and not hunters!!!

Submitted By
Wendy Dore Sutton
Submitted On
8/11/2017 1:37:45 AM
Affiliation

Phone
07581474798
Email
feiruzaliya@googlemail.com
Address
63 Lyttelton Court
Lyttelton Road
London, Other N20ED

I wish to comment on the State Regulation AAC 5 92.260. The Taking of cubs and female with cubs should be prohibited.

Submitted By
Janet Duran
Submitted On
8/24/2017 12:46:37 PM
Affiliation
Ms.

Phone
2125292384
Email
jan_duran@hotmail.com
Address
136 w 4th st
New York, New York 10012

PROPOSAL 15 – 5 AAC 92.26, Taking cubs and female bears with cubs prohibited.I will NOT engage in tourism activities in the State of Alaska until that Alaska Administrative Code is amended to remove such exceptions. A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception.

Submitted By
Dawn Eaton
Submitted On
9/27/2017 6:22:50 AM
Affiliation

Phone
646-456-6350
Email
Deinnyc@gmail.com
Address
5800 Arlington Ave.
Apt. 3R
Riverdale, New York 10471

Hello,

Please do not back inhumane and cruel types of hunting in your state. I understand that in March, 2017 the Senate signed a bill that allows aerial hunting of bears and wolves, bear baiting, denning, noose and steel jaw traps and the killing of hibernating bears and their cubs legal on public lands in Alaska. This saddens me greatly, especially the thought of baby bears snuggled up against their moms sleeping. No chance at escape. This seems particularly cruel and inhumane and so unfair for these animals. They have no chance. Isn't hunting supposed to be a "sport"? How is killing a hibernating bear and her cub sportsmanlike? Please do not allow this. I believe there needs to be a balance struck between man, nature and wildlife. National Geographic's latest issue is all about animals and wildlife, entitled "Inside Animal's Minds". I encourage everyone who makes decisions about animals and wildlife to read this issue.

Thank you,

Dawn Eaton

Submitted By
Eugénie Eggers
Submitted On
8/19/2017 12:32:32 AM
Affiliation

PROPOSAL 15 – 5 AAC 92.26 please stop the killing of Cubs. Why does the fun of people stand over the life of an animal?

Submitted By
Cynthia Elia, RN
Submitted On
8/19/2017 3:21:20 AM
Affiliation
Mrs.

Phone
3132473316
Email
sugarlips8624@yahoo.com
Address
1113 Breezy Knoll St
Minneola, Florida 34715

Please no killing of bear cubs or any denning bears at all! This is not sport. This is killing by thrill seeking trophy hunters. I would love to be able to observe live bears in Alaska. Get photos, best trophies ever!

Submitted By
Diana Faraci
Submitted On
10/21/2017 6:58:24 AM
Affiliation
Tourist

Phone
5166604152
Email
Ddfaraci@aol.com
Address
17 Wood Drive
Oyster Bay, New York 11771

Re: Proposal 15 5AAC 92.26 Prohibit shooting of mothers and Cubs

Have we sunk so low that we kill the mothers n cubs of another species? If who you are is not comfortable going to a kindergarten and showing those children the film of such a shooting than I believe you will not allow this murder to become law..

Submitted By
Zita Fekee
Submitted On
8/10/2017 11:46:26 PM
Affiliation

I am commenting on regulation AAC 5 92.260.

I think shooting cubs and saw should be prohibited.

Thank you.

Zita F

Submitted By
Robert M Fisher
Submitted On
8/19/2017 10:40:56 AM
Affiliation

Phone
6319770003
Email
rfisher1216@gmail.com
Address
17 oak st. East
Farmingdale, New York 11735

How can any civilized community even consider the killing of bear cubs. This is so sick and evil I can't even belive this is even being considered. Just killing mature bears for so called sport takes a person with no love in there heart and soul but to kill cubs is just evil. Please do not allow this to happen. It would be a new low for mankind.

Submitted By
Linda Fleming
Submitted On
8/27/2017 7:14:58 PM
Affiliation
Ms.

I am writing in reference to Proposal 15-5AAC 9226 Please stop the hunt! The killing of Mothers and cubs is concerning. So sad!! Thank you in advance!

Submitted By
Alexis Foxx
Submitted On
10/20/2017 4:34:11 PM
Affiliation

Phone
352-585-4878
Email
foxxa@hotmail.com
Address
16451 Hardeman Jct
Brooksville , Florida 34614

Regarding PROPOSAL 15 – 5 AAC 92.26, Taking cub bears and female bears with cubs prohibited: I am totally against the practice of killing mother bears and/or associated cubs. I beseech the Board to amend 5 AAC 92.260 to remove the exceptions allowing mothers or cubs to be hunted.

Submitted By
Belinda Fralick
Submitted On
10/22/2017 6:11:04 AM
Affiliation

Phone
772-233-7176
Email
Belindafralick@yahoo.com
Address
588 SE 4th Ave
Melrose , Florida 32666

PROPOSAL 15 – 5 AAC 92.26". I am against taking cub bears and female bears with cubs. I understand that some people need to hunt to survive. I disagree with this type of hunting. Thank you

Submitted By
Helena Frangogiannis
Submitted On
8/19/2017 2:20:22 AM
Affiliation

NO to trophy hunting of cubs and mothers and NO to trophy hunting in general. Killing cannot be a sport! Proposal 15-5 AAC 92.26

Submitted By
Gail Frost
Submitted On
8/19/2017 8:24:38 AM
Affiliation

Phone
941-258-6845
Email
gail2307@gmail.com
Address
5220 Anderson Road
Port Charlotte, Florida 33981

Allowing the killing of Mother Bears & their cubs would quickly result in these animals ending up on the endangered species list. We must respect wildlife and their important contribution to the balance of nature.

Submitted By
Megan Gardner
Submitted On
8/28/2017 2:08:02 AM
Affiliation

Phone
0402508946
Email
Megan.gardner@bigpond.com
Address
25 Holland street
Healesville, Other 3777

Proposal 15-5 AAC 92.26

Taking cub bears and female bears with Cubs prohibited

I am 100% against the killing of mother bears and their Cubs. This is an outrageous idea and very cruel. There needs to be more protection for the dwindling wildlife which is for everyone on this planet to enjoy. This is a cruel and barbaric act against wildlife and nature. It's time to listen to everyday citizens and their wishes and concerns and not trophy hunters.

Regards

Megan Gardner , potential tourist to see bears and other magnificent wildlife of Alaska

Submitted By
louis Gauci
Submitted On
8/19/2017 9:43:59 AM
Affiliation

Phone
879-781-9700
Email
lgauc8@gmail.com
Address
145 York Str
Newport, Kentucky 41071

~~Dear Members,

STOP FEMALE BEARS WITH CUBS FROM BEING KILLED!

We care so much about the safety and care for these beautiful mothers and cubs. We are frequent visitors to Alaska and hope the officials there do the right thing.

How many more beings, human or otherwise, have to die before we come to our senses?

Thank you for your attention.

Louis

Submitted By
Susannah Gelbart
Submitted On
10/20/2017 5:05:59 PM
Affiliation
Ms

Phone
7026452698
Email
gelbartsusannah@yahoo.com
Address
5181 North Tioga Way
Las Vegas, Nevada 89149

Stop kiiling cubs and sleeping mother's in their dens! End trophy hunitng! Alaska is meant to be a beautiful wilderness where wildlie can thrive. It is not meant to be a brutal killing and mass murder sight. We have to value livng things and not just a quick hunting license buck!

Submitted By
Timothy Gillaspy
Submitted On
10/21/2017 9:08:50 AM
Affiliation

Phone
513-254-5321
Email
tgillaspy@cinci.rr.com
Address
638 Cloverdale Ave
Cincinnati, Ohio 45246

The only right, and moral thing is, to leave Mother bears, and their cubs alone!

Let’s do the right thing!!

Submitted By
Laurel Gilligan
Submitted On
8/13/2017 1:53:37 PM
Affiliation

Phone
2407552095
Email
Lagilligan@gmail.com
Address
108 West Main St
Burkittsville , Maryland 21718

Please do not allow hunting of mother bears or their cubs.

Submitted By
Toby Glanville
Submitted On
8/18/2017 4:25:28 PM
Affiliation

Regarding PROPOSAL 15 – 5 AAC 92.26, killing wolf and bear cubs during denning season is a disgusting act. Even worse is the use of traps and snares that inhumanly injure or kill many types of animals indiscriminately. Hunting needs to be much more humane and used only as a source of sustenance. No more cruelty!

Submitted By
Tammy Goebel
Submitted On
10/22/2017 7:46:42 AM
Affiliation

Phone
3142496082
Email
tammy_goebel@sbcglobal.net
Address
2091 Autumn Wood Dr
Saint Charles, Missouri 63303-4476

Step outside of what you want and see the big picture. Where will your traditions be when there are no bears left to hunt? Stand with conservationists to protect the bears from extinction. Find another way to prove your manhood. Limit the number of bears that can be killed. Protect the cubs and females. Stop being prideful and start being sensible. Thank you.

Submitted By
Lewis Goldberg
Submitted On
8/13/2017 4:41:28 PM
Affiliation
Mr.

No Hunting cubs. Leave these animals alone.

Submitted By
Lewis Goldberg
Submitted On
8/28/2017 12:38:01 PM
Affiliation
Mr.

I am against the killing of mother bears and their cubs. It's unthinkable that any normal person would want to kill these animals. I am telling you not to allow this to happen.

Submitted By
Olga Golub
Submitted On
8/13/2017 1:41:31 PM
Affiliation

Phone
5023037321
Email
birdwatcher1316@gmail.com
Address
5919 s kolin av
chicago, Illinois 60629

PROPOSAL 15 – 5 AAC 92.26.

I respectfully urge you to vote to protect bears and their cubs.

Submitted By
Beth Gordon
Submitted On
10/21/2017 2:04:29 PM
Affiliation
Just a visitor to Alaska that loves it and it's wildlife!

Phone
561-706-1812
Email
Thegordonlawfirm@aol.com
Address
113 east noble avenue
Williston , Florida 32696

As a person who cherishes memories of visits to Alaska I am appalled at the hunting of lactating mothers, cubs, and wolf pups. What kind of person enjoys this? It's sick. Your tourist industry depends on regular folks like us who spend our dollars in your state to view live wildlife- only 6% of Americans hunt and less hunt trophies I will limit my travel in the future to places with more humane laws and have recently planned a trip elsewhere when I had earlier planned to visit Alaska. I cannot in good conscience travel to Alaska and spend money there.

Submitted By
Linda Grant
Submitted On
10/20/2017 3:40:36 PM
Affiliation

Phone
727 793 8000
Email
lindaannegrant@aol.com
Address
11555 grove st
Seminole, Florida 33772

Please no hunting of pregnant, nursing mothers and their cubs. Stop thus slaughter.

Submitted By
Stephany Gustavson
Submitted On
8/27/2017 8:09:21 PM
Affiliation

Phone
4074033436
Email
stephanycg@hotmail.com
Address
2663 Spicebush Loop
Apopka , Florida 32712

PROPOSAL 15 – 5 AAC 92.26

Good day, the taking of cub bears and female bears with cubs should be prohibited. I am against the killing of any bears especially mothers and their cubs. Please protect them from this senseless violence. You can help protect them. Thank for your time. Stephany

Submitted By
Antje Göttert
Submitted On
8/19/2017 11:41:30 AM
Affiliation

Phone
+49/06786/7104
Email
antje.go@googlemail.com
Address
Katzenloch 23
Kempfeld, Other 55758

Please stop the hunting of bear cubs in Alaska and everywhere-completely!

Submitted By
jamila hadjsalem
Submitted On
8/19/2017 3:50:14 AM
Affiliation

Phone
860-786-2112
Email
emilyviandier@yahoo.com
Address
12 Old Springfield Road
Stafford, Connecticut 06076

I am for Proposal 15-5 AAC 92.26, that would amend the Alaskan administrative code AAC 5 92.260. This proposal would end the hunting of bear cubs and mother bears with cubs. It is cruel, unfair and unsportsmanlike to target the young of any species. Not only does targeting the young hinder population growth, its ethical considerations are immense, as killing cubs or mothers with cubs is execrable and does not denote a true sportsman's spirit. Please prohibit taking cubs and female bears with cubs.

Thank you,

Jamila HadjSalem

Submitted By
Maureen Hannaway
Submitted On
8/9/2017 7:40:53 PM
Affiliation
Ms.

Phone
4152259238
Email
mosey63@juno.com
Address
1502-D Pershing Dr
San Francisco, California 94129

Please don't kill bear cubs.

Submitted By
Marjorie Hass
Submitted On
8/19/2017 8:39:41 PM
Affiliation

Phone
9185212966
Email
marjoriehass@sbcglobal.net
Address
820 Lehigh Ave.
Hartshorne, Oklahoma 74547

Please do not go into the bears' dens and kill the mother bears and the cubs. This is outrageous and cruel. It isn't fair to kill baby bears. They have just as much right to live on earth as man does. It is their home also. They feel the same as if someone came into your home and murdered your children. Thank you.

Submitted By
Suzanne Hodges
Submitted On
8/21/2017 3:22:29 PM
Affiliation

Phone
916-887-4370
Email
hodgess@sutterhealth.org
Address
Stockton Boulevard
Sacramento, California 95816

PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Submitted By
Nancy Holschuh
Submitted On
8/28/2017 1:14:29 AM
Affiliation

Phone
352-485-1973
Email
Nancyglassart@gmail.com
Address
16302 N County Rd 225
Gainesville, Florida 32609

To whom it may concern

Please be advised I am vehemently opposed to the killing of bear cubs and or the killing of mother bears with cubs. This is against all that is humane. There is no reason in the name of conservation of wildlife to warrant this behavior. Please treat our wildlife with the respect it deserves.

Thank you for your attention to this matter

Sincerely Nancy Holschuh

Submitted By
Sandra Horn
Submitted On
10/22/2017 3:05:12 PM
Affiliation

Phone
574-238-5401
Email
stevealex13@comcast.net
Address
52860 County Rd 131
Bristol , Indiana 46507

"PROPOSAL 15 – 5 AAC 92.26".

Prohibit the taking of cub bears and female bears with cubs prohibited.

I am against the hunting of mothers and cubs..

I believe this is a very despicable practice. Killing a mother and baby of any species is inhuman and must Br prohibited.

Submitted By
Debra Hubbs
Submitted On
8/18/2017 4:05:50 PM
Affiliation
Mrs.

Phone
6312697207
Email
desiderata@optonline.net
Address
62 Dillmont Drive
Smithtown, New York 11787

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Submitted By
Dr. Linda Hunter
Submitted On
9/24/2017 3:47:32 PM
Affiliation

RE; PROPOSAL 15 – 5 AAC 92.26 Taking cubs and female bears with cubs prohibited

As a veterinarian I am asking that you prohibit the killing of bear cubs and female bears with cubs. It should be obvious that this is cruel and below our humanity. There are other more acceptable ways to control the bear population.

Thank you

Submitted By
Pam huzvar
Submitted On
10/21/2017 6:43:38 AM
Affiliation

Please stop the senseless hunting of bears and their cubs!!

Submitted By
Surya Iacono
Submitted On
8/10/2017 11:42:51 AM
Affiliation

Phone
702-466-0544
Email
s.iacono@guardhouseproductions.com
Address
806 Buchanan Blvd 115-176
Boulder City, Nevada 89005

Dear Board,

I would like to say first and foremost, thank you for allowing this appeal to be heard.

I am a filmmaker but have a degree in Anthropology as well. We studied the history of animals as part of our curricula at length. In this setting I became intimately aware of how animals and the eco-system and the heirarchy of the animal kingdom works and interacts - and the most important item I took away was 'balance.' Our planet's habitats rely on a delicate balance of between species, between geographic regions.

Once I became a filmmaker I worked on the National Geographic Series caslled Y 2 Y, Alaska's Yukon to Yellowstone and how the various species needed to migrate between the two regions in order to keep the balance- gentically speaking they need variance and to thrive they need to interact in their natural roaming territories. We focused on the newly created pathways over freeways etc that have gone into re-establishing a free zone whereby the animals can migrate again from Y 2 Y. It was stunning and humbling to watch and traverse in theri footsteps.

It is in this spirit that I write to you to ask you to think very carefully and wisely when it comes to recklessly allowing our top predators to be killed needlessly. We need them to trim the herds, to keep the balance. To kill babies let alone is so un-civilized of us, and where does it stop- does it stop with the last bear cub, the top predator on its way to extinction.

We, as a species, have encroached and invaded every inch of this planet, so that the other species barely have room to breath let alone walk- and yet, we got here today through evolution of all the flora and fauna. We need each other for all of us to survive. We need the bears, wolves, foxes and mountain lions to do their jobs to keep the balance in the whole system.

Please do not allow a few humans hunger for blood sports but at risk the discussion in the bigger picture- that is by killing the top predator they are unbalancing nature and as we have seen with an in so many other situations that does not end well.

We need the bears just as much as they need us to protect them and allow them to fulfill their role in the eco-system. I hope my fellow Americans find their humanity in covering the facts on this one and I hope each of you stands up for nature and the environment and does the right thing by saying no to killing off or top predator.

Alaska is such a beautiful state, why not promote eco-tourism instead of cruel hunting that would actual cause greater harm to the environment overall than just the sad and horrible shooting of one poor baby bear cub or wolf in one day- in the end, moving forward that adds up to horrendous imbalance.

I hope each of you has the courage to stand up for the greater good of the region's flora and fauna.

Thank you for your time in reading this today.

Ms. Iacono

Submitted By
Janet Ince
Submitted On
8/25/2017 8:20:28 AM
Affiliation
Change.org

Phone
0441262766112
Email
jinceuk@btopenworld.com
Address
53 Darwin Road
Bridlington, Other YO16 6HZ

PROPOSAL 15 - 5 AAC 92.26

Sir/Madam

Although I live in England, I believe we all have a duty to care for all animals with which we share this planet. Shooting animals or using animals for sport is not a reason that I recognise. The humane treatment of bears in your country must win through.

Kind regards

Janet Ince

Submitted By
Vicky Issott
Submitted On
8/18/2017 6:49:01 PM
Affiliation

Phone
2507771829
Email
v.issott@hotmail.com
Address
3520 Hwy 3a
Nelson, Other V1L 6T2

PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited. Taking a mother and her babies from the den is nothing more than a canned hunt. Please do not allow this.

Submitted By
marina jirotka
Submitted On
8/20/2017 11:43:45 PM
Affiliation

Please amend Alaskan Administrative Code (AAC 5 92.260) and stop the hunting of bear cubs in Alaska - completely. Bears should be part of our world heritage. They deserve to have a safe habitat that can sustain them. They need our protection so that they are here for future generations to marvel at and appreciate.Right now they need our protection, which is our duty of care. Please take a lead and show the worls how to take a humane approach to protecting these wonderful creatures that ahsre the planet with us.

Middle Yukon Fish and Game Advisory Committee

Interior Region
Fish and Game Advisory Committees

Benedict Jones
Chairman
PO Box 47
Koyukuk, AK 99754

Central
Delta Junction
Eagle
Fairbanks
GASH
Koyukuk River
McGrath
Middle Nenana River
Middle Yukon River
Minto-Nenana
Ruby
Tanana-Rampart-Manley
Upper Tanana/Fortymile
Yukon Flats

October 9, 2017

Board of Game Members,

In 2004, our committee wrote a proposal to your board requesting that we be allowed to legally harvest bears in dens with artificial light. This is something that we have culturally and traditionally done and we wanted to be able to continue this practice legally. Our proposal was not passed in 2004, but we resubmitted it to your board in 2008, where your board passed it.

It is not practice or possible even to tell what sex a bear is in its den, and it is against our ways to not take everything in the den if the bear that was taken happens to be a female with young. To be able to use a flashlight to do this helps not only the hunter make a clean kill but also ensures that the animal does not suffer.

The people that make up the Middle Yukon Fish and Game Advisory Committee are currently putting food and firewood up for winter and we do not have the time to sit down and formally submit comments to you as a committee. That being said I did not want for anyone to believe that this practice is still not important to the people of this region and I wanted to ensure that there was a voice at the table letting you know this.

Please allow the people of this region to continue practicing something that is culturally and traditionally important to them by not passing Proposal 14 and 15.

Submitted By
Zenda Jones
Submitted On
8/11/2017 10:53:50 AM
Affiliation

Phone
270 646 2261
Email
zendafjones@hotmail.com
Address
3021 Matthews Mill Rd
Glasgow , Kentucky 42141

It's a shame to kill any of the Beats but especially the cubs and their mothers.

Submitted By
Zenda Jones
Submitted On
10/20/2017 8:34:34 AM
Affiliation
Concerned citizen

Phone
270 646 2261
Email
zendafjones@hotmail.com
Address
3021 Matthews Mill Rd
GLASGOW , Kentucky 42141

Proposal 15 - 5 AAC 92.26 .TAKING CUB BEARS AND FEMALE BEARS WITH CUBS PROHIBITED. I AM AGAINST THE HUNTING OF MOTHERS AND CUBS.

Submitted By
Kathie E Judy
Submitted On
10/23/2017 10:12:54 AM
Affiliation

Phone
7277354895
Email
kathiejudy@gmail.com
Address
13322 Balm Gardens Ln
Wimauma, Florida 33598

In RE: PROPOSAL 15 – 5 AAC 92.26 - hunting of Mother bears with cubs and cubs - I am writing to express my vehement objection to this. We must do everything possible to preserve wildlife. Killing mothers and their young is just beyond horrific. Please protect these innocent lives from hunters. Who could possibly feel good about killing a baby?

Submitted By
Jonathan Juges
Submitted On
8/19/2017 7:40:24 AM
Affiliation
Mr.

Phone
8508652938
Email
jjuges@mail.usf.edu
Address
1425 W. 78th St
Tulsa, Oklahoma 74132

PROPOSAL 15 – 5 AAC 92.26

Please prohibit the taking of cubs and female bears with cubs.

Submitted By
Kevin Kallenbach
Submitted On
8/10/2017 2:52:20 PM
Affiliation

Phone
414-313-4341
Email
visart7@yahoo.com
Address
9619 W Allyn St #4
Milwaukee, Wisconsin 53224

I am commenting on the State Regulation AAC 5 92.260. Taking cubs abd females with cubs should be prohibited.

Submitted By
Mary Ann Keefe
Submitted On
10/22/2017 5:01:33 PM
Affiliation

Phone
5704746849
Email
makeefe@yahoo.com
Address
24 Mallard Way
Mountain Top, Pennsylvania 18707

There is no humane, merciful reason to kill mothers bears and cubs. Ever. Ever.

Submitted By
Shana Kelly
Submitted On
10/23/2017 12:14:44 AM
Affiliation

Phone
2063719133
Email
kellshan@hotmail.com
Address
123 NE 57th St
Seattle , Washington 98105

I am writing in support of the Alaska Chapter 1P Proposal to amend Alaska Administrative Code (5 AAC 92.260) in order to remove exceptions 1 and 2. I object to exceptions 1 and 2 in 5 AAC 92.260 which allows for the taking of bear cubs and female bears with cubs.

A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception.

I request the Board of Game to accept this Proposal for change.

Sincerely,

Shana Kelly

Submitted By
Marilyn Kern
Submitted On
8/14/2017 4:05:34 PM
Affiliation

Phone
7177551247
Email
Meejkern@gmail.com
Address
4101 Wilshire Dr
York , Pennsylvania 17402

The killing of cubs is totally unsportsmanlike. Terrible action.

Submitted By
Feryal Khan
Submitted On
10/20/2017 7:23:21 AM
Affiliation

Phone
3126599846
Email
feryalkhan81@gmail.com
Address
4700 North Winchester Avenue
Chicago, Illinois 60640

PROPOSAL 15 – 5 AAC 92.26

Please Stop Killing Bears. Mothers, Cubs Who Cannot Survive without their Mothers, and Even Grown Males. Bears Play a Supporting Roles and Eco Systems and their Lives Matter.

Submitted By
Anita Kiefer
Submitted On
10/21/2017 9:08:14 PM
Affiliation

Phone
4192963342
Email
Bo.kiefer67@gmail.com
Address
836 N Circle Dr
Wapakoneta , Ohio 45895

Please I beg of you to make it illegal to hunt mothers and their cubs. I understand Bear population control, but mothers and cubs? We need OUR bears for future generations and OUR eco system. We need to SToP taking their natural habitat away to live in these places. If you love Alaska it's one of the things people love coming there to see is Nature at its finest. But we need not kill babies. We have proven Animals feel and nurtur just like us! Please... Make it illegal to kill! We are losing OUR wildlife at Alarming Rates..... Once they are Extinct.. That's it! Can't bring them back!!

Submitted By
Deborah Kingston
Submitted On
8/28/2017 4:33:58 PM
Affiliation
Ms.

PROPOSAL 15 – 5 AAC 92.26. I am against the killing of mothers and cubs.

I support the Alaska Chapter 1P Proposal to amend Alaska Administrative Code (5 AAC 92.260) in order to remove exceptions 1 and 2. I object to exceptions 1 and 2 in 5 AAC 92.260 which allows for the taking of bear cubs and female bears with cubs.

I won't engage in tourism activities in the State of Alaska until that Alaska Administrative Code is amended to remove such exceptions. A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception.

Thank you.

Submitted By
Daniela Kohl
Submitted On
8/27/2017 7:20:55 PM
Affiliation

Phone
3057102977
Email
danielakohl7@gmail.com
Address
641 Two Creeks Drive
Snowmass, Colorado 81615

Dear Sirs,

My family and I spend a lot of time in Colorado and Alaska, where we have a home. We always enjoy the outdoors and shooting wildlife with a camera, not a weapon. Ecological research shows us that "predator control" is not an effective way to manage wildlife.

Rather, it disrupts the ecosystem and results in unnaturally high herbivore populations that can damage trees, wild plants, and agriculture. We are against the killing of Bear cubs and Mother Bear with cubs. It just does not make any sense at all. Killing of all these beautiful Bear is absolutely not necessary but just a whim of some rich people who want to show off a trophy.

Stop justifying it as if it's good for the ecosystem, it's just a contrived loophole for people to hunt without restriction, and clearly, without understanding the long-term consequences of their actions.

Sincerely,

Daniela Kohl

Submitted By
kathie krager
Submitted On
8/14/2017 3:29:55 PM
Affiliation
Ms

Phone
512-258-4438
Email
kathie_krager@yahoo.com
Address
13823 FM2769
Austin, Texas 78726

Please stop the killing of bear cubs. Stop the slaughter! Save the bears and theit cubs.

Submitted By
William kreitner
Submitted On
10/23/2017 3:31:40 PM
Affiliation

Phone
305-903-3521
Email
Williamkreitner@att.net
Address
621 swan ave
Miami springs, Florida 33166

Please do not legalize and promote the killing of bears with cubs. Why is this even a consideration? Thank you for the consideration.

Submitted By
Christie Lagally
Submitted On
8/19/2017 9:41:05 PM
Affiliation

Phone
2062931344
Email
christielagally@gmail.com
Address
2100 NE 140th St.
Seattle, Washington 98125

Regarding: PROPOSAL 15 – 5 AAC 92.26. I strongly support the prohibition of taking cubs and female bears with cubs. Hunting cubs and bears with cubs is exgregously inhumane. Please prohibit this hunting practice.

Submitted By
Jenica Lambert
Submitted On
10/20/2017 6:51:46 AM
Affiliation

Phone
7735031661
Email
Shoesrock30@gmail.com
Address
4322 blanchan ave
Brookfield, Illinois 60513

"Proposal 15-5 AAC 92.26" Please protect mother bears and their cubs by prohibiting the hunting of cubs and female bears with cubs.

Submitted By
Maria F Landinez
Submitted On
10/21/2017 7:31:28 AM
Affiliation

Phone
9087232114
Email
Landinez71@gmail.com
Address
3424 Welwyn Way
Tallahassee, Florida 32309

Hunting Mother bears with cubs and hunting cubs is unethical and inhumane.

Alaska do the right thing and protect mother bears and their cubs from Trophy Hunters.

Submitted By
Margaret A. Landry
Submitted On
8/17/2017 6:00:15 PM
Affiliation
Ms

Phone
5087428220
Email
Mlandry24@mail.com
Address
9 Kindergarten CT
Dartmouth, Massachusetts 02747

Proposal 15 5AAC 92.26 Please protect our wildlife, don't allow Cubs to be hunted .

Submitted By
Eva Langan
Submitted On
8/18/2017 4:01:59 PM
Affiliation

Phone
407-857-3661
Email
Emlangan@cfl.rr.com
Address
3718 Manteo Cir
Orlando, Florida 32837

Proposal 15 - 5 A A C 92.26 It is beyond cruel to kill bear cubs What purpose dies it serve beside bloodshed?

Submitted By
Carmen LaRiviere
Submitted On
10/21/2017 7:54:14 AM
Affiliation

Phone
860-235-7432
Email
CarmenL66@yahoo.com
Address
28 High Meadows Crossing
Somers, Connecticut 06071

PROPOSAL 15 – 5 AAC 92.26". Taking cub bears and female bears with cubs prohibited. I am totally against the hunting of mothers and cubs.

Submitted By
Faith larmay
Submitted On
10/22/2017 5:40:03 AM
Affiliation

- PROPOSAL 15 – 5 AAC 92.26". Taking cub bears and female bears with cubs prohibited.
- i am against the hunting of mothers and Cubs.
- As a former resident of Alaska, I spent the majority of my time hiking in Rabbit Creek area down turn again arm, chugach mountains, pikes pike, eagle river wilderness area, skilak, eklutna....the list goes on and on. I never hiked with a gun. I knew I assumed a risk of encountering a bear and potential attack. But I also knew I experienced the reward of seeing wildlife and all its beauty. I ask that taking of female bears and her babies be prohibited. Let our human condition be better reflected. Thank you. Sincerely faith

Submitted By
Dona LaSchiava
Submitted On
9/30/2017 2:33:54 PM
Affiliation

Phone
520-395-0646
Email
dslaschiava@comcast.net
Address
4511 West Rockwood Drive
Tucson, Arizona 85741

Comment RE: Proposed amendment to prohibit the taking of any bear cubs or female bears with bear cubs.

I wholeheartedly support this proposed amendment to Alaska's current hunting regulations

In recent years Alaska's Board of Game has egregiously authorized extreme measures under its general hunting and trapping regulations that potentially increase the take of predators to a degree that disrupts natural processes and wildlife interactions. The taking of bear cubs and/or females with bear cubs grossly condradicts "FAIR CHASE" hunting ethics and must be stopped! Even professional hunters have strongly voiced their disdain.

Submitted By
Gail Leavitt
Submitted On
8/28/2017 4:04:34 AM
Affiliation

Phone
863-314-8882
Email
animalministries@gmail.com
Address
9205 Bridle Path, Sebring, FL 33875
Sebring, Florida 33875

I am so glad for another chance to change this law. Passing this law would at least give cubs a chance at survval. Please give them a chance to survive.

Submitted By
Mia lehavi
Submitted On
8/18/2017 4:22:39 PM
Affiliation

Phone
9494136674
Email
Mia.lehavi@me.com
Address
158 Sidney Bay Drive
Newport Coast, California 92657

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited. Please be respectful with your comments.... together we can save bears!

Submitted By
Howard Leicht
Submitted On
8/26/2017 5:07:59 PM
Affiliation

Regarding PROPOSAL 15 – 5 AAC 92.26, please do the humane thing and prevent the taking of cuibs and female bears with cubs.
Thank you.

Submitted By
Kianna LeVay
Submitted On
8/18/2017 9:09:58 PM
Affiliation

Please amend Alaskan Administrative Code (AAC 5 92.260). I support PROPOSAL 15 – 5 AAC 92.26, which prohibits the killing of cubs and female bears with cubs. This is a common sense proposal based upon science which amends a reckless code allowing indescriminate killing.

We are currently in the midst of an umprecidented extinction event, with many animal species endangered or already almost extinct. It is our responsibility to do all we can to protect and preserve our wildlife. Proposal 15 is one step forward towards a more responsible and ethical attitude towards wildlife.

Thank you.

Submitted By
Pamela Leverett
Submitted On
8/28/2017 6:39:33 AM
Affiliation

Phone
8646503320
Email
kidee@msn.com
Address
322 Chinquapin
Easley, South Carolina 29640

Please don't pass legislation that allows killing of bear cubs.

Submitted By
Babette Lewis
Submitted On
10/20/2017 10:16:07 AM
Affiliation
Bodysense by Babette

What reasoning could humans possibly have to kill bears and their cubs? Are they in your homes? Are they hurting people or doing damage to anything? They live in the wild for a reason, so leave them IN PEACE and stop thinking like barbarians. Show some responsibility for your wildlife!!! They were here long before you stepped in and decided to destroy everything you couldn't control

Submitted By
amber link
Submitted On
8/11/2017 6:33:15 AM
Affiliation
Miss

Phone
3366020245
Email
jaygirl09@hotmail.com
Address
141 Plowman Ln
Advance Davie County, North Carolina 27006

Please stop killing Bear cubs they deserve the right to live! They are defenseless babies. Bear numbers have dropped dramatically and they are just one of the many meat eaters that are being killed off for killing a few cattle. If we kill all the meat eaters we will be overrun with herbivores. They keep nature in balance! :(Please stop

Submitted By
Elina Lipilina
Submitted On
8/27/2017 8:23:31 PM
Affiliation

Phone
4158232415
Email
Lipiluna@hotmail.com
Address
1315 harwood street
Santa rosa, California 95401

Please do not allow the hunting of bear cubs at all. Please do not allow aerial killing of Alaska's at risk species, instead allow the wildlife and large predators recover from the effects of climate change. The Alaska dept of fish and game is seeing the effects of climate change already, dont make it harder for the at risk wildlife youngest generation by allowing the killing of young cubs and their parents.

Much more revenue is made by eco tourism rather than from a few wealthy tourist trophy hunters and thrill seekers.

Thank you.

Submitted By
Kimberly Litster
Submitted On
8/25/2017 10:38:57 AM
Affiliation
Ms.

PROPOSAL 15 – 5 AAC 92.26 [Prohibiting the taking of cubs and female bears]

Hello Board Members,

When I think of Alaska, I think of a region that is rich in both its history and resources. What I most strongly associate with Alaska is its diverse and unique wildlife. Part of keeping that diversity alive is ensuring the protection of young cubs and their mother bears. Prohibiting the taking of cubs and female bears demonstrates Alaska's committment to keeping its most precious and limited resource safe for future generations. I thank you for your thoughtful consideration of this important topic and I look forward to coming to visit Alaska to take in all its beauty soon.

Respectfully,

Kimberly Litster

Submitted By
Lauri Lueth
Submitted On
10/21/2017 7:02:19 AM
Affiliation

Proposal 15 - 5 AAC 92.26 Taking Cub Bears and Mother Bears w/Cub Prohibited: Please prohibit all hunting of cubs and mother bears with cubs. I am staunchly against this as are many others. It is not only heartbreakingly cruel and inhumane but an eraseable black mark on the beauty of the magical Alaskan wildnerness. PLEASE.

Submitted By
Edward Macan
Submitted On
9/6/2017 6:20:44 PM
Affiliation

Phone
707-441-1292
Email
hermetic1@earthlink.net
Address
1812 16th Street
Eureka, California 95501

I support the Alaska Chapter 1P Proposal to amend Alaska Administrative Code (5 AAC 92.260) in order to remove exceptions 1 and 2. I object to exceptions 1 and 2 in 5 AAC 92.260 which allows for the taking of bear cubs and female bears with cubs.

I will NOT engage in tourism activities in the State of Alaska (and I have been there twice before, three weeks in the Panhandle in 2003 and ten days in Nome in 2004) until Alaska Administrative Code is amended to remove such exceptions. A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception.

I request the Board of Game to accept this Proposal for change.

Submitted By
Laura Manz
Submitted On
8/10/2017 12:17:54 PM
Affiliation

Alaska is a beautiful state with amazing wildlife and landscapes. The bears are a huge part of this environment. Decisions regarding their life and death should be made very carefully and with the best research available. Denning, killing cubs....this is not good science. Please do not allow this to happen. There are many dollars spent in Alaska on tourism that want to see living animals, not take home trophies. Protect these animals . It is the right thing to do.

Submitted By
Debbie Mcqueen
Submitted On
8/9/2017 9:23:27 PM
Affiliation
One Protest/ STOP The Florida Black Bear Hunt/BearWarriors

Phone
8638738485
Email
dsmcqueen60@gmail.com
Address
1995 W.county Line Rd
Avon Park, Florida 33825

Please Accept Proposal 15 and Amend AAC 5 92.260 No MOTHERS&CUBS Should be Killed in their den. This is not hunting it is easy slaughter. And Would Not Help Alaska it would put a dark cloud in Beautiful Alaskan Skies.We Must Save What Little Wild is Left.Thank You

Submitted By
Jeannine Mendrola
Submitted On
8/18/2017 8:37:44 PM
Affiliation

Phone
6103539534
Email
Mendrola@yahoo.com
Address
14 willowbrook road
Broomall , Pennsylvania 19008

AAC 5 92.260

I strongly oppose hunting bear and wolf cubs in Alaska. I encourage your committee to reconsider this misguided policy and support amending it to protect cubs to preserve these species for future generations. We are in the midst of the 6th great extinction of the planet - the first the history of mankind and we need to protect populations of predator species.

Submitted By
RR Mier
Submitted On
8/14/2017 10:26:43 PM
Affiliation

Phone
6162960762
Email
rajaju@gte.net
Address
3358 Millard
Muskegon , Michigan 49441

Dear Sir , I cannot understand the desire of anyone to kill a bear cub this action seems unthinkable and without purpose, as states have different bear harvest agendas the taking of cubs has never been a logical one I want to encourage you to not allow this practice as it gives the great State of Alaska a black eye, recently I seen the inside of a congressmans office from WIS and hanging on the wall was a bear cub trophy no matter what he said everyone was focused on how small the bear was and why this guy shot it.-RR

Submitted By
Neil Miller
Submitted On
8/11/2017 7:39:04 AM
Affiliation

Please stop/prevent the killing of cub and sow grizzly bears in Alaska.

Submitted By
Briar Lee Mitchell, EdD
Submitted On
10/20/2017 6:44:21 AM
Affiliation
Year

Phone
8184150152
Email
briarlee@aol.com
Address
1406 Butch Cassidy Trl
Wimauma, Florida 33598-7606

PROPOSAL 15 – 5 AAC 92.26

Please stop killing mother bears and their babies.

Submitted By
Cecelia Mondoc
Submitted On
8/21/2017 3:11:45 PM
Affiliation
Ms.

Phone
8187143559
Email
themistresscc@gmail.com
Address
501 s spring st.
apt. 732
Los angeles, California 90013

Please do not allow bear cubs and mother bears to be hunted and killed. It is inhumane and cruel. Please protect these baby bears and family units from danger. This comment is regarding prop 15. Thank you.

Submitted By
Denise Moore
Submitted On
8/18/2017 4:01:35 PM
Affiliation
Miss

Phone
770-908-4993
Email
msdlmoore@bellsouth.net
Address
4169 Pine Valley Rd
Tucker, Georgia 30084

Subject: Taking cubs and female bears with cubs prohibiterd

I'm concerned that the people of Alaska would allow such brutality towards a living species in the wild. I understand if it was to control population but the killing of females with cubs is an abomination of the natural order of life. You as a people in such a area of the Unites States sould want to preserve the natural order of life and only havest when popultaions exceed a safe number. I can't fathom killing a mother bear and her cubs especially if you do so while they are in the den!. Please consider adopting regulations that allow bears to thrive but please don't help make them exstinct.

Submitted By
Kathleen Moore
Submitted On
8/19/2017 6:42:54 AM
Affiliation

Phone
9783560688
Email
vac_venice@hotmail.com
Address
7 Mount Pleasant Ave
Ipswich, Massachusetts 01938

PROPOSAL 15 – 5 AAC 92.26: IN FAVOR of this petition to prohibit taking of bears or wolves in dens, baiting or snaring or airplane hunting.

This is not sport. Science does not back the idea that predators must be so hunted. Animals do not recognize state boundaries and this is a national situation, not just local.

Please continue to support the Fish & WIldlife Service in their rejection of these unnecessary and cruel practices. We can be better than this.

Thank you for your serious consideration.

Submitted By
Ray Morris
Submitted On
8/19/2017 11:32:04 AM
Affiliation
Mr.

Phone
4034542201
Email
mondjomorris@gmail.com
Address
54 Mt Robson Close SE
New York, New York 12345

PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Mothers need their cubs abd cubs need their mothers, so please let them be.

Submitted By
Dolf Muccillo
Submitted On
8/21/2017 10:58:18 AM
Affiliation
Cardinal Solutions Group

Phone
5139846700
Email
dmuccillo@cardinalsolutions.com
Address
7755 Montgomery Road
Suite 510
Cincinnati, Ohio 45236

Re: PROPOSAL 15 – 5 AAC 92.26 / Taking cubs and female bears with cubs prohibited // proposal to amend Alaskan Administrative Code (AAC 5 92.260).

Hello,

I respectfully ask that you consider this amendment. Earlier in the year I lost sleep over the sickening press surrounding HJ Res 69 and its awful "predator control" provisions.

Animals, even predators, do not deserve to be treated like this. The main reason I would go to Alaska would be to see the very animals that pro-hunting groups want killed or "controlled."

If animals are being killed in this way it's only a matter of time before it's caught on tape and causes you a PR/tourism nightmare. Please do what is right.

Thanks for listening,

Dolf Muccillo

Submitted By
GREGORY MULLIN
Submitted On
8/18/2017 6:19:37 PM
Affiliation

Phone
1-626-733-2750
Email
mullinge@hotmail.com
Address
PO Box 193
Glendora, California 91740

Dear Alaska Regulators,

As a California family who would LOVE to visit our 49th state we would be "comfortable" and feel welcome to visit a state with humane and compassionate rules. **PROPOSAL 15-5 AAC 92.26** making the "Taking of cubs and female bears with cubs prohibited" would say a lot to the worldwide tourist market about the type of people to expect if visiting Alaska. We hope that you will find the many merits of approving this proposal and implementing same.

Respectully,

The Mullin Family

Submitted By
Richard Natoli-Rombach
Submitted On
10/23/2017 12:06:36 PM
Affiliation
1952

Phone
5852018091
Email
rnr4biz@rn-r.net
Address
376-378 Broadway
Rochester, New York 14607

PROPOSAL 15 – 5 AAC 92.26

Only when humans have interferred with nature and the balance of life have problems been created and the solution is to kill. Killing a mother and her cubs is heinous and beyond my scope of comprehension. Before you think I am just some tree hugging animal loving uneducated fool I have been chased by forest elphants, charged by Cape Buffalo and mountain gorillas, and sat and lived amongst mountain gorillas in 1974 at Karsisoke Research Center in Rwanda. I have been a student of anmial behavior for decades. The human concept of conservation is based on the needs of humans and not that of othe species.

Submitted By
Karin Nelson
Submitted On
8/13/2017 6:00:14 PM
Affiliation

Please stop the taking of mothers and cubs. This is an affront to humanity, civility and motherhood. There is no reason why these animals, who are a world heritage and have the intrinsic right to exist, should fall prey to selfish hunters and/or the greed of guiding companies. Humanity needs to evolve to a place that no longer sees the taking of life as a recreational activity.

Submitted By
Kay Norman
Submitted On
8/21/2017 12:32:23 PM
Affiliation
Mrs.

Proposal 15-5 AAC 92.26 Taking cubs and female bears with cubs prohibited

It would be wonderful if this amendment were to pass, especially in light of the disastrous HJ Res 69 that so many people fought against. I have been to Alaska a number of times, primarily in hopes of viewing wildlife, especially the majestic predators. I'm not interested in visiting any place where the lives of living creatures are valued so cheaply and wholesale slaughter is permitted.

Please take whatever steps are needed, including passing this amendment, to protect wildlife.

Submitted By
L OHARA
Submitted On
8/14/2017 8:55:19 PM
Affiliation

Phone
603-673-7313
Email
medtrans247@cs.com
Address
Box 1072
Wilton, New Hampshire 03086

PROPOSAL 15 – 5 AAC 92.26

I am writing to ask you to please, please prohibit the killing of denning bears, female bears with cubs. Bears are more sentient beings than many people realize. They are good mothers, they can look both ways before crossing a road, and are able to recognize themselves in a morrior.

I attended a meeting where the shooting and killing of a bear was played on tape. It was gut wrenching, and something I will never forget. You could hear the pain in the bear's moaning and groaning as it was dying.

Please protect these mammals. All animals and wildlife are important to the ecosystem.

Thank you.

Submitted By
marsha orent
Submitted On
8/19/2017 6:44:08 AM
Affiliation
Ms.

Phone
6176420723
Email
marshamcd34@gmail.com
Address
2130 mass avenue, No. 8E
Cambridge, Massachusetts 02140

To respect the lives of mother bears and their cubs is truly a humane a nd wonderful thing. Just another thing we can do to say that we respect our world. Thanks.

Submitted By
Mary Orndoff
Submitted On
8/27/2017 6:21:20 PM
Affiliation

Please leave mother bears and her cubs alone and don't KILL them. They deserve to have a life on this wonderful earth just like you.

Submitted By
Carol Painter PhD
Submitted On
8/19/2017 3:58:58 AM
Affiliation

Phone
6072774128
Email
cpainter1@twcny.rr.com
Address
141 Westhaven Rd
Ithaca, New York 14850

"PROPOSAL 15 – 5 AAC 92.26"Taking cubs and female bears with cubs prohibited. Please: together we can save bears!

Submitted By
Gail Patak
Submitted On
10/20/2017 5:01:54 PM
Affiliation

Phone
9047624114
Email
Gepatak@gmail.com
Address
13770 Devan Lee Dr N
Jacksonville, Florida 33226

Shameful. Please stop the destruction of the beautiful beings that we share this planet with. Allowing the hunting of Mother bears and their cubs is reprehensible and beyond anything that we as humans should condone. Please do not allow this horrific destruction.

Submitted By
Janice Pearsall
Submitted On
8/18/2017 6:54:46 PM
Affiliation

Phone
8287126594
Email
jotapejp@mac.com
Address
450 Flat Top Mtn Rd
Fairview , North Carolina 28730

It is hard to believe that in the year of 2017 we are even talking about this. This subject should have been discussed and settled decades before. We humans have for sure thrown the earths balance off but killing cubs is certainly not going to help us restore and recover any sense of equilibrium. Stop cub killings NOW.

Submitted By
Noreen Pearson
Submitted On
8/28/2017 9:13:25 PM
Affiliation
-- please select a prefix --

Phone
7194804908
Email
lllyasgirl@gmail.com
Address
3700 County Road 59
Center, Colorado 81125

Please stop the killing of mother Be A s and their babies. They are so precious. They do not harm anyone. So fragile is the balance in wildlife we need to help not hurt them. Babies just play. Please save them. You're the ones to do it thank you for listening and God bless you.

Submitted By
Constance Pennington
Submitted On
10/21/2017 8:50:11 AM
Affiliation
Dr.

Phone
2174314281
Email
conniepennington@sbcglobal.net
Address
102 Arlington Drive
Danville, Illinois 61832

To all concerned with the slaughter of bear cubs in Alaska.....What is wrong with you?? YOur state is known for the pristine wilderness, the wild, man living with nature.....OR WAS....

THIS IS BARBARIC, INHUMANE,, DESPICABLE , and even IGNORANT....Hearltess human beings, ...is it money, is it power....is is just that you are EVIL?

Submitted By
Christina Pestana
Submitted On
8/11/2017 4:40:06 AM
Affiliation
Miss

Phone
5616314398
Email
cpest003@fiu.edu
Address
5208 sw 161 pl
Miami, Florida 33185

Please support PROPOSAL 15- 5 AAC 92.26. The killing of bear cubs is ignorant, cruel, and pointless. They are children above all else, just as helpless and in need of protection as a human child. Please vote to keep them alive.

Submitted By
Valerie Peters
Submitted On
10/21/2017 7:44:18 AM
Affiliation

Phone
5308724125
Email
hwy70river47@yahoo.com
Address
5327 Foster Rd
Paradise, California 95969

I highly oppose regulations that would allow hunting, baiting and killing mother bears and their cubs. I have visited Alaska and hope to return soon. The icons of Alaska are its wildlife and majestic scenery. These are to be observed in all their majesty, not murdered or destroyed by man. I will not support Alaska with my tourist dollars if this activity is allowed. Its inhumane and catering to a limited population that has no concern for proper conservation.

Submitted By
Lance and Jenny Peterson
Submitted On
10/22/2017 3:14:38 PM
Affiliation

Phone
6086582165
Email
Roseyrose316@hotmail.com
Address
2995 county road bb
Madison , Wisconsin 53718

Please do not allow hunters to kill Mother bears with their cubs. This is hunting at its worst!

Submitted By
gwen pickelsimer
Submitted On
8/18/2017 8:35:46 PM
Affiliation
Ms.

The proposal to kill bear cubs and their mothers in their dens (or anywhere elese!) is shameful, immoral, and indecent! Please stop this before it goes too far!

Submitted By
LISA A PICKLE
Submitted On
8/10/2017 12:17:17 PM
Affiliation

I am commenting on the State Regulation AAC 5 92.260, Taking cubs and female with cubs should be prohibited

Submitted By
Lauren
Submitted On
10/21/2017 11:04:18 AM
Affiliation

PROPOSAL 15 – 5 AAC 92.26". Taking cub bears and female bears with cubs prohibited, I am against the hunting of mother bears and their cubs because it is extremely cruel.

Submitted By
Sherri Powell
Submitted On
8/27/2017 6:39:36 PM
Affiliation

Phone
541-6721045
Email
S.powell2011@gmail.com
Address
831 Newton Creek Road
Roseburg , Oregon 97470

Please stop the killing of bears. The killing of mother bears and cubs is particularly disturbing to me. Please stop the slaughter!! Good □

Submitted By
Julie Rabeau
Submitted On
10/21/2017 11:21:10 AM
Affiliation
Alaska Resident

Phone
907-301-3750
Email
julierabeau@aol.com
Address
12901 Ridgewood Rd
Anchorage, Alaska 99516

I am against Proposal 155AAC 02.26 taking of bear cubs and taking of mothers with bear cubs. As an Alaskan, I do not condone this practice. Please consider ammending.

Submitted By
Gill Ramsay
Submitted On
8/20/2017 9:51:25 AM
Affiliation

PROPOSAL 15 – 5 AAC 92.26 Dear Sirs, I would implore you to ban the hunting of bear cubs. This is in my opinion barbaric and quite unthinkable. I know there is a world wide outrage at the killing of so many animals in Canada. I know for my family we were considering looking to emigrate to Cananda but cannot while Canada is knee deep in blood. Please find it in your heart to stop this, it is a huge slight on the reputation of Cananda, a stunning and beautiful country.

Submitted By
Nellie Rando
Submitted On
8/18/2017 5:05:30 PM
Affiliation

Phone
617-984-9691
Email
nellrando@gmail.com
Address
20 Lawrence Street
Wakefield, Massachusetts 01880

Proposal 1.5-5AAC92.26

Killing of bear cubs and female bears with cubs must be prohibited.

Submitted By
Jodi reed
Submitted On
10/21/2017 4:16:55 PM
Affiliation

Phone
8185882524
Email
Jodismack73@yahoo.com
Address
1368 meadows blvd
Weston , Florida 33327

We can choose a different world, one where we don't exploit the innocent and the voiceless, causing them undeserved suffering and cruelty. Please don't condone the killing of Mother's bears and their young.

Submitted By
Lisa Reich
Submitted On
10/23/2017 5:54:10 AM
Affiliation

PROPOSAL 15 – 5 AAC 92.26- Please support proposal 15. Do not allow hunting of mothers and cubs. Thank you.

Submitted By
Lucia Reid
Submitted On
8/28/2017 6:03:50 AM
Affiliation
Ms.

Phone
9413237547
Email
luciareid@gmail.com
Address
325 Golden Gate Pt
4W
Sarasota, Florida 34236

Alaska is at the top of nearly everyone's Bucket List Why? Your wildlife; specifically your bear.
Alaskan bear photos are used worldwide to symbolize the beauty of Alaska.
Baby bear are the cutest animals on earth. Ask a child cuddling their Teddy bear.

Want to find a way for ultimate bad press? Kill Alaska's bear cubs.
Want to see Alaska crossed off thousands of Bucket Lists? Kill Alaska's bear cubs.
Want to see your revenue plummet? Kill Alaska's bear cubs.

Alaska isn't exactly hurting for wilderness and the people who really love Alaska and bear will never let up on this issue. Be smart, make allowances so bear can thrive in Alaska.

I beleive Alaskans are too smart to resort to barbarism. I ask you to choose life over death.

Submitted By
Marta Rico
Submitted On
10/21/2017 2:16:16 PM
Affiliation
Peta

Phone
5203316632
Email
kaklekakle23@hotmail.com
Address
6730 St. Andrews Dr.
Tucson, Arizona 85718

Dear Prince William: Aproching to you by a few words asking compation to Black Bears and cub's lives. They have rigths, feelings and need good care from HUMANS... please help THEM and respect any kind of animal life. Thanks in advance to you. Marta

Submitted By
Lynette Ridder
Submitted On
8/19/2017 4:28:17 PM
Affiliation

Phone
925-686-4966
Email
captain_nerful@yahoo.com
Address
4822 Eagle Way
Concord, California 94521

PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited

As someone who cares deeplly about our nations wildlife, I hope to see the hunting of bear cubs in Alaska end completely.

Submitted By
Janet Robinson
Submitted On
8/18/2017 4:06:46 PM
Affiliation

I am in favor of PROPOSAL 15 – 5 AAC 92.26, Taking cubs and female bears with cubs prohibited.

I think it is wrong to kill mothers and their cubs. If you keep doing that then there won't be any bears for you to kill, therefore, Proposal 15 is the best. An even worse outcome is if the mother is killed and the cubs are left to fend on their own. Most likely, they will die so it is better for them to get to adulthood and then you can hunt and kill them at that time. Thank you for considering my comments.

Submitted By
Marney roemmelt
Submitted On
10/21/2017 1:40:15 PM
Affiliation

Phone
6035834780
Email
Sageintegrativemed@yahoo.com
Address
30 charter st #7
Exeter , New Hampshire 03833

Speaking as a very concerned citizen of the USA I am politely requesting this inhumane practice of hunting mother bears and cubs be banned.

Submitted By
Sandra Rognerud
Submitted On
10/21/2017 7:52:22 AM
Affiliation

Stop the cruel and unnecessary practice of hunting bear mothers and cubs!!!

Submitted By
Judith Rollins
Submitted On
8/10/2017 2:34:23 PM
Affiliation

Phone
256-489-1484
Email
judithrollins@gmail.com
Address
1006 Hermitage Av SE
Huntsville, Alabama 35801

" I am commenting on the State Regulation AAC 5 92.260, Taking cubs and female with cubs should be prohibited". There is no valid reason to ever kill a mother with its babies. We as a society have better character than killing helpless little ones and the mom they depend on for life.

Submitted By
Carole Rolphe
Submitted On
8/9/2017 9:20:56 PM
Affiliation

Phone
406-300-1787
Email
cjrolphe@gmail.com
Address
POB 3021
KALISPELL, Montana 59903

I do not live in Alaska but I do live in Montana and we are not that different. My greatest fear is that you will be setting a precedent for the whole Northwest. I have NO IDEA why anyone would kill a bear cub (or a bear for that matter) but if you ALLOW this I can guarantee that it will also be allowed in Montana and other states. Please consider the future of our wildlife. Between the hunting and trapping for fur, our wildlife has now become a valuable commodity to the Asians...!! WE MUST PROTECT our wildlife from all forms of decimation....Stop this before it goes any further...Thank you.

Submitted By
Caroline Rosalbina Granados
Submitted On
8/18/2017 11:50:31 PM
Affiliation

Phone
42559011
Email
rosalbinagranados@gmail.com
Address
Moselgade 18, 2tv
Copenhagen, Denmark, Other 2300

Thank you for reading my comment. Please stop the killing of bear cubs.

Submitted By
Pei Pei Rossewey
Submitted On
8/14/2017 5:16:42 PM
Affiliation

Phone
813-476-1002
Email
Hughesotr@yahoo.com
Address
1756 Lakeview Rd
Clearwater, Florida 33756

PROPOSAL 15 – 5 AAC 92.26. Taking cub bears and female bears with cubs prohibited. Please stop killing our wildlife.

Submitted By
patrick ryan
Submitted On
10/21/2017 5:58:50 AM
Affiliation
- Select -

Phone
4147165194
Email
cpryan@wi.rr.com
Address
6253 north river trail drive
milwaukee, Wisconsin 53225

Proposal 15-5 AAC 92.26 Taking cub bears and female bears with cubs prohibited

I am against the hunting and killing of mother bears and their cubs. I believe that this is "not a sport". It is a particularly cruel and barbaric activity that takes advantage of bears when they are extremely vulnerable: "roaming, feeding, defending, or otherwise caring for their young". These acts have no place in the scheme of "fair game" practices. I hope that these bears, instead, will be given the opportunity to live their lives in peace without the stress of harrassment and the threat of slaughter. Further, this despicable act, is a "turn off" for tourists who visit Alaska to specifically view wildlife in their natural habitat. Tourism is a major "economic driver" for Alaska's economy, that increases year after year. Needless, to say, these tourists care about the preservation and protection of both wildlife, their young, and their habitats. I believe that it is fair to say that Alaskan tourism would suffer, as many people on social media have already eliminated their Alaskan trips as they do not want their tourism dollars to be spent supporting the killing of these vulnerable species. And, they are spreading the word.

Submitted By
Sy Sadeghpour
Submitted On
8/18/2017 4:06:11 PM
Affiliation
Mr

Phone
7133983882
Email
sascofin@gmail.com
Address
2429 Bissonnet St #548
Houston, Texas 77005

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Let's start to empathize as a society a bit more with animals they way we should. Bear cubs have not harmed anyone & deserve a chance at life without being shot down by a rifle for cruel sport. Please do the right thing!

Thank you!

Submitted By
Lygea San Pedro
Submitted On
8/18/2017 4:41:48 PM
Affiliation

PROPOSAL 15 - 5 AAC 92.26

Please STOP Bear Cubs from being killed and STOP taking Mother Bears with their Cubs.

Submitted By
Theresa sanders
Submitted On
8/16/2017 6:08:36 AM
Affiliation
No onw

Phone
706 419 8227
Email
Theresa'sanders@live.com
Address
456 walker hollow rd
Flintstone, Georgia 30725

Let the bears an cubs live. They beling in this world. They live an breath. It's a living being that deserves the right

Submitted By
Dawne Santopietro
Submitted On
10/21/2017 9:11:08 AM
Affiliation
Tourist

Phone
5852332799
Email
dawne_santopietro@urmc.rochester.edu
Address
3244 tanaberry circle
Macedon , New York 14503

We do not support the killing of bear cubs and mothers for any reason. Theater are proven, cost effective and humane ways to manage our wild animals. It is past the time to utilize them and to see the benefits to both the animals, and the people who can benefit from the eco tourism that would increase substantially in the state. Thank you.

Submitted By
Sheryl Schroeder
Submitted On
10/25/2017 10:10:32 AM
Affiliation

Phone
8059620207
Email
biguglystick@hotmail.com
Address
1416 Manitou Road
Santa Barbara, California 93105

I am strongly against the killing of mother bears and their cubs. Nobody needs to do this. People all over the United States are watching and the word is out. These killings are being filmed, killing bears and wolves from airplanes where they have no chance of escape... killing cubs and mothers in their dens, it is wrong. Children in school have seen this, and it's ugly. My child came home in tears from a presentations she saw in her high school. As a kind empathetic person, I am against the killing of any animals for "sport". It is gruesome and barbaric and devoid of any empathy. Please stand on the right side of history and protect our wildlife. We are in the midst of the Sixth Mass Extinction and we need to protect the innocent ones with no voice in politics. The small minority of hunters/trappers/killers who push for this are outnumbered by decent compassionate caring people who care about our world, our wildlife and the health of our eco-system. Please stop them from killing mothers and cubs. Save our bears and wolves from those who would harm and kill for "fun" or "sport".

Submitted By
Sheryl Schroeder
Submitted On
10/25/2017 10:12:00 AM
Affiliation

Phone
8059620207
Email
biguglystick@hotmail.com
Address
424 E. Arrellaga st
Santa Barbara, California 93101

I am strongly against the killing of mothers and cubs. Please do not let the killers hunt them. We need to protect our wildlife.

PROPOSAL 15 – 5 AAC 92.26

Submitted By
Mary shabbott
Submitted On
8/10/2017 12:50:58 AM
Affiliation

I strongly support any proposal that stops the murder of Amy animal. Please Act to end the slaughter of baby animals.

Submitted By
Mary Shabbott
Submitted On
8/28/2017 1:05:08 AM
Affiliation

I oppose all hunting of animals. I strongly oppose any form of hunting of mother bears and their Cubs.

Submitted By
Mary Shabbott
Submitted On
10/25/2017 2:07:09 PM
Affiliation

I strongly oppose all hunting, especially the hunting of female bears with cubs.

Submitted By
Mary Shabbott
Submitted On
10/25/2017 2:13:22 PM
Affiliation

Proposal 15-5 AAC 92.26

Taking cub bears and female bears prohibited and I am against the hunting of mothers and cubs.

Submitted By
Anna Sherrill
Submitted On
10/24/2017 4:26:05 AM
Affiliation

Phone
7868538484
Email
Anna@annasherrill.com
Address
5 Island ave #6H
Miami Beach , Florida 33139

Please protect all mothers and cubs from hunters.

Submitted By
Fateh Sidhu
Submitted On
8/10/2017 10:26:28 AM
Affiliation

Phone
5599166565
Email
fatehperform@gmail.com
Address
3935 N Owl Perch Ct
Sanger, California 93657

I have written to you in regards to Proposal #15 and to state that I support the full protection of bear cubs in Alaska. It is unacceptable under any cirsumstances to hunt and kill bear cubs. We must conserve and cherish Alaska's tremendous wildlife and natural grandeur. I am strongly against killing bear cubs in Alaska and I urge you once again to support full protection for cubs. Please do not put special interests of certain groups before the well-being of the state and its people's wishes.

Regards,

Fateh Sidhu

Submitted By
Judith Skenazy
Submitted On
8/18/2017 5:54:21 PM
Affiliation
Change.org

Phone
831-471-9088
Email
myokyo@icloud.com
Address
260 High St. #206
Santa Cruz, California 95060

I'm writing to urge your support of AAC9226, the proposal to end the killing of bear cubs and of mother bears with their cubs. Thank you for your consideration of this Proposal. Throughout the world and the USA, animal populations are declining, and species are becoming extinct at an alarming rate. It is in the best interest of the earth and of humans to preserve biodiversity, including wild mammals.

Submitted By
Teri L Slagle
Submitted On
8/18/2017 4:19:08 PM
Affiliation
Ms.

Phone
9548491670
Email
littlebird17ts@gmail.com
Address
1605 SW 25 Street Apt. 2
Fort Lauderdale, Florida 33315

Proposal 15 5 AAC 92.26 please prohibit taking cubs and female bears with cubs thank you

Submitted By
Ronald Smith
Submitted On
8/14/2017 8:23:24 PM
Affiliation

It's appalling and sadistic that Alaska would allow bear cubs to be hunted. This is barbaric and serves no purpose other than for animal murder. These majestic creatures have roamed this earth for millenia. They deserve our respect. This land was their land long before man. I implore you to respect what God has placed here and placed here for a reason!

Submitted By
Diane Soddy
Submitted On
8/18/2017 9:17:47 PM
Affiliation
Mrs.

Phone
2606278823
Email
fsoddy@frontier.com
Address
15442 Annabelle Place
Leo, Indiana 46765

Proposal 15 - 5AA 92.26 Killing bear cubs.

Please do not allow the killing of mother bears and their cubs. It is abhorrent to anyone who cares about animals. The reason many people visit your state is to see the wildlife. It is an asset that should be protected, not ignorantly slaughtered. I hope to visit some day, if there are any animals left.

Submitted By
Sally Sorensen
Submitted On
8/10/2017 10:59:01 AM
Affiliation

I am planning a trip to Alaska in the near future and would like to hear that the residents that I may meet in the future will not be baby killers. I am opposed to hunting and would be greatly offended if I heard that bear cubs could legally be hunted in your state. As a tourist, I am traveling to Alaska to experience one of the few wild places still left in existence today. I hope you plan to protect and treasure what others have chosen to destroy.

Submitted By
morgan stan
Submitted On
8/14/2017 3:02:43 PM
Affiliation

Phone
2034433612
Email
morgan@perfromancepropertiesllc.com
Address
29 spice hill st
wallingford , Connecticut 06492

please let these bears and cubs live. they are not trophies, they are worth more alive than dead! please have some compassion as we live with these animals harmoniously. thank you.

Submitted By
Lisa Starr
Submitted On
10/20/2017 2:59:15 PM
Affiliation

Phone
9543030547
Email
ldstarr@gmail.com
Address
221 Cameron Dr
Fort Lauderdale, Florida 33326

Proposal 15-5 ACC 92.26 Taking Cub bears and female bears with cubs prohibited. I'm against hunting of mothers and cubs. Please stop this, these mother bears should not be killed for a trophy on the wall....leaving cubs to die a horrible death without the protection of their mothers. Please stop this.

Submitted By
Rudy Stefenel
Submitted On
8/18/2017 9:14:48 PM
Affiliation

Phone
4082096953
Email
rudystefenel@yahoo.com
Address
120 Dixon Landing Road #117
Milpitas, California 95035

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Yes, let's amend amend this proposal to make it illegal to hunt bear cubs in Alaska - completely.

Let's leave the wild life live their lives normally.

Submitted By
Vickie Stellato
Submitted On
10/23/2017 1:53:48 PM
Affiliation
Ms.

Phone
4146540123
Email
gik@wi.net
Address
5115 57th Dr
Sturtevant, Wisconsin 53177

Please stop the hunting of mama bears and her cubs! Support PROPOSAL 15 5 AAC92.26

Submitted By
Laurie Storm
Submitted On
8/11/2017 7:39:23 AM
Affiliation

Phone
716-555-1212
Email
koostorm@yahoo.com
Address
80 Howell St
Buffalo, New York 14207

I am commenting on the state regulation AAC 5 92.260, taking Cubs and Female with Cubs strictly prohibited and enforced.

Submitted By
christine stripling
Submitted On
8/22/2017 7:52:20 AM
Affiliation

Phone
o7932759505
Email
christine.stripling@googlemail.com
Address
47 PETER BRUFF AVENUE
CLACTON ON SEA, Other CO168UE

Please , please try and pass a bill to put a STOP to the mass distruction of the wonderful Bears .They should be able to live a life of peace in their natural habitat . Mothers and cubs donot deserve to be killed they have done NO wrong and we are killing to many of our wonderful animal life. Please help them live and for the next generation to enjoy their existance. Thank you.

Submitted By
Maureen Sullivan
Submitted On
10/21/2017 4:13:21 PM
Affiliation

Phone
310-721-2018
Email
maureenpsullivan@gmail.com
Address
523 Manila Ave.
Long Beach, California 90814

Regarding PROPOSAL 15 – 5 AAC 92.26

My husband and I travel from California to Alaska every summer to photograph the incredible wildlife present. I suspect we are not the only people who do this. Why legislate the killing of mother bears and cubs when more people want to see the bears than to hunt them? For many a trip to Katmai or the Kenai Peninsula is a once in a lifetime trip. The reason it's worth the time and effort to travel to Katmai is obvious; it's the bears. Alaska welcomes hunters, fishermen, photographers and families. Let's try and keep those four legged families intact for those whose trophies are digital.

Submitted By
Kelly Sweeney
Submitted On
10/9/2017 1:40:04 PM
Affiliation

I am commenting on the State Regulation AAC 5 92.260.

Killing bear and wolf cubs and females with cubs should be prohibited, as should killing denned-and thus defenseless-animals. Humans already have tremendous advantage over these animals in technological assistance, such as cameras, advanced weaponry, and snares, to such a degree that calling hunting a "sport" is now completely ludicrous: there is nothing sporting about it (sporting implies a fair contest, not a contest where one party is handicapped by innocence and the other aided by technology and malicious intent). I oppose snares, I oppose aerial gunning, I oppose baiting, but allowing the killing of CUBS and mothers with cubs is barbaric.

Alaska will be boycotted by millions of Americans, crossed off the tourism destination list, should this terrible rule be allowed to stand.

Most people I know head to Alaska for the wildlife viewing, not to kill or be witness to killing.

Exempt cubs and mothers with cubs from the new hunting regulations.

Sincerely,

Kelly R Sweeney

Submitted By
Michael Tay
Submitted On
8/16/2017 8:10:04 AM
Affiliation

Proposal 15 - 5AAC 92.26

Please find it in your hearts to stop the hunting of bear cubs in Alaska.

Lead by example & show the rest of the country & the world that it is the right thing to do.

Many thanks for your time.

Submitted By
Sandra Taylor
Submitted On
8/19/2017 1:00:43 PM
Affiliation
Ms.

Phone
5303391691
Email
besaouin@charter.net
Address
7146 The Terrace St
Anderson, California 96007

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Please protect the lives of these animals.

Submitted By
Nancy Telese
Submitted On
8/21/2017 2:05:57 PM
Affiliation

Phone
5618337725
Email
Ntelese@aol.com
Address
PO Box 291
Palm Beach, Florida 33480

Please do not allow bears or bear cubs to be killed. Also do not allow bears to be killed in their dens. There is no need for trophy hunters to kill bears for pleasure. This is very very wrong. Humans have encroached into bear territory. Alaska is the last state left with a decent bear population. Leave them alone, to live out their lives. Do not allow human habitation in bear areas. Put the restrictions upon humans, not bears. Stop giving in to the trophy hunters who are allowed to murder animals. The monetary amount of money, that the state of Alaska acquires from trophy hunters, is not worth the life of bears. Do not allow cubs to be killed. Trophy hunters should take up a new hobby, such as helping with veteran causes. Trophy hunting bears or cubs is inhumane and sick.

Submitted By
Linda Terrell
Submitted On
8/28/2017 4:59:32 PM
Affiliation

Phone
772-240-5674
Email
Lindaterrell@Hotmail.com
Address
5059 North Hwy A1A
North Hutchinson Island, Florida 34949

Please pass proposed legislation prohibiting the hunting of cubs, PLEASE! These wonderful creatures need your help now more than ever. Allow these cubs to grow into adulthood and continue to have their own cubs. My personal feeling is no animal should be murdered for sport or trophy if for human food then so be it but no other reason. Save the he cubs!

Submitted By
Doreen Tetreault
Submitted On
10/21/2017 8:47:13 AM
Affiliation
Mrs

Phone
5615159694
Email
doreentetreault@comcast.net
Address
962 RED PARROT LN
WELLINGTON, Florida 33414-7934

What kind of a person kills mothers and cubs or even just cubs ? A real [redacted] who has no consideration for living things. Whether it's anima or human. Stop these hunts. They are cruel and only an ugly person could do such a thing.

Submitted By
Brenda Thompson
Submitted On
8/18/2017 6:43:14 PM
Affiliation
Mrs.

Phone
5419901451
Email
jboscht60@gmail.com
Address
410 Southwest Walnut Street
Albany, Oregon 97321

Dear Wildlife Management of Alaska,

PLEASE stop the bill that would allow the hunting and killing of bear cubs in your state. Your unique wildlife adds beauty and interest to the people that live in Alaska and it's visitors. One of the reasons my husband and I are planning to come to Alaska next Summer is to travel inland and hopefully see some of your bears!

Wildlife should be valued and taken care of and not used as pawns in our political/$ systems. Wildlife can bring revenue to your great state, and bears are iconic versions of such wonder!!!

Please stop this bill from taking the lives of innocent bears so that big game hunters have more moose to hunt and post their heads on their walls. BOTH bears and moose deserve better from us all!

Thank you, Brenda

P.S. These comments also cover the protection of wolves!

Submitted By
Patty Trammell
Submitted On
8/17/2017 11:59:22 PM
Affiliation

Phone
4055980288
Email
ptrammell@yahoo.com
Address
206 W Tennyson Ave
Tecumseh , Oklahoma 74873

Please allow the Cubs and mothers not to be killed. It is cruel and I humane. We don't know what the future might bring, we should save all we can.

Thank you

Submitted By
Crissy trayner
Submitted On
10/21/2017 1:02:01 PM
Affiliation

Stop allowing people to hunt bears with cubs and cubs. This is terrible.

Submitted By
Bobbie Tumolo
Submitted On
8/12/2017 11:26:19 AM
Affiliation

Phone
9492578560
Email
tumolobobbie@yahoo.com
Address
PO Box 565
Moran, Wyoming 83013

I am commenting on the State Regulation AAC 5 92.260, Taking cubs and female with cubs should be prohibited

Submitted By
Anthony Turitto
Submitted On
8/28/2017 8:06:12 AM
Affiliation

Phone
7608071775
Email
Pacificcoastenv@sbcglobal.net
Address
32140 Couser Canyon R
Valley Center , California 92082

I support the Alaska Chapter 1P Proposal to amend Alaska Administrative Code (5 AAC 92.260) in order to remove exceptions 1 and 2. I object to exceptions 1 and 2 in 5 AAC 92.260 which allows for the taking of bear cubs and female bears with cubs. I will NOT engage in tourism activities in the State of Alaska until that Alaska Administrative Code is amended to remove such exceptions. A person should not be permitted to take the life of a cub bear nor a female bear accompanied by a cub, without exception.

Submitted By
Joan Turpin
Submitted On
8/15/2017 7:32:26 AM
Affiliation
US Citizen

Phone
8012590426
Email
jot1956@hotmail.com
Address
12010 NE 40TH AVE
Vancouver, Washington 98686

I am writing to express my concerns over any proposed plans or ideas to shoot and kill, by any means, Alaska's bears. I had the opportunity to visit Alaska and was stunned and impressed with the beauty of the state and it's wildlife. The wildlife was a favorite with everyone in our party and was the main reason why we decided on visiting Alaska. It is also the main reason why we would return for another visit and encourage others to visit as well. The current plan to kill mother bears strikes me as inhumane in many ways, most noticably as it is a cover to kill the entire bear family as tiny cubs are left to defend and feed themselves when they are not physically able to do so and will also perish. Alaska has the means to become a great eco-tourism state where visitors can see real bears, elk, moose and other animals in their natural habitat. A place where you can do some fly fishing without worrying if a helicopter over year head signals your imminent death and the death of animals near you! And, as trophy hunting is becoming a pariah it is wise to look for other, more sustainable, avenues of revenue for Alaska, especially with the rise of eco-tourism and the anti-hunting tourists. This should be an opportunity to take a stand for the future of your state and your wildlife, please do the right thing and support you future, tourism, and leave the past, trophy hunting, wehre it belongs, in the dust bin.

Submitted By
Joan Van Velzer
Submitted On
10/22/2017 9:42:37 PM
Affiliation

This cannot be allowed, I cannot imagine anyone wanted to kill a Mother Bear with cubs, Or killing of cubs, it must take a certain type of hate filled person to want to kill them. Stop it now, I feel Grizzly bears should be protected anyway, If a person can't live among the wildlife then should move from the area. These animals must have some where to be safe.

Submitted By
Julieann Vanni
Submitted On
8/20/2017 6:50:30 AM
Affiliation

Phone
3058046642
Email
jjwels321@netscape.net
Address
6096 NW 62nd Terrace
Parkland, Florida 33067

Proposal 15-5 AAC 92.26 Taking cubs and female bears with cubs prohibited

It is important that we stop the destruction of our fragile ecosystem. Killing a young mammal before it has had a chance to live, experience, and thrive is not fair. Each life is valuable in this delicate balance, and our future as well as the future of our children and grandchildren depend on the choices we make. Remember, we inherited this beautiful planet from our ancestors, and we are borrowing it from our children. How do you want to leave it? I want to keep it beautiful and allow other forms of life to live on it as well. Just because you "can" kill these fragile, small, helpless animals DOES NOT MEAN YOU SHOULD!!! Thank you for your time.

Submitted By
Rupert Veitch
Submitted On
8/18/2017 7:46:13 PM
Affiliation
Mr.

PROPOSAL 15 – 5 AAC 92.26. Taking cubs and female bears with cubs prohibited.

I support this proposal. The killing or taking of a female bear with cubs will not only remove the mother from the declining bear population, but also the cubs, as they require their mother's protection and guidance for survival. As well as removing 2, to possibly 4 bears from the population with the killing of a single bear, it is also particularly cruel in that it will traumatise the cubs(severely) and condemn them to a slow, sad death by starvation, or to be killed by predation. While this is considered in some ways as a part of the natural cycle, that cubs may have to die like this for the sake of someone's hunting trophy, is an abhorrent state of affairs. Thank you for your time.

Submitted By
Barbara Walklate
Submitted On
10/20/2017 3:17:37 PM
Affiliation
Proposal 15-15AAC 9226

Phone
00447793407512
Email
barbarafred50@yahoo.co.uk
Address
Hall Croft House
Staffordshire , Other St104sw

Dear ladies & Gentleman, I write this as a tourist to Alaska and ask that you stop the planned and legal killing of Grizzly Sows & Cubs, I intend to boycott the country until this happens and I will be personally campaigning in the UK □□ to stop the sales of holidays to Alaska pleas consider the value of the Tourist Industry $2.42 billion, annually 38,000 jobs, & 1.3 billion in labour income, annually the fastest growth at this time is Eco Adventure Tourism, growing world wide @ 10%, just One Eco adventure can command the same price as you return for the Grizzly hunt annually, Please do not continue with this disgusting act and see the Grizzlies in there true worth, not just to you lucky people in Alaska, but to the rest of the world

Yours Sincerely Barbara Walklate UK □□

Submitted By
Kathe Walton
Submitted On
8/18/2017 4:10:54 PM
Affiliation

"PROPOSAL 15 - 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Please protect cubs and their mothers from being killed!

Submitted By
Andy Warrick
Submitted On
8/19/2017 8:18:49 PM
Affiliation

Phone
541-753-6704
Email
warrickaj@comcast.net
Address
2871 NW Monterey PL
Corvallis, Oregon 97330

I am writing this in support of your recent proposal to amend Alaskan Administrative Code (AAC 5 92.260), which would stop the killing of all mother bears with cubs. I am very glad to see that you are making stricter rules to hunting and predator control, among them banning hunting of mothers with cubs. Killing mother bears with cubs is not only cruel and inhumane, it has been proven unnecessary as well. While intensive predator control may be necessary in some areas with high predator density and many subsistence hunters who need game animals to survive, mothers with cubs always should be left out of the picture. We want there to be game for hunters to harvest, but predators should get a share as well. It is refreshing and encouraging to see you stop this cruel and unnecessary part of predator control and move toward a humane era. I hope you will vote to stop the killing of mother bears with cubs while continuing science-based wildlife management throughout Alaska. I look forward to your next moves.

Submitted By
Kim Waterson
Submitted On
10/24/2017 9:36:52 AM
Affiliation

Please DO NOT allow hunting of bear cubs and their mothers!

Submitted By
Sheila Webber
Submitted On
8/22/2017 7:18:40 PM
Affiliation

PROPOSAL 15 – 5 AAC 92.26

To the Committee

I am writing to beg that that the Alaskan Administrative Code AAC 5 92-26 be amended so that the killing of mother bears and cubs be prohibited. Not only is this practice extremely cruel, but is not biologically sound for the bear population in Alaska. I cannot believe this was a possibility in the first place. The bears cannot survive as a species if the mothers and babies are being murdered and regulations need to stay in place to stop those who would carry out this heinous crime.

Thank you for your consideration,

Sheila Webber

Submitted By
Katherine Weesner
Submitted On
8/19/2017 10:35:33 AM
Affiliation

Phone
9524235919
Email
kweesner@charter.net
Address
5087 147th St. W.
Apple Valley, Minnesota 55124

"PROPOSAL 15 – 5 AAC 92.26" I am thrilled that you have elected to review the disasterous killing of bear cubs in Alaska. These bears are necessary for the proper ecology in Alaska as well as throughout the country. I believe that as a civiization, such killing is also inhumane and I appreciate your decent thinking to consider alternatives.

Submitted By
Cynthia Weller
Submitted On
10/23/2017 8:03:27 AM
Affiliation

Phone
727-865-8808
Email
Cynthiasmoot@msn.com
Address
1645 Pinellas Bayway
St Petersburg , Florida 33715

IAs a visitor to Alaska, I am urging the board not to allow the killing of female bears with cubs. Not only will this impact the numbers of future generations of bears, there is nothing sportsmanlike about “taking “ an animal that is simply struggling to survive and feed her family. I suspect this would be frowned upon among ethical hunters

I appreciate the opportunity to comment and urge the board to do the right thing

Submitted By
Ellen Wertheim
Submitted On
8/21/2017 8:06:37 AM
Affiliation

Phone
7189453772
Email
ewertheim@bloomberg.net
Address
1 beach 105 st
rockaway, New York 11694

PROPOSAL 15 - 5AAC 92.26 Taking cubs and female bears with cubs prohibited

~~Stop killing innocent animals! This is absolutely despicable! SHAME on people that participate in such cruelty!
~~It never ceases to shock me that people think that killing innocent animals in the so called name of sport is acceptable. This has to stop! Realise that the majority of people do not agree with this and make it unlawful for it to continue.

Submitted By
Lisa Wiesbauer
Submitted On
10/21/2017 1:31:28 AM
Affiliation

Phone
919-625-9719
Email
Lakehaven58@gmail.com
Address
PO Box 348
Okemah, Oklahoma 74859

I am writing concerning Proposal 15-5AAC 92.26. Taking Cub Bears and Female Bears with Cubs Prohibited. Please amend this code as to NOT allow the taking of Sows with their cubs. It is unfathonable that it is even a consideration in today's day and age. We are currently planning a vacation to Alaska next August, but will definitely be changing plans if this type of hunting is allowed

Yukon Flats Fish and Game Advisory Committee

Interior Region
Fish and Game Advisory Committees

Larry Williams
Chairman
PO Box 93
Venetie, AK 99781

Central
Delta Junction
Eagle
Fairbanks
GASH
Koyukuk River
McGrath
Middle Nenana River
Middle Yukon River
Minto-Nenana
Ruby
Tanana-Rampart-Manley
Upper Tanana/Fortymile
Yukon Flats

October 6, 2017

Board of Game Members,

Due to the timing of the Statewide meeting, the Yukon Flats Fish and Game Advisory Committee will not be meeting prior to this meeting.

The passing of proposals 14 and 15 would be of concern to us as our committee was the author behind the proposal that got these practices passed in GMU 25D. I would once again like to restate and emphasize that these practices allow our communities to practice cultural and traditional methods to take black bears; we use black bear for food and their hides to sleep on.

On behalf of the Yukon Flats Fish and Game Advisory Committees, I would like to request that the board not pass proposals 14 and 15 so that we can be allowed to continue our traditional practices of taking bears in these methods so our needs are met.

Larry Williams
Chair

Submitted By
Pamela Williams
Submitted On
8/18/2017 7:56:39 PM
Affiliation
None

Phone
2083422423
Email
3blackdog9@gmail.com
Address
2418 Jean
Boise, Idaho 83705

I support Proposal 15-5 ONLY IF both exceptions are removed.

The killing of sows with cubs and/or the killing of cubs is repugnant and unacceptable to the general public. Most people do not want to see cubs killed or orphaned and feel disgusted and appalled with such practices. In addition, there is no economic justification nor socially redeeming benefit to such practices. Alaska is a supremely beautiful state treasured by residents of Alaska and the lower 48 alike. We admire the scenery and the wildlife and the wildness and believe in fairness and fair chase. Killing mother bears and young violates both. Thank you.

Submitted By
Romy Williams
Submitted On
8/21/2017 8:07:06 AM
Affiliation

Phone
5124912300
Email
romymwilliams@gmail.com
Address
11817
Lima Drive
Manor, Texas 78653

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Submitted By
Chris Wood
Submitted On
10/23/2017 1:39:19 PM
Affiliation

Please leave bears and cubs alone. No more hunting, baiting, or trapping. Give them peace.

Submitted By
Linda Wood
Submitted On
10/26/2017 9:06:50 AM
Affiliation

Phone
2392470220
Email
Woodlinn88@yahoo.com
Address
4223 Ellen Ave
Fort Myers, Florida 33901

PROPOSAL 15 – 5 AAC 92.26" I am against the killing of bear cubs and females with cubs. There is nothing at all ethical about that type of hunt. Please do not let this happen.

Submitted By
Cynthia Xerogianes
Submitted On
10/20/2017 3:43:38 PM
Affiliation

Please protect the innocent mommies and babies.

They are our most profound responsibility

choices matter please choose compassion..

Submitted By
Donna Yavorsky
Submitted On
8/26/2017 12:11:35 PM
Affiliation
Mrs.

Phone
7325639431
Email
dyavorsk@gmail.com
Address
5 Oak Fern Drive
Warren, New Jersey 07059

Save black bears! Protect bear cubs from trophy hunters.

Submitted By
Brad Yoho
Submitted On
8/24/2017 12:16:14 PM
Affiliation

Phone
7034307945
Email
byoho@hotmail.com
Address
23440 Somerset Crossing Place
Ashburn, Virginia 20148

Regarding PROPOSAL 15 – 5 AAC 92.26 I am submitting that you stop the hunting of bear cubs in Alaska entirely.

There is no cause or reason to be hunting cubs who have not lived a sufficient life yet and incapable of defending themselves.

This is not why hunting was invented. Ban the practice immediately.

Submitted By
Monica Zias
Submitted On
8/19/2017 4:27:05 AM
Affiliation

PROPOSAL 15 – 5 AAC 92.26, The bears and their cubs should be able to live and thrive in the wildlife without being harmed by human element. They are both a part of the natural environment as well as being a strong part of the eco system, which needs balance to be healthy and for the future. I think everyone would like to be able to say in future that bears do still exist in the wild and not just be seen as another species gone extinct.

Submitted By
Wanda Zubr
Submitted On
8/18/2017 6:42:54 PM
Affiliation

Ref: Proposal to Amend Code 15-5 AAC 92.260

Dear Sir/Madame

Respectfully I urge you to support aforementioned proposal to protect the lives of cubs and female bears with cubs.

These sentient beings as well as their male counterparts and all other wildlife need to have a safe place to be able to live their lives without human encroachment or be a target of trophy hunters who truthfully have no place in any civilized society.

Thank you for you attention.

Sincerely

Wanda Zubr

Submitted By
Katie Zukoski
Submitted On
8/20/2017 6:27:46 PM
Affiliation

Phone
530-343-5165
Email
katiezukoski@sbcglobal.net
Address
1884 Humboldt Rd.
Chico, California 95928

RE: Proposal 15-5AAC 92.26

Please prohibit the taking of cubs & female bears with cubs. Thank you, Katie Zukoski

Submitted By
Akshar
Submitted On
8/10/2017 6:12:00 AM
Affiliation

Every life matters. Killing someone is against the human nature. Please don't kill the bears and their cubs.

Submitted By
Anna
Submitted On
10/22/2017 3:54:13 AM
Affiliation

Please ban the hunting of bear mothers with cubs. We have to draw the line between responsible hunting and pure cruelty. Hunting bears with cubs is just plain cruel.

Sincerely, Anna

Submitted By
Ariela
Submitted On
8/10/2017 7:55:37 AM
Affiliation

Please make Taking cub bears and female bears with cubs prohibited.

Submitted By
Barry
Submitted On
8/18/2017 10:59:02 PM
Affiliation
PROPOSAL 15 – 5 AAC 92.26

Kind Regards

BarryDear Sirs, please consider the bears and their cubs with regards to hunting, we have to move on and protect these beautiful creatures.

Submitted By
Bozi
Submitted On
8/17/2017 5:40:04 PM
Affiliation

TOGETHER WE CAN SAVE CUBS FROM BEING KILLED

PROPOSAL 15 – 5 AAC 92.26. Taking cub bears and female bears with cubs prohibited. Please be respectful....

Submitted By
Deborah
Submitted On
10/21/2017 2:28:26 PM
Affiliation

Phone
9417357062
Email
debenslow@gmail.com
Address
2454 Breakwater Circle
Sarasota, Florida 34231

PROPOSAL 15 – 5 AAC 92.26

Opposed to killing Mother bears and cubs (babies)

Submitted By
ed
Submitted On
8/19/2017 9:03:02 AM
Affiliation
minister

Phone
419-565-1212
Email
edsmeyak@yahoo.com
Address
2321 fleming falls road
mansfield, Ohio 44903

These are Gods nature provided creatures, mothers and cubs, existing in natures given envirnment.

Brutility and massacre are propigated by political interests, certain mentalitys, and spritual voidness.

These creatures need our compassion and logic of a higher level, thus this appeal to permit their existance.

Submitted By
Janice
Submitted On
8/18/2017 4:07:06 PM
Affiliation

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited.

Submitted By
Louise
Submitted On
8/19/2017 6:39:08 AM
Affiliation

"PROPOSAL 15 – 5 AAC 92.26", Taking cubs and female bears with cubs prohibited. Please save the bears.

Submitted By
Marce
Submitted On
8/19/2017 9:55:47 AM
Affiliation

Proposal 15-5AAC 92.26

Taking cubs and female bears with cubs prohibited!

"The greatness of a nation and its moral progress can be judged by the way its animals are treated."-Mahatma Ghandi

Submitted By
Maria
Submitted On
8/10/2017 3:13:03 PM
Affiliation

Phone
3222767439
Email
mamix@yahoo.com
Address
9274 Shepton St
Orlando, Florida 32825

I hope you can help our bears with proposal 15 and stop the killing of bear Cubs. This planet belongs to all of us, not just humans

Submitted By
Natalia
Submitted On
10/21/2017 1:28:40 AM
Affiliation

Phone
5564282821
Email
CIntmg1@outlook.com
Address
Germany
Berlin, Other 10249

"PROPOSAL 15 – 5 AAC 92.26". I'm against the hunting of bears and mothers and cubs. Could you please protect them and educate and create ecotourism instead of allowing hunting them. Let's learn from countries like Costa Rica that projects and it brings money with eco tourism. Or education, research, protection. We can't be more like "we don't care". Thank you.

Submitted By
Stefan
Submitted On
8/19/2017 4:40:03 PM
Affiliation

Please say no to killing bears, especially bear mothers with their cubs! We, the humans, must find a way to peacefully coexist with bears and other wildlife. Killing and maiming bears is not acceptable!

Please find the kindness, love and empathy in your sould to stop the killing of these magnificent creatures!

Thank you!

Submitted By
Stephanie
Submitted On
10/24/2017 7:39:14 PM
Affiliation

Phone
415-328-4475
Email
Baller2661@gmail.com
Address
518 village circle
Novato, California 94947

No killing of bear cubs or mothers with bears. I spend a lot of money to travel to Alaska to see bears. Give the tourist a voice!! Stop listening to hunters.

Submitted By
stephanie
Submitted On
8/28/2017 6:08:29 AM
Affiliation

Please end the killing of bear cubs. This practice is not only cruel but inhumane and totally unnecessary. We did it here in Florida. We as Americans are better than that! Thank you! (amend Alaskan Administrative Code AAC 5 92.260).

Submitted By
Alaska Falconers Association
Submitted On
10/27/2017 8:14:25 PM
Affiliation
David Lorring

Phone
907-687-4858
Email
lorring@mosquitonet.com
Address
3530 Holden Road
Fairbanks, Alaska 99709

Mr. Ted Spraker, Chairman, Alaska Board of Game (BOG .

My name is David Lorring and I am the president of the Alaska Falconers Association (AFA . Alaska has 54 licensed falconers in three license classes (Master, General, and Apprentice . AFA has 36 members.

As president of AFA, We thank the BOG for allowing us to comment on proposals that will affect falconry in Alaska. I will be presenting both written and oral to the Board on six falconry related proposals. (Proposals 18 thru 23

Proposal #18 requests that the Board of Game remove the requirement for testing for West Nile Virus (WNV on raptors imported into the State of Alaska under terms of 5AAC 92.037(permits for falconry .

The Alaska Falconers Association supports proposal #18, which will eliminate the West Nile Virus testing and immunization requirements for raptors that are imported into the State of Alaska. Current falconry regulations require a raptor that is imported into the State of Alaska be vaccinated against West Nile Virus or have a blood test that produces a negative titer within 30 calendar days prior to the date of import.

In an Addendum to the Alaska Falconry Manual #9 dated March 29, 2013, (Manual #9 has been adopted into regulation by reference by the Board of Game , the Department stated that it will no longer enforce the West Nile Virus testing or immunization requirements listed in Falconry Manual #9 for importing raptors into the State of Alaska. In this Addendum, the Department outlines reasons that they feel would make it highly unlikely that West Nile Virus could be introduced into Alaska by imported raptors. Even though the Department stated that it will not enforce the requirement to test or vaccinate, the regulation is still in place and falconers feel that they are bound by its requirements.

Due to the reasons outlined in this Addendum and other research into the unlikely possibility that importation of raptors into Alaska will cause virus transmission, the Alaska Falconers Association requests that the Board of Game remove the testing and immunization provision from regulation.

The following excerpts are from research by:

Patrick T. Redig DVM, PhD

Professor Avian Medicine & Surgery

The Raptor Center, College of Veterinary Medicine

University of Minnesota

St. Paul, MN 55108

(Complete report can be found at" Biology of West Nile Virus"—Patrick Redig DMV, PHD

3. "**Risk posed by raptors for introducing WNV to Alaska:**

Raptors, like humans and horses, are regarded as "dead end" hosts for West Nile virus. This means they are not part of the amplification cycle. In experimental infections it has been shown that viremic tiers do not exceed 104 viral units/ml of blood (Komar except in great horned owls. Competent amplifiers are typically juvenile passerine species (catbird, robin, English house sparrows) that develop viral titers of greater than 106 viral units/ml and maintain that for days to a couple of weeks, generally without developing clinical disease. Similarly, it has been shown that in order for a mosquito to become infected, they need to ingest blood that contains greater than 105 virus

particles/ml of blood. In addition, raptors exhibit very short-term viremias beginning to rise on day 2 after infection and peaking about 3 days post-infection after which the virus is rapidly cleared from the blood and they are incapable of passing on the disease (Redig 2011). Most susceptible raptors develop clinical disease upon infection and die acutely; the number that develops mild or subclinical infections is unknown, however there is no evidence that they become carriers, rather they quickly clear the virus from their systems. Beyond the negligible risk raptors pose for introducing West Nile virus to Alaska, it should be considered that for large portions of the calendar year, essentially from October through May, there is no risk of them transporting or transmitting the disease.

1. **Why Alaska has little or no risk of WNV presently**

The reasons are stated on Alaska Fish & Game Web page (http://www.adfg.alaska.gov/index.cfm?adfg=disease.wnv – what follows reinforces the accuracy of that information in the context of current information. Not only does Alaska not have West Nile virus, but most of Canada does not (still , having been found only in the southern portions of Saskatchewan, Quebec and Ontario; Yukon Territories and Northwest Territories are devoid of WNV (figure 1 as recently as 2012. West Nile infections peaked in Canada in 2007 (table 1 and while the numbers were greater than in 2012 the distribution was the same. It is of interest to note that all of the cases reported in British Columbia were associated with travel outside the province. It may be suggested that human travel poses a greater risk of WNV introduction than does raptors based on known information. The factors that determine presence in any region are availability of competent mosquito vector species and temperature with the latter being the more important determinant. As noted above, nighttime temperatures in excess of 60 F (15 C for extended periods of time are necessary for amplification in mosquitoes; table 2 shows that at no time do the average minimum temperature in Juneau reach 60 F. Therefore, it is inconceivable that, absent climate change of catastrophic proportions or some incredibly and unlikely mutation of this virus, WNV would ever become established in Alaska. And, any such occurrence would be preceded by evidence of substantial northward expansion of its range long before it arrived in Alaska for which there is adequate monitoring in place. Several pieces of online information by experts in Alaska further argue against WNV becoming established in Alaska (Arctic Science Journeys, 2004 .

1. **Opinion:** Given the near zero risk of raptors intended for use in falconry would be able to carry West Nile virus into Alaska and the already apparent inability of West Nile virus to become established after 13 years of presence on the continent, it is not apparent why there is a need to implement complex control procedures. Further, this regulation would require veterinarians to use unapproved products for vaccination; products which, though used, have not been subjected to any kind of challenge study to determine their efficacy or establish their ability to seroconvert a proportion of the vaccinated population. It would seem entirely adequate for raptors entering the state do so with a Health Certificate signed by a licensed veterinarian.

Proposal #19: Requests the BOG to change the non-resident season take dates from August 15th thru October 31st to September 5th thru November 20th

The AFA supports this proposal with an amendment, which would read “the nonresident season for capturing a passage raptor by permit would start September 5th in GMU 23 and 26. The season would remain the same as current regulation for GMU 1 thru 22, 24 and 25.

The current regulation allows the take of one “passage” raptor by non-resident drawing permit only. In unit 26 and North-Western unit 23 on the Lisbunne Peninsula Tundra peregrine falcons and some Gyrfalcons have not fledged (left the nest or are still at the nest site depending on the adult birds for food on August 15th. By delaying the season opening until September 5th, those birds in this category will be true passage birds (Passage is a term used to describe a bird captured from the wild, often on migration, whilst still in its immature plumage, with the intent to train the bird for falconry .

Proposal #20 Requests the BOG to limit nonresident falconers to take one raptor every 4 calendar years.

As the proposer of #20, AFA would like to amend the language of this proposal to limit nonresident falconers who take a Gyrfalcon or a Peale’s peregrine falcon from GMU’s 1 thru 10 to one raptor every 4 calendar years.

The intent of the BOG, which was placed on record, when they implemented a non-resident capture allocation for raptors in Alaska was to allow the every day American falconer to experience a chance in his lifetime to come to Alaska to have the opportunity to take a falcon or a hawk that was not available to that person in his area. The large falcons, although they are found on the mainland of the US, are more abundant in Alaska and have been the targeted species of the non-resident falconer to date. One nonresident falconer, in the three years of the program, has won two tags and has taken two raptors. AFA feels that BOG intent was to spread out the opportunity in a way to allow more access to the permits by American falconers. This is one way that this process is commonly done.

Proposal # 21 Requests the BOG to require that a raptor that is captured under a nonresident capture permit, be implanted with a microchip by a licensed veterinarian prior to their export from Alaska.

As the proposer of #21, AFA would like to amend this proposal to read “require Gyrfalcons taken statewide and Peale’s peregrine falcons taken in GMU’ 1 thru10 be implanted with a microchip by a licensed veterinarian prior to export from Alaska”.

Microchip implantation is currently an option to identify a raptor that currently requires banding by the USFWS regulations. Literature indicates that the microchip implant is a safe procedure for the bird and will provide positive and permanent identification of ownership. The microchip is the size of a grain of rice and is implanted in the breast muscle of the bird. The microchip is implanted into the bird with a syringe by a Vet and the cost of the procedure is ~$85.

This proposal is designed as a law enforcement tool and used as a way to permanently mark a wild origin falcon taken in Alaska, and provide positive tracking as they leave the state and are possibly introduced into a breeding program. Wild origin birds are illegal to sell. Leg bands (zip-ties with a number on them can be cut off and the bird identification and the origin of the bird could become clouded.

An important side benefit to the falconer is that ownership of a falcon with an implanted microchip can never be disputed in the case of recovery of a disputed lost or stolen falcon.

Proposal #22 Requests that the BOG change the current non-resident allocation to add an additional five eyes goshawks to the current non-resident allocation of five passage raptors of any allowable Alaska species. (Eyas is originally a term for a young bird taken from the nest for training; it is often used to describe a young bird whose training is incomplete . In this proposal eyas is a term for a raptor that is still a chick in the nest that has not attained the age required to fly from the nest.

AFA is opposed to this proposal, as it will change the current nonresident allocation that only allows passage raptors to be taken. This proposal will allow chicks to be taken from the nest. AFA has requested the BOG and ADFG to keep the current allocation of up to 5 passage raptors in effect for a full five years in order to evaluate the current nonresident falconry program. AFA sees that this evaluation by the Department would include a review of the bird species targeted by non-resident falconers, the timing of the captures, the areas in the State that are targeted by non-resident falconers, any problem areas and illegal activities, internal Department logistics as the Department deals with in the implementation of the program which may include, but is not limited to, the cost to administer the non-resident program, training field biologists to identify the species of raptors that are taken, cost to develop area closures and prevent conflicts with resident falconers if changes are made to allocations, and other internal issues.

AFA believes that this evaluation by the Department demands a full five-year window of data, which will show a valuable trend of resource activity. AFA does not want to move too fast into a new increased exploitation of a very valuable State resource. There is no reason to rush into increased exploitation by allowing an eyas take with out making timely educated decisions about what might happen to Alaska's very valuable raptor resource if changes are made. AFA believes that this proposal is a gateway proposal into the realm of eyas take for all species of raptors including the highly sought after large falcons. AFA believes that regulated eyas take may be available in the future by non-resident falconers, but not without a good evaluation of the pros and cons of developing that program. AFA requests the BOG to continue to keep the current allocation of up to five passage raptors in place for an additional two years.

Proposal #23: requests an up date to the Alaska Falconry Manual. AFA supports this proposal and has been a partner with ADFG in developing this up-dated manual.

The Alaska Falconers Association, founded in 1979, represents the interests of all Alaska resident falconers.

I would like to see Alaska open up the take of first year raptors to 5% of population numbers and half of those opened up to non-residents. It is well known that the majority of first year birds do not survive in the wild and this will have no impact on wold populations. I fail to understand how Alaska can open up Brown bear to non-residents but still maintain severe limits on raptors for licensed out of state falconers. Furthermore the season should be 365 days for non-residents or the same as residents. Please consider much greater numbers and longer trapping season.

Doug Alton
Madera California

October 26, 2017

To: Alaska Board of Game

From: American Falconry Conservancy

Please accept our comments on the statewide regulations:

PROPOSAL 18 – 5 AAC 92.037. Permits for falconry. Remove the West Nile Virus testing requirement for raptors.

We support this proposal.

PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season for taking passage raptors.

This proposal should be rejected. The raptor resource of Alaska is abundant and the harvest by nonresidents is so small it cannot possibly have an impact on raptor populations. Absent a legitimate concern (demand exceeds sustainable harvest) nonresidents should have the same access to the resource as residents.

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PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years.

Reject this proposal. The Alaska Board of Game has approved only 5 permits per year which is insufficient to meet the small demand. The unreasonably restricted harvest is responsible for the conflicts suggested by the petitioner. To make matters worse the Game Department has arbitrarily used its discretion to limit the harvest to three. The petitioner's example of Alaska not allowing a person who successfully fills a drawing hunt to apply for the same hunt the following year is not applicable to this situation. The most sought after big game animals have a high demand as it relates to sustainable use, which is an appropriate reason to carefully monitor who has access to the limited resource. This is certainly not the case with wild raptor harvest for American falconers. As an example, the State of Alaska approved the 2009 Environmental Assessment on the take of peregrine falcons for falconry. The EA approved the very conservative sustainable harvest of 41 anatum peregrine falcons per year from Alaska. Each year only a handful is taken by residents, and nonresidents are denied equal access. If the Board and petitioners genuinely want to make trapping a raptor in Alaska available to nonresident falconers, they should consider our petition to allow nonresident American falconers the same access as residents to this abundant resource.

PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips.

Reject this proposal.

This appears to be another attempt by a few resident falconers erect hurdles to deter nonresidents from enjoying an abundant resource. The petitioner fails to point out that the federal law which prevents the sale or export of these birds from the country is applicable to both residents and nonresidents alike and, yet they want to make the rule applicable only to nonresidents where it has no force and serves no purpose.

There is already a federal policy in place requiring the banding of these birds for identification. If Alaska implements this rule, it should be applied only to birds remaining in Alaska since this would be the only way it could be enforced. Once a bird leaves the state the chip could be legally removed by anyone who chooses to do so; however Alaska could require that birds residing in Alaska be microchipped at all times, which is perfectly acceptable.

They site one specific example of a migratory bird which was banded in the Yukon Delta and was later identified in the Middle East as if this were evidence that nonresident American falconers should be viewed as potential criminals. We do not know what year this occurred or any other details about this circumstance, however we do know that these are "migratory birds" which do not recognize the international border between Alaska and Russia. Gyrfalcons are known to roost on icebergs floating across the ocean. Gyrfalcons and other migratory birds also fly across this border using their wings. There is no evidence of any illegal international trafficking of falcons in the U.S. that we are aware of, however it is well documented that falcons are trapped in Russia where they are exported to the Middle East. We feel that an Alaska state microchip identification rule for falconers is an unnecessary burden since it will not deter the trafficking of birds trapped in Russia.

PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents.

We support the nonresident take of goshawks, however there is no reason to restrict this very common species to an annual limit of five or to restrict the take to only eyas (pre-fledged) birds. Due to the expense of traveling to Alaska, we can imagine that a group of 3-5 falconers may want to travel to Alaska to enjoy fishing and harvest goshawks on the same trip. We do not see a compelling state interest which would necessitate a lottery or a one or two year waiting period before being qualified to reapply for this lottery.

Given the limited demand for goshawks by both residents and nonresidents, we support a no restriction limit of annual take of eyass and passage (juvenile) goshawks with a bag limit of two birds per falconer which complies with federal regulation of this species.

Thank you,

Troy Morris

Submitted By
Ryan Anthony
Submitted On
10/26/2017 1:18:07 PM
Affiliation

Proposed restrictions on non-resident take of raptors are burdensome and excessive. No raptors that are commonly used or desired in falconry are in threat of extinction. Raptors populations in Alaska are doing wonderful, thanks to the conservation ethic of ADFG and the Alaskan public. It is pertinent that non-resident take for falconry not be restricted any further than what it currently is. Doing so would be biologically absurd and detrimental to the efforts taken at national levels to conserve migratory birds which included raptors. While the states govern and regulate the take of raptors for falconry, the migratory nature of raptors demands that conservation be done at a national scale. This not only makes every American responsible for cleaning raptors, but also be allowed to possess and use them in falconry. Restrictions on nonresident take will burden many falconers in succeeding to draw and successfully take a raptor for falconry or breeding. Breeding of raptors in falconry has conservation benefits as it serves as a "Noah's Ark" such as demonstrated previously during the recovery efforts made by falconers nationally to bring back the peregrine falcon from the brink of extinction. I am a migratory bird biologist, and in my opinion, the restrictions proposed by Alaskan falconers are not only biologically unsound, but also childish. I plead the ADFG to consider biological implications rather than fear mongering by selfish individuals. Thank you for allowing me to comment on this issue.

Submitted By
Mike Barker
Submitted On
10/26/2017 12:58:22 PM
Affiliation

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Dear Members of the Alaska Board of Game and associated Alaska Department of Fish and Game staff -

Thank you for the opportunity to submit these comments. My comments relate specifically to Proposals 18 thru 23 which focus on falconry. While my wife and I now live in Montana, we lived in Alaska from 1989 thru 2009. We are no longer Alaska residents. However, we own a cabin on the Anchor River near Homer, pay property taxes, and our family spends at least a few months each year at our cabin. Additionally, one of our daughters has remained in Alaska, married an Alaskan, and both of their children (my grandchildren) were born in Alaska.

My wife began falconry in 1965 at the age of 12. Her father was a falconer and he taught her how to hunt with raptors. She was my falconry mentor after we met in 1973, and we actively practiced falconry until 1989. We are both lifetime members of the Montana Falconers Association. We are also founding and lifetime members of the Wyoming Falconers Association. Additionally, we are members of the North American Falconers Association, and the International Eagle Austringers Association. We maintained strong ties to falconry while we lived in Alaska, but did not practice falconry in Alaska. We restarted hunting with raptors when we retired in 2009 and moved back to Montana. Over the years we have hunted with a variety of raptors, but enjoy hunting with Golden Eagles the most.

With this background in mind, I believe the following comments are relevant and I hope you will find them helpful.

Proposal 18 - I support. While some falconers may continue to vaccinate their birds for West Nile, it is currently unnecessary in Alaska. This is an overly cautious requirement, that can easily be reinstated if/when necessary.

Proposal 19 - I oppose. As a wildlife biologist, I find this proposal in conflict with scientifically sound biological principles. Natural mortality rates are typically high in first year raptors. Taking young (eyass) raptors from the nest has been scientifically demonstrated to have the least potential for impact on raptor populations, including those species which might be of most concern in Alaska such as gyrfalcons. If ten falconers remove ten nestling gyrfalcons from the wild, that will have a smaller impact, if any, on the gyrfalcon population than if ten immature (passage) gyrfalcons are removed from the population, weeks or months after fledging from their nest. Yet this is exactly what this proposal intends - to not only disallow the taking of nestlings, but rather to promote the taking of flighted birds which have a better chance of surviving to adulthood. Rolling back the start date is inconsistent with sound wildlife management principles. While I understand the desire to minimize particular nests/eyries being repeatedly targeted by falconers, there are much better ways to manage for that. Rotating falconer take between the various ADFG management regions from year to year, for instance. Additionally, it is hard to imagine that three falconers will ever have any discernible impact, of any kind. In fact, it would be nearly impossible for thirty falconers to have any measurable impact on Alaska's raptor populations, if managed properly. Further, I do not know any biological research that suggests nonresident take of any fish or wildlife species has a discernable negative impact that is somehow different from resident take. This proposal seems to be motivated by something other than concern for the raptor species it purports to protect.

Proposal 20 - I support either Option, but prefer Option B. Restricting successful applicants from reapplying year after year for another opportunity is counterproductive. Many States handle this sort of concern with "point" systems or similar methods. Trapping a wild passage raptor in Alaska is the opportunity of a lifetime for some falconers. In fact, if Golden Eagles become available for falconers in Alaska, my wife and I will be guaranteed applicants. I would suggest the Board of Game consider another Option - Allow one nonresident falconry take permit to be auctioned off each year and let ADFG split the auction proceeds with the auctioning party. This could be the Alaska Falconers Association or the North American Falconers Association. This auction permit could be valid for anyone, from anywhere - providing they are a properly licensed falconer their home State or Country.

Proposal 21 - I oppose. This is another proposal that seems to be motivated by something other than concern for the raptors it purports to protect. Requiring any falconer to microchip a raptor is biologically, scientifically, and philosophically inappropriate, in my opinion. I doubt the Board of Game or ADFG personnel think falconers are somehow not worthy of the trust and respect that is shown any other hunting group. In my experience, falconers are law-abiding citizen-scientists, and follow a myriad of laws and regulations that govern falconry. Also, banding requirements are already in place.

Proposal 22 - I support. This could be increased to 50 goshawks, and the Alaska population wouldn't have a dent put into it.

Proposal 23 - I support. These seem like reasonable and prudent updates/changes.

Respectfully,

Mike Barker, 7739 Schafer Road Bozeman, MT 59715

(406) 581-0629

Montana Master Falconer number 13035801122

Submitted By
Darryl Barnes
Submitted On
9/16/2017 2:34:26 PM
Affiliation

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Dear Sir/Madam,

Regarding Falconry regulation proposals 19, 20 & 21:

My name is Darryl Barnes and I am a falconer living in Idaho. I writing in response to the proposed further limiting of access to out of state falconers to Alaska raptors, specifically peregrine falcons and gyr falcons.

First, the current limit of three, non-resident tags for a peregrine falcon OR gyr falcon is more than adequate to protect the birds themselves and the land in which the birds would be trapped or otherwise harvested on. The severe limit of three raptors of either species would preclude the adverse effect of any of the feared effects stated in these proposal such as in proposal 19 which states: "can ultimately effect the presence and maintenance of certain scarce genetics in the wild". While this sounds scientific it is illogical. Even if all three tags were filled in the same area, and this is unlikely, three, even compounded annually is an insufficient number to be bio-statistically significant. Please keep in mind the well documented biological fact that 75% or more of these dispersing youngsters perish before reaching breeding maturity where they have opportunity to contribute to the gene pool in question. If the number of tags were increase to a scientifically reasonable and ethical number then the AK F&G could restrict certain areas in future years if the harvest data collected at the time of harvest did in fact reveal a "targeted harvest" that was concerning for a potential negative impact.

Second, given the huge landmass and and available habitat in Alaska that support very large, healthy populations of both peregrine falcons and gyrfalcons a limit of three of either species seems overly cautious. Such a quota cannot possibly be based on any kind of scientific data. Rather, the Game Board must have set an arbitrary number on the suggestion or inference of some other rationale. In my opinion this is very short sighted and begs the question what possible logic has been presented for the board to set such a low limit in the first place. A model used by the USFWS performed by professional biologist stated allowing a 5% harvest of juvenile peregrine falcons would not adversely effect the health of the wild population. The Service set an even more conservative limit of 2.5%. There is precedence for Alaska to use the same model and set a 2.5-5% quota based on known population data then divide the quota between resident and non-resident falconers. I suspect this would constitute a significant increase in available tags available.

Third, these proposals by Alaska resident falconers and their state falconry association is especially confounding at a time when several state Game Departments, all Eastern Flyway Counsels, the USFWS, many state falconry associations and The North American Falconers Association have managed to workout a multi-state sharing of migrating tundra peregrine permits fairly and equitably to each of the three flyways. All American falconers, including those who reside in Alaska are beneficiaries of this cooperation. Again, the Alaska falconer's Association and F&G rationale in limiting non-resident access begs explanation.

Forth, I submit managing two species within a single pool of tags is also illogical and equivalent to managing moose and caribou in the same pool of tags. With the current, non-resident tag limit of three (3) gyr OR peregrine falcons, it is assume that the department would not consider a total annual harvest of three gyr falcons or three peregrine falcons in a single year an adverse event because with an open tag that could occur. Further, the two species annual production of juvenile falcons do not effect one another and are totally separate populations. Therefore, an annual allotment of 3 gyr falcon tags and 3 peregrine falcon tags would not increase the currently allowable, species specific harvest level but would effectively increase the available permits to a total of 6.

I welcome the opportunity to better understand the thoughts of both the AK F&G and the AK falconers Association in limiting non-resident

falconers access to precious American resources particularly considering the climate of cooperation and reciprocity with most other states and our national Association concerning raptorial resources.

In closing I appreciate being given the opportunity to comment on Alaska proposed changes to their falconry regulations.

Sincerely,

Darryl Barnes,

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Boise ID 83716

(208) 631-8674

Submitted By
Mark Borden MD
Submitted On
9/26/2017 1:48:37 PM
Affiliation

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Dear Sirs, I have been a licensed Master Falconer and Frequent visitor to AK. For over 30 years.

Alaska is a vast state, with extensive renewable resources that could be better utilized to assist the survival and preservation of wildlife. I have hunted Caribou in Alaska, and appreciated the opportunity to benefit from the adventure and savored the delicious meat for many months. I have also fished from Sitka annually for the last 5 years.

Similarly the raptors of Alaska could be managed. In falconry, though, the birds are kept live, and live much longer in captivity than in the wild. Many Wild taken birds are later used in captive breeding and thus have been used to restore wild populations, as well as for education.

There is a large and stable population of many species of raptor in AK. Issuing permits for the take of several thousand immature raptors to be taken annually for falconry would have no impact whatsoever on the wild population.

The fact is that if permits were issued on an unlimited basis there would still be only lminimal demand. Tha bottom line is that there are not very many falconers.

I would be glad to speak to the commission.

When I moved to Ohio in 1990 for Medical School there was no legal take of eyass raptors allowed in that state. When I asked I was told there were few nesting birds. Within a week I was able to locate and document dozens of nesting sites of the "rarest species," the Sharp Shinned Hawk, in the Cleveland area.

Mark Borden MD. (BS Zoology, WSU, 1989)

Submitted By
Jeff
Submitted On
9/10/2017 3:12:55 PM
Affiliation
none

Dear members of the Alaska Board of Game, Thank you for this opportunity to comment on proposed rules affecting nonresistant falconry take. I am a lifelong falconer, and one of my dreams is to have the opportunity to visit Alaska and capture a passage gyrfalcon. I want to mention that my interest is exclusive to falconry. I don't breed raptors and I am not affiliated with any raptor breeders. I simply want the chance to fly a passage gyr, and Alaska affords me the best opportunity to fullfill that desire. From that perspective, I would appreciate your consideration of the following comments:

PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season from Aug 15-Oct 31 to Sept 5-Nov 20.

I don't object to this change, though I wonder how true the comment is that "A majority of the nonresident permit applicants are raptor breeders and/or their affiliates and are targeting certain localities and very specific genetic stock". The people I know that have applied for permits were interested in falconry birds (though none of them have been fortunate enough to draw one). In any event, I do agree that changing the dates will still provide nonresidents a reasonable opportunity to take a passage bird.

PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years as follows

While I agree with the principle, 4 or 5 years is too long. Alaska does not allow a person who successfully fills a drawing permit for a big game animal to re-apply for that same hunt the following year, and I think an every two or three years should be long enough for nonresident raptor take. Utah does this now for peregrine take, and my sense is this does help spread the opportunity to secure a wild peregrine across the falconry community.

PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips

I strongly disagree with this proposal. The federal bird band does everything needed in terms of tracking, and unlike microchips, is readily recognized by state wildlife agencies across the US. It is important to note that there is currently no uniformity across microchip readers, so the chip reader one agency is using might not even recognize the chip in a falcon whose chip was implanted by an Alaskan veterinarian. Thus, microchips are actually quite likely to undermine reasonable efforts to document track a legally acquired raptor. Finally, the argument that chips somehow protect against nefarious actors is obviously false. Anything that can be implanted can also be removed.

PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents

I strongly support this proposal, and urge the wildlife board to extend this consideration to two other highly prized species whose populations also can readily sustain increased levels of take: peregrine falcons and gyrfalcons. The benefits to the resource and to the state that are outlined for increased take of goshawks would extend to increased harvest of these species as well.

Thank you again for the opportunity to comment.

Sincerely,

Jeff Broadbent, PhD

Submitted By
Scott Coleman
Submitted On
10/27/2017 4:31:49 PM
Affiliation

I am a non-resident falconer who is concerned about some of the proposals regarding falconry currently being considered. In general, I oppose unwarranted protectionism of native raptors for falconry purposes. It is an established scientific fact, acknowledged by USF&W Service that falconry does not affect wild raptor populations. Alaska has robust populations of raptor species commonly flown by falconers accross the United States. Rather that adopting reulations witch will negatively impact the ability of non-resident falconer to obtain a raptor in Alaska, I strongly argue that Alaska consider adopting rules that are consistent with the falconry community in other States that allow for geneous non-resident passage raptor trapping and eyass permits. Proposal 19 and 20 if adopted reduce the likelihood non-resident take. One Proposal, 22, suggests that nonreisnet falconers be required to purchace a hunitng liciense simply to a enter raptor permit lottery. Alaska could greatly benefit from a more inclusive nonresident permit policy. These new proposal will exacerbate the current, unsatisfactory, non-resident falconry regulations in Alaska.

Sincerely, Scott Coleman

Submitted By
Robert Collins
Submitted On
10/25/2017 2:55:09 PM
Affiliation
Retired

Thank you for the opportunity to comment on the proposed falconry regulations. I have been an active falconer for over 55 years and am a licensed attorney in Alaska. I retired from the Alaska Department of Law after a 34 year career (AK and IL) as a prosecuting attorney.

Proposal 18: Removal of the testing requirement for the West Nile Virus. I support this removal. As recently as 2013, ADF&G itself sent a notice to falconers that this testing was not required. The "requirement" was reinstated after someone in ADF&G apparently decided that BoG approval was needed prior to removal of this regulation. A copy of the notice of the testing is not required letter is available if one cannot be supplied by ADF&G.

In addition, a lenghty, well-researched article in the February 19, 2017 issue of the Anchorage Dispatch News detailed "Alaska's population of backyard chickens is booming." The article states that according to the state veterinarian Bob Gerlach, in the 2016 fiscal year almost 125,000 birds were imported into the state for mostly backyard farming. Other farm animal imports, including cattle, swine and horses also had increases but not as much as poultry.

The number of falconry birds imported into the state is miniscule, probably less than 10. Almost all these birds were in Alaska prior to being "exported" for a few weeks for a falconer's hunting trip in the lower 48. There appears to be a double standard taking place. One cannot imagine that 125,000 chickens are subject to WNV testing but a handful of raptors are.

Proposal 23: Falconry Manual Number 10

This proposal is held out to be a rewrite of Falconry Manual Number 9 to simplify and clarify the regulations. The idea is to be commended; however, the manual consists of 41 pages. The number of pages likely exceeds the number of active falconers in Alaska. Respectfully, the BoG should consider deferring action and request that the ADF&G simplify and rewrite the regulations to delete requirements and notices that are not necessary. For example: 1) There is no reason a falconry permittee should be required to notify the department prior to attempting to capture a raptor. The permit alone and the required federal 3-186 form filing post capture should suffice. The regulation requires TWO notices, one to the regional ADF&G office for the area of the proposed take, and another to the office of the permittee as well as reports to the Permit office and regional falconry representative for release, loss, and death of a raptor.A successful take or capture reported is already required. Simply, there are not enough birds taken annually to justify so much reporting and detail. For example, no other trappers - such as fur trappers - who take many more animals annually are required to so report before, during, and after. 2) It should be noted that the USFWS has already determined that such detailed reporting is not necessary for its purposes. The USFWS reporting was much less onerous than the reporting presently required by ADF&G. The USFWS does NOT require that its own 3-186 form be filed with the USFWS and has transferred the use of that form to the states. The additional, double reporting simply is not necessary.

Thank you.

Submitted By
Simone Cook
Submitted On
10/27/2017 9:32:35 PM
Affiliation

PROPOSAL 18 – 5 AAC 92.037

I agree with PROPOSAL 18 – 5 AAC 92.037 stating that the WNV testing requirement should be removed, as it is unnecessary and costly. There is not enough of a risk of WNV entering the state via a captive bird to warrant this requirement.

PROPOSAL 19 – 5 AAC 92.037

I strongly disagree with PROPOSAL 19 – 5 AAC 92.037. I was a permit winner this year (2017) and spent my time on the Seward Peninsula where the weather was fair for the months of September and half of October. However, this would most certainly not be the case into the later part of November. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. I stayed in Alaska from the beginning of September to the middle of October and it took me the entire time to secure a bird to export. There is no way to guarantee that a bird will be trapped quickly, thus with this proposal someone may find themselves trapping into the end of November if they are only allowed to start trapping on Sept. 5.

The cost of trapping in remote areas of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push trapping back will only add to the cost of a non-resident's trip due to weather conditions, rental of snow machines, etc.

This proposal also states that certain genetics are being targeted thus the reason for the push back on dates. However, only 5 raptors have been exported from Alaska in the last three years of non-resident take. Of those five raptors, two were trapped in their natal territories. The other three (one was a goshawk) were trapped on migration. Two birds from one site in three years does not qualify as " targeting certain genetics/year after year/loss of certain scarce genetics."

This proposal also goes on to state that, "the majority of nonresident permit applicants are raptor breeders and/or their affiliates." The individual behind PROPOSAL 19 – 5 AAC 92.037 seems to have an odd grasp of numbers and the definition of "majority." To the very best of my knowledge (the falconry community is small, and I know the majority of other permit winners), one, I repeat, one, of nine winners possesses a breeding permit. One. I am not a breeder and do not possess a breeding permit. I went to Alaska to trap a bird to fly for falconry, as I know personally four other friends did as well (they also do not have breeding permits). The other two successful trappers I do not know personally.

This trip was about watching wildlife, hopefully catching a bird to fly for FALCONRY and meeting some wonderful locals, falconers and otherwise. There is no conspiracy here to remove certain genetics from nest sites year after year after year. The **data** from non-resident trapping efforts shows that the MAJORITY (a *noun,* meaning, "the greater number") of birds were trapped during migration, and not near nest sites. In addition, many of the non-residents who were **not** successful trapping were trapping during migration, and not in early August near nest sites.

Lastly, the proposal states that "As nonresident demand for Alaskan birds increases..." The number of applicants in 2015 was 23, in 2016 it was 24, in 2017 it was 18. This is a low number of applicants to begin with. "Increasing" is an odd word to use for a lower number of applicants this year than the previous two years.

I would urge the board to consider that perhaps some folks pushing this proposal are aspiring breeders of raptors themselves who may not be keen on (perceived) competition from non-resident falconers on the very, very slim chance that they (non-residents) may breed birds taken in Alaska, which in and of itself is perfectly legal if said permit winner had the proper federal permits in addition to a falconry permit.

PROPOSAL 20 – 5 AAC 92.037

I strongly disagree with PROPOSAL 20 – 5 AAC 92.037. With an already low number of people applying for a nonresident permit there is a high chance of any one of the applicants being successful. In addition, the proposal states "The board's intent language placed on record when nonresident take was instituted in 2014 was to make available the special opportunity and experience of trapping a raptor in Alaska available to as many nonresident falconers as possible. The Alaska Falconers Association agrees with the board's intent." It seems ironic that the entity claiming they want to make trapping a raptor in Alaska available to as many nonresidents as possible is also the entity that pushed for 3 permits to be allocated instead of the 5 allowed. Additionally, I personally know that one falconer that drew a permit was in his 70's. It would be a shame for the older folks to draw a permit with such a long wait in between applying again. This proposal, along with proposal PROPOSAL 19 – 5 AAC 92.037, seem to be implying that Alaska's raptor resource is limited and thus non-resident take should

be quite limited as well. The biology does not match up with this assessment. Alaska hosts large and healthy populations of breeding raptors, including gyrfalcons, peregrines and goshawks. There is no threat to “certain genetics” or populations and non-resident take should reflect that the population can handle (without any detriment) the maximum number of permits allowed and would be able to handle an even larger number without a doubt. I spent 6 weeks watching raptors and trapping in Alaska. There is no shortage of raptors in Alaska, no populations are at risk, and the area I trapped in was infinitesimal when compared to the state as a whole. This should be a biological question and not an emotional one: can Alaska’s populations of raptors handle the maximum number of permits allowed without detriment to the population and the answer is without question Yes.

Lastly, the big game hunts that this proposal references where successful applicants have to wait a certain number of years before applying again is comparing apples and oranges. Hundreds to thousands of people apply for big game hunts in Alaska for a handful of permits showing that there is a very high demand for big game permits. Non-resident falconry permit applications thus far have never numbered more than 24. Compared to big game draws, non-resident falconry applications are a very small number indeed.

PROPOSAL 21 – 5 AAC 92.037

I disagree with PROPOSAL 21 – 5 AAC 92.037. It is hard enough to get an appointment with vets that will see raptors. I saw a mobile vet due to my flight schedule, ADF&G check out hours, and the fact that you do not know in advance when you will be successful in getting a bird and thus may need a vet appointment last minute before your flight. Some vets I spoke to were booked for a week or two out.

A mobile vet would most likely be unable to administer a microchip. In reference to **one** wild Alaska gyrfalcon showing up in the Middle East: well-known studies show that wild Alaskan gyrfalcons migrate to Russia. The chances of a raptor trapped in Alaska and then smuggled to the Middle East is so unlikely that I am almost shocked to see it mentioned here, as a reason for law-abiding non-resident falconers to be required to microchip their birds. The chances of a bird migrating to Russia and then being trapped there, where laws are much more lax, is much, much more likely. Additionally, if someone were to take the time and effort to smuggle birds out of Alaska (which I have never heard of happening) it would not be beyond them to cut a microchip out of a bird the same way that it would not be beyond them to cut a band off. But this is a non-issue anyway and is why I disagree with PROPOSAL 21-5 ACC 92.037

PROPOSAL 22 – 5 AAC 92.037

I agree with PROPOSAL 22 – 5 AAC 92.037and the points brought up within it: Alaska has very healthy populations of goshawks and raptor mortality is high in the first year of life. Allowing up to five eyass goshawks to be taken by non-resident falconers would not impact populations and would be a great opportunity for non-residents to fly a bird raised from a young age while perhaps even helping out the siblings in the nest by reducing competition. Eyass goshawks are popular in falconry and I do believe there would be interest from non-residents in flying an eyass goshawk from Alaska.

I would like to thank ADF&G for how wonderful they have been to deal with in terms of permits, and the many wonderful Alaskan falconers I met on my travels in Alaska who were willing to lend help in many different ways. Lastly, I would like to thank the board for taking my comments into consideration.

Submitted By
Scott Dinger
Submitted On
10/1/2017 4:47:50 AM
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Falconer

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Board Members and Alaska Residents, I respectfully submit the following comment in furtherance of your consideration regarding the proposed Non-Resident Raptor Take.

I was fortunate to be one of the original 3 non residents awarded the take. In retrospect, the entire experience was both good and bad.

Having spent the first 32 years of my life in Alaska, I was thrilled to be able to return and pursue the permit. However, it became apparent along the way that the red tape and costs associated with doing so was not without a commitment that most average income folks could ever accomplish. Furthermore, the resident falconry community was little or no help. Not that I needed any. I know Alaska better than most of them perhaps. But to not be lost, the falconers in Alaska that are most influential towards the Board of Commisioners are clearly interested in protecting their breeding programs so they can make money selling the gyr falcons.

Now this theory is backed up by having read the new proposals being considered. A later start date and microchipping birds? Both of these proposals are so as to make the costs associated with the pursuit of the permit being filled even more out of reach for the average person.

To travel to Alaska, find lodging, travel to search for the raptor, vet inspection, food, and all the other necessary costs along the way when I did it costs me in excess of ten thousand dollars. I could have easily purchased a bird from a breeder instead.

To the board, please leave things as they were originally set. Allow the original number of permits be offerred. You will note that its very likely that even if all the permits were accepted and even if every non resident came to the greatland, that the success rate for take would still be at 50% or less.

The mention of protecting the gene pool in certain areas is obviously related to serving the greed of the resident falconry guys associated with breeding programs. I ask the board to take a serious look at who the mouth peices are at your meetings. You will most likely note there is a breeder or two amongst them.

Stop the politics and let Americans enjoy all of our Nation.

Thank you and Good Luck.

Scott Dinger

Submitted By
Paul Domski
Submitted On
10/19/2017 10:09:26 AM
Affiliation

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October 19, 2017

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 998115526

Ladies and Gentleman,

Thank you for the opportunity to comment on the falconry proposals being considered for your October meeting. My name is Paul Domski I reside in the state of New Mexico and I have been the president of the New Mexico Falconers Association (NMFA) for the last 6 years. In my capacity as president of the NMFA I have worked closely with our game and fish department on the falconry regulations, and our raptor take policy, so I feel that I am qualified to make educated comments on the proposals before the Alaska game board. I will limit my comments to the proposals which directly impact nonresidents, therefore, I will not comment on Proposal 18 – 5 AAC 92.037.

I strongly oppose Proposal 19 – 5 AAC 92.037. This proposal is discriminatory against nonresident falconers. If, as Mr. Schmidt asserts, nonresidents are "targeting certain nesting pairs over the years", then so must to be residents targeting these same pairs, and why is that allowed? Further, Mr. Schmidt asserts nonresident take "could cause the loss of certain scarce genetics", I would like to see the scientific documentation of such claims, and exactly why this same principle does not apply to Alaska falconers? In addition, Millsap and Allen in their peer reviewed paper, *Effects of Falconry Harvest on Wild Raptor Populations in the United States: Theoretical Considerations and Management Recommendation*s, determined that falconry take had zero impact on raptor populations, and given that there are only three nonresident take permits annually issued in Alaska the effect of take would be nil.

Additionally, moving the take season for nonresidents back by 20 days would severely limit the possibility of a successful take by nonresidents because many of the raptors would have migrated by this time. This proposal could potentially endanger the lives of nonresidents who could get stranded in the backcountry should foul weather move in during these later dates. Overall proposal 19 was submitted to further limit nonresidents from participating in raptor take practices in Alaska, and there is no scientifically documented basis for the claims made by Mr. Schmidt.

Regarding Proposal 20 – 5 AAC 92.037 which seeks to limit nonresidents to receiving a take permit to every 5 years I am strongly opposed to this arbitrary proposal. Is there a scientific study which documents that the taking of a raptor by the same person in consecutive years has a deleterious impact on the population? While I appreciate the sentiment of allowing the maximum number of nonresidents to experience taking a raptor in Alaska, however, everyone who enters the drawing has an equal chance of being drawn. This proposal is yet another protectionist ploy to discourage nonresidents from applying for Alaska nonresident take.

Proposal 21 – 5 AAC 92.037 which seeks to require birds taken by non-residents be microchipped prior to export from Alaska is an example of regulatory overreach. This proposal assumes that all nonresident falconers have ill intent, and want to smuggle Alaska birds out of the country for sale in a foreign market. The Alaska Falconers Association asserts that *"Highly prized raptors such as Alaska passage gyrfalcons and peregrine falcons have been traded and sold illegally in the past."*When did this occur? Did the parties involved have official nonresident tale permits issued by the state of Alaska? Most certainly not. Falconers are the most self-policing group of sportsman that exist, and given that there are only three nonresident permits issued per year the probability of any criminal activity going unnoticed by the falconry community is impossible. Please do not allow this Draconian proposal to become part of the Alaska falconry regulations.

Proposal 22 – 5 AAC 92.037 submitted by Timothy Sell to institute a nonresident eyas goshawk take of five birds per year is an excellent proposal. The biology clearly supports the taking of eyas goshawks in Alaska, and speaking from experience, New Mexico allows nonresidents to take of eyas goshawks from a far more limited population than AK with no negative effects on our population. I applaud

Mr. Sell for embracing nonresident take.

Proposal 23 – 5 AAC 92.037, I agree with the Alaska Department of Game and Fish, improving the falconry manual is in the best interest of all falconers.

Finally, I would like to say that the falconers of Alaska should consider the falconers of Texas as a role model. Texas has a highly sought after raptor resource in the species of Harris's hawks and northern migrant peregrine falcons, and rather than trying to make more difficult for nonresidents the Texas falconers go out of their way to assist nonresidents in taking birds. By working with nonresidents the Texas falconers insure that nonresidents do not trespass or break any of the local customs with regard to dealing with landowners. This comradery builds an environment of trust rather than suspicion, and invests the nonresident in behaving in the best possible manner.

Thank you for the opportunity to comment.

Kind Regards,

Paul S. Domski

36 Brendan Lane

Tijeras, NM 87059

To: Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK. 99811-5526

Subject: Multiple Falconry Proposals

My name is Brad Felger & I have been a falconer since 1970. I reside in Mount Vernon, Washington and I am the President of the Washington Falconers Association and this is my second term as President. Prior to residing in Washington I lived in California and beginning in the early 1980's I served 4 terms on the board of Directors and on legal committees with falconry organizations that were dedicated to legislation and preservation of falconry in California and the USA. I have spent the majority of my lifetime as a dedicated falconer who educates the public and gives of my time towards the preservation and to the future of birds of prey.

I want to thank you for this opportunity to comment on the Alaska proposals that pertain to Falconry non-resident take of Alaska raptors. My intention is to comment on these proposals with respect and courtesy towards the Alaska Dept. of Fish and Game and also to the resident falconers of Alaska.

First, I want to state that I understand that ALL wildlife management decisions (seasons, take, etc.) must be decided upon and supported by good biology. I am certain that when resident and non- resident annual take of Halibut, Salmon, other fish species, Bear, Sheep, Moose, Caribou, Deer, & other large game species, Ptarmigan, Grouse, different species of gamebirds and other small game, that it is fully supported by good Biology in Alaska and that annual take is decided to be as generous as possible while staying within the confines of that biology and that the well being of the resource is kept first and foremost to insure the future of the species that are taken.

Also from an economic standpoint non-resident take in Alaska for fishing and hunting is vital to many towns, businesses, the Alaska DFG, etc. so for many years it has been encouraged and wide economic benefits have resulted. Alaska is the #1 place in the USA for us in the lower 48 states to go for great Salmon fishing, Halibut, Northern species of Big Game, etc. and it is also a destination where the person(s) that decide to go to Alaska for fishing or hunting are prepared to spend a generous amount of money and have probably saved for quite some time to afford that "trip of a lifetime!" For example, the falconers, fisherman, hunters, etc. that I know that have gone to fish, hunt, take a raptor, etc. in Alaska have each spent around $10,000 on average and sometimes more depending on the length and location of their adventure.

I will now make my comments on some proposed changes to non-resident falconry take of raptors in Alaska.

***Proposal 19- I strongly oppose Proposal 19, this proposed change in take season. The author states that "the majority of non- resident permit applicants are raptor breeders and/or their affiliates" this statement is based on assumption and it appears that the author is talking**

about certain genetic lines (color phase) of Gyrfalcons. Of the very few permits that have been issued and of the birds that I know about that were taken they have been, and are being used for falconry. Once again good biology with evidence needs to accompany this which has an obvious bias against non-resident take for falconry raptors. Also Winter happens early and it happens fast in the Pacific Northwest and much more so in Alaska. The change in seasons goes beyond dispersal of raptors, it results in the migration of many species of raptors out of Alaska. I cannot even think of a true biological reason behind moving the season later with both the start date and end date being moved later. If the intention of the Alaskan Game and Fish is to only allow the take of fledged (flighted) or passage raptors then the start date for that season needs to be no later than August 15th, however if you want to move the existing end date to the proposed end date I would have no objection to that. Also it is my understanding that eyas (nestling) take is legal for resident Alaska licensed falconers so it is unclear to me as to what the biological reasons are for the disallowance of non-resident take of nestling raptors in Alaska? If it is biologically ok for Alaskan falconers to take nestling raptors then what is the biological reasoning behind not adding eyas take for non- resident falconry raptor take? I believe it should be added and that Alaskan biology would support this.

***Proposal 20- I strongly oppose Proposal 20. This proposal limits the non- resident falconers to having to wait for 4 or 5 years before entering the drawing after they are successful in being drawn for non- resident take. I oppose this as it is written because waiting that many years is extreme and not supportable by biology. I believe that if the intention is to be fair to the others that have entered (this is only an assumption of mine) then a reasonable solution would be that when a non- resident falconer successfully gets drawn and takes a raptor during the August- October season then the next year that non- resident falconer can only apply for the eyas Goshawk season (as is suggested in Proposal 21), or visa versa if the situation is reversed. But if the number of applicants is less than the number of available non-resident permits then that non- resident falconer can apply in that consecutive year for the same permit. Biology supports this because if a resident Alaskan falconer takes a certain species of raptor from the wild, that resident falconer can take another from the same species the following year. If Alaskan biology did not support this then resident falconers would have to wait for additional seasons before taking that species of raptor from the wild again.**

***Proposal 21- I strongly oppose Proposal 21. Legal falconry take (both resident and non-resident) is what we as licensed falconers practice and uphold. The illegal trade and sale of raptors is NOT what licensed falconers do! This is what criminals do that sneak into protected raptor territories and illegally poach raptors. They are a different group of people. The reasoning listed on this Proposal does not take into consideration the export process by the USFWS to export raptors out of the USA. There is an extensive process that legally documents the origin of the raptor as captive bred (including a USFWS seamless band that goes on the raptor at approx. one week – 10 days old before the foot grows too large for the solid band to go over) with documentation of the origin and band numbers of the parents of that raptor by**

the breeders of that raptors parents. It is impossible to get a permit to legally export a wild take raptor or any MBTA raptor that is not wearing a USFWS seamless band out of the USA. I and the other licensed falconers in the lower 48 states are greatly offended by the suggestion that we might illegally trade or sell a wild take raptor that we legally captured and exported out of Alaska. This is the same thing as saying that an Alaskan Falconer would illegally sell or trade a wild take Alaskan raptor (of course they would NOT!) so I would assume that resident Alaskan Falconers would also be required to microchip their wild take birds also. I consulted a well known and very experienced exotic animal/raptor veterinarian who told me that insertion of a microchip is done with a large 12-14 gauge needle (and unlike a dog or cat), that on a bird there are very few places to safely insert a microchip (he said perhaps into the breast muscle). These raptors are for falconry and if a microchip is not inserted carefully or is too large for the species of raptor being microchipped it can hinder the flight and performance of that bird and worst case scenario jeopardize the health of that raptor. If future identification of an individual raptor is what Alaska DFG is wanting a good safe method would be that when an Alaskan Veterinarian or the Alaskan DFG is examining/certifying the raptor then pluck one or two breast feathers to keep an exact record of that birds DNA which will accurately identify that bird in the future if necessary.

***Proposal 22- I support the addition of 5 eyas Goshawk permits for non-resident falconers. I also would support an additional drawing for a take of 5 eyas Peales Peregrines. This is supportable by biology also as is the proposed non-resident Goshawk take. Proposal 22 is consistent with biological data that documents how legal falconry take (this includes non-resident take) has zero negative impact on the wild resource as is evidenced and stated in USFWS published biology.**

In conclusion- Please keep these and any future proposed changes to non-resident capture of raptors for falconry regulations based only on good biology and logic and away from bias and assumptions. Alaska is an amazing, wonderful State in our great Country with a great resource that draws a lot of people from down in the 48 to experience. In the present and into the future we want Alaska to remain a wild State with abundant, healthy populations of its wildlife. This is the Alaska that we know and love. Thank You.

Respectfully,
Brad Felger- President
Washington Falconers Association

Submitted By
Flyyomomma
Submitted On
9/17/2017 6:04:59 PM
Affiliation

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Fly yo momma say ten non res falconry takes. And Ak falconers get theirs heads out the bootie! We all Americans Yo. Peace y'all inpeating my right to life liberty and pursuit of happiness. Enacting uncivil and roadblocking mines ability to trap my dream bird. Y'all Alaska folks ain't no different than any of the rest of us and under federal law y'all cheatin. But Ima fix it if you don't get it straight. You don't know me I got power. Ima set you strait boyz

Submitted By
Dale Hall
Submitted On
9/29/2017 11:37:35 AM
Affiliation
Mr.

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I would like the Board to consider a charge for the NON-resident Falconry take permit to cost $1200 to $1800, this a fair price, if you buy a nice shotgun and or a good hunitnig dog, thats what you'll be into.

Thank you for your time.

Dale Hall

Submitted By
Gary Hampton
Submitted On
10/8/2017 9:26:45 AM
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I agree with Tim Sells proposal #22. A five eyas goshawk nonresident take.

Thanks

Gary Hampton

Submitted By
Laura Hazelett
Submitted On
10/14/2017 6:52:42 AM
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Licensed Falconer

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~~To: Alaska Board of Game
P.O. Box 115526
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Re: 92.037 Permit for Falconry
Falconry Regulations Proposals 21 - 23
AGENCY: Alaska Department of Fish and Game
ACTION: Proposed rule.
Dear Commissioners,
Thank you for the opportunity to comment on the proposed changes to the Falconry Regulation in state of my birth, Alaska. I regard Alaska as my first home since my birth in Fairbanks and I believe that fact bears great relevance as to why I have always kept track of the goings on in my birthplace.
At this time I would like to make comment on the proposals for Falconry regulation in order that it be fair for both residents, non-residents, and former and potential residents alike.
PROPOSAL 18 – 5 AAC 92.037. Permits for falconry. Remove the West Nile Virus testing requirement for raptors as follows:
Remove the requirements to test birds for West Nile Virus.
What is the issue you would like the board to address and why? The Centers for Disease Control and Prevention acknowledge that West Nile Virus (WNV) is not transmitted from human to human or human to animal, WNV is not transmitted from animal to person contact, WNV is not transmitted from handling live or infected birds, or from consuming infected birds or animals.
The transmission cycle of WNV additionally shows that humans horses and other animals are 'dead end' hosts, meaning that they do not develop high levels of the virus in the blood stream and cannot pass the virus on to other biting mosquitoes.
Proper facilities maintained for the keeping of raptors discourage the presence of mosquitoes and falconers are more than attentive to keep their facilities mosquito free using double doors, mosquito netting, and other techniques to minimize mosquito borne illnesses.
The Centers for Disease Control and Prevention do not have any record of human WNV cases in Alaska or Hawaii and the mosquito most blamed for the transmission of WNV is the Culex mosquito who's range does not include Alaska.
When looking at the facts, the necessity of this proposal seems unclear at best.
PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season for taking passage raptors as follows:
Amended regulation should read:
(7) take is limited to one passage, hatching-year raptor;
(8) the annual nonresident season for acquiring a passage raptor is from September 5 – November 20; The regulation currently reads:
(7) take is limited to one passage, hatching-year raptor;
(8) the annual nonresident season for acquiring a passage raptor is from [AUGUST 15 – OCTOBER 31];

What is the issue you would like the board to address and why? This proposal would seem to be completely geared towards preventing non-resident falconers from completing a successful take after all the time and energy and money spent to accomplish that goal.
When researching the best times to take a raptor who has left its natal area, gyrfalcons in particular are documented in the research published by respected Wildlife Biologist Carol McIntyre with the Denali National Park and Preserve, Alaska, entitled, McIntyre, C.L., D.C. Douglas, and L.G. Adams. 2009. Movements of juvenile Gyrfalcons from western and interior Alaska following departure from their natal areas. Journal of Raptor Research 43:99-109.
The study documents that 1) Gyrfalcons left their natal areas between 15 August and 6 September , but most left within a 2-wk period in late August and early September. 2) Research cited by the study reveals that regardless of the natal area dipersion dates were similar to estimates reported in the literature (Nielsen and Cade 1990, Clum and Cade 1994). Our results suggested that Gyrfalcons departed their natal areas from late August to early September. 3) Birds are highly mobile organisms and their spatial and temporal movement patterns are among the most diverse among vertebrates (Welty 1963, Alerstam 1990, Newton 2008). Some bird species remain within several kilometers of their natal nest throughout their entire lives, whereas others travel thousands of kilometers annually, starting with their initial movements away from their natal nests (Newton 2008). Juvenile raptors exhibit a wide range of movement patterns (Newton 1979), with individuals originating from high latitudes often traveling hundreds or thousands of kilometers across different habitats and often across international boundaries within their first year of life (e.g., McGrady et al. 1997, McIntyre et al. 2008).
Therefore the dates for both the old and proposed regulation seem prohibitive of success knowing that once they disperse their natal areas they immediately travel vast distances, including the Russian coast. I would suggest dates that allow for earlier trapping of dispersed birds. Since non-residents come long distances and spend lots of money supporting the Alaskan economy, they should have opportunity

equal to the that of the Alaskan falconer.
PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years as follows:
Option A: A nonresident falconer who draws a permit and captures a raptor in Alaska may not apply for a nonresident capture permit for five calendar years.
Option B: A nonresident falconer who draws a permit and captures a raptor in Alaska may not apply for a nonresident capture permit for four calendar years.
What is the issue you would like the board to address and why? This proposal is one again wholly unnecessary when considering the fact that once a nonresident falconer returns to his or her home state, they are limited by that states regulations on possession numbers per calendar year of raptors taken from the wild, with a cap on how many wild taken raptors may be in their possession. Up to the limit allowed by the Federal Regulations from which each states Falconry regulation come which may not be exceeded by any states regulation.
PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips as follows:
Add a new section that reads:
Prior to exporting a raptor from Alaska that was taken by a nonresident falconer under the terms of a nonresident capture permit, the raptor must be implanted with a microchip by a licensed veterinarian. Documentation of the procedure and registration must be presented to ADF&G during the check-out process.
What is the issue you would like the board to address and why? It appears here that members of the Alaska Falconers Association wish to continue to allow regulators and the general public to believe that there is a huge black market of gyrfalcons from the state of Alaska based on a single incident of DNA. This would seem to be yet another example of local falconers wanting to impose restrictions to prevent take by non-residents, but not be subject themselves to those same restrictions for the same reason. As gryfalcons are documented in many studies as being the most widely dispersing birds in the world, it is entirely possible that any DNA from any wild bird may be found in birds from Greenland to Russia and beyond. I contend that Operation Falcon itself proved that there is truly no black market of falcons from the United States or Canada and since the birds may be purchased legally and are subject to CITIES restrictions, this step is completely uncalled for. If the Alaskan falconers agree to microchip their own birds, than this might be considered a detriment to any sort of black market as they are just as liable to sell falcons to an alleged black market as they have considerably more access to the birds year round. This rule should certainly not be included in the regulations as it is arbitrary unless Alaskan falconers also agree to microchip their raptors. They know that falconers do not do this regardless of the "value" of the raptor.
PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents as follows:
#1. The proponents request an annual take of up to five eyas goshawks (Accipiter Gentilis) by nonresident falconers.
#2. This proposed regulation is a new addition to the present Alaskan nonresident take of raptors, and is specific to goshawks.
#3. The proponents request the nonresident take of goshawks using an application and a lottery system administered by the ADF&G. We also suggest applicants be required to purchase a nonresident hunting license to enter the lottery.
#4. The proponents suggest that areas for nonresident take would be determined by ADF&G with the input of Alaskan falconers. Nonresidents must comply with all local state and federal laws concerning raptor take and must have prior approval to enter privately owned or native lands.
#5. The proponents suggest that successful applicants be required to check-out with ADF&G before being issued an export permit to leave the state with an eyas goshawk.
#6. The proponents suggest that a successful applicant will have a one or two year waiting period before being qualified to reapply for this lottery.
What is the issue you would like the board to address and why? There is obviously no need to limit the take of goshawk in Alaska via a lottery system of any manner. You should simply be able to apply for the permit and pay the fee. This is traditional in all states who have goshawk take unless the take is restricted in certain areas where studies or other criteria are being met. If the resource is indeed vast and virtually untapped by local falconers this restriction is arbitrary and simply another method to discourage take by nonresidents. It is once again going to be regulated to limited wild caught birds in possession once the falconer reaches their home state.
PROPOSAL 23 – 5 AAC 92.037. Permits for falconry. Update the falconry manual as follows:...
I applaud the states falconers and regulators for efforts to clean up the language in the falconry manual and regulations booklet. I request that you consider addition of two birds to the list of non-natives which are flown for falconry in the species of Red-shouldered Hawks (Buteo lineatus) and Northern Harriers (Circus cyaneus).
In conclusion, it is common knowledge that falconry does not affect the population numbers of species flown or the population numbers of the game taken. Considering the comments above and including them in the regulation will go a long way toward improving the public perception of falconry as a sport that is continuing based on the science that we use to govern our regulatory practices and the relationships between Alaskan falconers and other falconers around the country who are just as involved in conservation of species and the continuation of our age old pastime. Thank you for your consideration.
Laura Hazelett
Licensed Falconer

Submitted By
Kirk Hohenberger
Submitted On
10/26/2017 6:51:27 AM
Affiliation

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I would like to comment about the non-resident falconry regulations . Would like to see the amount of permits given out increased . Basing that on science , raptor populations are very healthy in Alaska, as well as the rest of the country . Federal regulations ,just increased the wild caught Peregrine permits from 48 to 148 . Non-resident falconry take in other states works well, with few problems . Treat Alaska falconry take the same, and like other non-resident hunting permits, and take are allowed in Alaska. The negative comments a few Alaska falconer's write about, are based on fear, and selfishment , not reality. And the few Alaska falcon breeders, keeping their personal monopoly on selling Captive bred Gyrfalcons . So I ask the Commision to please consider increasing the number of non-resident permits for non-resident falconer's . Thank you.

Submitted By
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Submitted On
9/27/2017 7:16:47 AM
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~~With respect non-resident and resident take of raptors for falconry ~~
1) The same basic biological principles govern the populations of all organisms, invertebrates and vertebrate -- both game and non-game species.
2) Unless there is evidence to the contrary, species exist as self-sustaining populations.
3) Self sustaining populations represent renewable wildlife resources.
4) Reproduction creates a surplus. Thus, renewable wildlife resources can withstand some level of take and remain as sustainable populations.

The amount of take (demand) that species can sustain is contingent on 'supply'. The biologists in your wildlife agency should have some rational understanding of the 'supply' (populations) of all Alaskan raptors that are used in falconry. Agency biologists should also understand that relative to supply, demand is miniscule.

Richard F. Hoyer (Wildlife Biologist, OSU, '55')

Submitted By
don hunley
Submitted On
10/13/2017 10:54:44 PM
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proposal 18: please support. fish and game has sent out a memo in 2013 that essentially duplicates this proposal. Alaska does not have the environment for west nile virus to live. think about it, 20,000,000 birds migrate or fly up here every year and west nile virus is not up here. obviously none of them are tested, why are we goint to test the 2 or 3 that a falconer owns and travels with?

proposal 19: please do NOT support. moving the trapping season for non resident take makes it later and even more difficult and dangerous for a non resident to try and use his permit. please leave passage take dates as they are. the concerns are greatly overblown. first, non residents take about 2 falcons (of the 3 allowed) per year. to date, no two birds have been taken from the same area. so certain genetics are NOT being targeted. even if they were, we are talking about two falcons in a population of maybe 2,000 young birds of the year? this is a biological non issue. i believe the true isssue is to make it even more difficult than it already is to access a very limited take.

proposal 20: i do agree with making a successful permitee waiting after drawing a permit, but three years would be plenty of time to wait. if the alaska falconer association want to allow more non resident opportunity to take a wild falcon, we should support upping the number of birds available. comparing to bison or coastal brown bears is not a reasonable comparison.

proposal 21: please do NOT support. microchipping a hawk is an unessecary stress on birds. in the justification, it is said that a chipped alaskan gyr ended up in the middle east. gyrfalcons fly all over the northern world, they are birds! to assume somebody took one from alaska and transported to the middle east is much less likely than the gyrfalcon that flew to russia on its own (they have been gps tracked doing this) and was trapped and later sold. if the state really wants birds to be micro chipped then the state should pay for it.

proposal 22: please SUPPORT: the goshawk is a lightly used raptor in alaska by residents, they are common raptor in alaska. there is no biological issue with taking up to 5 eyay (nestilings) from the wild each year. this would be an opportunity of a lifetime for many lower 48 falconers, and would give non residents access to birds that alaksan falcons take small numbers of in any given year.

Submitted By
James M Ingram III MD
Submitted On
10/5/2017 1:46:01 PM
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Proposal 18-23 5-AAC 92.037

Thank you for the opportunity to comment on the non resident raptor take proposals. As an American citizen I am for the equal treatment of a non resident falconer's access to healthy non threatened or endangered wildlife for the following reasons:

1. There are about 50 resident falconers who have unlimited access to all species of raptors in the State of Alaska. Alaska is about 1/5 the size of the entire lower 48 states, bigger than California, Texas and Montana combined. There are a about 5000 falconers nationwide with the same qualifications, thus resident falconers represent only 1% of all the falconers. Because of their residency in Alaska this 1% has effective control over a massive national resource(raptor population) and land mass. Currently, 61% of Alaska (223 million acres) is federally owned which represents 36% of all the federal land in the U.S. Therefore, that 1% of the tax paying falconers control access to that federal land by 99% of the rest of the tax paying falconer population. This is an unfair situation. I feel that all US citizens who are qualified falconers, should have equal access to the land and the resource (raptors).
2. Raptor take by both resident and non resident falconers should be based on science, not politics. USFWS study (2004 by Millsap and Allen: Effects of Falconry Harvest on Wild Raptor populations in the United States) concludes that falconers have ZERO impact on raptor populations, thus , biologically speaking, all raptor take in Alaska by falconers would not affect the populations that live there. In 2016 Lydia Ash published an article " Impact of Wild Take of Raptors for Falconry in Washington State" The study covered 10 years and followed all species of raptors taken by falconers in the state, and it concluded that the Impact of falconry was a net POSITIVE gain of 251 raptors to the wild that would have otherwise perished. September 16 , 2017 issue of Alaska Dispatch News indicates that there are usually only a half dozen (6) new raptor captures per year by the 4 dozen falconers who live in Alaska. There are about 25 non resident requests for a raptor capture permit per year, and only 3 are awarded by Alaska.The past 2 years of non resident take was the following: 2 gyrfalcons trapped by nonresidents in 2015, 1 gyrfalcon and 1 goshawk in 2016). Alaska Dispatch News also states that 80% of the wild youngsters don't survive the first season.
3. Gyrfalcon: There is only 1 state in the United States that a citizen can get an eyas (nestling) Gyrfalcon, and that is Alaska. Currently, there are 2500 nesting pairs of gyrfalcons which produce about a clutch of 1-5 eggs) If the average production is 2 offspring that would be about 5000 juvenile gyrfalcons per year. The number of juveniles that die per year is 50-80% which is 2500 to 4000. It is a biological fact that if an eyas (nestling) is removed from the eyrie it will improve the survival of the remaining eyases. The demand for raptor take in Alaska by nonresidents is about 25, therefore if all of them would take a gyrfalcon, it would be 0.5% of the juvenile gyrfalcons. Non resident take would have no biological impact, and improve the survival of the few taken. Currently, non resident falconers are not allowed to take an eyas (nestling). Unfortunately, this policy is based on politics not biology. Only resident Alaska falconers have access to that resource. There are Alaska falconers who take gyrfalcons from the wild in Alaska and sell the offspring to American falconers as well as to international falconers. Those falconers want to prevent any competition to their business and force any other non Alaskan falconer to a buy a bird from their breeding project. Thus, these gyrfalcon breeders want to control access by proposing Alaska regulations that prevent non resident raptor take for eyases.
4. Peregrine falcon: In 2004 USFWS published a management plan. The reported nesting pairs in Alaska in 2003 was 930 pairs, which was more than the entire Western United States, 879 pairs. At that time USFWS allowed a 5% peregrine take by falconers. Alaska was allowed 44 peregrines to be harvested. Since that time over the past 14 years the population has exploded. Alaska falconers only harvest a few peregrines per year out of the allowable number. Biologically, non resident falconers should have access to the balance of the 44 allowable take set 14 years ago. There is no impact on the peregrine populations. The production of juveniles in 2003 was about 880 per year so between 440 and 704 of those offspring would die naturally per year. Removing 44 peregrines makes no biological difference.
5. Coming to Alaska to trap a raptor is the dream of a life time for a falconer. Most will never be able to do it. It is costly for the falconer, but it is an experience never forgotten. Falconers who come to Alaska to trap a raptor spend time and money that is beneficial to the State of Alaska. In addition, falconers don't come to kill wildlife, but to take care of it . which improves the survival of that bird taken.

In conclusion, I want to thank the Alaska Game Board for allowing me to make a comment on the upcoming non resident raptor take proposals. I hope that the board will make a decision that is based on sound biological science, beneficial to the raptor resource, as well

as in fairness to all US citizens

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Sincerely, James M Ingram MD, biologist

Submitted By
Clifford Kellogg
Submitted On
10/4/2017 9:12:03 AM
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Subject: Multiple Falconry Proposals

My name is Clifford Kellogg, and I reside in North Bend, Washington. I am the North Pacific Director for the North American Falconers Association; my directorate includes Alaska, Washington and Oregon. I am also an associate member of the Alaska Falconers Association.

Currently, there are a number of falconry related proposals before the board for consideration. As a non-resident falconer, 4 of these proposals could affect me and my constituents in the lower 48. I would therefore like to comment on these specific proposals.

Proposal 19
This proposal would move the season for non-resident take to start on September 5, rather than the current August 15. This further restricts an already limited non-resident harvest.
I oppose this proposal in that there is no biological justification for it. It is well known that responsible harvest from a specific location has no impact on further reproductive activity. To move the start date by 20 days will ensure that those who are attempting to fill their non-resident permit will not have adequate access to young birds around their natal area. Also, the proponents of this proposal cite “ever increasing demand” from non-residents, which is simply not true. Demand is currently controlled by the number of permits issued by the Department.
I would submit that a better alternative would be to open up the take to both nestlings (eyasses) and passage birds, expanding the take season accordingly.

Propoal 20
This proposal would limit non-resident falconers to a harvest every 4 or 5 years.
I oppose this proposal as it is based on limited data and on misplaced logic. The proponents cite one non-resident falconer who was successful in being drawn and harvesting raptors for two consecutive years. What they do not point out is that during these two years, he was able to take two separate species of raptors, a Gyrfalcon and a Goshawk. While they may be correct in pointing out that Alaska places similar restrictions on certain species harvest, such as Tok sheep, Brown bears, or Musk ox, the proposal aims to prohibit consecutive take on all raptors.
Should the Board deem it appropriate to place further restrictions, it might be a better idea to place them on species, as with Tok sheep, rather than raptors as a whole, and to make the wait period much shorter, a year for example.

Proposal 21
This proposal would require that a non-resident falconer have his new bird micro-chipped prior to leaving Alaska with it.
I oppose this proposal because is it invasive and unnecessary. It attempts to impose a restriction on non-residents that is not imposed on resident falconers. The proponents claim illegal activities, but cite no specific examples. This is a case of “fixing something that isn’t broken”. It also assumes bad intentions on the part of non-residents only. If this is a legitimate concern, then it should apply to all raptors harvested, by both residents and non-residents.
If the concept of future identification of raptors leaving Alaska (whether by residents or non-residents) is a legitimate concern, it might be a better idea to pluck a breast feather from the raptor, for DNA analysis and filing, rather than implant a microchip which can later be removed.

Proposal 22
This proposal would allow the take of up to 5 eyas goshawks by non-residents.
I support this proposal, in that it is biologically defensible and that it expands non-resident opportunity in Alaska.
In summary, I oppose proposals 19-21, and support proposal 22. I believe that non-resident harvest of raptors should be encouraged in all states in which falconry is legal. There is no question that the biology of Alaskan raptors supports a more liberal non-resident harvest. Rather than add additional restrictions, I would encourage the Alaska Department of Fish & Game to seriously consider going in the opposite direction and eliminate restrictions.
Thank you for the opportunity to comment.
Respectfully,

Clifford S. Kellogg
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Submitted By
Karl Gene Kerster
Submitted On
10/26/2017 12:16:44 AM
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Falconer from California

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Please allow non-resident take of Alaska's pleantiful raptor resources in a simulare manor and quantity to the way that bears and other trophy hunting is conducted in the great state of Alaska.

Submitted By
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10/24/2017 9:13:36 PM
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Kristy Tibbles, Executive Director Alaska Board of Game, Mr.Ted Spraker, Chairman and remaining Board members,

As President of the Alaska Falconers Association, and maker of proposals #20 and 21, AFA wishes to ammend language in both proposals.

Proposal #20 ammendment will change proposed language to say that **"non-resident falconers who take a Gyrfalcon, or a Peale's peregrine falcon from GMU's 1 thru 10 under the terms of a non-resident capture permit, are ineligable to apply for a subsequent nonresident capture permit for a period of four calendar years.**

Proposal #21 ammendment will change proposed language to say that **"Prior to exporting a Gyrfalcon, or a Peale's peregrine falcon that is taken in GMU's 1 thru 10, under the terms of a non-resident capture permit, the raptor must be implanted with a microchip by a licensed veterinarian**.

Alaska falconers association also wishes to propose an ammendment to proposal #19. The ammended language would read **"that the annual nonresident season for aquiring a passage raptor from GMU's 23 and 26 is from September 5th thru November 20th"**

The maker of proposal #19, Mr Kurt Schmidt, supports this ammendment and will submit a comment with this request also.

Thank you, Dave lorring

Submitted By
Wendy R Louie
Submitted On
10/27/2017 4:37:35 AM
Affiliation

Greetings, I would like to ask that the board please base out of state/non-resident raptor trapping opportunities in accordance with biology and healthy raptor population levels, and not due to the complaints of gyrfalcon breeder falconers.

I personally am a falconer from Washington state, your nearest US neighbor, who am not interested in the slightest for gyrfalcon trapping, but of Harlans red-tailed hawk trapping. My father in law in one of the few pharmacists in Sitka, and I'd love to visit him, and perhaps capture a lovely early season young Harlans hawk for hunting with back in Washington. These birds are abundant, and visit my state in the fall and winter anyways, but I would be doing this due to adventure of the process, and as a way to make lifelong memories with my father in law, who would love to see me flying a bird from his home state.

My reason is of course, all my own, with significance only to me, but everyone applying for a raptor take permit has their own reason as well. These birds are numerous, their populations healthy and stable, and the cost of the adventure is high. There will not be a mass exodus of raptors from Alaska, only a beloved, hard-obtained few. Raptor trapping will endanger none of the raptor populations in Alaska. I ask that this wonderful opportunity be expanded and extended, for all falconers to enjoy, in accordance with actual scientific and biological population data.

Thank you for your consideration.

-Wendy Louie

Submitted By
Dan McCarron
Submitted On
10/1/2017 4:24:51 PM
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RE: Falconry: Proposals: 19 - 5 AAC 92.037 through 22 - 5 AAC 92.037

The historic and legal take of raptors from the wild for falconry purposes has no measurable biological impact on the raptor resource whatsoever. No documented scientific evidence exists anywhere to suggest otherwise. States such as Wyoming and Kansas have had open wild take for residents and nonresidents alike for decades with no reported issues.

Individuals promoting that the wild take of raptors has any negative consequence is inconsistent with the long standing premise that wild take, specifically for falconry, is environmentally harmless.

Therefore, I respectfully request that the Board take into consideration the insignificant impact falconry wild take actually has and develop more generous nonresident take quotas for American falconers.

Thank you for the opportunity to comment.

Sincerely,

Dan McCarron

Biologist

Submitted By
Scott McNeff
Submitted On
10/8/2017 2:58:33 PM
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October 8, 2017

The North American Falconers Association is the largest membership falconry organization in the world, representing the falconry community of all three countries on this continent. On behalf of our membership, I would like to thank you for the opportunity to comment on the proposals that have been submitted to your board for consideration.

Wild raptors are an important and integral part of the long traditions of the cultural heritage of falconry; and, therefore, falconers are among the most ardent raptor conservationists. NAFA continues to strongly support science-based, biologically sustainable management of falconry and birds of prey and we have always encouraged the development of non-resident take provisions across the United States.

NAFA was very pleased, therefore, when the Alaska Board of Game and Fish introduced a modest non-resident take for the first time in 2015. It was our understanding that the Alaska Board of Game and Fish would review this new program after 5 years. Only 2 years have passed, and we believe that is simply not enough time to gather the experience or trend data that would support sound decision-making on some of the restrictive changes proposed.

Alaska has enormous raptor resources with species that are difficult to obtain in many other parts of the country. A trip to Alaska to obtain a falconry raptor represents the opportunity of a lifetime for many falconers in the lower 48. Our detailed comments on the individual proposals are as follows:

Proposal 18 – NAFA Supports. Removing the West Nile virus vaccine requirements, it is scientifically defensible and will abolish an unnecessary portion of the regulations that govern falconers in Alaska.

Proposal 19 – NAFA Opposes. Moving to a later start-date for nonresidents who are permitted to trap raptors in Alaska further restricts access to a resource that is already more than adequately protected through an extremely limited level of access. A later start-date could potentially endanger out-of-state falconers seeking birds in remote areas, due to the onset of foul weather. The concern stated as a rationale for the proposal is scientifically indefensible and, if true, would apply to residents as well as non-resident falconers. In addition, there simply has not been enough time to determine whether the focus on specific nests is, in fact a meaningful trend.

Proposal 20 – NAFA Opposes. This is an onerous restriction and at this point there is almost no data on the level of "repeat" demand from non-resident falconers. This proposal is simply one more restriction on a system that is already incredibly restricted, further limiting already limited access. It is biologically unnecessary. The comparison to large game animals is inapposite, as the biology, take levels, and non-resident demand for these animals is very different.

Proposal 21 – NAFA Opposes. Requiring nonresident or resident falconers to microchip a passage raptor is biologically, scientifically, and philosophically indefensible, and is a restriction founded upon the presumption that falconers are not worthy of the trust and respect of any other group of citizens practicing an outdoor activity involving wildlife. To the contrary, falconers are law-abiding citizen-scientists, that scrupulously adhere to the myriad of laws and regulations that govern the falconry heritage that we all practice. Suggestions to the contrary are false and unacceptable; and our board of directors condemns any accusation or action that is inconsistent with the fact that the falconry community is composed of honest and honorable people. Furthermore, banding requirements are already in place, making microchips superfluous.

Proposal 22 – NAFA Supports. This proposal is a step in the right direction. Further, the closing paragraph in the supporting language of this proposal is in keeping with the views shared by the community of falconers that NAFA represents. In particular, we are referencing the line which reads; "We are proud of the privilege of residing in Alaska and having access to its vast natural resources, and are willing and happy to share with others our passion for the sport." However, we would note that falconry is better referred to as an intangible cultural heritage of mankind, and has been recognized as such by the United Nations Educational, Scientific and Cultural Organization.

Proposal 23 – NAFA Supports. These proposed changes appear to be simply clerical and are clean and concise. We are in favor of adopting all of the proposed edits outlined herein.

Once again, we thank you for the opportunity to comment on these proposals and would like to offer any additional assistance that you are willing to call upon us for.

Respectfully,
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Submitted By
Jonathan Millican
Submitted On
10/26/2017 6:37:47 PM
Affiliation

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I am respectfully requesting the adjustments to limits for non-resident take of raptors be reconsidered. The impact non-residents Falconers have on the population is minimal, and easily trackable through the permitting process and required 3-186A reporting. This wildlife resource is mostly migratory anyways and they travel across the boarder into Canada and many into the NW United States along the Pacific Flyway at some point in their life. My understanding is the few Alaskan Falconers who are against non-resident take are concerned about the well being of the birds and protecting the resource. The vast majority of Falconers feel the same way, and we all want to protect the resources throughout the United States. However, restricting legal take for residents or non-residents, or making it to difficult will likely have the opposite effect. If you consider the level of dedication it takes to travel from the lower states to AK just to get a raptor, you can rest assure those Falconers are also dedicated to the safety of the birds and protection of the resources. Additionally, by allowing legal take, Falconers are likely to report any criminal acts that threaten the resource or access to it. I am a Texas falconer, and our state honors reciprocity. We also have the highest number of wild peregrine permits allocated to nonresident take due to the 60/40 allocation resulting in 12 total non-resident permits this year. We are glad to have non-residents come to our state for a resource that is not readily available in their state. I would like to see the same courtesy in AK, granting access to different species of birds that are not available in Texas or other states. Please consider the intent of the regulation is protecting the resource, and the environmental assessment has shown the population is not affected by the number authorized for take regardless if it's a resident or nonresident. The majority of the falconry community is asking for resident and nonresident trapping regulations to match and to grant at least a 60/40 allocation of permits. Non-residents already need to travel long distances, collect extra permitting and licenses, and many times get additional health certificates for raptors taken. Having extra requirements for nonresidents performing the same activity as residents does not fall inside the intent of protecting the resource.

Submitted By
Daniel Murray
Submitted On
9/26/2017 10:13:03 AM
Affiliation

As it pertains to **PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season for taking passage raptors**

I would like to comment against this proposal, as the justification for it is not based on any science, nor is it accurate what so ever. Falconry has been scientifically proven to have no impact on any wildlife populations, and this is simply a targeted effort by a few Alaskan falcon breeders (who take full advantage of their allowable take), to monopolize on a resource that belongs to all citizens of the United States. Making the assertion that this proposal is for the purposes of maintaining genetic diversity as opposed to a self-serving means to fulfilling certain people's selfish desires is ludacris, and I personally find it disgusting.

As it pertains to **PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years**

I would like to comment against this proposal. The system of utilizing a lottery to distribute permits is fair and satisfactory. No additional stipulations need to be applied.

As it pertains to **PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips**

I would like to comment **against** this proposal. It is excessive, and results in no benefit to the state of Alaska. Furthermore, it will in no way assist biologists, law enforcement, or state wildlife agencies when attempting to keep track of wild origin birds that must stay in state falconry programs. This is because those "easily installed" chips can just as easily be removed by these fictional, non-existent bad guys that this proposed regulation was created to address. Additionally, I find it outrageous that in the last paragraph, the Alaskan Falconry Association is attempting to perpetuate the myth that US falconers are selling wild caught birds out of Country. The mentioned incident occurred roughly 30 years ago, and was addressed and resolved by the Federal Fish and Wildlife Agency.

As it pertains to **PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents**

I would like to comment In Favor of this proposal. Falconry has been proven to have zero impact on wild populations, and allowing nonresident falconers the opportunity to take five goshawks annually would not only greatly benefit falconers in North America, but would be an increase in revenue for the state of Alaska. **I would like to comment against the stipulations set forth in sections 3** though, which requires an out of state license to be purchased prior to entering the lottery. This is simply a money grab tactic, and also an attempt to deter the number of out of state permit applications. If the intent was to mitigate the cost of implementing and maintaining a nonresident take program, then a simple application fee of ten or twenty dollars would be more appropriate to offset the costs, being it would more aptly correlate with the financial requirements of the program. **Additionally I would like to comment against the stipulations set forth in sections 6.** The system of utilizing a lottery to distribute permits is fair and satisfactory. No additional stipulations need to be applied.

Submitted By
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Submitted On
10/1/2017 9:06:25 AM
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Comments to Changes to Nonresident Take for Falconry

The reason the Federal Constitution replaced the Articles of Confederation in the late 18th century was due to the type of issues we are today facing with falconry regulations regarding wild take of raptors: Residents wish to protect their personal interests at the expense of all others. Human selfishness is at the base of such behavior, but with no compelling justification. Of course, if there are compelling State interests, such as high demand of a scarce resource, States rights (of which I am a huge advocate for) require that they place their residents' interests before nonresidents. However, this is not the case with raptors; the supply exceeds the demand to the point where no measurable impact of raptor take would occur. Therefore, Federalist principles, as enumerated in various portions of the Federal Constitution, must prevail, and my position is supported by a number of U.S. Supreme Court cases. To do otherwise may compel nonresidents in other States to take prohibitory actions against Alaska residents with some form of retaliation. This is form of balkanization that the Constitution was instituted to prevent. Therefore I ask that the Board open raptor take by nonresidents to levels that science supports rather than by restricitive measures a few residents are selfishly demanding of you. Thank you for your consideration of this matter.

Submitted By
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10/14/2017 11:21:34 AM
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Thank you for the opportunity to comment on the falconry related proposals, 18 thru 23.

By way of introduction, I've been a falconer for 50 years, and practiced this sport in Alaska for 26+ years between 1974 and 2001. I am a founding member, and first Vice President, (southern) of the Alaska Falconers Association, which started in 1979. I pioneered the hunting of ptarmigan and sharp-tailed grouse in Alaska with big falcons and pointing dogs, and achieved scores which have yet to be duplicated. I found the, "Hatcher Pass" (actually Snowbird Valley) gyrfalcon nesting location, which, over the years, has been the only place near the Anchorage Bowl where bird watchers can experience a nest of this species---and I shared this location with ADF&G so birdwatchers could also enjoy it. It is only for health reasons that I'm still not an Alaskan resident.

Proposal 18 I support

Proposal 19 I support. This is important to pass because it's the raptor breeders that want eyass (nestling) birds---while those that actually hunt with birds, would be happy with passage (flying, already on the wing in immature plumage) raptors.

Proposal 20 I support

Proposal 21 I support. This is a great tool for wildlife law enforcement, and if the BOG passes it, within a few years you'll see that nestling raptors will end up in captive breeding projects outside our country---and this is simply a way to make money selling Alaskan wildlife.

Proposal 22 I oppose. The AKBOG should not allow ANY eyass (nestling) raptors for non-residents because those wanting eyasses, are NOT falconers, but raptor breeders in disguise! REAL falconers would be just as happy to come to Alaska and trap a passage bird of their dreams---and these proposals are about falconry, and NOT captive raptor propogation, which is a much different (and often not connected) endeavor. I fully support a non-resident harvest of raptors for falconry---but ONLY passage birds. I'm rather certain that the BOG will get opposite commentary; but by NOT ALLOWING a non-resident raptor take of nestlings---it can easily seperate falconry take, from raptor breeder wants---which are two entirely different agendas.

Proposal 23 I oppose. This proposal is not legal on the Federal level, because there is a statement to allow the hybridization of these listed species---and the Feds do not allow any hybridization of golden eagles (which is on this list). This list needs to be fixed first.

I urge the BOG great caution on this proposal, because it is already being used as a generalized method of keeping captive wildlife--allowing the take of species which were NEVER intended to be used for falconry----and the BOG has NEVER allowed wildlife to be kept for individual enjoyment. Last season, an Anchorage falconer took a small owl, and kept it in his house for his childrens entertainment, but not paying adequate attention to this bird, it fell into the toilet and drowned (saw this on Facebook). This bird would have NEVER been used in falconry; and if the BOG wishes to allow the use of these very small owls for falconry, please require the falconer to prove that it is actually used as a falconry (hunting) bird (not as a pet). If the BOG allows falconers to keep raptors as pets, this will, in time, allow hunters to keep other wildlife like deer, martin, moose, etc., as pets. I ask the AKBOG to be very careful about, "opening this door"----because once open, shutting it will be very difficult or impossible. Just because falconers hunt with birds, does not mean they should be allowed to keep other raptors as pets.

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9/29/2017 8:16:55 AM
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Regarding Falconry Permit Proposal 18 (HQ-2016-ACR8) Removal of West Nile Virus testing requirement. As a former resident-falconer in Alaska I have direct experience with this regulation and agree it should be removed. In my case, I legally secured two male Peale's falcons (tiercels) from the Aleutians in early July (2011) with the intention of training and hunting with them in Unalakleet throughout the summer and fall. An unexpected health crisis with my elderly mother in Washington State caused me to travel to Washington with the young tiercels in order to assist my mother who was in intensive care at Harborview Hospital in Seattle. I remained with her through the summer to aid in her recovery, but when I was ready to return for work with the Bering Strait School District in August, I discovered the West Nile Virus quarentine regulation caused me to keep the tiercels indoors for 30 days. When I finally was able to move them out-of-doors for training, some of the most important days for early training and "entering" were irreparably lost, and by the time the young falcons were ready for free-flight, many of the young migratory waterfowl I had hoped to hunt with them had left the area and moved south. While I complied with the regulation, I felt it was unreasonable. Migrating raptors and other birds move from Alaska to Washington and back to Alaska numbering in the millions, twice a year, without being quarentined. Alaska non-falconer residents travel to and from the Lower 48 with other birds (such a parrots, chickens, and pigeons without being subject to quarantine). To selectively apply this regulation to the few falconers and their small numbers of raptors not only adds a financial burden, but also significantly currupts the management and flying of the falcons/hawks and seemingly does nothing to actually safeguard indiginous wildlife in an appreciable way.

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Regarding Falconry Permit Regulations Proposal 19 (EG-F17-090), "rolling" the dates of trapping for passage falcons for non-resident take "out 20 days".

I object to this proposal.

1) The premise of the proposal is to preserve genetic stock of nesting falcons in Alaska by making it virtually impossible to remove young falcons from the vicinity of their natal eyrie. The proposal is disingenuous at best coming from an Alaskan falconer who is part of a larger group (resident Alaskan falconers) who have been taking eyessess from a limited number of "favorite eyries" for decades. If the Alaskan falconers indeed had an authentic concern for the depletion of genetic stocks by virtue of take of young from a particular nesting area (be it for genetic preference or for simple runway/roadway-access convenience) this same regulation should have been self-imposed by resident falconer upon the resident falconers themselves. However, these falconer know full well that traditional eyries site, if responsibly harvested (meaning leaving one young in the nest as required by law) has no impact on further reproductive activity and success at that site, which is why Alaskan falconers have practiced the removal of eyess falcons from individually targeted eyrie sites for many, many years with no ill results. This no-impact from harvest at favored nest sites has been observed and recorded for centuries around the globe, the prime example being the falcons of Lundy Island in Great Britian, but there are many more examples as well. In short, the claim of genetic harm to a specific location from the harvest of young falcons in consecutive years is a false narrative and should be rejected as pseudo-science.

2) Another false narrative that this proposal seeks to propogate is that of "increasing demand" (implying increasing pressure upon nesting falcons). The "demand" for Alaskan falcons cannot pracitcally impact nesting falcons beyond the number of permits allotted. Once the permit numbers are established, people can demand all they want, but their "demand' (a better word might be "desire") is made moot by the limit of permits issued.

3) Lastly, the point should be considered that to push the dates further out in the calendar places an unfair burden on non-resident falconers by making it virtually impossible to locate young falcons for trapping once the young are dispersed from the nest sites. Yes, it is theoretically possible that one might be lucky enough, through happenstance, to cross paths with a dispersed young falcon somewhere near enough to cilivlization to realistically secure it, but more often than not, the non-resident falconers will journey to Alaska on an expensive and fruitless quest. If the state allows permits for falcon take, isn't the idea to allow that take to be predictably successful? The state doesn't prevent salmon fishermen (resident or non-resident) from fishing in rivers because the river systems are where salmon **can most predictably be found**. In the Lower 48, non-resident falconers are allowed to journey to the states along the Atlantic seaboard and some offshore barrier islands that are within the tundra peregrine's narrow flyway because that is the locations a trapper is **most likely to encounter** these birds. Because no such flyway exists in Alaska, to disallow trapping in the nesting localities (by virtue of pushing out the dates for this acitivity post dispersal) is to **all but ensure failure** for the vast majority of visiting falconers.

In summary: 1) The notion that trapping young falcons near their nesting sites will cause a depletion of falcons or their genetics in that area is a false narrative and should be disregarded. If it were indeed true, those falconers promoting this proposal should self-impose this same regulation upon themselves and curtail their own taking of youngsters, year after year, from "favoritite eyries." 2) The notion that there is "increasing demand" for any particular type of raptor is offset by permit limits. Those concerns can be reasonably addressed in other ways without selectively imposing onerous regulations on visitors to the state who arrive with permits issued by the state presumably for the purposee of succeeding in their quest. And 3) it should be considered that if the idea of issuing any form of permit is for the permittee to succeed in filling the permit, onerous regulations which place unreasonable barriers to that success should not be imposed. Because dispersed young raptors within a region as vast and impenetrable as most of Alaska is are rarely encountered in situations reasonable for trapping, the reasonable approach is to trap the fledged young where they can be predictably located: ie. in their natal area before they wander away from it. It is the same reason sport fishermen fish for salmon in streams and rivers more than in the open ocean, and why non-resident falconer in the Lower 48 are allowed to trap migrating falcons in those states and locations where the falcons funnel through in concentrated numbers during their fall migration.

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Regarding Falconry Permit Proposal 20 that proposes a non-resident falconer who successfully takes an Alaskan raptor be compelled to wait 4 to 5 yearrs for another chance to be drawn for a permit.

I object to this proposal on the grounds that it is both punitive and unecessary. The State of Alaska may already impose such a restriction on the gun-hunting of some big-game species by non-resident hunters, but this situation is entirely different in two significant ways.

1) There are currently (approximately) 12.5 million registered gun hunters in the United States. There are about 3,500 licenced falconers in the United States. That means the ratio of falconers to gun hunters in this country is approximately 1 falconer for every 3,300 gunhunters (1:3,300). The purpose of the long wait between drawings for gun hunters is the result of such a large, and unwieldy volume of potential applicants for a limited resource. This just isnt the case with falconers.

2) As the proponents state in their rationale, the gunhunters are currently restricted in this way by successful take of a determined **species.** However, in their proposal, the proponents request this system be applied to the successful take of **raptors.** The term "raptors" applies to a fairly abundant number of species of hawks and falcons and other birds of prey. To apply this system to all raptors would be the same as saying a gun hunter who successfully harvests a Tok sheep cannot apply for another permit for hunting **ungulates (all hooved mammals)** in Alaska for a determined period of time. It should be noted the non-reident falconer mentioned by the proponents who drew a permit two years in a row in fact trapped a passage gyrfalcon the first year and a passage goshawk the second year. Not only are these two birds **not the same species**, they are not even in the same genus. So the big-game permit analogy cited by the proponents was exactly what did occur (the taking a different species during consecutive seasons) without the need for the imposition of yet another regulation.

If the state does determine that there is a need to create a waiting period between drawings for successful non-resident falconers, I suggest the waiting period be no longer than **every other year per species** (the comparitively small pool of applicants in this case does not warrant a punitively long wait of 4 to 5 years in order to efficiently manage this program), and that the successful non-resident **remain eligible in the interim** to be drawn for another raptor **provided he/she trap a different species** than the year before.

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Regarding Falconry Permit Proposal #21, where it is proposed that all non-resident faconers who successfully take an Alaskan raptor under permit be required to microchip the bird before exporting from the state.

Again, the Alaska falconers' proposal creates an "us" vs. "them" environment by proposing to impose restrictions on non-residents that Alaskan falconers do not assume upon themselves. The supposition made by the Alaskan falconers is that the temptation to market wild-taken wildlife illegally is a flaw in the character of non-resident falconers that Alaskan falconers are immune to. I oppose this proposal--in the main--for the following reasons:

1) The prosposal assumes potential bad intentions on the part of non-resident falconers only. If this issue really is of authentic concern to Alaskan falconers, then it should apply to Alaskan falconers as well. They are humans and capable of making bad choices in life as any other group of people.

2) The proposal is designed to create a regulation for something already being regulated. The banding of captured raptors marks them as wildlife, which makes their sale illegal. An implanted chip would be an unecessary redundancy that adds a cost burden and a time burden on non-resident falconer that does not effectivey change the situation. Afterall, if a person is so corrupt they would sell a wild-taken falcon overseas, what would prevent them from surgically removing a chip in order to do so? Just as with gun owning, the assumption should be that only criminals commit crimes, and the rest of us should not have to got through unreasonable over-regulating on off-chance someone may or may not be prevented from doing the wrong thing already regulated by law.

3) If the state of Alaska is in favor of this proposal, I would suggest it apply only to species known to have a significant overseas market value (ie: gyrfalcons and peregrine falcons) and that this regulation apply equally to Alaska falconers and non-residents alike. In addition, such a regulation should be of a reasonable nature in that the chip should be required to be implanting, say, within two weeks of a bird's capture to give the falconer the opportunity to return home and organize such a procedure with a veternarian of their choice in a location of convenience to them. That way, a non-resident falconer that captures a falcon in Alaska is not compelled to find one of the few veternarians available in the state (possibly on a weekend or holiday) before the return flight back home. Once home, the falconer could have the procedure completed, documented and faxed or emailed from the verternarian to the state of Alaska.

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10/2/2017 12:44:38 PM
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Regarding Falconry Permit Proposal #22 where it is proposed a non-resident take of 5 eyess (nestling) goshawks per year be allowed.

I support this proposal and would add that based on realistic biology-based managment this proposal be extended to include all raptor species indigenous to Alaska that are allowed for falconry-take under current regulations. At the very least, this could be extended to a similar take of 5 eyess merlins, a species of high interest to falconers, but without any of the "baggage" regarding illegal-marketing fears that surround the larger falcon species.

Submitted By
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Submitted On
10/21/2017 8:05:50 AM
Affiliation
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Proposal 18 - Support

West Nile Virus is not an issue in Alaska and therefore should not be required.

Submitted By
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Submitted On
10/21/2017 8:20:19 AM
Affiliation
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Proposal 19 - Oppose

Submitted By
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Submitted On
10/21/2017 8:24:06 AM
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Proposal 20-Support

I agree with AFA that raptors taken from Alaska by nonresident falconers hold that same special value and that a nonresident falconer should only be allowed to capture one raptor every five years

Submitted By
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Submitted On
10/21/2017 8:27:40 AM
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Proposal 21 Support

Submitted By
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Submitted On
10/21/2017 8:33:35 AM
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Proposal 22 Oppose

This proposal should be deferred until after the five you evaluation period has been completed.

Submitted By
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10/21/2017 8:35:31 AM
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Proposal 23 Support

Submitted By
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Submitted On
10/24/2017 2:15:05 AM
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To Whom It May Concern,

After reading the proposals to modify the Non Resident take, I would like to add my two cents. As current president of the Nebraska Falconers Association I was active when Nebraska revised their falconry regulations. We had an active discussion on non resident take. It apears to me there are some concerned individuals who appear to be motivated by their own personal agendas. We had some of the same issues. I brought order to the chaos by reminding them that falconry is, and will most likely always remain, a ZERO impact sport.

While Alaskas wild resources are vast in a manner that dwarfs Nebraskas, Nebraska will be hosting both the North Amerca Falconers Association and the International Association of Falconers field meet the week of Thanksgiving. Unlimited numbers of non resident take permits are available for purchase to visiting falconers with the following restriction. The state you come from must offer non resident take as well. The biologist in charge of the non game species has zero concern that these events and the trapping that occurs with them will effect the wild populations in any way shape or form.

I do not believe making an individual purchase a 160$ hunting permit just for the honor of being in the drawing is morally right. You are collecting money for no services rendered. All of the hunting permit holders who are not drawn will most likely not come to Alaska to hunt. Nebraska has a few lottery permits and last I knew they were 10$ to enter the lottery, but you have a completely guided hunt if you were to win. Please consider something to this effect. Additionally the proposal to move the trapping season before September would effectively eliminate the ability for anybody to legally trap a passage bird by USFW regulations.

I hope my thought have helped. Someday it would be a dream for me to trap a Peales in Alaska, but after seeing these proposals I believe I will settle for trapping Tundra peregrines as they move through Texas.

Respectfully

Chris Podraza

Submitted By
Bart
Submitted On
9/26/2017 6:16:30 PM
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Proposal 18-5AAC 92.037 Please remove the WNV testing requirements. Current regulation is costly and the vaccines are unnecssary as well as the stressful and hazardous quarantines.

Proposal 19-5AAC 92-037 not in favor Please make no changes in this proposed regulation starting date and do not allow those with a breeding permits to trap passage birds. Also do not allow as a condition of the permit a non-resident to transfer passage birds taken from your State to breeders.

Proposal 20-5 AAC 92.037 not in favor please make no changes there are very few falconers that can take advantage of a trip to Alaska to trap any way and quoting the Alaska Falconers Association its a trip in a lifetime. Continue to Allow the non-resident the same prividlege.

Proposal 21-5 AAC 92.037 not in favor takes more money and time and is more stress on the fresh taken raptor. Micro chip readers are different and often dont work. Peregrine falcons are numerous in central flyway and are now just another falcon and falconry take numbers have been increased in most every State.There are so many captive bred Gyrfalcons available that are bred in the Middle East also exported from US to Middle East Cities permit that wild Gyrfalcons are not sought as "highly prized". Again dont permit breeders and breeders that are falconers to take birds from your State or a falconer to transfer the bird to a breeder.

Proposal 22-5AAC 92.307 not in favor of #3 a lottery system for Goshawks and #6 having to wait one to two years if you successfully take one on the first attempt. Ther would not be a reason for licensed falocners to go all the way to Alaska from the lower States to take an young goshawk.

Submitted By
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9/18/2017 1:23:55 PM
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Dear ALaska Department of Fish and Game. Regarding: PROPOSAL 21 – 5 AAC 92.037. Permits for falconry.~PROPOSAL 20 – 5 AAC 92.037. Permits for falconry, and PROPOSAL 19 – 5 AAC 92.037. Permits for falconry.

These are all extremely short sighted and self serving proposals. They appear to be based on some sort of "protectionism" idea designed to benefit eighteen (18approx) local Alaskan resident/licensed falconers and breeders by specifically excluding more than One Thousand Eight Hundred (1,800) United States licensed Falconers and Breeders from any access to more than 663,300 square miles of a United States National resource.

I would like to remind those who want to exclude their fellow Americans from the lawful enjoyment of interstate commerce and national resources that Alaska is not self sufficient. Alaskans need interstate commerce and trade of resources just as much as the rest of us in the lower 48 do. I submit that most of the lower 48 states have interstate reciprocity incorporated in their falconry and other applicable regulations for that very purpose.

I have personally spent Tens of Thousands of US Dollars in the Alaskan economy traveling to, and legally hunting and fishing in, your beautiful state several times. Alaska is a big place, while traveling in your great state, I have personally seen nesting populations of Gyr and Peregrine falcons in areas of Alaska that I suspect have never been seen by, or know of by, any of the 18 (approx) licensed members of the Alaskan Falconers Association who are pleading for the exclusion of their fellow Americans access to the states abundant natural resources.

After reading some of the comments supporting these ill concieved restrictions it appears to me that the proponents of the same are worried about the sale and export of their own limited and linebred captive falcons in addition to a few nest locations, easily accessible to them, that they dont want anyone else to have access too. Again - Alaska incorporates over 663,000 square miles of surface area. A substancial portion of which is prime habitat for the falcons in question.

In my opinion - the proposed restrictions dont pass the "smell test". It appears that these proposed restrictions are not designed to protect and properly manage Alaska's abundant natural resources but are rather (incorrectly) attempting to protect a small number (less than 20 people) of the local falconers/breeders consumption and production of the same. The ecological impact of allowing non-resident falconers to take nestling falcons from Alaska is non-existant, however the finacial cost to the states economy is significant. Thus those who are trying to restrict the legal take of nestling falcons from Alaska are not only hurting their fellow Americans they are also financially hurting their fellow Alaskans.

If the proponents of these restrictions logic was sound Alaska would be closed to ALL Hunting and Fishing by anyone that is not a Resident of Alaska. I submit that the further restrictions on legal falcon take are not based on sound scientific, economic, or ecological data. I request that you do not add the proposed restrictions to the statues and furthermore ask that Alaska open up a limited legal take (by draw if necessary) of eyass falcons for use in Falconry.

Submitted By
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9/26/2017 7:52:36 PM
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Proposal #18. I concur. Please remove the west nile requirement! Thank you, Tim Sell

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Concerning Proposal #19. There is no need for a date change. No specific areas or falcon eyries have been visited more than twice in the three years that the Non-resident take has been in effect. The broad based statement that raptor breeders are the people recieving non-rresident permits is erronious. The date change would expose non-resident applicants to posibility of harsh fall/winter weather for no reasonable pupose. The current dates are sufficent. Thank you, Timothy Sell

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concerning Proposal #20. I agree with this proposal. There is a lineup of eager to become successful applicants in this system. A once every five year limit is justified. Thank you, Timothy Sell

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This is a unnecessary requirement. The federal 3-186A data base already tracks all raptors involved in falconry throughout the country. A micro chip would be usless and redundant. The fact that Alaskan raptors have been found in middle eastern falcon market has nothing to do with non-resident take and the correlation is ridiculous. Please turn down this requested proposal. Thank you, Timothy Sell

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I wrote this proposal and I support it. We have a healthy and robust population of goshawks and five eyass birs year is a small and unnoticable request. The proposal was written with input from The ADF&G. There is no viable reason to wait 1,2 or 3 years to istall this non-resident take. It is justified. Thank you, Timothy Sell

Submitted By
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10/26/2017 8:26:49 AM
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Non Resident

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I am a second year apprentice falconer living in Arizona. As a hunter I greatly look forward to one day visiting Alaska and spending some quality time with nature. I would ask that given the very stable population of the vast majority of north american raptors and the very unique access that Alaska provides for American citizens particularly with Gyrfalcons that you increase the non resident take limit. Gyrfalcons are considered by many to be the apex experience possible within our sport and I hope very much by the time I am ready for such a relationship I will be welcome to trap one in your state. Here in the Sonoran desert the unique and sought after experience is the Harris's Hawk. There is a very stable population with 10 non resident tags issued every year for trap. It could be argued that in my own state this could easily be increased but generally speaking we get less than that in applications every year and everyone seems to be happy with that number. Thank you for your time.

Submitted By
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Submitted On
10/19/2017 7:39:11 PM
Affiliation

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920 Riverview Drive
Gardnerville, Nevada 89460

Dear Sirs,

I am a falconer living in NV and have travelled to AK to hunt in the past. I do not understand why there is so much emphasis being placed on non-resident take of raptors. It has been scientifically proven that wild take of raptors has no impact on population levels. These animals are a renewable resource and should be managed like the rest of the indiginous wildlife. Personally, I would like to see a season on eyas goshawks.

Thank you.

Lew Souder

Submitted By
Peter Stavrianoudakis
Submitted On
10/26/2017 7:19:34 AM
Affiliation

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pssesq@yahoo.com
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Hilmar, California 95324

Respectfully Requesting that limits on non-resident take of falcons/raptors be equal to that of resident take of falcons/raptors. The impact would be nominal on these migratory birds of prey. This wildlife resource travels across the US and I believe the equal protection clause includes application The take of US wildlife regardless of the state in which it is taken. I am from California and many of the falcons that reside temporarily in your state, migrate to and across not only California but other states included in the Pacific Flyway. Also many of the peregrines that exist today were captive bred in California and released so that they might reproduce in the wild and nest in the great state of Alaska. A handful of Alaskan falconers have disparaged the Falconry community alleging that the rest of us will abuse any trapping allowed to non-residents. There is nothing to support this but the facts are that a monopoly has been created by those Alaskan falconers that our trapping and eventually breeding falcons that are unnaccessable to rest of us. These are US birds that breed in the North but migrate South through the rest of United States.

Submitted By
John Sykes
Submitted On
10/27/2017 9:28:31 PM
Affiliation

I am writing to comment on the proposed regulation changes related to nonresident take for falconry.

PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season from Aug 15-Oct 31 to Sept 5-Nov 20. I strongly diagree with logic and the validity of the statemnents made by Kurt Schmidt. In the past three years non-resident permit applicant have not targeted the same eyeries. Only two birds were trapped near eyeries and they were from different locations. In additon demand has not increased. The number of applicants has gone from 23, to 24, to 18 in 2017. Further I think shifting the season into deep winter could be very dangerous and make access extremly difficult for permit holder to get to where the birds are.

PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years as follows. I think 4 or 5 years is excessive. I feel one or two years makes more sense.

PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips

I strongly disagree with this proposal. The curently used federal bird bands are the best method of keeping of wild caught birrds. Microchips readers are not universal so it is hard to say if a chip implanted in Alaska would picked up buy a given reader in another state.

PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents

I strongly agree with this proposal. It is based on fact and sound biology! The truth is that taking eyass and passage raptors from the wild for use in falconry has no negative effect on adult populations! Alaska has a massive and healthly breeding population of Goshawks, Gyrfalcons, and Peregrines. I feel that the total non-resident number of permits allocated should be increased from 3 to 5 permits. This increase would definitely have no negative effect on wild Alaskan raptor populations, would generate money through the application process, and would provide Americans in the lowwer 48 states with an Alaskan adventure they would never forget regardless if they were sucessful in filling their permit!

Thanks for considering my comments.

Sincerly,

John Sykes

Submitted By
Arnaud Van Wettere DVM
Submitted On
10/27/2017 11:21:54 AM
Affiliation

PROPOSAL 18 – 5 AAC 92.037. Permits for falconry. Remove WNV testing requirement.

I support removing this requirement. I'm a veterinary pathologist with clinical and research experience with West Nile virus and don't see any scientific justification for this requirement. A negative PCR test does not ensure a bird is free of West Nile. A positive antibody test indicate that the bird was exposed to the virus, but does not show if the bird is currently infected. Falconry birds are not how WNV will enter Alaska. Migratory bird will bring the virus as you well know (see your own website).

PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season from Aug 15-Oct 31 to Sept 5-Nov 20.

I don't object to this change, though I wonder how true the comment is that "A majority of the nonresident permit applicants are raptor breeders and/or their affiliates and are targeting certain localities and very specific genetic stock". I really doubt this statement is supported by facts. Anyhow, I do agree that changing the dates will still provide nonresidents a reasonable opportunity to take a passage bird.

PROPOSAL 20 – 5 AAC 92.037. Permits for falconry. Limit nonresident falconers to take raptors every four or five years as follows

Four or years is too long. Alaska does not allow a person who successfully fills a drawing permit for a big game animal to re-apply for that same hunt the following year. I support being able to apply every year. So few permits are allocated that the chances to get a permits 2 or 3 time in a row are dismal. If this is not possible, every two years should be long enough for nonresident raptor take.

PROPOSAL 21 – 5 AAC 92.037. Permits for falconry. Require raptors taken under nonresident capture permits be implanted with microchips

I strongly disagree with this proposal. The federal bird band does what is needed in terms of tracking, and unlike microchips, is readily recognized by state wildlife agencies across the US. It is important to note that there is currently no uniformity across microchip readers, so the chip reader one agency is using might not even recognize the chip in a falcon whose chip was implanted by an Alaskan veterinarian. Thus, microchips are actually quite likely to undermine reasonable efforts to document track a legally acquired raptor. Very few veterinarians, and even more in Alaska than other place in the USA, are trained and familiar with microchip implantation in birds. While subcutaneous implantation can be done awake, the more secure intramuscular implantation requires general anesthesia. Extremely few veterinarian in Alaska are equipped and familiar with bird anesthesia. Finally, the argument that chips protect against nefarious actors is obviously false. Anything that can be implanted can also be removed and implanted again. The gyrfalcon that was taken in Alaska and found in the middle east did not get in the middle east by legal pathways. Implanting microchip won't stop people who want to illegally trap and export birds.

PROPOSAL 22 – 5 AAC 92.037. Permits for falconry. Allow the take of up to five eyas goshawks by nonresidents

I strongly support this proposal, and urge the wildlife board to extend this consideration to two other highly prized species whose populations also can readily sustain increased levels of take: peregrine falcons and gyrfalcons. The benefits to the resource and to the state that are outlined for increased take of goshawks would extend to increased harvest of these species as well.

Submitted By
Ted Wenzel
Submitted On
10/26/2017 9:53:46 AM
Affiliation

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5544 Meadowview Dr. S
Florence, Montana 59833

I am in support of non resident take of raptors for falconry or science. Just like game soecies, management of thes birds should include non residents. Take of raptors has no impact on the current populations.

Submitted By
Lindsay Wheeler
Submitted On
10/2/2017 10:27:50 AM
Affiliation

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313 Dirksen Dr. Apt. B12
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There is no biological justification for denying non-resident take. At 3 birds a year non-resident falconers are having ZERO impact on native populations or group genetics. Many of the lower 48 states now offer less restrictive non-resident takes for falconry birds, and some differ by species. Offering 3 permits a year for the wide variety of birds available in AK is ridiculous! There are harlans ssp. red tails, peregrines, gyrs, goshawks, etc. Limiting 3 permits for all those species, and then constricting that even more is self-serving and not at all what American Falconry is actually about.

If you feel you have to be specific to protect a specific species from over-harvesting, then restrict that one species, but open up the take more overall. Don't push back the dates for no logical reason and make it harder for falconers to obtain early birds or particular species that might be dispersing already by September (peregrines).

Requiring microchips is ridiculous when AK falconers are looking at removing the requirement of the WNV vaccine...so they can cut costs but increase costs for non-residents? What proof is there that anyone is spending the tons of money to go to AK to trap a bird, and then sending it elsewhere? This is blatant disrespect towards the falconry community at large and the regulations that we operate within.

I agree with the allowing of 5 eyass gos permits, and I think the permits overall should be increased, to allow for those looking to trap birds other than the coveted gyrfalcons. Not every falconer is a breeder wanting white gyrs.

Submitted By
Bruce
Submitted On
10/27/2017 9:56:54 AM
Affiliation
NFA

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Chitina , Alaska 99566

Proposal 19; On NR Take, no biological reason to limit take, Gyrfalcon probably # 1 target, 2500 breeding pairs in state, probably 70% of young die in first year.Prey numbers are the main determiner of population. If the applicant has 2+ years of experience. This would give guides with an airplane something to do after spring bear season.

Proposal 20; 4-5 year gap between attempted take, really no biological reason, if it's a clerical problem increase take, again 2,500 breeding pair dependent on prey populations not incidental take.

Proposal #22; If the applicant has 2+ years experience there is no biological reason not to take eyas goshawks in any numbers. I live in Chitina and see goshawks EVERY SINGLE DAY while walking my dogs, or driving to Glennallen and back. Think of Goshawks as you do Lynx, both are dependent on prey populations, there are lots of hares so we see many Lynx and Goshawks, when prey populations go down the Lynx will travel to find prey or starve and the Goshawks will do the same with "pulses" recorded as far south as the Rockey Mts about every 10 years or so. The hare numbers will eventually build up and Lynx and Goshawk will follow with a buildup in numbers.

With the large number of Harris Hawks being raised in the lower 48 the cost is less than a trip to AK to attempt to catch a Goshawk, Harris Hawks are much easier to handle than Goshawks and are as versital at catching different prey types, and Harris Hawks are less likely to die from fungal infections than are wild caught Goshawks.Times change and so has falconry.

The USFS in NM found 100 Goshawk nests in 100 sq. miles. Think of how large the boreal forest is and how many Goshawks are there. There are about 7,000 falconers in the USA, you could give every one a Goshawk and there would be no effect on the population in AK.

Submitted By
Adak Island
Submitted On
10/24/2017 11:28:47 AM
Affiliation

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Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
Heather Aronno
Submitted On
10/13/2017 10:47:49 AM
Affiliation

My name is Heather Aronno and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild. Alaska's citizens deserve the opportunity to implement the only humane and effective approach to community cats

Submitted By
Samantha Blakenship and Marina Lindsey
Submitted On
10/23/2017 7:23:21 AM
Affiliation
Gastineau Humane Society

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Juneau, Alaska 99801

October 23, 2017

ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

Re: Trap, Neuter and Release Proposal

The Gastineau Humane Society (GHS) Board of Directors and Interim Executive Director are writing to express our support for Regulatory Proposal #62, currently before the Board of Game that, if approved, would allow sterilized cats to be released into the wild and, therefore, legalize Trap, Neuter and Release (TNR) programs for feral cats in Alaska.

Alaska, like most places in the world, has a population of feral cats. The primary options for shelters, such as GHS, to manage these animals typically include: 1) do nothing, 2) trap and euthanize, 3) trap and attempt to rehabilitate, or 4) implement a TNR program.

Based on our experience and widely supported research, the first two approaches only perpetuate the problem and burden local animal shelters. In Juneau, our local feral cat populations, which are inbreeding, have resulted in 61 euthanasias in the past 15 months. Increased euthanasia rates due to feral cat populations affect our ability to obtain grants, which adversely affects our ability to care for all the animals in our shelter. Euthanasias also have a negative impact on staff morale and potentially devastating impacts on community support of our shelter.

The third option overburdens shelter staff with animals that are often unsafe to handle and still results in high euthanasia rates, adversely impacting both staff morale and fundraising – people don't want to donate to or work for shelters that catch and kill domestic animals. None of the approaches is guaranteed, and each approach has its supporters and opponents. However, after experiencing the other options, GHS believes that TNR presents a realistic, viable way to help reduce feral cat populations.

TNR programs are not only the most humane method of preventing cats from entering the shelter system, they are the most effective when implemented correctly. *(1)* TNR is the most widely implemented program to manage cat populations in the U.S. The main goal of the program is to reduce feral cat populations, but it also decreases the spread of cat diseases. *(2)* TNR goes back to the late 1960's in the U.S. It has been endorsed by the American Society for the Prevention of Cruelty to Animals as "the most humane, effective and financially sustainable strategy for controlling free-roaming cat populations." The Humane Society of the United States has also endorsed community-based TNR programs as the "most viable, long-term approach available at this time to reduce feral cat populations."

Other entities oppose TNR including the American Bird Conservancy and The Wildlife Society. They dispute its effectiveness at reducing feral cat populations, and comment that free-roaming cats are responsible for much of the decline in bird populations. Rather than TNR, they recommend that free-roaming cats be taken to local animal shelters. The Wildlife Society states that they "support and encourage the humane elimination of feral cat populations, including feral cat colonies, through adoption into indoor-only homes of eligible cats and humane euthanasia of unadoptable cats." GHS's experience is that most feral cats are simply too wild to be safely adopted and they must be euthanized. Additionally, trapping and euthanizing cats has been used in many communities, but almost never results in a permanent decrease in the cat population. Until food sources are completely removed, more feral cats will move into the area.

GHS currently spends up to $1000/month handling, evaluating, and euthanizing feral cats. TNR may initially cost the shelter even more. However, Juneau's feral cat populations are in specific areas and could effectively be trapped, vaccinated, sterilized and released, eventually reducing our costs, the number of feral cats, and the incidence of diseases spread by cats. This, in turn, would allow the shelter to fulfill its mission to promote animal welfare and prevent animal cruelty and suffering.

We acknowledge that the challenge of dealing with feral cats is both an animal welfare and environmental issue. This issue is complicated even further because many feral cats live on private lands where federal and state agencies have limited jurisdiction. As we understand it, the Board of Game does have authority to proactively help balance these complicated animal welfare and environmental issues and could

do so by putting sideboards on TNR programs in Alaska. We suggest that the most important sideboard is to allow TNR programs to be implemented only by official animal shelters, registered Alaska 501(c) 3 animal non-profit organizations, and humane societies. GHS has professionally trained staff and Animal Control Officers who have the skills and knowledge to implement a thorough TNR program in specific circumstances.

If the Board of Game chooses to disapprove this regulatory proposal and disallow any type of TNR in Alaska, we respectfully believe the State then needs to take on the responsibility and cost of trapping and euthanizing feral cat populations. This is the only fair way to reduce the physical and financial burden on local shelters like GHS that were founded to help domestic animals. We are not funded to run euthanasia programs nor do we want this responsibility.

We thank you for your consideration and request that you vote affirmatively to approve this proactive proposal and allow sterilized cats to be released into the wild.

Sincerely,

Samantha Blankenship
Interim Executive Director

Marina Lindsey
Board President

1. Levy, J.K., Gale, D.W., et al. Evaluation of the effect of a long-term trap-neuter-return and adoption program on a free-roaming cat population. Journal of American Veterinary Medical Association 2003; 222(1):42-46.

2. Fischer, Sarah M., Quest Cassie M., et al. Response of feral cats to vaccination at time of neutering. Journal of American Veterinary Medical Association 2007; 230(1):52-58.

Submitted By
Pat Bock
Submitted On
10/16/2017 11:53:40 AM
Affiliation
1946

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Douglas, Alaska 99824

Let's do all we can to help these cats!

Submitted By
Jill Bohr Jacob
Submitted On
10/25/2017 5:55:51 PM
Affiliation

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Address
PO Box 1721
Ward Cove, Alaska 99928

I would like to state my support for proposed Rule 62, allowing for trap-neuter-vaccinate-return (TNVR) programs in Alaska.

TNVR programs are animal-friendly, cost-effective, and reduce the burden and bureaucracy placed on the state's animal shelters. Current methods of animal control relative to community cats are expensive, ineffective and oftentimes inhumane. The proposed rule changes would be better for the cats, for public health and for the wildlife we all want to protect.

Thank you,

Jill Bohr Jacob

Submitted By
Christina Brancaleone
Submitted On
10/17/2017 11:38:00 AM
Affiliation

I am in favor of proposal 62. I feel that this will help battle the overpopulation issue of cats in the state of Alaska. I am an Alaskan resident and would love to see this able to be done with the stray cats in cities around the state.

Submitted By
Marjorie Carter
Submitted On
10/27/2017 8:41:12 PM
Affiliation

Phone
907-248-4619
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pouncam@alaska.net
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3005 Carroll Lane
Anchorage, Alaska 99507

Dear Members,

I am writing to you on behalf of the feral cats of Alaska. I am asking you to approve Proposal 62 that would allow us to implement Trap Neuter Return in the state of Alaska.

I subscribe to many cat and animal publications that strongly support Trap Neuter Return. Some of them are “Animal Sheltering” from The Humane Society of the United States, “Catnip” from Cummings School of Veterinary

Medicine at Tuft’s University, “Cat Watch” from Cornell University College of Veterinary Medicine Feline Health Center, “Catster” magazine and Best Friends Animal Society in Kanab Utah.

Best Friends has expanded its highly successful TNR program to Los Angeles as part of their No-Kill campaign and are well on their way. Now they are tackling New York.

There are many organizations that promote Trap Neuter Return such as Tree House in Chicago and many too numerous to mention here.

With Trap Neuter Return, feral populations can be humanely reduced, cat’s lives improved, neighborhood concerns addressed and financial resources previously spent taking lives can be re-allocated to lifesaving practices.

Thank you for your time,

Marjorie Carter

Submitted By
C Cechi
Submitted On
10/25/2017 10:09:59 PM
Affiliation
Ms.

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

Trap/Neuter/Release saves lives and is the **only and humane solution**. (Killing cats or ignoring the problem is not a solution, instead it is just the opposite.)

Many animal rights organizations have researched the issue and have in many communities implemented a TNR program. These programs are very successful.

For more info you may check out this website. It's a resource of information, studies and proven facts:

https://www.alleycat.org/resources/

Please take in consideration the following facts.

It’s time to stop the killing.

Cities and shelters across America have experienced great success with Trap-Neuter-Return—it is now official policy for feral cats in Washington, DC, Baltimore, and Chicago and other cities across the country. It’s time to learn from past mistakes and move forward instead of going around in circles—it’s time to stop fighting the endless battle and protect cats’ lives.

Trap-Neuter-Return is the responsible, humane method of care for feral cats

Trap-Neuter-Return stabilizes feral cat populations. The cats are humanely trapped, vaccinated, and neutered, so no more kittens will be born. They are then returned to their original location to live out their lives in their outdoor home. Not only is Trap-Neuter-Return the humane option for feral cats, it also improves cats’ lives by relieving them of the stresses of mating and pregnancy. In the end, unlike catch and kill, TNR works.

The vacuum effect

Removing cats from an area by killing or relocating them is not only cruel—it’s pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn’t permanently clear an area of cats.

Scientific evidence indicates that removing feral cat populations only opens up the habitat to an influx of new cats, either from neighboring territories or born from survivors. Each time cats are removed, the population will rebound through a natural phenomenon known as the “vacuum effect,” drawing the community into a costly, endless cycle of trapping and killing.

The vacuum effect is a phenomenon scientifically recognized worldwide, across all types of animal species

Well-documented among biologists, the vacuum effect describes what happens when even a portion of an animal population is permanently removed from its home range. Sooner or later, the empty habitat attracts other members of the species from neighboring areas, who move in to take advantage of the same resources that attracted the first group (like shelter and food). Killing or removing the

Research shows majority of feral cats are healthy.

Feral cats are cats who are not socialized to humans. Instead, they live contented lives with their feline families (often called colonies) outdoors. Cats, like squirrels, chipmunks, and birds, are capable of living healthy, fulfilling lives in the outdoors.

One prominent animal rights organization falsely states that “horrific fates” await feral cats, like diseases, injuries, or human cruelty. But these claims are based on isolated incidents and *not* supported by scientific evidence.

In fact, the research points the other way—a 2006 study found that of 103,643 stray and feral cats examined in spay/neuter clinics in six states from 1993 to 2004, less than 1 percent of those cats needed to be euthanized due to debilitating conditions, trauma, or infectious diseases.

Feral cats *live* full, healthy lives outdoors—there is no reason for them to be *killed* in shelters.

Feral cats are not a health threat.

Feral cats have equally low rates of disease as the cats who share your home.

In 2008, only 294 cases of rabies were reported in cats, both pet and feral. That’s just 4. 3 percent of all the rabies cases reported in animals that year. Feral cats do not pose a rabies risk to humans: there hasn’t been a confirmed cat-to-human rabies transmission in more than 30 years. The number one source of rabies in the United States is wildlife—accounting for more than 90 percent of rabies cases in animals. Since feral cats involved in Trap-Neuter-Return programs are vaccinated and therefore cannot acquire or transmit the virus, they pose no threats to humans or other animals.

Most importantly, research confirms that feral cats are neither breeding grounds for disease nor a health threat to communities in which they live. After testing feral cats in Northern Florida for FIV, FeLV, and nine other infectious organisms, a 2002 study concluded that “feral cats assessed in this study posed no greater risk to human beings or other cats than pet cats.”

Feral cats are not a significant health threat to humans or other animals. They deserve to live out their lives just like other outdoor creatures do.

Feral cats live healthy lives outdoors. Trap-Neuter-Return IS THE SOLUTION !

Thank you so much for your consideration.

The **compassion** and **humanity** of those making the decision is **greatly appreciated**.

Sincerely,

C. Cechi

Submitted By
Charlotte Ciszek
Submitted On
10/24/2017 12:39:17 PM
Affiliation

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
Della Coburn
Submitted On
10/13/2017 11:04:53 AM
Affiliation
Kasaan's resident

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lllskidy54@yahoo.com
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2 Young Street
Kasaan, Alaska 99950-0340

Feral house cats are the offspring of unaltered pets who either are being dumped off in Kasaan, or who are being abandoned in other towns and villages on Prince of Wales Island! I intend to catch the ones who need to be altered and vaccinated, since we do not want cat viruses to get spread to the house pets. I have been feeding abandoned and feral house cats for a long time, and can't see any good reason to let them be killed! Many can survive on their own, even without being fed by humans!

Submitted By
Ruth Craine
Submitted On
10/24/2017 5:01:39 PM
Affiliation

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9077362227
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PO Box 566
Tenakee Springs, Alaska 99841

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

This is not only beneficial for the cats but by controlling the feral population it will benefit and protect the bird population.

Thank you,

Ruth Craiine

Submitted By
Amber Enns
Submitted On
10/12/2017 11:02:54 PM
Affiliation

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Address
6078 S Hayfield Rd
Wasilla, Alaska 99623

My name is Amber Enns and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild. Why should Alaska allow TNR? As I am sure you are well aware we have overcrowded and overwhelmed shelters and rescues. Allowing a TNR program will greatly reduce the amount of stray cats that are present. I believe TNR is an Alaskan way to deal with community cats. It allows us as a community to show compassion and humanely address an issue that these animals never asked to be put into. Being able to implement a TNR program will add to the overall public health. When these animals are captured they are vaccinated and sterilized. Reducing the risk of disease among household pets who may come into contact with community cats. Let us stand together and take care of the community cat issue.

Submitted By
Corinne Estelle Ferre`
Submitted On
10/26/2017 10:13:18 AM
Affiliation
Kodiak Soil and Water Conservation

Please save feral cats!

Submitted By
Susan Fisher
Submitted On
10/24/2017 2:44:44 PM
Affiliation
Ms.

Trap neuter and return is the only reasonable action to take to control animal populations especially domesticated animals as they are ultimately all of our responsibility.

Submitted By
Mark Francis
Submitted On
10/25/2017 10:47:06 PM
Affiliation
Ms.

PRO / IN FAVOR of Trap-Neuter-Return program for CATS

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

Trap/Neuter/Release saves lives and is the only and humane solution. (Killing cats or ignoring the problem is not a solution, instead it is just the opposite.)

Many animal rights organizations have researched the issue and have in many communities implemented a TNR program. These programs are very successful.

For more info you may check out this website. It's a resource of information, studies and proven facts:
https://www.alleycat.org/resources/

Please take in consideration the following facts.

It's time to stop the killing.

Cities and shelters across America have experienced great success with Trap-Neuter-Return—it is now official policy for feral cats in Washington, DC, Baltimore, and Chicago and other cities across the country. It's time to learn from past mistakes and move forward instead of going around in circles—it's time to stop fighting the endless battle and protect cats' lives.
Trap-Neuter-Return is the responsible, humane method of care for feral cats
Trap-Neuter-Return stabilizes feral cat populations. The cats are humanely trapped, vaccinated, and neutered, so no more kittens will be born. They are then returned to their original location to live out their lives in their outdoor home. Not only is Trap-Neuter-Return the humane option for feral cats, it also improves cats' lives by relieving them of the stresses of mating and pregnancy. In the end, unlike catch and kill, TNR works.

The vacuum effect
Removing cats from an area by killing or relocating them is not only cruel—it's pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn't permanently clear an area of cats.
Scientific evidence indicates that removing feral cat populations only opens up the habitat to an influx of new cats, either from neighboring territories or born from survivors. Each time cats are removed, the population will rebound through a natural phenomenon known as the "vacuum effect," drawing the community into a costly, endless cycle of trapping and killing.
The vacuum effect is a phenomenon scientifically recognized worldwide, across all types of animal species
Well-documented among biologists, the vacuum effect describes what happens when even a portion of an animal population is permanently removed from its home range. Sooner or later, the empty habitat attracts other members of the species from neighboring areas, who move in to take advantage of the same resources that attracted the first group (like shelter and food). Killing or removing the original population does nothing to eliminate these resources; it only creates a "vacuum" that will inevitably draw in other animals living nearby.

Research shows majority of feral cats are healthy.

Feral cats are cats who are not socialized to humans. Instead, they live contented lives with their feline families (often called colonies) outdoors. Cats, like squirrels, chipmunks, and birds, are capable of living healthy, fulfilling lives in the outdoors.
One prominent animal rights organization falsely states that "horrific fates" await feral cats, like diseases, injuries, or human cruelty. But these claims are based on isolated incidents and not supported by scientific evidence.
In fact, the research points the other way—a 2006 study found that of 103,643 stray and feral cats examined in spay/neuter clinics in six states from 1993 to 2004, less than 1 percent of those cats needed to be euthanized due to debilitating conditions, trauma, or infectious diseases.
Feral cats live full, healthy lives outdoors—there is no reason for them to be killed in shelters.
Feral cats are not a health threat.
Feral cats have equally low rates of disease as the cats who share your home.
In 2008, only 294 cases of rabies were reported in cats, both pet and feral. That's just 4. 3 percent of all the rabies cases reported in animals that year. Feral cats do not pose a rabies risk to humans: there hasn't been a confirmed cat-to-human rabies transmission in more than 30 years. The number one source of rabies in the United States is wildlife—accounting for more than 90 percent of rabies cases in animals. Since feral cats involved in Trap-Neuter-Return programs are vaccinated and therefore cannot acquire or transmit the virus, they

pose no threats to humans or other animals.
Most importantly, research confirms that feral cats are neither breeding grounds for disease nor a health threat to communities in which they live. After testing feral cats in Northern Florida for FIV, FeLV, and nine other infectious organisms, a 2002 study concluded that "feral cats assessed in this study posed no greater risk to human beings or other cats than pet cats."
Feral cats are not a significant health threat to humans or other animals. They deserve to live out their lives just like other outdoor creatures do.
Feral cats live healthy lives outdoors. Trap-Neuter-Return IS THE SOLUTION !

Thank you so much for your consideration.
The compassion and humanity of those making the decision is greatly appreciated.

Sincerely,

Mark Francis

Submitted By
C Francis-C
Submitted On
10/25/2017 10:43:26 PM
Affiliation
Mrs.

PRO / IN FAVOR of Trap-Neuter-Return program for CATS

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

Trap/Neuter/Release saves lives and is the only and humane solution. (Killing cats or ignoring the problem is not a solution, instead it is just the opposite.)

Many animal rights organizations have researched the issue and have in many communities implemented a TNR program. These programs are very successful.

For more info you may check out this website. It's a resource of information, studies and proven facts:
https://www.alleycat.org/resources/

Please take in consideration the following facts.

It's time to stop the killing.

Cities and shelters across America have experienced great success with Trap-Neuter-Return—it is now official policy for feral cats in Washington, DC, Baltimore, and Chicago and other cities across the country. It's time to learn from past mistakes and move forward instead of going around in circles—it's time to stop fighting the endless battle and protect cats' lives.
Trap-Neuter-Return is the responsible, humane method of care for feral cats
Trap-Neuter-Return stabilizes feral cat populations. The cats are humanely trapped, vaccinated, and neutered, so no more kittens will be born. They are then returned to their original location to live out their lives in their outdoor home. Not only is Trap-Neuter-Return the humane option for feral cats, it also improves cats' lives by relieving them of the stresses of mating and pregnancy. In the end, unlike catch and kill, TNR works.

The vacuum effect
Removing cats from an area by killing or relocating them is not only cruel—it's pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn't permanently clear an area of cats.
Scientific evidence indicates that removing feral cat populations only opens up the habitat to an influx of new cats, either from neighboring territories or born from survivors. Each time cats are removed, the population will rebound through a natural phenomenon known as the "vacuum effect," drawing the community into a costly, endless cycle of trapping and killing.
The vacuum effect is a phenomenon scientifically recognized worldwide, across all types of animal species
Well-documented among biologists, the vacuum effect describes what happens when even a portion of an animal population is permanently removed from its home range. Sooner or later, the empty habitat attracts other members of the species from neighboring areas, who move in to take advantage of the same resources that attracted the first group (like shelter and food). Killing or removing the original population does nothing to eliminate these resources; it only creates a "vacuum" that will inevitably draw in other animals living nearby.

Research shows majority of feral cats are healthy.

Feral cats are cats who are not socialized to humans. Instead, they live contented lives with their feline families (often called colonies) outdoors. Cats, like squirrels, chipmunks, and birds, are capable of living healthy, fulfilling lives in the outdoors.
One prominent animal rights organization falsely states that "horrific fates" await feral cats, like diseases, injuries, or human cruelty. But these claims are based on isolated incidents and not supported by scientific evidence.
In fact, the research points the other way—a 2006 study found that of 103,643 stray and feral cats examined in spay/neuter clinics in six states from 1993 to 2004, less than 1 percent of those cats needed to be euthanized due to debilitating conditions, trauma, or infectious diseases.
Feral cats live full, healthy lives outdoors—there is no reason for them to be killed in shelters.
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Sincerely,

Mrs. C. Francis-C

Submitted By
Julie Furgason
Submitted On
10/26/2017 5:46:11 AM
Affiliation

Phone
9073989128
Email
jlfurgason@yahoo.com
Address
1409 Courtney Dr
Kenai, Alaska 99611

My name is Julie Furgason and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild. I volunteer with Clear Creek Cat Rescue. TNR benefits public health because community cats get spayed and neutered and get rabies vaccinations they wouldn't have received otherwise. Cat populations will stabilize or reduce in size. Alaska's citizens deserve the opportunity to implement the only humane and effective approach to community cats.

Submitted By
Paula S Geier
Submitted On
10/24/2017 12:17:36 PM
Affiliation

Phone
9075901307
Email
psjgeier@netscape.net
Address
1316 Woll Road
North Pole, Alaska 99705

Please support Trap-Neuter-Vaccinate & Return programs Proposal #62. This would greatly improve the lives of feral cats in Alaska and reduce cats coming into animal shelters and lower rates of euthanasia.

Thank you!

Submitted By
Jessica Grantier
Submitted On
10/25/2017 5:27:37 AM
Affiliation
None

Phone
9073511706
Email
jessicac729@gmail.com
Address
7275 Chugach Meadows Loop
Anchorage, Alaska 99507

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska. Thank you.

Submitted By
Meadow Green
Submitted On
10/25/2017 10:51:16 PM
Affiliation

PRO / IN FAVOR of Trap-Neuter-Return program for CATS

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

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For more info you may check out this website. It's a resource of information, studies and proven facts:
https://www.alleycat.org/resources/

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The vacuum effect
Removing cats from an area by killing or relocating them is not only cruel—it’s pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn’t permanently clear an area of cats.
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Research shows majority of feral cats are healthy.

Feral cats are cats who are not socialized to humans. Instead, they live contented lives with their feline families (often called colonies) outdoors. Cats, like squirrels, chipmunks, and birds, are capable of living healthy, fulfilling lives in the outdoors.
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Thank you so much for your consideration.
The compassion and humanity of those making the decision is greatly appreciated.

Sincerely,

M Green

Submitted By
Kareen Hoover
Submitted On
10/24/2017 2:16:48 PM
Affiliation

Phone
9079832648
Email
5pugs@aptalaska.net
Address
POB 54
Skagway, Alaska 99840-0054

There are so many unwanted creatures in our shelters, let alone left feral to fend for themselves, unloved and unhealthy. This bill would help reduce the expansion of the feral population and the suffering and deaths they endure.

I feel that an attempt to control back yard breeders, who selfishly breed innocent animals for profit, would be a big step forward as well. I totally support and will share with friends and members of our community!!

Submitted By
Kristine Hutchin
Submitted On
10/24/2017 11:28:47 AM
Affiliation
Ms.

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9076967250
Email
khutchin@mtaonline.net
Address
10335 Stewart Dr
Eagle River, Alaska 99577

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
Kora C Isakson
Submitted On
10/13/2017 11:13:01 AM
Affiliation

Phone
9072311776
Email
isaksonkora@hotmail.com
Address
1860 Bluegrass Circle
N/A
Anchorage, Alaska 99502

Please allow Trap-Neuter-Release for feral cats in Alaska.

Submitted By
Satonya Jumps
Submitted On
10/25/2017 7:53:05 AM
Affiliation

~~Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
Christina Kluever
Submitted On
10/25/2017 7:28:50 AM
Affiliation

As a licensed veterinary technician I believe spay and neuter clinics/release programs can be an effective and positive way to handle a growing cat population. These populations can grow out of control so quickly. Action should and must be taken at some point.

Submitted By
Marcia Kramer
Submitted On
10/26/2017 2:02:07 PM
Affiliation
National Anti-Vivisection Society

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3124276073
Email
mkramer@nav.org
Address
53 W. Jackson Blvd.
Ste. 1552
Chicago, Illinois 60604

Dear Members of the Alaska Board of Game,

It is with great delight that I have heard that you are considering adoption of Proposal 62 – 5 AAC 92.029, to permit the release of sterilized wild cats back into the wild. Feral cats have become a nuisance problem world wild, and while humans have contributed to the problem by abandoning feline pets, this problem has grown to enormous proportions.

The typical solution, gathering and euthanizing feral cats, seems to be a great idea, it is not the most effective way of dealing with the nuisance issue. Several years ago, Cook County, Illinois, was considering a similar measure. At that time, I knew little about the issue, but I learned. Chicago, which is in Cook County, already had active caretakers for Trap-Neuter-Release (or Return) (TNR) colonies of cats. They were largely operating without legal authorization, but there was a perceived need.

That need is one of the reasons that TNR programs have become so popular around the country. When a location is attractive to wild cats, removing the cats does not make the location any more attractive to other cats. Long-term studies showed that removing nuisance feral cats from a particular location was a very short-term solution, as other cats rapidly took their place.

By capturing, sterilizing, vaccinating and returning those cats to the same location—with their ears tipped for identification—the population will go into a gradual decline, with aging cats staying in the same place and even growing accustomed to the people and hazards nearby. As more cats are captured and sterilized, it is also hoped that the exploding wild population will decline. At least that has been the experience in the Chicago area.

Laws that prohibit the release of wild animals back into the wild can make sense. But in the case of feral cats, everyone is a loser when TNR is not an option.

I hope that you will look at the experiences of many city and county governments that have adopted laws which permit the release of feral cats who have been captured, sterilized (neutered or spayed), vaccinated and returned to their homes. I am convinced that you will give your approval to Proposal 62 as well.

Thank you,

Marcia Kramer

Director of Legal/Legislative Programs

The National Anti-Vivisection Society

Chicago, IL

Submitted By
Julie Linford
Submitted On
10/24/2017 7:56:19 AM
Affiliation
Outcast Cat Help

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925-788-0356
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julie.linford@outcastcat.org
Address
PO BOX 963
Martinez, California 94553

Hi,

My name is Julie Linford and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild. I was born and raised in Alaska and have many friends and family in the great state. I've been involved with trap-neuter-return (TNR) in California where I now live for the past 12 years. I founded a 501(c)(3) to use TNR to address outdoor cat overpopulation. It works. It works. It works. Thank you!

Submitted By
Rena Lopez
Submitted On
10/25/2017 10:22:10 PM
Affiliation
Ms.

Pro - In favor of Trap Neuter Return program for Cats

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

Trap/Neuter/Release saves lives and is the **only and humane solution**. (Killing cats or ignoring the problem is not a solution, instead it is just the opposite.)

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https://www.alleycat.org/resources/

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Trap-Neuter-Return is the responsible, humane method of care for feral cats

Trap-Neuter-Return stabilizes feral cat populations. The cats are humanely trapped, vaccinated, and neutered, so no more kittens will be born. They are then returned to their original location to live out their lives in their outdoor home. Not only is Trap-Neuter-Return the humane option for feral cats, it also improves cats’ lives by relieving them of the stresses of mating and pregnancy. In the end, unlike catch and kill, TNR works.

The vacuum effect

Removing cats from an area by killing or relocating them is not only cruel—it’s pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn’t permanently clear an area of cats.

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One prominent animal rights organization falsely states that "horrific fates" await feral cats, like diseases, injuries, or human cruelty. But these claims are based on isolated incidents and *not* supported by scientific evidence.

In fact, the research points the other way—a 2006 study found that of 103,643 stray and feral cats examined in spay/neuter clinics in six states from 1993 to 2004, less than 1 percent of those cats needed to be euthanized due to debilitating conditions, trauma, or infectious diseases.

Feral cats *live* full, healthy lives outdoors—there is no reason for them to be *killed* in shelters.

Feral cats are not a health threat.

Feral cats have equally low rates of disease as the cats who share your home.

In 2008, only 294 cases of rabies were reported in cats, both pet and feral. That's just 4. 3 percent of all the rabies cases reported in animals that year. Feral cats do not pose a rabies risk to humans: there hasn't been a confirmed cat-to-human rabies transmission in more than 30 years. The number one source of rabies in the United States is wildlife—accounting for more than 90 percent of rabies cases in animals. Since feral cats involved in Trap-Neuter-Return programs are vaccinated and therefore cannot acquire or transmit the virus, they pose no threats to humans or other animals.

Most importantly, research confirms that feral cats are neither breeding grounds for disease nor a health threat to communities in which they live. After testing feral cats in Northern Florida for FIV, FeLV, and nine other infectious organisms, a 2002 study concluded that "feral cats assessed in this study posed no greater risk to human beings or other cats than pet cats."

Feral cats are not a significant health threat to humans or other animals. They deserve to live out their lives just like other outdoor creatures do.

Feral cats live healthy lives outdoors. Trap-Neuter-Return IS THE SOLUTION !

Thank you so much for your consideration.

The **compassion** and **humanity** of those making the decision is **greatly appreciated**.

Sincerely,

Rena Lopez

Submitted By
Kari Mason
Submitted On
10/12/2017 12:49:19 PM
Affiliation
Independant

Phone
907-338-5340
Email
themasons@gci.net
Address
3220 Tayshee Circle
Anchorage, Alaska 99504

My name is Kari Mason and I am writing this in support of proposal 62 - 5 AAC 92 029. Permit for possessing wild game. This will allow the release of sterilized, feral cats into the wild. Alaskan feral cats deserve to live, and this is the only humane and effective way of dealing with feral cat populations. I lost a wonderful cat a few years ago that was both an inside and outside cat, the feral population in the baxter bog area was killed and I believe he was part of the cats that were killed.

thank you.

Submitted By
katherine mcfarland
Submitted On
10/10/2017 11:57:08 AM
Affiliation

Do the right thing. The rescues work hard to save lives. Don’t stand in their way.

Submitted By
kathleen michael
Submitted On
10/10/2017 11:43:27 AM
Affiliation
Ms.

We need to do a better job at protecting our communities cats. They need to be treated as any domesticated animal. After all that is what they are. Many of them once belonged to someone and some how got separated from their family's one way or another. Let's do a better job caring for them!

Submitted By
Pamela Myers-Lewis
Submitted On
10/24/2017 12:50:54 PM
Affiliation

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Pibble1@hotmail.com
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Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return (TNVR) programs and improve the lives of feral cats in Alaska. TNVR has proven very successful where it's been implemented. Feral or "community" cats thrive in their natural environments. TNVR is a humane way to manage community cat populations and is advocated for by animal welfare organizations such as Ally Cat Allies.

Submitted By
Amanda Nace
Submitted On
10/24/2017 5:16:19 PM
Affiliation

I support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska. We must strive to be humane to all living beings, and if we cannot then we do not deserve it either.

Submitted By
Ana Maria Navidad
Submitted On
10/24/2017 12:27:51 PM
Affiliation
Mrs.

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676069673
Email
anamar_1975@hotmail.com
Address
barcelona
barcelona, Other 08185

Cats must be protected!!!

Submitted By
Mary O'Connor
Submitted On
10/27/2017 5:46:34 PM
Affiliation

~~My name is Mary O'Connor and I am writing in support of Proposal 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild.

I am a volunteer at Anchorage Animal Care and Control and I also volunteer with two groups that rescue cats and dogs from that facility. I have worked with cats that come to the shelter in traps, many are cats that owners have released outdoors and the owners never claim them after they are picked up and brought to the shelter. Ideally, these cats are evaluated and then adopted into loving homes where they are kept indoors. The rescue groups that I volunteer with also work to that goal. The other cats that come to the shelter in traps are feral, or community cats that are not socialized or comfortable around humans. The municipality currently pays staff from Anchorage Animal Care and Control to pick up cats, house them at the shelter, and then euthanize them.

In order to successfully and more humanely deal with free-living cats in the community, a plan with two main components is needed. The existing community cats need to be fixed so they do not continue to add to the population, and people need to be educated so they do not contribute to the community cat population. Both of these are possible with adoption of Proposal 62. I interact with several rescue organizations, including those that are interested and are capable of trapping, neutering, and returning (TNR) cats to the community where they live. The current system of catch and kill is not working. As nature abhors a vacuum, community cats and other unaltered pet cats that are allowed outdoors reproduce to create more cats that live outdoors. As cats are removed from the environment, they are replaced by more cats, and the cycle repeats itself. TNR and limiting the addition of new cats into the community is the only way to reduce the community cat population in the long term.

Currently TNR is illegal. Changing the Alaska Administrative Code 92.029 will permit communities to allow for TNR to take place. This change must be enacted in coordination with an educational component to teach people to keep their cats indoors. This is the easiest method of compliance with Anchorage Municipal Code Title 17, as most cats are not controlled by restriction to yards, restrained by harness and leash, nor controlled by voice command. This is the second critical piece that is required to successfully manage community cat populations. Neither rescue group that I volunteer with will adopt cats to people that will allow their cats outdoors. In talking to potential adopters, I find that many people living in the municipality of Anchorage have no idea that it is illegal to let their cats roam loose. The myths that cats "need" to be outdoors or that they can "take care of themselves" need to end. Anchorage Animal Care and Control and several of the legitimate rescue organizations are capable of developing and managing an educational campaign to educate the public about responsible cat ownership, the safety benefits, and the regulatory requirements to keep them indoors, or otherwise controlled. eeping cats indoors will reduce the number of calls to Anchorage Animal Care and Control, limit the number of owned cats that are picked up, and lighten the resulting workload.

Alaskans have been providing food and shelter for community cats and will continue to do so, whether it is legal or not. Proposal 62 will allow them to act in a kind and compassionate manner and get help in properly caring for these animals by altering and vaccinating them. Allowing the trapping of cats for TNR will inevitably result in owned cats being trapped. This will help reduce the numbers of pet cats living outdoors, as they can be brought to Animal Care and Control and claimed by their owners or adopted into homes. Providing this opportunity for our community members is the right thing to do and will enable them to be part of the solution in finding better lives for these cats.

Simply killing the cats is not humane and it does not work. As a community and a society, we are better than that. illing the cats does not make any of the risks associated with outdoor animals go away, it just makes the catch and kill cycle repeat itself more quickly. Humans have created community cats by not responsibly having their cats altered, and by allowing them to roam freely outdoors. This human-caused problem deserves a humane solution. The cycle needs to be broken and TNR along with education is the best option to treat animals humanely and effectively, and allow their numbers to decrease naturally over time.

Thank you.

Submitted By
Holly Odd
Submitted On
10/26/2017 5:18:42 PM
Affiliation

I urge the Board of Game to pass proposal #62;

In 98% of the studies done, the TNR (Trap neuter release) has been sucessful in contorlling feral cat populations. There are many arguments to this issue on both sides. My statement is simple. What would it hurt to release feral neutered cats back into the wild? They were in the wild to begin with, only now they will not reproduce. People will NOT live trap a cat to neuter it if it will be killed.

Thank you for your consideration on this proposal.

Holly Odd

Submitted By
joann Odd
Submitted On
10/24/2017 1:48:44 PM
Affiliation
Ms.

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9072624590
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joodd1@gmail.com
Address
P.O. Box 62
Clam Gulch, Alaska 99568

COMMENTS ON PROPOSAL 63

Please do not support Proposal 63.

Truth and facts do not support the argument in proposal 63.

Many national and international groups support the TNR program as a humane way to reduce feral cat populations. Currently the only method approved by the Dept. of Fish & Game, is to KILL feral cats.

Supporting Proposal 63 has not and will not end the problem. It also makes **lawbreakers** out of MANY Alaskans who do not agree with the slaughter of feral cats as a way to solve this problem. They will just 'go underground' and relocate cat communities. Does Fish & Game have the resources to try and stop people from TNR programs? Is that a good use of their resources?

The TNR program – AT LEAST – assures that a cat is checked out and vaccinated by a vet, and is neutered, so that they will not ever breed again. Logic should be enough, to see that this program will lessen the numbers of feral cats.

Opponents of proposal 62 cannot show ANY statistics that show it does not help solve the problems. Their only objective is to continue killing feral cats which they call “vermin”.

Proposal 63 states that feral cats carry Rabies and Toxoplasmosis, which could spread to native animals and fish. The opposite is closer to the facts. Nearly ALL animal and fish in Alaska ALREADY HAVE TOXOPLASMOSIS, even on remote Arctic areas where there ARE no domestic cats, and cats are not the primary carries of RABIES. Bats, foxes and canines are.

In addition, feral DOGS carry more than 18 diseases that can be spread to native species and humans, but there is no mandated effort to KILL feral dogs. Feral dogs routinely kill more than birds....they can take down baby moose as well as many other native species.... and dogs KILL MORE HUMANS in Alaska, than any other state, the victims are overwhelmingly … native CHILDREN.

Where is the Proposal to kill feral dogs?

Consider what could happen if TNR cats are killed as the current practice requires..In addition to the extra COSTS, which must be the responsibility of a government agency, requiring a building, staff and all other costs, and when or if someone has a **pet** caught and killed by that agency, a terrible PR issue will be incurred. The firestorm such legal action would cause, would be yet another unneeded expense.

Passing Proposal 62 would eliminate the problems. TNR operates on volunteers, who provide everything. No agency would have to fund

that program. There will also be a lot of time and money involved in determining how long captured cats must be held, and who will be responsible for catching and killing them.

Allegations that TNR programs do not work, are easily refuted. I cannot include here, all the success stories, but WILL include the most recent one ;

Baltimore Hearing Affirms Success of City Trap-Neuter-Return Program

September 27, 2017

In an overwhelming show of support for Baltimore's landmark Trap-Neuter-Return (TNR) program, city officials, residents, and advocates hailed its success at a hearing on Tuesday and recommended that it continue without changes or modifications. The Judiciary and Legislative Investigations Committee held the hearing to discuss Resolution 17-0042R, which required officials from the Health Department's Office .

"Sharon Miller, director of the city's Office of Animal Control, testified that TNR benefits residents and community cats. She was joined by Jennifer Brause, the executive director of the Baltimore Animal Rescue and Care Shelter (BARCS), which runs the TNR program, and its Community Cat Program Coordinator Grace Fellner.

Brause and Fellner presented statistics showing the positive impact of TNR since the program began a decade ago. "

If this cruel practice of KILLING CATS is allowed to continue, will the same fate next include feral DOGS?

Please avoid all the unnecessary expense and problems, **do not support Proposal 63.**

Submitted By
joann Odd
Submitted On
10/24/2017 2:14:53 PM
Affiliation
Ms.

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Clam Gulch, Alaska 99568

COMMENTS ON PROPOSAL #62

I urge the Board of Game to support and pass proposal 62.

Here are FACTS to support Proposal 62:

The TNR (Trap, Neuter and Release) program has been successful INTERNATIONALLY, as the most effective and humane method of reducing feral cat populations. This program stops the problem of 'what to do' about cats at shelters being killed in large numbers, and offers another solution.

Adding Proposal 62 to current game laws, also allows for **different locations in our huge state, to decide what works best, for them.** Conditions in the far north of Alaska differ greatly from Southeast, and the local residents should be allowed to take the actions their area wants and needs.

Realistically, there is really NO WAY to enforce the current regulation. If people do not comply, they simply go 'underground' and continue their project.

Does the State of Alaska and the Dept. of Fish & Game have the **time, money and resources**, to try and stop concerned Alaskans who practice TNR? Since this program has only positive results, why would anyone want it to be stopped? What is the penalty for releasing vaccinated, neutered cats back into their home?

Does the State of Alaska and the Dept. of Fish & Game want to be subjected to lengthy and expensive court cases such as with the ferret case which LOST in the Alaska courts.?

Or the Key Largo, Florida lawsuit which the Fish and Wildlife service LOST a similar case where they wanted to forbid the TNR program.

Opponents of Proposal 62 bring up once again, the **BOOGY-MAN of "RABIES"** when even in the Fish& & Game regulations, on rabies, do not even mention CATS.

Bats, foxes and DOGS present the most danger. I have been told by official sources, that there has not been a case of Rabies, IN ANY

CAT, in Alaska, for more than 30 years. The FACT is, cats are MORE LIKELY to **get** rabies from a native species, than to give it to them.

The same is true for the issue of Toxoplasmosis. The fact is, Toxoplasmosis is already present in most humans, animals and fish, and is such a non-issue that government records are not even kept regarding it. The PRIMARY way Toxoplasmosis is spread is in undercooked meat, working in the soil, and gardening. The vast majority of people who get it, in Alaska, is from lynx, caribou and wolves. Once you have it in your system, you are immune to it forever.

Official sources conclude that in Alaska, up to 60% of native people already HAVE toxoplasmosis, and domestic feral cats are NOT the carriers.

JOURNAL OF WILDLIFE DISEASES, VOL. 36, NO. 2,

APRIL 2000

"Domestic cats are uncommon in rural Alaska villages. In most areas of mainland Alaska, feral domestic cats do not survive outside of es- tablished communities. Therefore, domestic cats are not believed to represent a major source of exposure for wildlife."

Further research shows that bears, wolves and lynx are primary carriers...and please do NOT conclude that lynx might mate with feral cats. When lynx meets domestic cat the result is NOT reproduction – it's DINNER.

"Hunters and trappers should take special precautions when hunting or trapping lynx, as **lynx serve as the only known Alaska wildlife source of *Toxoplasma* oocysts.** There is a need for more public education, particularly among pregnant women in Arctic regions to alert people to the fact that **this is a food-borne disease, and is not always associated with cats.**

T. gondii have been detected in a wide variety of species, including lynx, black bears, grizzly bears, wolves and herbivores (23–25). Among marine mammals, antibodies have been detected in walrus, Steller sea lions, harbor, ringed, spotted and bearded seals (26).

Opponents of Proposal 62 have not based the Toxoplasmosis argument on facts, studies or truth. People, mammals and marine life ALL show the presence of taxoplasmosis, where there ARE no feral domestic cats.

Allegation that TNR programs do not work, are easily refuted. I cannot include here, all the success stories, but WILL include the most recent one ;

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September 27, 2017

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"Sharon Miller, director of the city's Office of Animal Control, testified that TNR benefits residents and community cats. She was joined by Jennifer Brause, the executive director of the Baltimore Animal Rescue and Care Shelter (BARCS), which runs the TNR program, and its Community Cat Program Coordinator Grace Fellner.

Brause and Fellner presented statistics showing the positive impact of TNR since the program began a decade ago. Among the data:

The FACT is, “community cat” colonies are maintained ENTIRELY by volunteers, at **NO COST** to any agency. They provide food and spaying fees as well, which results in the need for fewer native food sources.

Arguments have also been made, that cats eat a lot of birds. BIRDS ARE HARD TO CATCH.. So, MICE, RATS, VOLES, SHREWS and other small rodents provide most of their food.. Do we have a shortage of ANY of those?

Please adopt the small change that Proposal 62 has asked for, and let us see how effective this program can be in Alaska.

Just killing more cats has NOT been the answer.

Submitted By
Anne Ogden
Submitted On
10/11/2017 5:50:05 AM
Affiliation
None

Trap, spay, neuter, release is a humane, low cost solution to an on going problem created by people. Please seriously consider allowing this to become a reality in Alaska.

Submitted By
Dr Marius & Sylvia Panzarella
Submitted On
10/26/2017 2:49:58 PM
Affiliation
Self

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7022 Tanaina Dr
Anchorage, Alaska 99502

My name is Sylvia Panzarella and I also represent my husband, Marius Panzarella. This comment is being written in SUPPORT of permit for possessing live game. This proposal will allow release of sterilized feral cats into the wild. PROPOSAL 62-5AAC 92.09

I feel that we are all interested in the same outcome, having less feral cats in our community. However, the difference comes in the humanity in achieving this goal. These unfortunate companion animals are in this situation from no fault of their own. There are many trained TNR (trap neuter return) individuals who are waiting and ready to trap these kitties,vaccinate, and return the feral to where they were found, to live out an observed life. Many do not even know they are there and the decimation of wildlife is HIGHLY exaggerated if the truth is examined. Although we have lived in Alaska, Kodiak/Anchorage for over 18 years, I have first hand knowledge that "down South" , good Barn Cats are highly prized for for their mousing and vermin skills! That is FIRST HAND KNOWLEDGE, not something read out of a hand picked article. They help to prevent diseases from mice, etc. and also prevent mold from grain and foodstuff around horses, chickens and other barn animals. The same would be true for our local gardening community. Unless there is a HIGHLY individualized situation, I am not seeing a lack of songbirds unless there is a raging pack of SUPERCATS equivalent to the Superheroes in action movies rampaging the city! For goodness sake, we are not shooting down all the wild birds in a community when rumors of bird flu appears. We have also seen TNR successfully applied to a feral cat community in Ottawa, Ontario, Canada at their Federal Capitol Bldg. There were many international stories over the years of the large colony that was cared for until the last couple were recently homed. Please look this up online as there is no shortage of stories and videos. There was not a problem with attracting other wildlife with food as there were trained individuals who knew how much, what type, and when to place it. Ottawa is also in a very cold climate and some shelters were put in appropriate spots. TNR CAN WORK if given the chance. I have FAITH that the BOG will take the Humane route of dealing with this situation by supporting TNR. Thank you for your time, Sylvia & Marius Panzarella

Submitted By
SHERYL
Submitted On
10/10/2017 11:51:55 AM
Affiliation
NONE

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po box 60155
Fairbanks , Alaska 99706

TNVR IS A GREAT PROGRAM, DON'T PUNISH THE CATS FOR PREVIOUS OWNERS THAT ARE IDIOTS. A LOT OF US CARE FOR STRAY CATS PROVIDING FOOD, WATER AND SHELTER ALL YEAR LONG. LETS DO THIS!!!!!!!!! TNVR!!!!!!!!!!!!

Submitted By
SHERYL
Submitted On
10/24/2017 11:24:09 AM
Affiliation
NONE

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sheryl_post@yahoo.com
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po box 60155
Fairbanks , Alaska 99706

PLEASE SUPPORT AND IMPLEMENT THE T-N-V-R PROGRAM FOR FERAL CATS. THIS IS A GREAT PROGRAM AND WILL CONTROL THE POPULATIONS AND THEN IMPLEMENT AN EDUCATION PROGRAM FOR PEOPLE WHO ARE NOT TAKING CARE OF THEIR CATS AND LETTING THEM RUN AND BECOME FERAL. PEOPLE ARE THE PROBLEM HERE NOT THE CATS. LET'S DO THE RIGHT THING HERE.

THANK YOU

Submitted By
Jeanie Preuit
Submitted On
10/24/2017 6:53:59 PM
Affiliation

Phone
9073490076
Email
FlakeInnAK@aol.com
Address
8346 Bearberry St
Anchorge, Alaska 99502

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
Judy Price
Submitted On
10/15/2017 5:33:05 AM
Affiliation
Clear Creek Cat Rescue

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9079808898
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clearcreekkitties@gmail.com
Address
POBox 15231
Fritz Creek, Alaska 99603

I am requesting that the Board of Game approve Proposal 62 to allow colony cats to be released back to their homes ('the wild') after spay/neuter. This is the ONLY measure that will curb the burgeoning population of unwanted free-roaming cats. Killing our way out of this problem is not, and has never been, a viable solution and certainly not a humane one. Trap/neuter/return has worked in other parts of the country and has an excellent chance of being successful here.

As founder and Rescue Coordinator of Clear Creek Cat Rescue, I am fully aware of the homeless cat problem. We have been trapping feral cats for many years. They are spayed/neutered, vetted and rehomed to barn situations. This option for the wild cat population is only a half measure. The number of possible barn homes is not great enough to meet the needs of the feral population. And displacing colony cats to a different area without their family group often means that the cats have a tendency to wander off and become part of the homeless population once again.

One of the great advantages of allowing TNR is the attention that cat rescuers, and others, will put on helping ferals. As it is now, most rescue groups refuse to deal with feral colonies because of the limited options of what to do with them after rescue. This means that the cats get no help, but continue to breed, to contract illnesses and to create overpopulation nuisance situations because of their overcrowded destitute situation. What we have found is that the reality of most feral colonies is that a great number of the cats living in that situation are not feral at all. They are family cats that have been abandoned by people who moved away or kicked the cats out of the house or were too irresponsible to feed and care for them. These cats have ended up living in a feral colony for survival support. These dumped cats could be removed entirely from the streets and rehomed as beloved pets of families. Allowing TNR, besides helping these house cats get off the street, would give rescue groups the option of removing the kittens who have a chance of being socialized with people and adopted out to family homes while assuring that the mom cat is spayed. Removing these two groups--abandoned house cats and kittens--from feral colonies could immediately decrease the population by half. With the remaining cats spayed/neutered, that population will decrease over time rather than continuing to grow.

Last year Clear Creek Cat Rescue trapped a colony of 87 cats and kittens. After taking them into foster homes, having them vetted and evaluated by fosters, only about 20 of the cats were determined to be unsuited to living in a family home. Rescue operations like this could make a huge difference to the homeless cat problem. But most rescue groups will not even attempt to deal with such a group of ferals because of the difficulty of what to do with those unsociable cats who cannot be rehomed in the traditional way. If TNR was allowed, the barrier of returning spayed/neutered cats to their homes would be removed and rescue groups given more chance to make this kind of difference.

In attempting to save the wild areas from cats, the state has created a situation of perpetuating and increasing the problem tenfold by making help from those who will help illegal.

And it is clear that the areas where cats are now living and would be returned to are not 'wild' areas at all. Feral colonies are NOT situated in wilderness or lands uninhabited by humans. Feral cats are not hunting endangered species. They are living where their parents or grandparents were dumped by people in the middle of populated areas--rural subdivisions, trailer parks, city streets. Cat colonies are surviving where people have already completely altered the natural habitat and eliminated the ability of most native wild species to survive, particularly those who are so unstable as to be endangered. What these cats are surviving on is the refuse of humans and the non-native species of mice and rats that people have brought in. Blaming cats for ANY reduction in fragile wild species in Alaska is nothing more than a diversion from the true problem. Feral cat colonies follow in the wake of human's destruction of wild creatures' habitat; they do not create it.

I ask that the Board take a rational look at the problem and act accordingly. Allowing people to intervene in cat colonies to reduce the population through humane measures, rather than killing more and more cats without any hope of making a difference in the growing problem, is the ONLY reasonable and humane response.

Please vote to change the wording of Proposal 62 to allow the spaying and neutering of cat colonies.

Submitted By
R Rauber
Submitted On
10/26/2017 11:35:27 PM
Affiliation
Ms.

PRO / IN FAVOR of Trap-Neuter-Return program for CATS

Herewith I urge you to consider to put in action the proposed "Cat Program" for Trap/Neuter/Release.

Trap/Neuter/Release saves lives and is the only and humane solution. (Killing cats or ignoring the problem is not a solution, instead it is just the opposite.)

Many animal rights organizations have researched the issue and have in many communities implemented a TNR program. These programs are very successful.

For more info you may check out this website. It's a resource of information, studies and proven facts:
https://www.alleycat.org/resources/

Please take in consideration the following facts.

It's time to stop the killing.

Cities and shelters across America have experienced great success with Trap-Neuter-Return—it is now official policy for feral cats in Washington, DC, Baltimore, and Chicago and other cities across the country. It's time to learn from past mistakes and move forward instead of going around in circles—it's time to stop fighting the endless battle and protect cats' lives.
Trap-Neuter-Return is the responsible, humane method of care for feral cats
Trap-Neuter-Return stabilizes feral cat populations. The cats are humanely trapped, vaccinated, and neutered, so no more kittens will be born. They are then returned to their original location to live out their lives in their outdoor home. Not only is Trap-Neuter-Return the humane option for feral cats, it also improves cats' lives by relieving them of the stresses of mating and pregnancy. In the end, unlike catch and kill, TNR works.

The vacuum effect
Removing cats from an area by killing or relocating them is not only cruel—it's pointless. Animal control agencies and city governments have blindly perpetuated this futile approach for decades. But scientific research, years of failed attempts, and evidence from animal control personnel prove that catch and kill doesn't permanently clear an area of cats.
Scientific evidence indicates that removing feral cat populations only opens up the habitat to an influx of new cats, either from neighboring territories or born from survivors. Each time cats are removed, the population will rebound through a natural phenomenon known as the "vacuum effect," drawing the community into a costly, endless cycle of trapping and killing.
The vacuum effect is a phenomenon scientifically recognized worldwide, across all types of animal species
Well-documented among biologists, the vacuum effect describes what happens when even a portion of an animal population is permanently removed from its home range. Sooner or later, the empty habitat attracts other members of the species from neighboring areas, who move in to take advantage of the same resources that attracted the first group (like shelter and food). Killing or removing the original population does nothing to eliminate these resources; it only creates a "vacuum" that will inevitably draw in other animals living nearby.

Research shows majority of feral cats are healthy.

Feral cats are cats who are not socialized to humans. Instead, they live contented lives with their feline families (often called colonies) outdoors. Cats, like squirrels, chipmunks, and birds, are capable of living healthy, fulfilling lives in the outdoors.
One prominent animal rights organization falsely states that "horrific fates" await feral cats, like diseases, injuries, or human cruelty. But these claims are based on isolated incidents and not supported by scientific evidence.
In fact, the research points the other way—a 2006 study found that of 103,643 stray and feral cats examined in spay/neuter clinics in six states from 1993 to 2004, less than 1 percent of those cats needed to be euthanized due to debilitating conditions, trauma, or infectious diseases.
Feral cats live full, healthy lives outdoors—there is no reason for them to be killed in shelters.
Feral cats are not a health threat.
Feral cats have equally low rates of disease as the cats who share your home.
In 2008, only 294 cases of rabies were reported in cats, both pet and feral. That's just 4. 3 percent of all the rabies cases reported in animals that year. Feral cats do not pose a rabies risk to humans: there hasn't been a confirmed cat-to-human rabies transmission in more than 30 years. The number one source of rabies in the United States is wildlife—accounting for more than 90 percent of rabies cases in animals. Since feral cats involved in Trap-Neuter-Return programs are vaccinated and therefore cannot acquire or transmit the virus, they pose no threats to humans or other animals.

Most importantly, research confirms that feral cats are neither breeding grounds for disease nor a health threat to communities in which they live. After testing feral cats in Northern Florida for FIV, FeLV, and nine other infectious organisms, a 2002 study concluded that “feral cats assessed in this study posed no greater risk to human beings or other cats than pet cats.”
Feral cats are not a significant health threat to humans or other animals. They deserve to live out their lives just like other outdoor creatures do.
Feral cats live healthy lives outdoors. Trap-Neuter-Return IS THE SOLUTION !

Thank you so much for your consideration.
The compassion and humanity of those making the decision is greatly appreciated.

Sincerely,

R, Rauber

Submitted By
Rosemarie Ray
Submitted On
10/24/2017 2:34:35 PM
Affiliation

Phone
907690625
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karmarays3163@gmail.com
Address
205 W Birch
#3
Palmer , Alaska 99645

I support saving cats for all regions!

Submitted By
Delisa Renideo
Submitted On
10/24/2017 1:00:06 PM
Affiliation
Yes to Life

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5010 W. Lakeside Dr.
5010
Wasilla, Alaska 99623

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

This program will allow us to compassionately care for the cats who have no one to care for them, and help stem the tide of unrestricted population growth of these feral cats.

I appreciate your careful consideration and support of Proposal #62.

Thank you,

Delisa Renideo

Submitted By
Thomas Richards
Submitted On
10/27/2017 2:07:48 PM
Affiliation

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PO Box 2769
Palmer, Alaska 99645

Dear Sir or Madam,

I have read on the internet the following: **Thankfully, Proposal 62 will allow communities to implement TNVR programs to humanely and effectively manage feral cat populations in the state. The Alaska Board of Game is considering these rule changes—and you can help show your support.**

Proposal 62 is good if it will advance the cause of trapping, neutering and return outside cats to their home environment and will then stop breeding.

Thank you.

Thomas Richards

Submitted By
Kelli Riley
Submitted On
10/14/2017 2:12:12 PM
Affiliation

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rileyfamily85@yahoo.com
Address
Ok box 870829
Wasilla, Alaska 99687

My name is Kelli Riley and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild.

Submitted By
M F -Robison
Submitted On
10/26/2017 11:47:23 PM
Affiliation

PRO / IN FAVOR of Trap-Neuter-Return program for CATS

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they live. After testing feral cats in Northern Florida for FIV, FeLV, and nine other infectious organisms, a 2002 study concluded that “feral cats assessed in this study posed no greater risk to human beings or other cats than pet cats.”
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Feral cats live healthy lives outdoors. Trap-Neuter-Return IS THE SOLUTION !

Thank you so much for your consideration.
The compassion and humanity of those making the decision is greatly appreciated.

Sincerely,
M F-Robison

Submitted By
Carita Rosebeary
Submitted On
10/10/2017 1:19:47 PM
Affiliation

Alaska’s taxpayers deserve TNVR programs, which are animal-friendly, cost-effective, and reduce the burden and bureaucracy placed on the state’s animal shelters. The simple truth is that current methods of animal control relative to community cats are expensive, ineffective and oftentimes inhumane. The proposed rule changes would be better for the cats, for public health and for the wildlife we all want to protect.

ADF&G Boards Support
Brynn Parr
PO Box 115526
Juneau, AK 99811-5526

October 21, 2017

Dear Brynn,

I am writing this letter in support of changing Alaska Administrative Code number 5 AAC 92.029, Permit for Possessing Live Game to remove the regulatory barrier to implement Trap-Neuter-Return (TNR) programs to manage community cat populations.

I have been a Licensed Veterinary Technician since September 2000. I have worked in the veterinary field for a total of 23 years. During this time I have become very familiar with feral cat management strategies. While practicing in Washington State (1994-2014) I worked with Feral Cat Coalition of Oregon (FCCO) as a Technician at many of their community outreach clinics. We would routinely sterilize/ear tip/vaccinate 100-140 cats during an 8 hour shift. The feral cat's care takers were responsible for trapping the cats and bringing them to the clinics. They were also responsible for returning them to the same location once they recovered from surgery. In each community there is a dedicated group of individuals who care for these cats and work hard to trap and successfully prevent kittens in their colonies. I remember numerous times when the 3-5 hardest to trap cats, within a colony, were finally brought in and the colony was completely sterilized. It was a proud moment for everyone involved knowing these cats were no longer reproducing and would have a stable group.

Without these programs the cats will reproduce unchecked even with a trap and kill policy. The area in which these cats live is a suitable environment to support a feral cat colony and will continue to support them in spite of the efforts to remove the cats. Within a short time new cats will take their place. The funding used to trap and kill cats is a waste of tax dollars because it is chasing the issue without an end point. A TNR program would allow the sterilized cats to prevent other cats from taking their place and save tax dollars.

I have read multiple articles regarding feral cat's impact on native wildlife. A lot of the information is based on estimations and projections. One point that comes up often is that native species are impacted by human intervention just as much or more so than feral cats. The impact from feral cats will not change with a trap and kill policy because the cats are quickly replaced. However, having a stable group of cats within a given area will likely lessen the impact.

I have been a resident of Juneau, AK since July 2014 and have continued my work as a Veterinary Technician. I am disheartened that current State Code requires feral cats to be trapped and killed as the only form of population control. I have seen many successes when TNR is used to stabilize cat colonies. I fully support changing the current State Code to allow TNR programs in our community and state wide.

Sincerely,

Melissa M. Roulette, LVT

Submitted By
Isobel Roy
Submitted On
10/10/2017 3:10:44 PM
Affiliation

Please devote resources towards humane strategies as regards to community cat populations. Trapping, neutering and releasing is the correct path. Our ecology has greater threats than any one posed by community cats. Is it the reluctance to address deeper issues the reason for the folly? Let's be better.

Submitted By
Goldie Russell
Submitted On
10/18/2017 7:17:09 AM
Affiliation

My name is Goldie Russell and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild.

As a supporter of TNR, this will help cat communities in Alaska but ensuring the Cat populations will stabilize or even reduce in size. Public health is supported because the cats will receive rabies vaccinations that they wouldn't otherwise. As recent issues with cat colonies in the MatSu valley have shown the size will rapidly increase and illness is spread through out the colony because of lack of vet care and vaccinations.

Alaska's citizens deserve the opportunity to implement the only humane and effective approach to community cats. I fully support TNR because the cats provide a valuable service to the communities they live in. Please pass this proposal and give Alaskans the chance to help support the health and human control of the feral cat population.

Thank you.

Submitted By
Lynsey Ryan
Submitted On
10/13/2017 2:54:06 PM
Affiliation
109

Phone
9073159510
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pheonix1882@yahoo.com
Address
3577 w. Lynn
Wasilla, Alaska 99654

My name is Lynsey Ryan. I have been a foster/volunteer for Clear Creek Cat Rescue for 7 years. You have no idea how important passing thus proposal us to me and many others. Why? Because I have witnessed first hand the devastation these cat colonies are under. I have fought the war with then when a cat colony of 80 I was taking care of until we could get into foster homes was dying of distemper , not to mention their bellies full of worms. I watched kitten after kitten die in my arms, I have seen colonies of well over 70 eating their own dead. I could go on, and wish I could share photos with this comment. Please pass this proposal and let rescue groups like ours that believes all lives matter dave them from future death, devastation and more unwanted and abandoned life! Let us do what we do and help our community!!!

Submitted By
Tarissa Sardari
Submitted On
10/26/2017 2:57:36 PM
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4681 S Runabout Circle
Wasilla, Alaska 99623

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska. Thank you.

Submitted By
Katharine Savage
Submitted On
10/23/2017 11:25:50 AM
Affiliation

Phone
907-957-2230
Email
dock_savage@msn.com
Address
421 West 10th
Juneau, Alaska 99801

To Whom It May Concern:
I am writing this letter in support of Proposal #62, which allows the re-release of sterile, feral cats into the wild, and against Proposal #63, which prohibits the release of sterile, feral cats into the wild. These Proposals are further described in the Statewide Regulations document the Board of Game will tentatively discuss Nov 10 – 17, 2017 in Anchorage.
I have served rural Alaska for over 20 years as a veterinarian. With respect to feral cats, the following has been my experience:
• Some people release/abandon their unwanted cats with the justification that "they will be fine in the wild".
• Many of these animals will survive. While generally in suboptimal condition, they are able to forage in the wild. Food supplements are often provided by community "cat people".
• Over time, the abandoned animals become feral and create problems for the community. They reproduce, significantly impact local bird and small mammal populations, and may transmit disease to domestic cats, other wild animals, or zoonotic diseases to people, including rabies and toxoplasmosis.
How to address the problem? On the most pragmatic level:
1. A community may do nothing.
2. A community may choose to trap and euthanize. A decrease in the population with euthanasia also decreases the competition for food, which would likely increase the fitness of the remaining population. Euthanasia is also often met with public resistance.
3. A community may trap, neuter and release, which maintains the competition for resources, but lowers the reproductive potential of the population. It is important to recognize that a more accurate term for this process would be trap, neuter and "re-release". The true release of these animals occurs when the original owner abandons it in the wild. The animal is "re-released" following neutering, which does not include an introduction of disease. In actuality, with vaccinations as part of the process, disease transmission may be reduced.

I believe that the first two options either maintain the status quo or exacerbate the problem. It is only through trap, capture and re-release that the feral cat population will start to be addressed, with the understanding that prevention of the initial release and humane care for all animals is the ultimate goal.

Regards,
Katharine Savage DVM

Submitted By
Madeline Scholl
Submitted On
10/27/2017 12:40:32 PM
Affiliation

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madelineamber3@gmail.com
Address
1143 L St
Anchorage, Alaska 99501

Hello, my name is Madeline Scholl and I am writing this comment in support of PROPOSAL 62 - 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild. I am a supporter of local organizations who want to implement and manage community cats through a scientifically proven method of Trap-Neuter-Return (TNR). This method benefits public health and safety because community cats receive rabies vaccinations that they otherwise would not receive. TNR is a proven method for stabilizing and reducing the number of feral/community cat colonies. The State of Alaska should allow organizations with the dedicated board members and volunteers to implement the ONLY human and effective approach to managing community cat colonies.

Current municipal and state law prohibits the return of feral cats to their colony if they are captured and brought to an animal control facility. Feral cats have lived their lives outdoors, away from humans, and cannot be placed for adoption. The only option is to destroy the cat, thus creating a vacuum effect in that cat colony - other homeless cats move in, and/or the colony reproduces to replace those taken. This method is an endless cycle and does not address the root-cause of the problem.

By allowing for TNR programs to manage community cat colonies by sterilizing, vaccinating, and returning the cats to their colony, the population is controlled and gradually reduces in size as the cats live out the rest of their lives. Public health is also protected because the cats receive vaccinations and health care when they would otherwise go without. The current laws and regulations do nothing to protect public health with regard to feral cat colonies which, so long as irresponsible pet owners fail to sterilize and care for their cats, will ALWAYS exist - even if an entire colony is destroyed, MORE homeless/abanonded cats will move in. Without TNR, the cycle never ends. TNR is a SMART solution, and is the proven BEST solution for Alaskans.

Please feel free to contact me with any questions. Thank you for considering my comment on this issue.

-Madeline Scholl, Anchorage resident, concerned citizen.

Submitted By
Rebecca Sentner
Submitted On
10/24/2017 4:17:42 PM
Affiliation

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rebsentner@gmail.com
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4002 Taft Dr.
Anchorage, Alaska 99517

Please support Proposal #62 which will allow for Trap-Neuter-Vaccinate-Return (TNVR) programs in Alaska. This will help to control populations and improve the lives of feral cats in our state.

Thank you.

Submitted By
Zoe Seppi
Submitted On
10/13/2017 10:47:49 AM
Affiliation

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19074402525
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Seppi.zoe@gmail.com
Address
12337 Siver Spruce cir anchorage
Anchorage , Alaska 99516

My name is Zoe and I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild/ back into the habitat they were captured from

Submitted By
Molly Sherman
Submitted On
10/11/2017 7:20:07 AM
Affiliation
Pet Pride Cat Rescue

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907-687-8935
Email
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Address
3467 Shanly
Fairbanks, Alaska 99709

Good Day Game Board Members,

Please adopt Proposed rule 62 for Alaska's unwanted feline population. **Well managed** trap-neuter-vaccinate-return (TNVR) programs have proven to reduce suffering for feral and unwanted cats. It is not a perfect solution -- as long as companion animals are not required by law to spayed/neuter at a young age, as long a cat hoarders can have 100's of cats on their property without enforcement of animal cruelty regulations and as long as people feed feral cat populations indiscriminately there will always be an excess of unwanted cats who damaged wildlife populations and who suffer greatly. It is important to note that TNVR programs need to be managed by trained people in order to successfully and safely reduce unwanted cat colonies and increase health in wild cat populations.

Community support is essential in places that undertake TNVR programs. One respected, effective program is the Ally Cat Allies organization. They offer guidance and have experience: https://www.alleycat.org/community-cat-care/ongoing-health-care/

I am not an expert and have never worked for a TNVR program but with solid, knowledgeable management these programs they have reduced and even eliminated unwanted cats, reducing suffering and improving local wildlife habitat for people and animals. Thanks for listening.

Molly Sherman

Submitted By
janis skliar
Submitted On
10/27/2017 8:27:16 PM
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9073606675
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2939 captain cook estates circle
anchorage, Alaska 99517

We need TNR in AK. Neutering feral cats is the only way to control population expansion among these cats. This has been proven in multitudes of communities aound the world. Killing feral cats does not solve the cat population problem nor does it help in keeping cats from killing birds. Many people let their domesticated cats outside and those cats kill birds at least as much as feral cats do. I implore our state to adopt this practice.

Submitted By
Christina Spears
Submitted On
10/10/2017 1:03:50 PM
Affiliation

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PO Box 244665
Anchorage, Alaska 99524-4665

I whole-heartedly support Rule 62, TNVR, being put into place. There are do many feral and house cats on the loose in our neighborhoods. So many, even the house cats have not been spayed or neutered, which exacerbates the problem of loose cats. It is also a compassionate way to deal with these strays, as many would be euthanized under the current rule, as they would be unadoptable. Please make Rule 62 part of the solution! Thank you.

Christina Spears

Submitted By
Chayna Stewart
Submitted On
10/13/2017 12:20:59 PM
Affiliation

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Fairbanks, Alaska 31905

Please support the trap spay and neuter release program

Submitted By
Joyce Taylor
Submitted On
10/24/2017 1:45:39 PM
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Humane Society

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P.O. Box 886,
29425 Fool's Gold
Soldotna,, Alaska 99669

I believe we should trap, neuter, and release feral cats. This action, done in a humane manner, would benefit cats in Alaska and help insure better lives for them.

THE HUMANE SOCIETY
OF THE UNITED STATES

Celebrating Animals | Confronting Cruelty

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October 27, 2017

ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Dear Board of Game Members:

The Humane Society of the United States (HSUS), the nation's largest animal protection organization, works to protect both wildlife and cats. On behalf of our Alaska members and supporters, please accept these comments in support of Proposal 62 – 5 AAC 92.029. Permit for possessing live game and in opposition to Proposal 63 – 5 AAC 92.029. Permit for possessing live game. Both of these proposals concern the appropriate management of unowned feral and stray cats, commonly referred to as community cats.

We firmly believe that cat management should be designed to protect public safety, protect cats, and protect wildlife. The HSUS supports strategic, non-lethal management of community cats who already exist outdoors through sterilization and vaccination efforts, such as trap-neuter-return (TNR). The goal of TNR is to humanely reduce, and eventually eliminate, the number of community cats, as well as the nuisance behaviors, wildlife predation and public health concerns associated with them.

The effects of free-roaming cats on wildlife are well documented and are a cause of legitimate concern to us, as well as wildlife agencies and organizations. However, it is important to draw a distinction between such concerns and baseline conditions as they currently exist in Alaska. The presence of free-roaming cats, living alone and in aggregations (colonies) throughout the state (including natural habitat areas) and the existing effects of cats on the environment is the pre-existing condition that forms the baseline for this proposed rule-change. The question to consider here is not how Proposal 62 would impact the environment starting from a baseline of no cats on the landscape because that in no way matches the current state of affairs. Rather, starting from the reality of currently unmanaged cats, the decision here is whether to allow for humane and effective management programs or keep the status quo.

The intent of Proposal 62, and any TNR program in any location, is to positively impact the current state of affairs by sterilizing enough unowned cats to reduce the overall population, thereby reducing wildlife predation and public health risks. A 2003 study by Levy, et al., to evaluate the effect of a long-term trap-neuter-return program, with adoption whenever possible, on the dynamics of a free-roaming cat population concluded that, "A comprehensive long-term program of neutering followed by adoption or return to the resident colony can result in reduction of free-roaming cat populations in urban areas." Numerous other studies, as outlined in Proposal 62 and the related Appendix, support the claim that when conducted appropriately, non-lethal strategies can achieve the desired outcome.

In addition, lethal trap-and-remove efforts (as proposed in Proposal 63) are ineffective in curbing

populations, and will never achieve the desired results for a variety of reasons. Trap-and-euthanize is extremely costly and labor intensive, not to mention unpopular with the vast majority of American citizens. Cats are now America's number one companion animals and Americans want to see then treated humanely, regardless of the cats' temperament.

Lethal trap-and-remove efforts end up being a haphazard approach that addresses too few cats, often targets household pets, and has little impact on animal welfare, environmental, wildlife or public health issues. These efforts are also incredibly costly, in terms of both financial and human labor/mental welfare impacts. On the other hand, non-lethal strategies such as those put forth in Proposal 62 are widely favored by the public and are supported through volunteer activity and time, as well as financial donations.

We are also providing our publication, "Managing Community Cats: A Guide for Municipal Leaders," as well as a fact sheet on public health concerns to provide further information regarding the efficacy and benefits of non-lethal management for unowned cats. Thank you for considering our comments in support of Proposal 62 and in opposition to Proposal 63. We are available to answer any questions the Board may have regarding effective and humane cat management.

Respectfully,

Katie Lisnik
Director, Cat Protection and Policy

Heather Carpenter
Western Regional Director

PC405
3 of 47

Managing Community Cats

A Guide for Municipal Leaders

THE HUMANE SOCIETY OF THE UNITED STATES

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THE HUMANE SOCIETY
OF THE UNITED STATES

FOREWORD

Few animal-related issues facing local leaders are potentially more difficult and time-consuming than those involving un-owned cats in the community. Complaints or concerns regarding cats often represent a disproportionate share of animal-related calls to elected officials and local animal care and control agencies.

"Community cats" are typically un-owned or semi-owned cats, comprised of both strays (lost and abandoned former pets who may be suitable for home environments) and ferals (extremely fearful of people and not welcoming of human attention, making them unsuitable for home environments), who are the offspring of other feral or stray cats. Some community cats can be considered loosely owned, meaning that concerned residents feed them and may provide some form of shelter in their own homes or on their own property, but do not always identify the cats as their own personal pets.

This guide examines the role of community cats (sometimes called free-roaming cats) in cat overpopulation and the concerns shared by officials, animal care and control agencies, and constituents about these animals. It provides recommendations for strategies to manage community cat populations.

This guide can assist municipal leaders in evaluating the presence of cats in their communities and determining how to address these populations effectively.

WHY THIS GUIDE IS IN YOUR HANDS

Local officials and agencies are mandated to protect public health and safety by managing animal control issues such as zoonotic diseases, nuisance animals, and animals running at large. Agencies also commonly receive calls from constituents about community cats.

The issue of managing community cats can create unnecessary conflict. Dissent often arises among neighbors; between cat advocates and wildlife advocates; and among animal care and control leaders, local government leaders, and their constituents.

Often excluded from animal care and control budgets and mandates, community cats might not be managed by field officers who neither have the training to handle them nor a holding space to house them. Whether by choice or regulation, many animal care agencies deal with community cats only when there is a specific nuisance complaint about them or concern for their welfare.

In past decades, many local governments approached community cat populations using solutions like trap and remove, which usually involves killing the trapped cats. Those conventional approaches are now widely recognized as mostly ineffective and unable to address the larger community animal issue. New research (Hurley and Levy, 2013) reveals that this non-targeted, selective response to a population which is reproducing at high rates doesn't help to reduce cat populations and nuisances in our communities, improve cat welfare, further public health and safety, or mitigate the real impact of cats on wildlife.

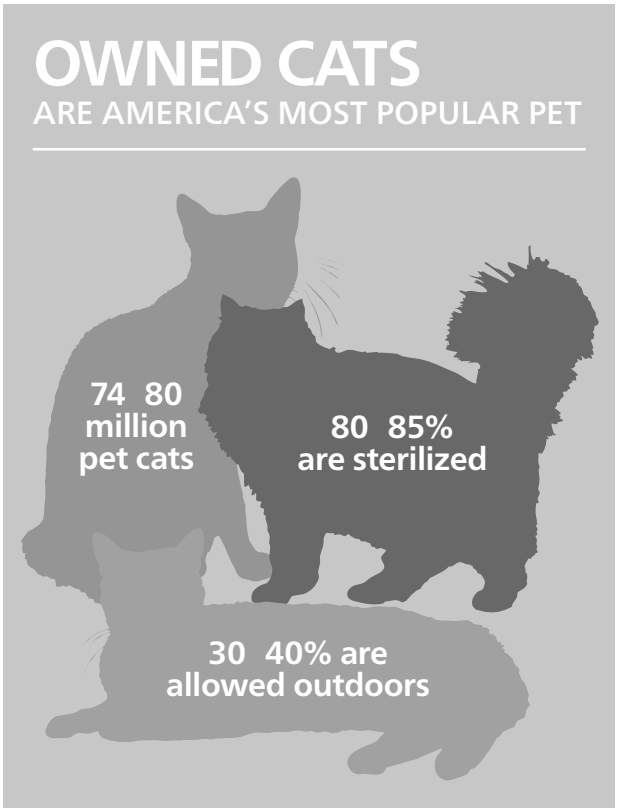
Instead, sterilization and vaccination programs, such as trap-neuter-return (TNR), are being implemented to manage cat populations in communities across the country. Well-managed TNR programs offer a humane and proven way to resolve conflicts, reduce population, and prevent disease outbreaks by including vaccinations against rabies and other potential diseases. This guide provides you with the tools and information you need to implement a well-planned and effective community cat management program.

> *"A well-managed TNR program will provide both cost control as well as long-term, community cat population control for a municipality. In Somerdale, we recognize this value and the positive impact it will have on our animal and residential population. We also recognize that this proactive approach is the most humane and effective means by which we can care for and manage our community cat population."*
>
> *—Gary J. Passanante, Mayor, Borough of Somerdale, NJ*

WHY ARE THERE SO MANY CATS?

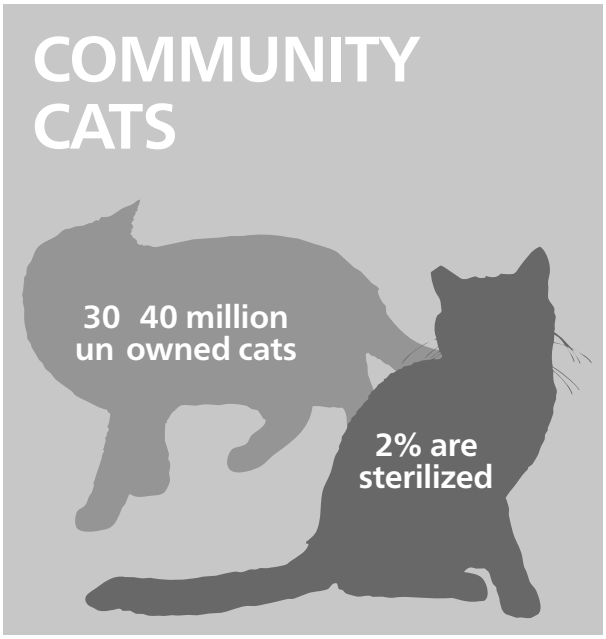
Owned Cats

Cats are the most popular pet in the United States according to the American Veterinary Medical Association's 2012 *U.S. Pet Ownership & Demographics Sourcebook* (AVMA 2012). Approximately 30% of households own cats, and overall owned cat numbers have been increasing as the number of households in the U.S. rises. The majority (approximately 85%) of owned cats have been spayed or neutered, but they may have had one or more litters—intended or accidental—before being sterilized. In under-served communities, rates of sterilization in owned cats tend to be much lower, with cost and transportation being the biggest barriers. Accessible spay/neuter services for cat owners are critical for the overall welfare and management of cats. Approximately 65% to 70% of owned cats are kept indoors at least at night, and this trend has been on the rise, up from approximately 20% in the 1970s (APPA 2012).



Un-Owned Cats

Unsterilized community cats (un-owned or semi-owned) contribute about 80% of the kittens born each year and are the most significant source of cat overpopulation (Levy & Crawford, 2004). Estimates vary greatly for the number of community cats in the United States, ranging all the way from 10 to 90 million (Loyd & DeVore, 2010). The limited evidence available indicates that the actual number may be in the 30–40 million range (Rowan, 2013). The real problem is that only about 2% of them are spayed or neutered (Wallace & Levy, 2006) and continue to reproduce generations of outdoor cats. For this reason, large-scale and targeted reproductive control of community cats is critical to reduce cat populations in your community.



> *"When cat populations are present, the choice is not between having cats or not having cats. The choice is between having a managed community cat population, or an unmanaged one."*
>
> *—Bryan Kortis, Program Manager, PetSmart Charities, Phoenix, AZ*

Community cat population numbers are greatly affected by the community in which they live. Human demographics, types of land usage, climate, presence of predators, and availability of resources all affect the cat population and determine how many cats can be supported in a given area. Population estimates vary greatly and provide only a loose number that can be further refined as program work takes place. Experts differ on recommended calculations, with a range of formulas from human population divided by six (Levy & Crawford, 2004), to human population divided by 15 (PetSmart Charities, 2013). For a mid-range estimate of the number of community cats in your area, divide your human population by 10. This estimate is exactly that—an estimate. Cold weather areas with freezing temperatures or locales with robust predator populations that limit survival may have fewer cats than estimated, while rural areas with lots of barns and farms may have more than estimated. Warm climates tend to support larger populations of cats. Densely populated areas with shelter and adequate food sources for outdoor cats may have very large concentrations or relatively few cats depending on the neighborhood's demographics.

MEET THE PLAYERS

Knowing the stakeholders in your community and working cooperatively with them leads to better outcomes and a more cohesive community cat management plan.

Most animal care and control agencies are operated by local governments, but some jurisdictions contract with nonprofit organizations to perform these important functions. Regardless, their primary role is to manage public health, safety, and disease concerns as well as complaints from community residents. These agencies are also expected to take care of and redeem lost pets, as well as re-home pets who no longer have homes. For people concerned with the welfare of outdoor cats or those who find them a nuisance, animal care and control agencies are often the first points of contact. Animal care and control agencies and public health departments need to be prepared to respond effectively to these complaints and proactively address community cat populations when possible.

One of the biggest challenges is maintaining adequate resources (i.e. budget). Few local governments find themselves swimming in the extra money needed to adequately fund a complete animal sheltering operation, including programs addressing community cats. This underscores the importance of volunteers and nonprofit organizations in the community who are willing to devote their resources to helping manage community

PUBLIC HEALTH DEPARTMENTS' APPROVAL OF TNR

New York City Department of Health and Mental Hygiene
nyc.gov/html/doh/html/environmental/animals-tnr

Lists local TNR groups on its website

New Jersey State Department of Health & Senior Services
state.nj.us/health/animalwelfare/stray

Lists TNR as an approach for managing community cats

Delaware Department of Health & Social Services, Division of Public Health
dhss.delaware.gov/dhss/dph/oaw/foundstraycats.html

Lists TNR as an approach for managing community cats

Baltimore City Health Department
neighborhoodcats.org/uploads/File/Resources/Ordinances/Baltimore_TNRRegs.pdf

Issues regulations for practicing TNR

"Collectively, our goal is to eliminate the free-roaming cat population and decrease the spread of rabies in our communities. The only approach that has proven effective is conducting large-scale, targeted sterilization and vaccination programs that result in healthier cats and healthier communities."

— Dr. Karyl Rattay, Delaware Division of Public Health Director, Wilmington, DE

cats. We strongly encourage municipalities to develop comprehensive volunteer programs and partnerships and agreements with other community organizations. It's also important that agencies evaluate their intake and outcomes regularly to ensure that current resource allocations are appropriate. For example, an agency with high euthanasia rates for cats may want to reconsider its intake policies and reallocate those resources spent housing cats for euthanasia on proactive cat management.

> *"The Vet PH SPIG encourages communities to discuss trap, neuter, vaccinate and return (TNVR) as a management practice to control community cats, and to adopt this practice where possible."*
>
> *—American Public Health Association–Veterinary Public Health Special Interest Group Policy*

Read about municipalities where animal care and control provides services to reduce community cat populations:

Pittsburgh, PA (*pittsburghpa.gov/animalcontrol/spay_neuter.htm*)
Elk Grove, CA (*elkgrovecity.org/animals/feral-cats.asp*)
Dallas, TX (*dallasanimalservices.org/trap_neuter_return.html*)
Sacramento County, CA (*animalcare.saccounty.net/spayneuter/pages/feralcatsandkittens.aspx*)
San Jose, CA (*sanjoseca.gov/index.aspx?nid=2382*)
Camden County, NJ (*ccasnj.org/spay_neuter_clinic/feral_cats.html*)

Private Animal Shelters and Humane Societies

Around three billion public and private dollars are spent each year operating animal shelters across the country (Rowan, 2012). The primary role of most private animal shelters is the housing and adoption of homeless cats and dogs, but shelters are often the receptacle for injured or sick wildlife and cats and dogs who might be considered unadoptable by some. Many community cats fall into this category.

These organizations play an important role in the community, often serving as a point of contact, and are widely recognized by the public for enforcing local and state humane laws and ordinances. They are often involved at a policy level, lobbying for animal protection laws and programs.

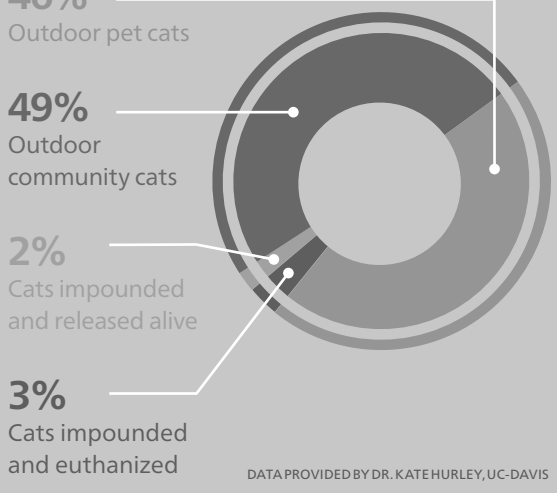
> *"After we implemented a shelter, neuter, return (Return to Field) program in 2010, it changed the way we do business and it has improved our ability to do more to help all animals. It convinced us that more was possible. Last year alone, there were 3,000 fewer cats and kittens in our shelter. As a result, the capacity and savings that we have enjoyed have allowed us to do more to help the cats in our care and it has even benefitted the dogs because those resources don't have to be spent on more cats."*
>
> *—Jon Cicirelli, Director, Animal Care and Services, San Jose, CA*

Approximately 6–8 million cats and dogs enter U.S. animal shelters annually, with approximately half being euthanized (HSUS, 2013). That number includes as many as 70 percent of cats who enter shelters (ASPCA, 2013). These cat-related intake and euthanasia activities cost more than a billion dollars annually (Rowan, 2012), while affecting only a tiny fraction of the total number of cats in a given community and doing nothing to manage overall cat populations. This haphazard approach has little impact on welfare, environmental, or public health issues. It stresses shelters, overwhelming their resources and far exceeding capacity, and it gives false expectations to citizens coming to these agencies for help resolving problems.

The pie chart from the state of California shows the estimated percentages of outdoor community cats (red) and owned cats (blue) who go outside, compared with the number of cats handled by the California sheltering system who are either euthanized or adopted out (green and purple combined) (CA Dept of Public Health, 2013). Clearly, the tiny sliver of cats handled by the

SHELTER AND COMMUNITY CAT DYNAMICS

CALIFORNIA 2010



DATA PROVIDED BY DR. KATE HURLEY, UC-DAVIS

RETURN TO FIELD

Some shelters care for feral colonies on their own property, either by themselves or in collaboration with local TNR groups. Others with high euthanasia rates for cats are embracing "Return to Field" programs as a way to reduce euthanasia while focusing energy and resources on spaying and neutering.

In the Return to Field program, healthy, un-owned cats are sterilized, eartipped, vaccinated, and put back where they were found. The rationale is that if the shelter has no resources, a healthy cat knows how to survive and should not be euthanized to prevent possible future suffering. Using resources for sterilization has a larger impact than focusing resources on intake and euthanasia.

California sheltering system pales in comparison to the total cat population, demonstrating that these hard-working agencies are still making little long-term impact. (Koret, 2013).

Animal Rescue Groups

These privately run organizations—usually, but not always, with nonprofit tax status—typically do not have a facility and are foster-based. Rescue groups are primarily focused on finding homes for animals in the community. Often, rescue groups and shelters have cooperative relationships in which shelters transfer animals to the care of rescue groups whose foster homes and volunteers help to stretch resources and increase opportunities for homeless animals. There are many rescue groups that specialize in cat rescue, including those that participate in TNR activities.

TNR Groups

Thousands of nonprofit organizations exist around the country for the primary purpose of assisting community cats. These organizations are often funded by private donations and operate on small budgets, but they work hard—often as unpaid volunteers—to trap, neuter, and return cats living outdoors. They may also be involved in local politics, lobbying for improved animal-related ordinances and funding. Some TNR groups also consider themselves rescue groups, and vice versa.

Wildlife Agencies and Conservation Groups—Public and Private

The federal government has not adopted or taken a specific position on TNR. Federal wildlife agencies, such as the U.S. Fish and Wildlife Service, oppose the management of TNR colonies in or near wildlife conservation areas, and individuals in federal agencies have adopted a variety of positions with regard to TNR programs. State wildlife agencies, such as departments of natural resources or fish and wildlife agencies, are funded through a variety of state and federal sources, such as taxes placed on all firearms and ammunition sold. These

state agencies have traditionally focused on the management of game (i.e. hunted) species, but increasingly are becoming involved in broader conservation agendas that include non-game and threatened and endangered species. They typically do not regulate or get involved with TNR programs outside of protected wildlife areas.

Private wildlife groups, such as the National Audubon Society or the World Wildlife Fund, are funded by donations and private grants and operate primarily to protect wildlife from harm and habitat degradation. These groups are often actively involved in lobbying for public policy changes that affect vulnerable wildlife species. Concern regarding outdoor cat predation on wildlife has become a hot topic in the conservation community, but all stakeholders (both cat and wildlife advocates) share the same end goal of reducing outdoor cat populations. See the Concerns about Wildlife section on page 22 for more details.

Veterinarians

Many veterinarians support the concept of TNR and may offer various forms of assistance, but they are also business owners who have a bottom line to meet. While many would like to offer discounted services or to expand their offerings for community cats, they still need to make a living.

The involvement of local veterinarians is a key component of any sterilization program. Communities and organizations need to understand the unique challenges of the veterinary community and to consult local veterinarians when drafting program plans. Sterilization capacity will be determined by how many surgeries your local veterinary partners can handle above and beyond their everyday business. Even if your agency hires a staff veterinarian, you should continue to work with other local veterinarians. They can be strong partners for your program, filling in when extra capacity is needed, helping with injured and ill cats, and providing other kinds of medical support.

"I am very proud to be a part of the profession that puts the "N" in TNR. Nationwide, increasing numbers of veterinary professionals are participating in this life-saving strategy. More and more veterinary practices treat free-roaming cats and the number of high-quality, high-volume spay/neuter clinics continues to grow. This is all in recognition of the fact that discontinuing the breeding cycle and then returning the cats to their original environment is the only scientifically proven effective and humane approach to stabilizing, and ultimately decreasing, free-roaming cat populations, as well as protecting potentially affected wildlife. The veterinary profession should be applauded for being such an integral part of the solution to a problem that has plagued our country for decades."

—Susan Krebsbach, DVM, Humane Society Veterinary Medical Association Veterinary Advisor, Oregon, WI

The Public

Most people care about cats and want to see

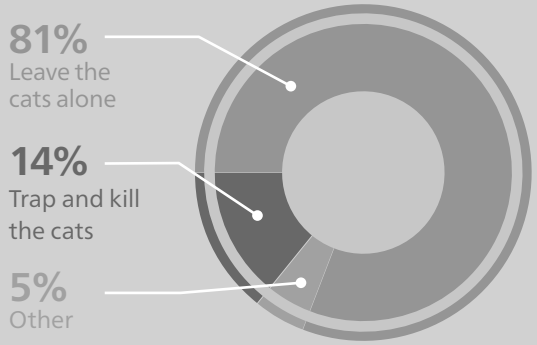
them treated humanely. Communities that embrace effective cat management programs will be rewarded with goodwill from their residents. Many communities are learning about what officials in San Jose, California experienced: that a public who readily understands and supports decisions made in the best interest of the cats turns out to be the best at reducing conflicts between cats and humans and cats and other animals.

Some residents might complain about cats in their backyard or cats adversely affecting their property. Many of these complaints can be resolved with information about humane deterrents and civil dialogue with neighbors, which agencies can help facilitate. Animal control officers can be an integral part of this approach, or if there are no resources to support this, other successful models include enlisting the aid of a local nonprofit to help mediate cat-related conflicts.

Large-scale sterilization programs depend on volunteer support. A significant portion of the public (approximately 10% to 12%) already feeds community cats (Levy & Crawford, 2004) and might be willing to help, especially when low-cost, high-quality sterilization programs are available. Non-lethal management programs will be readily supported by the majority in your community, while lethal control will not receive the same support and may actively be opposed by concerned residents. Policies designed to support and enable TNR activities are critical; those that place barriers to public engagement in TNR activities or threaten caretakers with penalties for their goodwill and volunteerism need to be amended or removed. Agencies that do not recognize the need to adopt non-lethal solutions often become the focal point of community criticism over high levels of cat euthanasia in the shelter.

WHAT WOULD YOU DO ABOUT

UN-OWNED CATS IN THE STREET?



An overwhelming majority of Americans believe that leaving a community cat outside to live out his life is more humane than having him caught and euthanized, according to a nationally representative survey conducted for Alley Cat Allies by Harris Interactive in April and May 2007.

U.S. PUBLIC OPINION ON HUMANE TREATMENT OF STRAY CATS
LAW AND POLICY BRIEF, ALLEY CAT ALLIES

SEVEN IN 10 PET OWNERS

say they believe animal shelters should be allowed to euthanize animals only when they are too sick to be treated or too aggressive to be adopted.

Only a quarter of the people who took part in a recent *AP-Petside.com* poll said animal shelters should sometimes be allowed to euthanize animals as a population control measure (*ap-gfkpoll.com/featured/ap-petside-com-latest-poll-findings*, conducted Oct. 13–17, 2011).

MANAGING COMMUNITY CAT POPULATIONS: WHAT DOESN'T WORK

Many conventional strategies have been used over the years to attempt to manage community cats. You might have tried them or have contemplated trying them, but here is why they don't work.

Trap and Remove or Relocate

Trap and remove may at first glance seem to be the logical approach to solving community cat problems. However, unless it is consistently performed with very high levels of resources and manpower and addresses over 50% of a targeted population, it doesn't offset the root of the problem: ongoing reproduction of un-trapped cats (Andersen et al, 2004). The resources (money, manpower, etc.) required to capture this many cats simply do not exist, either in the budgets and capacity of government

agencies or in terms of public support. Haphazard lethal control efforts only result in a temporary reduction in the cats' numbers, essentially putting a band-aid on the problem and further distance from real solutions.

Moreover, while some advocates of this approach claim that the cats just need to be removed and placed elsewhere, there is no "elsewhere." Relocating cats is a complex task that is usually unsuccessful and creates more problems than it resolves. The vast majority end up "relocated" to shelters that have no other recourse but to perform euthanasia. Euthanasia in shelters is typically performed to end the lives of ill, dangerous, or suffering animals in a humane manner. When euthanasia is performed on healthy but unsocialized cats, it can be characterized as unnecessary, calling into question whether their deaths are actually humane.

Opposition from many in the community who oppose killing cats and insufficient resources to achieve the level of removal/euthanasia necessary to actually achieve results can often prove to be insurmountable barriers to lethal control programs. Communities that use trap and euthanize strategies typically do not realize reductions in the number of cat complaints, and cat intake at local shelters stays constant or continues to rise. Therefore, the only result

of trap and remove/euthanize programs is turnover—new feline faces in the community, but not fewer.

Feeding Bans

The logic behind banning the feeding of outdoor cats is that if no one feeds them, they will go away. However, this doesn't work because cats are strongly bonded to their home territories and will not easily or quickly leave familiar surroundings to search for new food sources. Instead, they tend to move closer to homes and businesses as they grow hungrier, leading to more nuisance complaint calls, greater public concern for the cats' welfare, and underground feeding by residents. People who feed cats will ignore the ban, even at great personal risk, and enforcement is extremely difficult, resource intensive, and unpopular.

"As a nation, we have over 50 years of witnessing the ineffectiveness of trap and kill programs and their inability to reduce community cat numbers. It's time we try the only method documented to work—TNR."

—Miguel Abi-hassan, Executive Director, Halifax Humane Society, Daytona Beach, FL

Licensing Laws, Leash Laws, and Pet Limits

Laws intended to regulate pet cats and their owners don't work to reduce community cat populations, because community cats do not have "owners" in the traditional sense.

"Bans on feeding feral cats do nothing to manage their numbers. Bans force feral cats to forage though trashcans and kill wildlife, such as birds, squirrels, and rabbits. Establishing feeding stations ensures a healthier colony and allows a human being to interact with the colony and provide care for any cat that is under stress or who needs medical attention. Feeding stations also bring feral cats to a central location and help establish a trust, making trapping [for sterilization] an easier task."

—Wayne H. Thomas, Councilman, Hampstead, MD

Instead, they're cared for by volunteer resident caretakers who happen upon them. These caretakers should not be penalized for their goodwill; they are essentially supplementing the community's cat management protocols with their time and resources. Rather, laws should be designed to incentivize people in the community to care for these cats and to protect those who do so.

Caretakers don't choose how many cats there are, so pet limits are of little use. Because these cats are not owned, caretakers don't control the cats' movements, so leash laws are equally ineffective. Requiring community cats to be licensed by caretakers is a bad idea from an enforcement and compliance standpoint, and forcing caretakers to register colony locations often causes people concerned for the cats' welfare to go underground and off the municipal radar screen. Additionally, cat-licensing projects rarely pay for themselves and further drain already limited resources. Policies that impose penalties on caretakers are barriers to sound community cat management. However, proactive, non-lethal control programs can enlist the support of caretakers by gaining their trust, and they can in turn provide data on the cats people care for.

Relocation and Sanctuaries

Some individuals or organizations may call for un-owned cats to be relocated or placed in sanctuaries. While this may seem like a humane alternative to lethal control, it is unrealistic due to the sheer numbers of cats in communities. Relocation is time-consuming and usually unsuccessful. Cats are strongly bonded to their home areas and may try to return to their outdoor homes. In addition, if the food and shelter that initially attracted the cats cannot be removed, other unsterilized cats will move in to take advantage of the available resources.

Some shelters and rescues have implemented successful barn cat programs, where unsocialized cats can be relocated to barns and farms to provide rodent control. But these programs require management and are by their nature limited. They can't address the large number of un-owned cats in the community.

Sanctuaries might be available in some areas, but those that provide quality care for animals quickly fill to capacity and are too expensive to maintain for large numbers of un-owned cats. Cat populations vastly out-scale availability at sanctuaries, making them an unrealistic option in most cases. Many unfortunate examples exist of sanctuaries that grew too large and resulted in neglect and cruelty. Moreover, these organizations cause an additional burden on communities, requiring law enforcement intervention and resulting in a large group of cats again needing to be removed and relocated. If you are able to secure a spot in a sanctuary, always visit it in person before sending the cat there, to ensure that all animals receive proper and humane care.

> *"While licensing a cat (like dogs) seems responsible, the unintended consequences of it are damaging. Licensing owned cats does not take care of feral cats that are not owned by anyone."*
>
> *—Councilman Rod Redcay, VP*
> *Denver Borough Council, PA*

MANAGING COMMUNITY CAT POPULATIONS: WHAT DOES WORK

Properly managed sterilization-vaccination programs do not create cat overpopulation—the cats are already there. Your choice is between proactive, effective management of an existing problem or continuing to react in crisis mode to an unmanaged problem. Well-designed and implemented community cat programs reduce the numbers of unsterilized and unvaccinated cats, are in line with public opinion and can mobilize an army of compassionate, dedicated people to take action for cats, wildlife, and their communities. To be most effective, these programs must be adopted by more communities and supported by more animal care and control agencies and municipal officials. The HSUS strongly recommends proactive, effective community cat management programs (including TNR and other sterilization programs), legislation that allows for and supports them, and coalition-based approaches that involve community leaders, citizens, and stakeholders.

Solving community cat problems requires many strategies, including:

TNR

Trap-Neuter-Return and its variants are non-lethal strategies intended to reduce the numbers of community cats, improve the health and safety of cats, and reduce impacts on wildlife. At minimum, TNRed community cats are spayed or neutered so they can no longer reproduce, vaccinated against rabies, marked to identify them as sterilized (the universally recognized sign of a sterilized cat is an ear-tip, a surgical removal of the top quarter inch of the of the cat's ear, typically the left), and returned to their home territory.

Community-wide TNR programs are effective because they:

- Halt reproduction of existing cats through sterilization, leading to long-term management, reduction and eventual elimination of outdoor cat populations
- Vaccinate cats against rabies (and other diseases, depending on available resources), addressing public health and safety risks
- Decrease nuisance complaints by eliminating or dramatically reducing noise from cat fighting and mating and odor from unneutered male cats spraying urine to mark their territory
- Ease the burden on community resources such as animal shelters flooded with cats and their offspring
- Bring new financial resources and volunteer workforces into the community
- May in some instances create an immediate reduction in cats due to:
    - Kittens young enough to be socialized can be routed into adoption channels, depending on available shelter or rescue resources
    - Friendly adult cats being evaluated for potential reunification with lost owners, transition into home of caretakers, or rehoming through rescue and shelter channels depending on situation and resources and the input of caretakers and feeders bonded with the cats
    - Both of these options are recommended only if a live outcome for the cats is likely. If that is not the case we recommend sterilization, vaccination, and return to territory for all cats.
- Can improve community and neighborhood

relations and lead to new collaborations

- Allow private nonprofit organizations that help community cats and volunteers to mediate conflicts between the cats and residents of surrounding communities
- Maintain the health of colony cats (cats living together in a given territory) and allow caretakers to trap new cats who join the colony for TNR or other live-outcome options

Targeting Efforts

TNR and sterilization efforts are constantly evolving and improving. Through better data collection on cat intake, complaint calls, and euthanasia, and with the advent of GIS software, we are now able to target and focus resources on areas where projects can have the biggest impact. Many projects have had success focusing their funding and efforts within certain zip codes, neighborhoods, or specific locations, such as apartment complexes.

Through an assessment of the data for a given community, geographical "hotspots" become visible. By targeting the appropriate amount of resources—including trappers, surgeries, and marketing—to fully address that target zone, programs can effectively stop the reproduction and get a handle on that population set before moving on to the next target area. This approach has a much faster and more visible impact on cat populations than a scattered, random approach centered on complaint calls across a wide geographical area. Targeted efforts allow you to reach a high enough rate of sterilization (ideally as close to 100% as possible) to quell population growth. Assessing your community, mapping cat hot spots, and targeting your approach can also help reduce impacts on wildlife by identifying sensitive and vulnerable wildlife areas and focusing efforts in those areas.

> *"One of the most important recent advances in TNR is the strategy of targeting. By focusing resources like surgeries, outreach, and trappers on areas with high concentrations of free-roaming cats, populations can be reduced faster and more efficiently, resulting in lower intake and euthanasia at shelters as well as fewer complaints."*
>
> *—Bryan Kortis, Program Manager, PetSmart Charities, Phoenix, AZ*

Animal Control/ Shelter Innovations

In their efforts to combat cat overpopulation, the majority of municipal agencies and private organizations are spaying and neutering animals before they are adopted, providing subsidized spay/neuter for pet owners with low incomes, and supporting community cat caretakers with low-cost spay/neuter services, training, equipment and increased legal protections. Programs like these can also attract private funding and grants and engender public goodwill. Most citizens want to do the right thing for their cats, but barriers such as cost or transportation exist in communities across the country. In order to truly address cat overpopulation, these barriers need to be removed for all members of our communities.

"Veterinary students at the University of Florida have been performing TNR in the Gainesville area since 1998. Since Operation Catnip started focusing on litter prevention in community cats, the euthanasia rate for cats at our local shelter has plummeted from more than 4,000 in 1998 to less than 400 in 2012. Residents were wary at first, but 40,000 cats later, it's well-recognized that the program to sterilize, vaccinate, and treat parasites in free-roaming cats has made our community better for people and for cats."

—Julie Levy, DVM, PhD, Diplomate ACVIM, Director, Maddie's® Shelter Medicine Program at the University of Florida Gainesville

Services for Pet Owners

Services for pet owners in the community must be accessible to all residents. They should include preventative and wellness care, such as vaccinations, tips for finding pet-friendly rental housing, and information on keeping pets in their homes by resolving unwanted behaviors and managing allergies. It's important to promote keeping cats indoors and using collars, visible identification, and possibly microchipping for pet cats so that those who do go missing can be reunited with their families. It's also important to let community members know that shelters and rescue groups provide adopters with resources when they face problems with their cats. Shelters and rescues can provide behavior assistance and potentially medical assistance when cats face severe injury or disease.

Collaboration

Each community is different. There is no one-size-fits-all solution for managing community cats. Stakeholders must work together to create programs that address specific needs and maximize their community's available resources. By working together, municipal agencies, shelters, veterinarians, and cat rescue groups can humanely reduce community cat populations while protecting the public, cats, and wildlife. The returns are plentiful: fewer free-roaming cats; lower cat intake and euthanasia; municipal cost savings; greater volunteer participation; more adoptions; better use of limited shelter, animal control, and public health resources; increased good-will towards shelters; and more lives saved.

"One of the new programs we created was our TNR program, the Apartment Cat Team (ACT). Our data showed us that apartment complexes and mobile home parks were "ground zero" for abandoned cats, feral cats, and litters of unwanted kittens. The ACT program focuses on teaching and empowering apartment residents and managers in the benefits of TNR, spay-neuter, rabies vaccination, and microchips. In addition, we are recruiting kitten foster homes and rescuing kittens out of feral life, socializing them, and adopting them into new homes. The ACT program is a vital program that is contributing to a reduction in euthanasia—along with other innovative programs we have recently put into place to save cats and kittens. The ACT program gives us a chance to try a different approach that is not only more humane, but that also builds rapport between manager and tenant. The result is a public better educated about humane treatment of animals."

—Mike Oswald, Director, Multnomah County Animal Services, Troutdale, OR

ADDRESSING CONCERNS ABOUT COMMUNITY CATS

Concern

The cost to the municipality

Long-term solutions like TNR may sound expensive, but they usually end up costing less than repeated cycles of trap-house-euthanize. TNR is a long-term investment in a community. The cost of TNR is often covered out-of-pocket by individuals who care about community cats and by nonprofit organizations. But animal care and control agencies and nonprofit organizations with self-funded TNR programs have often found the cost of TNR less expensive than admitting, holding, euthanizing, and disposing of healthy cats. The money saved can be put towards more TNR. There are also many grant opportunities available for targeted TNR programs that can offset budgets and improve efforts.

Concern

By allowing TNR, the municipality may be liable for any future conflicts with cats

A municipality would be liable for an injury or damage only if it committed an act of negligence. Implementing or permitting a TNR program to reduce the community cat population and resolve nuisance complaints is reasonable government behavior, not negligent conduct. In addition, liability for harm caused by animals typically stems from ownership—but no one "owns" a community cat just as no one "owns" a squirrel who might cause damage.

Even if a person is bitten or scratched, a TNRed cat likely would have been vaccinated against rabies. Rabies prophylaxis treatment will likely still be advisable, but the real risk of rabies is reduced. Consider an alternate situation, where a person is bitten and sues the municipality because officials turned down a TNR program that would have dealt with an overpopulation issue and vaccinated cats against the disease. At least 34 states require rabies vaccination for cats, and efforts should be made to revaccinate cats when possible (AVMA, 2013).

Concern

Community cats transmit diseases

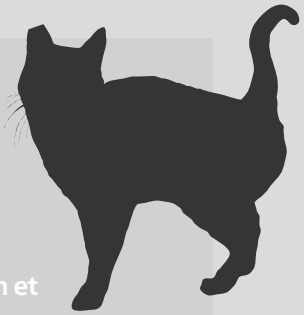
Many animals, both wild and domestic, can pass diseases to people. Rabies is a disease of significant concern, and focusing on prevention is the best medicine. Vaccination against rabies should be a standard protocol for TNR practitioners.

According to the Centers for Disease Control and Prevention (CDC, 2013), over the last 100 years, rabies in the United States has changed dramatically. The number of rabies-related human deaths in the United States has declined from more than 100 annually at the turn of the century to one or two per year in the 1990s (CDC, 2013). In the United States, human fatalities associated with rabies occur in people who fail to seek medical assistance, usually because they were unaware of their exposure. Modern day prophylaxis has proven nearly 100% successful (CDC, 2013). The CDC also reports that the number of reported cases of rabies is decreasing in both wild and domestic animals. In 2010, wild animals accounted for 92% of reported cases of rabies (CDC, 2013). The World Health Organization hasn't recommended removing dogs to control rabies since 1983 because vaccine programs have been more successful (WHO, 1984).

Although the majority of rabies cases occur in wildlife, domestic animals are the source of the majority of human cases that require post-exposure treatment because people are more likely to handle unknown dogs and cats than wildlife. Most rabies cases in cats occur in areas with large raccoon populations, like the Northeast.

Vaccinating community cats against rabies as part of a TNR program should be supported as a preventative measure against the potential spread of the disease. Some public health officials have concerns about revaccinating community cats when vaccines expire. Because the lifespan of community cats is typically much shorter than that of pet cats, a vaccine with three-year immunity may provide protection for the life of many community cats. It's clearly better than no vaccine at all. Well-managed programs should attempt to re-trap cats for further vaccinations. These programs also have the benefit of potentially reducing cat roaming. They can manage feeding so that fewer people come into contact with the cats. In this way, while the risk of rabies transmission from cats may not be entirely eliminated, it can be significantly reduced.

There has not been a proven case of cat to human trans mitted rabies in four decades, and the more vaccinations administered through TNR programs, the more likely this trend is to continue. (Anderson et al, 1974; Roebling et al, 2014)



Sterilized cats are typically healthier overall (Scott et al., 2002) and have greater immunity against a host of other diseases and parasites (Fischer, et al., 2007). Sterilized cats are also less likely to transmit feline diseases that are largely spread through mating behavior and mating-related fighting (Finkler, et al., 2011). People who feed community cats should use feeding strategies that do not attract wildlife (e.g. not leaving food out overnight), as should people who feed their pet cats outdoors. Not all states have mandatory rabies vaccination laws for cats, so it is important to determine whether your state does (or should). You should offer low-cost vaccination options for low-income cat owners. Refer to the appendix for additional public health information and documents about rabies and other diseases.

Concern

Cats will continue to be a nuisance to residents

With TNR, nuisance behaviors can be drastically reduced or eliminated. Neutered cats typically don't yowl late at night or fight over mates (Finkler et al., 2011), so noise is greatly reduced. The odor from male urine spray is mostly eliminated because testosterone is no longer present, and spraying to mark territory may stop entirely. Altered cats, no longer in search of mates, may roam much less frequently (Scott et al., 2002) and become less visible. Because they can no longer reproduce, over time there will be fewer cats, which in itself will result in fewer nuisance behaviors, complaint calls, and a reduced impact on wildlife.

To prevent community cats from entering areas where they're unwanted, such as yards or gardens, residents can try blocking access to shelter areas and securing garbage containers. If these solutions don't work, many humane cat-deterrent products are available in stores and online. Check the appendix for a list of simple solutions to common complaints.

Remember that many cat nuisance cases are the result of neighbor disputes. Facilitating dialogue and mutually agreed-upon resolutions in those cases is often a much more effective outcome than removing the cat(s) in question.

Concern

TNR is illegal in our community

Some existing ordinances may have components that pose barriers to practicing TNR. Ordinances are typically written for pet cats, so it's important to review local and state laws to know where amendments are needed to allow your community to implement TNR. For example, laws might ban feeding animals outdoors, limit the number of cats that can be owned (with "owners" defined in a way that includes colony caretakers), prohibit returning cats to the community under abandonment language, prohibit cats from roaming freely, or require that all cats be licensed. In order for an effective TNR program to thrive, your community should amend these provisions to exempt managed community cats and their caretakers or enact an ordinance that explicitly legalizes TNR. Our website and the appendix include examples.

Even when conflicting regulations don't exist, some municipalities may still choose to enact an ordinance authorizing TNR and defining the roles and duties of all parties. Or a community might prefer, as a matter of local culture, to allow TNR informally. In such cases, a TNR ordinance might be unnecessary and actually hinder the functioning and growth of an already successful program.

The goal of a TNR ordinance is a successful sterilization program. Your program will succeed only if your community encourages participation and full engagement by caretakers and removes overly burdensome requirements and restrictions that discourage their involvement.

"Carroll County has a law that is in effect in Hampstead, which states that if you care for an animal for more than three days, the animal is considered yours. Therefore, anyone caring for feral cats for more than three days would be considered their owner and if it were more than three cats, that person would be in violation of the Hampstead limit of three cats.

The code change I proposed and got passed exempted persons participating in a TNR program with continued care of feral cats from the limit of three cats. This allowed citizens to participate in the TNR programs and management of feral cat populations."

—Wayne H. Thomas, Councilman, Hampstead, MD

Concern

Welfare of cats

The idea that community cats are at great risk for suffering and untimely death if not admitted to a shelter is a long-standing one. However, a growing body of evidence suggests that this is not the case. Data from clinics that sterilized more than 100,000 cats nationwide revealed that they are generally fit and healthy, with less than one percent requiring euthanasia to end suffering (Wallace & Levy, 2006). Common feline diseases, such as feline immunodeficiency virus (FIV) or feline leukemia virus (FeLV), occur at the same rate as in the pet cat population (Lee et al., 2002). Our article "*Keeping Feral Cats Healthy*" (*animalsheltering.org/resources/magazine/sep_oct_2008/keeping_feral_cats_healthy.html*) offers more details.

Concern

Welfare of wildlife

There are no easy answers to the issue of cat predation on wildlife. What to do about it has been a concern for more than 100 years. However, neither cats nor wild animals are well served by a polarized, divisive, and expensive "cats vs. wildlife" controversy. Practical solutions include humanely reducing cat populations using TNR and managing cats (individuals and colonies) so they do not impinge on designated wildlife areas and at-risk wildlife populations. Not all cat colony situations are the same. For example, cats may need to be removed when they congregate in or near a sensitive wildlife habitat, whereas they could be effectively managed behind a shopping center in a suburban town.

When predation by community cats is an issue, respectful dialogue and productive collaboration between cat and wildlife advocates is essential. There are several examples of such dialogue (e.g. in Portland, Oregon, and New Jersey) that communities might seek to follow. It is not always easy to arrive at a solution that protects all interests to the greatest extent. Effective TNR programs seek to reduce the population of community cats, eventually bringing it to zero. Although TNR might not work as quickly as some would like, there are numerous successful examples of population reduction.

Wildlife and cat advocates can also help protect wildlife by joining forces in non-controversial collaborative projects such as informing cat owners about keeping owned cats indoors, seeking support and funds for installing cat-proof fences around sensitive natural areas, humanely relocating cat colonies that pose unacceptable risks to wildlife, and, of course, continuing community cooperation to improve the efficiency and economy of TNR programs.

FINDING FUNDING

Adequate funding is critical to a successful TNR program. When all stakeholders are engaged in targeted efforts to reduce cat populations they'll likely offer resources to help the program succeed. Municipalities that operate TNR programs through their agency or a contracting agency should include funding for these activities in the budget, but financial assistance and grant opportunities can offset budgets and help stretch dollars. A successful community TNR program can also generate savings through lower intake and euthanasia—funds that can help the program continue running.

If an incorporated nonprofit animal welfare organization runs the TNR program, it can raise funds through direct mail, grants, and special events. Many grant-making organizations exist; some provide grants to government agencies, whereas others focus their efforts on nonprofit organizations. Many states have local or statewide community foundations that may support a program that encompasses law enforcement, public health, animal welfare, and wildlife conservation. Grant-makers are very interested in collaborations between private organizations and municipal agencies—an additional incentive to partnerships between those stakeholders.

For a list of grant-making agencies to get you started, please check out our list in the appendix. You can find information on necessary supplies, vaccines, etc. that require funding in the *Neighborhood Cats Handbook* (*neighborhoodcats.org/uploads/File/Resources/NC TNR Handbook_WEB_v5-4.pdf*).

FINAL THOUGHTS

Properly managed TNR programs do not create cat overpopulation—the cats are already there. Your community must choose between progress or an unmanaged, ever-growing problem. Well-designed and well-implemented programs that focus on non-lethal control and involve all community stakeholders are in line with public opinion. They can mobilize an army of compassionate, dedicated people who care about the cats, wildlife, and their communities.

By working together, municipal agencies, shelters, veterinarians, and cat rescue groups can humanely reduce community cat populations while protecting the public, cats, and wildlife. The returns are plentiful: fewer community cats; lower cat intake and euthanasia in shelters; municipal cost savings; greater volunteer participation; more adoptions; better use of limited shelter, animal control, and public health resources; increased goodwill towards shelters; and more lives saved.

Doing nothing or repeating failed approaches is no longer an option. Proactive, effective approaches exist and need to be fully embraced and implemented in a majority of our communities if we're going to have a lasting impact. Please join us in making our communities safer for all.

"Trap, neuter and return works. It is a humane solution and we are thrilled that in such a short time the TNR program is showing significant results in Fairfax County. With the help of citizen trappers, we are able to spay or neuter these cats before they contribute to our community's homeless cat population. TNR is saving lives in Fairfax County."

—Dr. Karen Diviney, Former Director, Fairfax County Animal Shelter, Fairfax, VA

SELECTED SCIENCE ON COMMUNITY CATS

In the ongoing and polarized dialogue concerning the role of non-lethal management, including trap-neuter-return (TNR), in managing community cats, reference is often made to studies that demonstrate that this approach does not work. This selected bibliography points to studies that, among others not summarized here, comprise a body of work that shows TNR as a valuable tool in managing cat populations at the local level. Clearly, additional research would help us determine how non-lethal strategies can be best maximized as a tool for controlling cat populations, but we believe that the argument that it is indeed possible is past us now and that it is time to move forward with improving and perfecting this approach.

– Dr. John Hadidian, Senior Scientist, Wildlife Protection, The Humane Society of the United States

TNR Reduces Cat Numbers

An 85% reduction in population over 11 years
Before implementing a TNR program on the University of Central Florida campus, periodic trap and removal efforts tried to keep the population at bay when it increased to nuisance levels. This 11-year study followed a population of 155 free-roaming campus cats from 1991, when the TNR program began, to 2002. No kittens were observed on site after 1995. Additional stray or abandoned cats arrived, but they were neutered and adopted before they could reproduce. The campus cat population decreased by 85% to 23 cats in 2002, demonstrating that a long-term program of neutering plus adoption or a return to the resident colony can reduce free-roaming cat populations in urban areas (Levy et al., 2003).

TNR can control feral cat populations
Robertson reviewed the scientific literature on feral cats and feral cat control and concluded that there is scientific evidence that, under certain conditions, TNR can control feral cat populations. The practice of TNR on a far greater scale, as well as continued and increased funding and endorsement of TNR by private welfare organizations and municipal and government agencies, is essential for the success of TNR (Robertson, 2008).

In the long run, TNR programs are cost-effective
For many years, Texas A&M University attempted to control its campus cat population with a trap-and-euthanize approach. Two years after a trap-test-vaccinate-alter-return-monitor (TTVARM) program was implemented on campus, there was a 36% reduction in the number of cats and fewer nuisance complaints to the university's pest control service. The authors also note that although the initial costs of starting up TTVARM programs can be substantial in terms of time and money, these costs tend to decrease with time as fewer new cats need to be caught (Hughes and Slater, 2002).

Trap-and-remove efforts can have the opposite effect
To determine the population impact of trap and remove (culling) efforts on two open population sites in Tasmania, researchers used wildlife cameras and cat counts to track the number of cats at each site. Despite culling efforts, researchers found large increases in cat numbers: one site had a 75% increase, while another had a staggering 211% increase. Researchers suspect that the populations increased because new cats moved into the sites to take advantage of

resources that became available when previously dominant cats were removed. Another explanation could be that kittens born to the unsterilized remaining cats had a better survival rate thanks to more readily available resources (Lazenby et al., 2014).

TNR Reduces Nuisance Behaviors and Complaints

Neutered free-roaming males exhibit less aggression

This study compared four free-roaming cat colonies in urban Israel: two that were managed by TNR and two that were not managed at all. Less aggression was observed in the neutered groups, specifically between males, which resulted in reduced fighting and vocalizations. The study concludes that TNR reduced the noise associated with mating and fighting and could lead to fewer nuisance complaints (Finkler et al., 2011).

Reduced nuisance behaviors in reality and perception

Researchers at a federal facility and hospital in Louisiana studied 41 cats in a TNR program. Three years later, 30 of the original cats remained. Their overall health had improved and nighttime vocalizations were greatly reduced, and no new litters of kittens were found. Although cats were seen as a nuisance prior to the program, human attitudes changed by the end of the three-year period (Zaunbrecher and Smith, 1993).

TNR Adoption and Return-to-Field Programs Reduce Shelter Intake and Euthanasia

Dramatically reduced shelter intake, impound and euthanasia numbers

This study examined the impact of a municipal shelter's Return to Field program in San Jose, California. These programs are shelter-based and include sterilizing, vaccinating, ear tipping and returning healthy, impounded community cats to the place they were found, with or without an identified caregiver. Over four years, the shelter's program garnered decreases in cat intakes (from 70% to 23%), cat and kitten impounds (by 29.1%) and euthanasia for Upper Respiratory Disease (by 99%) (Johnson and Cicirelli, 2014).

Significant reductions in shelter intake and euthanasia numbers

A two-year program in Alachua County, Florida, was implemented to capture and neuter at least 50% of the estimated community cats in a single zip code. If the cats were friendly, they were adopted out. If not, they were returned to the area. Researchers then compared trends in shelter cat intake from the target zip code to those of the rest of the county. After two years, per capita shelter intake was 3.5 times higher and per capita shelter euthanasia was 17.5 times higher in the non-target area than in the target area. Clearly, high-impact targeted TNR combined with the adoption of socialized cats and nuisance resolution counseling for residents is an effective tool for reducing shelter cat intake (Levy et al., 2014).

TNR's Effects on Community Cats and Disease

Including vaccinations in TNR programs can protect feral cats for many years

A TNR program for feral cats in Florida included vaccinations at the time of sterilization. Researchers were able to compare a cat's antibody titers (a measurement that indicates the strength of the body's immune response to a given disease) before the vaccinations and then 10 weeks post-vaccination. Many cats had an excellent immune response, indicated by the increase in protective antibody titers post-vaccination: panleukopenia (90%), herpes (56%), calicivirus (93%) and rabies (98%). Other studies have shown that post-vaccination immunity persists for a minimum of three to seven years in most cats, which means that many feral cats are protected for much of their remaining lifespan. The authors conclude that TNR programs that include vaccinations are likely to protect individual cats and possibly reduce diseases in feral cats in general (Fischer et al., 2007).

Unowned free-roaming cats don't have higher FeLV infection rates than owned cats

In this study, 1,876 unowned free-roaming cats who were treated in TNR programs in North Carolina and Florida were tested for FeLV infection and FIV antibodies. The results indicate that the prevalence of FeLV infection and FIV antibodies in unowned free-roaming cats are similar to infection rates reported for owned cats (Lee et al., 2002).

The secondary effects of neutering can improve community cat welfare

Body condition scores can help evaluate a cat's overall healthy and welfare. This study analyzed the body condition of 105 adult feral cats at the time of neutering and found that they were lean (but not emaciated). Fourteen of the original cats were trapped one year later and showed significant increases in weight and improvements in body condition similar to those of confined pet cats. Caretakers also noted that neutered cats roamed less. The researchers conclude that in addition to halting reproduction, neutering may have other effects that improve the welfare of community cats (Scott et al., 2002).

Despite popular belief, toxoplasmosis is not definitively associated with exposure to cats

According to the authors, the transmission of toxoplasmosis from cats to people rarely occurs from direct contact. They state that people most commonly acquire toxoplasmosis by eating the cyst form of toxoplasmosis in undercooked meat. A case study of toxoplasmosis in pregnant women did not show a significant association with having an adult cat or kitten at home, cleaning the litter box or having a cat who actively hunts. The authors also cite a study of HIV-infected adults that did not show any association of toxoplasmosis with cat ownership or exposure (Kravetz and Federman, 2002).

Public Perceptions

American adults favor the non-lethal treatment of community cats

Adults in a national survey conducted by Harris Interactive were given two options: leave a community cat as-is or catch and kill the cat. More than four out of five people thought it was more humane to leave the cat. The survey then added a twist: what if the community cat would die two years later after being hit by a car? More than 70% of respondents still chose to let the cat remain in the community. The authors conclude that an overwhelming majority of Americans believe that leaving a stray cat outside to live out his life is more humane than having him caught and killed (Chu and Anderson, 2007).

Wildlife management practices should be based on shared opinions

Conflicts over cat management practices often prevent or delay the implementation of policies that could reduce cat populations, improve animal welfare and reduce risks to wildlife. This study reveals the differences of opinion that lead to these conflicts, specifically among Audubon members, the public and TNR program participants. They also note areas of agreement among the groups and suggest that stakeholders focus on these shared opinions when developing policies. For example, mandatory pet identification, rabies vaccination and non-lethal methods of management could satisfy all groups (Wald et al., 2013).

Wildlife Predation

Opposing parties should compromise on cat management approaches

The authors suggest ways that conflicts between cat colony caretakers and bird conservation professionals can be managed more productively. For example, bird conservation professionals' values could guide cat colony management in high conservation priority areas, whereas cat colony caretaker values could guide management in low conservation priority areas. The authors conclude that bird conservation professionals must develop innovative and collaborative ways to address threats posed by feral cats instead of advocating for euthanasia in all situations (Peterson et al., 2012).

Current methods of measuring predation rates could be inaccurate

This study found that many cat owners overestimate their cats' predation rates. The authors conclude that surveying predation rates with questionnaires alone isn't sufficient since the self-reported numbers aren't always accurate. They note that further extended studies are needed, especially in large urbanized areas with varied habitat types, cat densities and prey availability. The authors recommend using the "what the cats brought home" method at a larger scale in time and space. At a larger scale, this method would more accurately assess the seasonal variation in predation rates, individual hunting behavior throughout the year and the actual impact of cat predation on prey populations (Tschanz et al., 2011).

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Appendix

TNR is supported by The Humane Society of the United States and many other national groups, including:

Alley Cat Allies
American Animal Hospital Association
American Association of Feline Practitioners
American Humane Association
American Society for the Prevention of Cruelty to Animals (ASPCA)
Association of Shelter Veterinarians
Best Friends Animal Society
Cat Fanciers' Association
Humane Society Veterinary Medical Association
National Animal Control Association
Petco Foundation
Petfinder
PetSmart Charities

Find Local Organizations and Agencies in the United States and Canada Supporting TNR
humanesociety.org/assets/maps/feral-cats.html

Find Grant Opportunities for Organizations and Agencies
animalsheltering.org/how-we-help/strengthen-your-shelter/financial-assistance/grant_listings.html

Links Found Throughout the Document

Municipal Programs

Pittsburgh, PA: *pittsburghpa.gov/animalcontrol/spay_neuter.htm*

Elk Grove, CA: *elkgrovecity.org/animals/feral-cats.asp*

Dallas, TX: *dallasanimalservices.org/trap_neuter_return.html*

Sacramento County, CA: *animalcare.saccounty.net/SpayNeuter/Pages/FeralCatsandKittens.aspx*

San Jose, CA: *sanjoseca.gov/index.aspx?nid=2382*

Camden County, NJ: *ccasnj.org/spay_neuter_clinic/feral_cats.html*

Departments of Health

New York City, NY: *nyc.gov/html/doh/html/environmental/animals-tnr.shtml*

State of New Jersey: *state.nj.us/health/animalwelfare/stray.shtml*

Baltimore, MD: *neighborhoodcats.org/uploads/File/Resources/Ordinances/Baltimore_TNRRegs.pdf*

State of Delaware: *dhss.delaware.gov/dhss/dph/oaw/foundstraycats.html*

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"*Cats and Wildlife: An HSUS Perspective*"
hsus.typepad.com/wayne/2013/01/cats-wildlife-hsus-perspective.html

"*Finding Common Ground: Outdoor Cats and Wildlife*"
humanesociety.org/news/news/2011/11/ferals_wildlife.html

"*Prowling the Divide*"
animalsheltering.org/resources/magazine/jul_aug_2009/creature_feature_prowling_the_divide.html

"*Keeping Feral Cats Healthy*" *Animal Sheltering* September/October 2008; 51–53
animalsheltering.org/resources/magazine/sep_oct_2008/keeping_feral_cats_healthy.html

Videos

"*Fixing Cat Overpopulation*"
youtube.com/watch?v=fTCTuJRkvng

"*How to Perform a Mass Trapping*"
neighborhoodcats.org

Other Online Resources

The HSUS's Position Statement on Cats
humanesociety.org/animals/cats/facts/cat_statement.html

FAQs
humanesociety.org/issues/feral_cats/qa/feral_cat_FAQs.html

Handouts
"*Can You Help This Cat?*"
marketplace.animalsheltering.org/product/can_you_help_this_cat

"Helping Homeless Cats" handout in English and Spanish (can be printed on both sides of paper)
humanesociety.org/assets/pdfs/pets/helping-homeless-cats_english.pdf
humanesociety.org/assets/pdfs/pets/helping-homeless-cats-spanish.pdf

Self-Paced Online TNR Course for Caretakers and Webinar Series
humanesociety.org/outdoorcats

Community Assessment Toolkit: HSUS Pets for Life program
animalsheltering.org/how-we-help/work-for-change/pets-for-life/pets-for-life-toolkit.html

Community cat information sheets on cat ordinances, protecting public health, rabies concerns, humane deterrents, and more can be found on our website: *humanesociety.org/outdoorcats*

Books (Available at *marketplace.animalsheltering.org*)
Publicity to the Rescue shows how you can use the power of publicity to raise more money, recruit volunteers, and boost adoptions.

Coalition Building for Animal Care Organizations describes how coalition building can maximize the positive impact of animal-related organizations on their communities. The book demonstrates that, by finding common ground and putting aside their differences, groups can tackle difficult problems that can't be solved by any one agency.

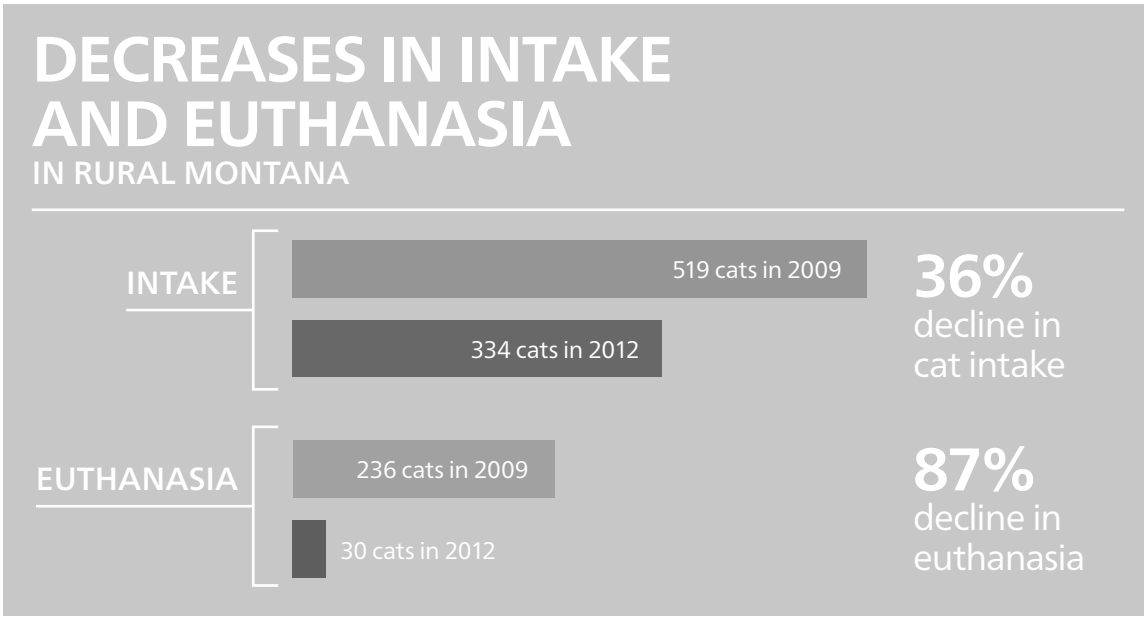
Fund-Raising for Animal Care Organizations demystifies the fund-raising process and breaks down this daunting task into practical, manageable steps.

Funds to the Rescue will save you from wasting time as you search for new revenue streams to support your humane organization. The book begins with "The Hows and Whys of Fundraising" and follows with 101 entertaining and creative ideas.

Neighborhood Cats Handbook, 2nd Edition:
neighborhoodcats.org/RESOURCES_BOOKS_AND_VIDEOS

Data from Successful Targeted TNR Programs

(Provided by PetSmart Charities)

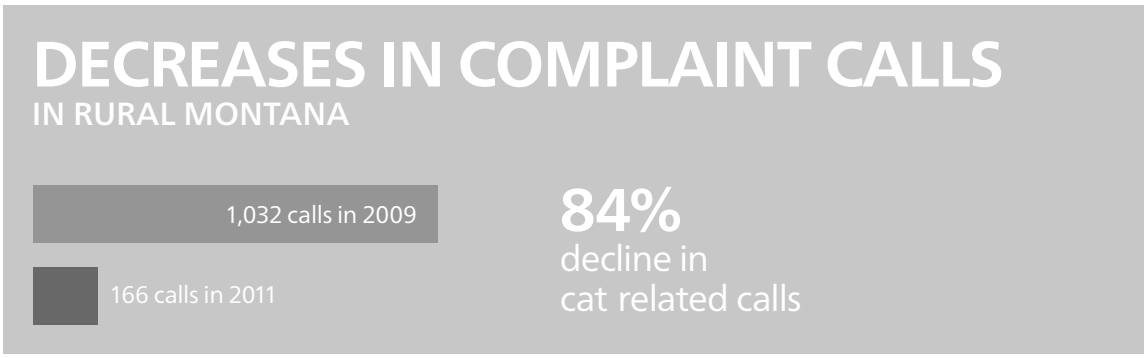


Group: Fox Hollow Animal Project

Target area: Ravalli County, MT (pop. 40,000; 2400 sq. miles)

Project: 1,329 spays/neuters of community cats from July 1, 2010 through 2012

Results: Cat intake from Ravilli County to the Bitter Root Humane Association (open admission) went from 519 in 2009 to 334 in 2012 (36% decline) and cat euthanasia went from 236 in 2009 to 30 in 2012 (87% decline).



Group: Thompson River Animal Care Shelter (TRACS)

Target area: The five towns located in Sanders County, MT (pop. 11,000; 2700 sq. miles)

Project: 755 spays/neuters of community cats from July 1, 2010 through July 1, 2012

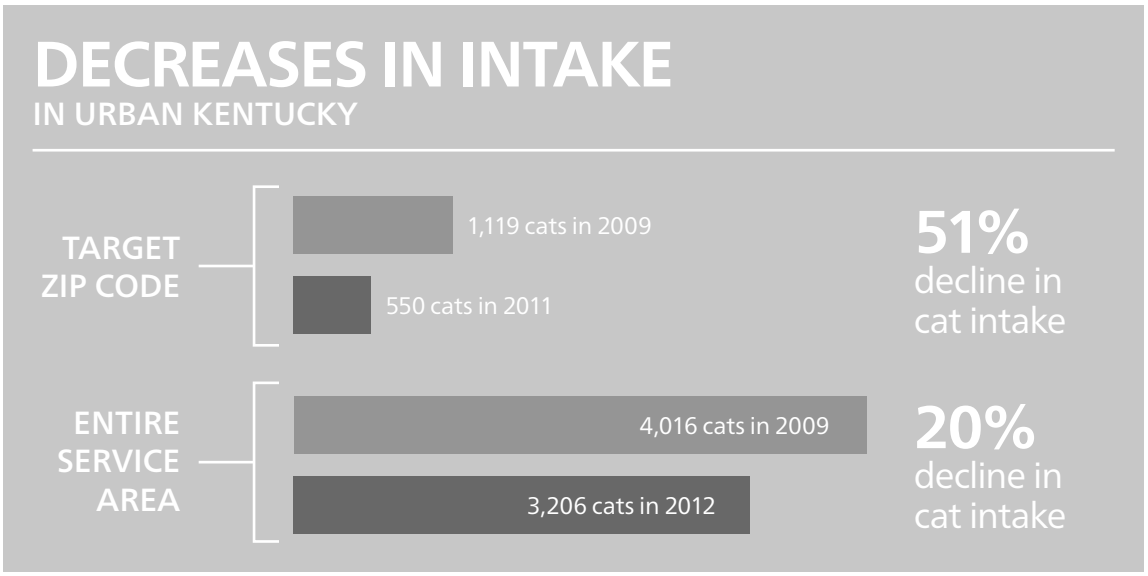
Results: Cat-related calls to TRACS, the only animal shelter in the county, went from 1,032 in 2009 to 166 in 2011 (84% decline).

Group: PETS Low Cost Spay and Neuter Clinic

Target area: Wichita Falls, TX (pop. 104,000)

Project: 1,188 spays/neuters of community cats from 2011 through 2012

Results: Community cat related complaint calls to Wichita Falls Animal Control went from 1,958 in 2010 to less than 200 in 2012 (at least 90% decline).



Group: Alley Cat Advocates

Target area: Began as one zip code in Louisville, KY (later expanded to total of five zip codes)

Project: 2,000 spays/neuters of community cats in the five zip codes

Results: Cat intake excluding owner surrenders from the original zip code to Metro Animal Services went from 1,119 in 2009 to 550 in 2011 (51% decline). Cat intake excluding owner surrenders in the rest of the shelter's service area went from 4,016 to 3,206 (20% decline). As a result of the project, the Councilwoman for the original target zip code sponsored TNR-enabling ordinance that passed the City Council.

Other Organizations' Policies

American Animal Hospital Association, *aahanet.org/Library/AAFPPosition.aspx*

American Association of Feline Practitioners,
catvets.com/guidelines/position-statements/free-roaming-abandoned-and-feral-cats

American Humane Association,
americanhumane.org/assets/pdfs/about/position-statements/animal-position.pdf

American Society for the Prevention of Cruelty to Animals (ASPCA), *aspca.org/about-us/aspca-policy-and-position-statements/position-statement-on-feral-cat-management*

Association of Shelter Veterinarians,
sheltervet.org/wp-content/uploads/2012/11/FeralCommunityCatMgmt.pdf

Best Friends Animal Society, *bestfriends.org/What-We-Do/Our-Work/Initiatives/Cat-Initiatives/*

Cat Fanciers' Association, *cfainc.org/CatCare/OverpopulationLegislativeIssues/FeralCats.aspx*

Humane Society Veterinary Medical Association, *hsvma.org/legislation#feralcats*

National Animal Control Association, *nacanet.org/guidelines.html#community*

Petfinder, *petfinder.com/helping-pets/feral-cats/what-is-a-feral-cat/*

PetSmart Charities, *petsmartcharities.org/pro/grants/spayneuter-grants/free-roaming-cat-spayneuter-grants*

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The HSUS is the nation's largest and most powerful animal protection organization backed by 11 million Americans, or one in every 28. Established in 1954, The HSUS seeks a humane and sustainable world for all animals, including people. We are America's mainstream force against cruelty, exploitation, and neglect, and also the nation's most trusted voice extolling the human animal bond.

THE **HUMANE** SOCIETY
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THE HUMANE SOCIETY OF THE UNITED STATES

Community Cats and Public Health

Many animals, both wild and domesticated, can pass diseases to people. These are known as zoonotic diseases. Although we should be concerned about such diseases, there are some common myths about the public health risks associated with community cats. In most cases, a compassionate coexistence between cats and humans can be established—and knowing how to prevent zoonotic disease is the best medicine.

Rabies

Rabies is an extremely rare disease in humans and in cats. According to the Center for Disease Control, there were only 4 reported cases of rabies in humans in 2011, and 49 cases since 1995.[i] None of the cases were attributed to cat bites[i]. Considering that only 303 rabid cats were identified in 2010 in the US[ii], where the population of cats is estimated at between 25 million and 90 million, the likelihood that a particular cat is rabid is extremely low (0.3 to 1.2 per 100,000 cats), as is the likelihood of coming into contact with a rabid cat . Even so, rabies is a serious concern of a cat bite. Therefore, bites should be treated immediately and appropriately.

For more information, see our fact sheet, ―Community Cats and Rabies."

Cat Scratch Disease

Cat scratch disease (CSD) is caused by a bacteria, *Bartonella henselae*. Most people get CSD from cat bites and scratches.[iii] Cats that carry *B. henselae* do not show any signs of illness; therefore, it is difficult to know if a cat is infected. Kittens are more likely to be infected with *B. henselae*, although cats, fleas and to a lesser extent, ticks, can also pass *B. henselae* to people. Individuals, such as those undergoing immunosuppressive treatments for cancer, organ transplant patients, and people with HIV/AIDS, are more likely than others to have complications of CSD. You can minimize the chance of getting CSD from cats by taking the following precautions:

- Avoiding rough play and other activities that may lead to scratches and bites, especially with kittens.
- Washing cat bites and scratches immediately and thoroughly with running water and soap.
- Preventing cats from licking open wounds that you may have.
- Controlling fleas and ticks.

Contact your physician if you start developing symptoms, such as infection (pus and swelling) at the scratch or bite site, fever, headache, swollen lymph nodes and/or fatigue, after a cat scratch or bite.

Toxoplasmosis

Toxoplasmosis is caused by a parasite, *Toxoplasma gondii.* Although infection with the parasite is relatively common in people, actual disease is rare. *About half of the adult*

human population has been exposed to T. gondii, developed protective antibodies and are probably immune to Toxoplasma infection. However, infection could cause serious health problems for the infant of pregnant women who have never been exposed and developed immunity, as well as immune-compromised individuals. Nonetheless, it's not necessary to get rid of your cat to avoid this parasite since cats are unlikely to directly transmit toxoplasmosis to people.

It's important to understand that once a cat has been infected with toxoplasmosis, he or she acquires immunity and can rarely be reinfected or pass potentially infectious feces. Other animals, including people, get toxoplasmosis by accidentally ingesting cat feces or by eating animals already infected with toxoplasmosis. You're more likely to be infected with *T. gondii* from eating raw or undercooked meat or gardening in contaminated soil than from your cat.

The most obvious preventive measures should focus on food and hygiene –cooking meat thoroughly; washing uncooked vegetables and fruit; wearing gloves when working in soil and scooping litter boxes; and washing hands thoroughly following soil and litter box contact – and have little to do with cats.

You can minimize the chance of getting toxoplasmosis by taking the following precautions:

- Cooking meat, eaten by people or cats, thoroughly (for appropriate temperatures, go to www.cdc.gov/toxoplasmosis/prevent).
- Washing uncooked vegetables and fruit before eating.
- Avoid consuming raw milk or other unpasteurized dairy products.
- Thoroughly cleaning surfaces/utensils that come into contact with uncooked meat, vegetables and fruit.
- Washing hands thoroughly with soap and water immediately following contact with raw or undercooked meat, uncooked vegetables and fruit, soil, unpasteurized dairy products and litter boxes.
- Boiling water from ponds and streams when camping/hiking.
- Wearing gloves when working in soil and scooping litter boxes.
- Keeping pet cats indoors or confined to their property so they can't roam, hunt infected animals and defecate outdoors.
- Covering all outside sand boxes when not in use to prevent cats from using them as litter boxes.
- Avoiding the litter box, if possible, if you're pregnant or immune-compromised (e.g., ask your spouse, roommate, etc. to scoop and clean the litter box) or scooping it daily, using rubber gloves when doing so, and washing your hands thoroughly afterwards.

Roundworms

Roundworms can cause a disease in people called visceral larva migrans. This disease is caused by *Toxocara canis* from dogs and, less commonly, *Toxocara cati* from cats. In most cases, *Toxocara* infections are not serious, and many people, especially adults infected by a small number of immature worms may not notice any symptoms and severe cases are rare.

While direct contact with infected dogs and cats increases a person's risk for roundworm infection, most infections come from accidentally eating the worm larvae or from larvae that enter through the skin. For example, children are at risk for infection if they play in areas that may contain infected feces (such as
dirt piles and sandboxes), where they pick up the larvae on their hands.

You can minimize the chance of getting roundworms by:

- Having your dogs and cats, especially young animals, treated for worms by your veterinarian.
- Washing hands with soap and warm water after playing with your pets or other animals, after outdoor activities and before handling food.
- Teaching children that it can be dangerous to eat dirt or soil.
- Covering outdoor sandboxes when not in use.
- Avoiding areas that are soiled with pet or other animal feces.
- Cleaning your pet's living area at least once a week. Dog and cat feces should be bagged and disposed of in the trash.

Ringworm

Ringworm isn't actually a worm; it's a fungal disease. People get ringworm from direct contact with an infected animal's skin or hair; carpets, brushes, combs, toys and furniture and other objects which have come into contact with an infected animal; or from contact with fungal spores in the soil. Cows, goats, pigs, horses, people, and dogs and cats, especially kittens or puppies, may have ringworm that can be passed to people. Children, who are more likely to catch ringworm, shouldn't handle any animal with ringworm. Adults, except for elderly and immune-compromised individuals, seem relatively resistant.

The fungus that causes ringworm thrives in warm, moist areas. You can minimize the chance of getting ringworm by:

- Keeping your skin and feet clean and dry.
- Shampooing regularly, especially after haircuts.
- Not sharing items such as clothing, towels, hairbrushes, combs and headgear.
- Wearing sandals or shoes at gyms, lockers, and pools.
- Not touching pets with bald spots.

Plague

For many people, the mention of plague (bubonic plague) conjures up images of the infamous Black Death of the Middle Ages, a pandemic that killed a third of Europe's population in the 14th and 15th centuries. Fortunately now, the incident of this disease is almost nonexistent—between 5 and 15 human plague cases are reported each year in the United States.[iv]

Plague is caused by a bacterium, *Yersinia pestis*, and the majority of human cases occur in New Mexico, Arizona, Colorado and California. People usually get plague from the bite of an infected

flea, although humans can also acquire it as a result of contact with secretions or tissues from infected animals. Infected fleas are more commonly carried by wild animals, such as rabbits and rodents, but a number of other mammalian species, including the cat, can as well. You can minimize the chance of getting plague by taking the following precautions:

- Not picking up or touching dead animals.
- Reporting any sick or dead animals to the local health department or law enforcement officials if plague has recently been found in your area.
- Eliminating potential food sources for rodents, such as pet and wild animal food, around homes, work places and recreation areas.
- Removing nesting places for rodents, such as brush, rock piles and junk cluttered firewood, around homes, work places and recreation areas.
- Applying insect repellents to clothing and skin, to prevent flea bites.
- Wearing gloves when handling potentially infected animals.

Treating pet dogs and cats for flea control regularly if you live in areas where rodent plague occurs and not allowing them to roam and hunt. Information adapted from Centers for Disease Control. More information is available at http://www.cdc.gov.

[i] Center for Disease Control. ―Human Rabies," May 3, 2012, http://www.cdc.gov/rabies/location/usa/surveillance/human_rabies.html>(December 20, 2012).

[ii] Blanton JD, Palmer D, Dyer J, Rupprecht CE. Public Veterinary Medicine: Public Health - Rabies surveillance in the United States during 2010. *Journal of the American Veterinary Medical Association* 2011;239(6):773-783.

[iii] Chomel BB, Boulouis HJ, Breitschwerdt EB. Vet Med Today: Zoonosis Update - Cat scratch disease and other zoonotic Bartonella infections. *Journal of the American Veterinary Medical Association* 2004;224(8):1270-1279.

[iv] Orloski KA, Lathrop SL. Vet Med Today: Zoonosis Update - Plague: a veterinary perspective. *Journal of the American Veterinary Medical Association* 2003;222(4):444-448.

Submitted By
Jennifer Thorne
Submitted On
10/26/2017 10:09:02 AM
Affiliation

Please support Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs and improve the lives of feral cats in Alaska.

Submitted By
JoAnna
Submitted On
10/13/2017 8:47:34 PM
Affiliation

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Anchorage , Alaska 99519

Please allow community members and non profit organizations to TNR (trap, neuter and return) felines/cats where acceptable/appropriately Alaska - without this effort we will see higher euthanasia rates where acceptable colonies can be managed and live successfully. I support TNR in our communities. I personally foster rescue cats, I am a donor and volunteer in support of animal welfare organizations in Alaska. I have been an Alaskan resident for 30+ years. Thank you for taking the time to read my note in support of TNR in Alaska. JoAnna Tomuro, joanna.tomuro@gmail.com, 907-782-9299 cell

Submitted By
Susan Vogt
Submitted On
10/12/2017 1:55:45 PM
Affiliation

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Address
269 Bias DR
Fairbanks, Alaska 99712

I am writing this comment in support of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allowthe release of sterilized, feral cats into the wild.

Submitted By
Linda von Bose
Submitted On
10/10/2017 1:22:12 PM
Affiliation

TNR(trap, neuter, return) is an important TOOL that will reduce and possibly eliminate the growth of feral cat populations in Alaska. Currently there is NO effective, feasible and especially HUMANE legal procedure to manage these cats and control their breeding--the MANPOWER is there to control and manage these populations, there just needs to be a LEGAL mechanism to allow it.

Submitted By
Deborah Voves
Submitted On
10/10/2017 2:27:57 PM
Affiliation
Concerned Citizen

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13231 Mountain Pl
Anchorage, Alaska 99516

Please support proposed Rule 62, which will be up for approval this November, would allow for trap-neuter-vaccinate-return (TNVR) programs in Alaska.

We truly and sincerely want to save animal lives with this rule change. The lifesaving efforts being focused on community cats would certainly be wonderful thing for these cats and their caregivers. Their caregivers love them just as much as they do their own personal pets. In fact, I would not hesitate to call it their 'Labor of Love'.

Alaska's taxpayers deserve TNVR programs, which are animal-friendly, cost-effective, and reduce the burden and bureaucracy placed on the state's animal shelters. The simple truth is that current methods of animal control relative to community cats are expensive, ineffective and oftentimes inhumane. The proposed rule changes would be better for the cats, for public health and for the wildlife we all want to protect.

With all my heart, I hope that you choose to embrace the Trap-Neuter-Vaccinate-Return program.

Thank you for reading my appeal. I am so hoping we can get this done.

Submitted By
Mark Ward
Submitted On
10/24/2017 11:42:18 AM
Affiliation

Please support prop. 62!

Submitted By
Hannah Watkins
Submitted On
10/24/2017 6:29:59 PM
Affiliation
Democrat

I am commenting to voice my support for Proposal #62 to allow for Trap-Neuter-Vaccinate-Return programs to humanely work toward a solution for the feral cat issues in Alaska.

Submitted By
Alyssa
Submitted On
10/17/2017 1:00:58 PM
Affiliation

TNR has shown good results in other states where overpopulation is not a problem even though the cats are still in the area.

Submitted By
Leslie
Submitted On
10/25/2017 12:42:27 PM
Affiliation

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PO Box 105
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Please support proposal #62 TNVR cats. Thank you.

Submitted By
Melanie
Submitted On
10/14/2017 1:19:52 AM
Affiliation

I very strongly agree with proposal 62 regarding trapping of animals. I myself have had to catch kittens in my area along with momma cat but due to the cats being so unused to people, they could not be rehabilitated and adopted. I have also trapped individual cats which were also too feral to be adopted. Because these cats are running loose without being neutered and spayed, the problem continues. Should this proposal pass, this would greatly impact the amount of feral litters being born. Although I do not want kittens running around loose, I would prefer them to be running around neutered and spayed along with vaccinations to ensure that they are not creating huge litters and running the risk of biting and harming children and house cats. This proposal will pay for itself because animal shelters will not have to put down cats that are unavoidable and will not have to search and set traps for possible aggressive feral cats. Please take my comment into advisement as I am one who has had to deal with catching feral cats and see the impact they make within the community. As sad as it is, there are people who dump animals they no longer want and if they can be caught, given vaccinations and spayed/neutered then this will reduce the amount spent on constantly putting down the feral animals.

Submitted By
Shawna
Submitted On
10/10/2017 5:59:37 PM
Affiliation

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Wasilla, Alaska 99654

I understand there will be a consideration this November on the trapp spay/neuter and release of ferrel cats. Please pass this.

Thankyou,

Shawna Jerman

AMERICAN BIRD CONSERVANCY

Bringing back the birds

10/25/2017

ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, AK 99811-5526

Dear Alaska Department of Fish and Game:

On behalf of American Bird Conservancy (ABC), please accept this letter as testimony in **OPPOSITION to Proposal 62** (5 AAC 92.029), which would "allow the release of sterilized, feral cats into the wild" and in **SUPPORT of Proposal 63** (5 AAC 92.029), which would "prohibit the release of feral or stray domestic [sic] cats into the wild."

Feral domestic cats (*Felis catus*) are one of the world's most harmful invasive species and have contributed to the extinction of 63 species.[i,ii] Free-roaming cats are the top source of direct, anthropogenic mortality to birds in the United States and Canada and kill an estimated 2.4 billion birds and 12.3 billion mammals in the U.S. annually.[iii] Furthermore, the mere presence of a cat in the environment reduces bird reproductive output and survival by altering prey behaviors and indirectly harms wildlife through competition for resources and the spread of diseases.[iv]

Disease transmission is a serious concern not only for wildlife but also for people and domesticated species. Cats are the top carrier of rabies among domestic animals in the U.S. and are a definitive host for the parasite (*Toxoplasma gondii*) that causes toxoplasmosis. Any warm-blooded species may become infected with *T. gondii*, and the consequences can be severe. In people, infection may result in miscarriage, blindness, organ failure, or death.[v,vi] Infection has also been linked with numerous neurological impairments including memory loss, obsessive-compulsive disorder, and schizophrenia.[vii,viii] Because cats excrete the parasite's infectious eggs (oocysts) into the environment and these oocysts have been identified as a major cause of human infections in multiple epidemics, free-roaming cats are a major risk factor for *T. gondii* transmission.[ix]

The management of feral cats is a necessity, but purposely permitting these feral animals to continue to roam parks, neighborhoods, and communities is irresponsible and ineffective. The program known as trap, neuter, release (TNR), which is advocated for in Proposal 62, fails to effectively reduce feral cat populations. An evaluation of two long-term TNR programs in California and Florida led researchers to conclude that "no plausible combinations of life history variables would likely allow for TNR to succeed in reducing [feral cat] population size, although neutering approximately 75% of the cats would achieve control (which is unrealistic)."[x] Another study suggested that TNR was actually worse than doing nothing.[xi] Furthermore, while TNR cats persist in the environment the rest of their lives, they continue to harm wildlife. Even a well-fed cat will hunt and kill.[xii] The following organizations have adopted position statements that formally oppose TNR:

American Association of Wildlife Veterinarians | American Ornithologists' Union | Association of Avian Veterinarians | Association of Fish and Wildlife Agencies | Black Swamp Bird Observatory | Cooper Ornithological Society | International Wildlife Rehabilitation Council | National Association of State

AMERICAN BIRD CONSERVANCY

Shaping the future for birds

Public Health Veterinarians | National Wildlife Federation | Texas Parks and Wildlife Department | The Wildlife Society

The major issue of concern with regard to feral cat population management is confinement. Effective removal of cats from the environment is critical, whether this be through adoption, placement in a sanctuary or shelter, or euthanasia, and is the only way to reliably reduce feral cat populations and eliminate harm to sensitive wildlife. Any sanctioning of roaming feral cats further represents a legal liability for the State, which would be at risk should a threatened or endangered species or person be harmed by a released feral cat. Confinement eliminates this liability.

ABC appreciates this opportunity to provide comments on the proposed amendments to the Alaska Administrative Code and asks that, in order to effectively manage the pervasive threat to wildlife from feral cats, you please **OPPOSE Proposal 62** and **SUPPORT Proposal 63**.

Respectfully,

Grant Sizemore, M.S., AWB®
Director of Invasive Species Programs

---

[i] Lowe S., M. Browne, S. Boudjelas, and M. De Poorter. 2000. 100 of the World's Worst Invasive Alien Species: A Selection from the Global Invasive Species Database. The Invasive Species Specialist Group, International Union for the Conservation of Nature.

[ii] Doherty T.S., A.S. Glen, D.G. Nimmo, E.G. Ritchie, and C.R. Dickman. 2016. Invasive predators and global biodiversity loss. Proceedings of the National Academy of Sciences 113: 11261-11265.

[iii] North American Bird Conservation Initiative, U.S. Committee. 2014. The State of the Birds 2014 Report. U.S. Department of Interior, Washington, D.C. 16 pages.

[iv] Bonnington C., K.J. Gaston, and K.L. Evans. 2013. Fearing the feline: domestic cats reduce avian fecundity through trait-mediated indirect effects that increase nest predation by other species. Journal of Applied Ecology 50: 15-24.

[v] Undseth O., P. Gerlyng, A.K. Goplen, E.S. Holter, E. von der Lippe, and O. Dunlop. 2014. Primary toxoplasmosis with critical illness and multi-organ failure in an immunocompetent young man. Scandinavian Journal of Infectious Diseases 46: 58-62.

[vi] Tenter A.M., A.R. Heckeroth, and L.M. Weiss. 2000. Toxoplasma gondii: from animals to humans. International Journal of Parasitology 30: 1217-1258.

[vii] Gajewski P.D., M. Falkenstein, J.G. Hengstler, and K. Golka. 2014. Toxoplasma gondii impairs memory in infected seniors. Brain, Behavior, and Immunity 36: 193-199.

[viii] Torrey E.F. and R.H. Yolken. 2013. *Toxoplasma* oocysts as a public health problem. Trends in Parasitology 29: 380-384.

[ix] Boyer K., D. Hill, E. Mui, K. Wroblewski, T. Karrison, J.P. Dubey, M. Sautter, A.G. Noble, S. Withers, C. Swisher, P. Heydemann, T. Hosten, J. Babiarz, D. Lee, P. Meier, and R. McLeod. 2011. Unrecognized ingestion of *Toxoplasma gondii* oocysts leads to congenital toxoplasmosis and causes epidemics in North America. Clinical Infectious Diseases 53: 1081-1089.

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AMERICAN BIRD CONSERVANCY

Shaping the future for birds

[x] Foley P., J.E. Foley, J.K. Levy, and T. Paik. 2005. Analysis of the impact of trap-neuter-return programs on populations of feral cats. Journal of the American Veterinary Medical Association 227: 1775-1781.

[xi] McCarthy R. J., S. H. Levine, and J. M. Reed. 2013. Estimation of effectiveness of three methods of feral cat population control by use of a simulation model. Journal of the American Veterinary Medical Association 243: 502-511.

[xii] Loyd K.A.T., S.M. Hernandez, J.P. Carroll, K.J. Abernathy, and G.J. Marshall. 2013. Quantifying free-roaming domestic cat predation using animal-borne video cameras. Biological Conservation 160: 183-189.

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Submitted By
Alice Anderson
Submitted On
10/25/2017 12:52:27 PM
Affiliation

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I taught biology and mathematics at Ketchikan Commuity College in 1974-76. Although many residents kept indoor pet cats, there were no outdoor cat colonies. Flocks of juncos enlivened street scenes, and spring mornings were filled with songs of hermit thrushes and Swainson's thrushes. These delightful little birds are favorite prey for running-at-large house cats,

Beginning around 1990, a fad for feeding stray cats swept the nation. Consequently, cat colonies infest many U.S. cities, including some Alaskan cities. I am saddened to learn that Ketchikan's juncos and thrushes may be replaced with house cats

You have been asked to amend sections 62 and 63 of the state game regulations, to legalize the release of sterilized house cats to run at large. Cat advocates call running-at-large house cats "community cats", because a community, i.e. a group, of people feed them. Those requesting the change claim, "Over time, TNR stabilizes or reduces community cat populations." They offer no evidence to support their claim. They provide a long list of technical, semi-technical, and popular references, but none of these references document a cat colony being eliminated by TNR. Nor do they document a long-term reduction or stabilization of colony size. Mere reduction or stabilization does not correct the problem of house cats running at large.

The cat advocates list Finkler et al 2011 on cat behavior, but they omit the companian paper published in the same issue of the Journal of the American Veterinary Medical Association.

Gunther, Idit, Hilit Finkler, and Joseph Terkel. 2011. Demographic differences between urban feeding groups of neutered and sexually intact free-roaming cats following a trap-neuter-return procedure. JAVMA Vol. 238 No. 9: 1134-1140, May 1, 2011.

Two urban cat colonies, treated with TNR plus feeding, grew slightly in one year. Two other colonies, treated with feed-don't neuter, shrank slightly in one year. This paper indicates that neutering some cats in a colony enhances colony growth.

The cat advocates also list

Levy, J.K., N.M. Isaza, and K.C. Scott. 2014. Effect of high-impact targeted trap-neuter-return and adoption of community cats on cat intake to a shelter. The Veterinary Journal, 201(2014):269-274.

The authors studied a ZIP code in Florida, where TNR had been promoted and practiced since 1998. A telephone survey of cat feeders found that only 14% (7/49) feeders had neutered any of the cats they fed. Then about half the estimated free-roaming cat population was trapped. Only 5% (111/2366) had been neutered. TNR fails to eliminate, reduce, or stabilize cat colonies because cat feeders do not neuter enough of the cats they feed.

The appendix submitted to you by cat advocates says, "A habitat will support a population of a certain size." The most important components of urban outdoor house cat habitat are food and, in Alaska, shelter. To reduce cat numbers, the habitat must be made unsuitable by eliminating food and shelter. Stop feeding, dismantle shelters, and the cats will disappear under what cat advocates call natural attrition.

A cat advocate can rescue stray cats by trapping them, neutering them, and confining them in a fenced yard at his home. Even if the cats do not become friendly to their rescuer, they will be safe in his yard, and their confinement will protect wildlife and the public.

Please do not legalize releasing house cats.

Audubon ALASKA

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www.ak.audubon.org

Kristy Tibbles
Executive Director
Alaska Board of Game
dfg.bog.comments@alaska.gov

VIA EMAIL SUBMISSION

Re: November 2017 Statewide Regulations Alaska Board of Game meeting; opposition to Proposal 62

October 27, 2017

Dear Director Tibbles,

Thank you for the opportunity to comment on the Alaska Board of Game consideration of proposals on statewide regulations. Audubon Alaska is an independent 501(c)(3) nonprofit that works to conserve habitat for the birds and wildlife in Alaska, to ensure their place for future generations. We are opposed to Proposal 62 that seeks to change Alaska regulatory code *5 AAC 92.029. Permit for possessing live game*, in order to allow the release of sterilized feral cats into the wild. If implemented, this proposal would effectively create a "Trap Neuter Release" program, or TNR program. This regulatory change would legalize the release of feral cats into Alaska's outdoors to the detriment of our state's native birds. The Board of Game should decline to implement Proposal 62.

The science clearly shows that outdoor cats have a large negative effect on our nation's native bird populations. A 2013 study indicates that between 1.4 billion to 3.7 billion birds are killed by cats in the U.S. every year.[1] Cats are second only to habitat loss as a leading cause of bird deaths nationwide, according to the *2014 State of the Birds* report, published by the U.S. Fish and Wildlife Service and the North American Bird Conservation Initiative.

TNR programs are often defended by claiming that the program will reduce feral cats over time. However, this and other claims simply do not withstand strong scientific scrutiny.[2] There is no

[1] S.R. Loss, T. Will and P.P. Marra. The impact of free-ranging domestic cats on wildlife in the United States. Nature Communications. doi: 10.1038/ncomms2380 (2013).
[2] Longcore, T., Rich, C. & Sullivan, L. M. Critical assessment of claims regarding management of feral cats by trap-neuter-return. Conserv. Biol. 23, 887–894 (2009).

evidence that TNR programs effectively reduce feral cat populations. Instead, strong evidence exists that TNR programs allow feral cat populations to perpetuate and cause a measurable detriment to individual birds and bird populations.

The Alaska Board of Game is charged with conservation of Alaska's native wildlife, including its birds. The Board should continue to prohibit the release of feral cats, which are non-native predators that negatively impact our state's native birds. We urge the Board of Game to decline to implement Proposal 62 and instead retain 5 AAC 92.029 as currently written. Please feel free to contact us with any questions or requests for additional information.

Sincerely,

Susan Culliney
Policy Director
Audubon Alaska

Submitted By
Laurie Benson
Submitted On
10/26/2017 12:23:14 AM
Affiliation
Ms.

I am opposed to proposal #62 that would allow feral cats to be released into the wild. Cats are highly efficient predators, have caused extinction of bird species worldwide and are a significant cause in the decline of some bird species. They are not part of the Alaskan ecosystem and are not even native to North America. Introduced predators are bad news for Alaskan wildlife. Capture, neuter and release programs have not eliminated a single cat colony. Those programs just allow the cats to keep on killing. Alaska for Alaskan wildlife. Just say no to this nutty idea.

Submitted By
Anissa Berry
Submitted On
10/23/2017 10:40:00 AM
Affiliation

Phone
9077663490
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backlagoon@aol.com
Address
PO Box 1222
Haines, Alaska 99827

Dear Board of Game,

I am against Proposal 62.

The debate of what to do with feral cat colonies should be centered on the ecological implications of destruction of native species rather than emotion. The third sentence in Proposal 62, "Killing cats is cruel," is subjective and based on an emotions from the cat-loving community. With no disrespect to the cat-lovers, the problem of feral cats has nothing to do with people's personal feline pets. The question to you is, do Alaskans want the ability to legally dispose of feral cats which have devastating effects on small mammal and bird populations or do we wish to limit management techniques? To pass this proposal would limit techniques to only Trap, Neuter and Release (TNR).

Within the purview of the Board of Game's task this fall are proposals to limit numbers of large animal predators, wolves and bears, to support large game management. Proposal 62 is unusual in that it limits the management of an invasive predator on an ecosystem. Feral cats have a large detrimental impact on wild birds and small mammals. Supporting studies show that feral cats cause more mortality than free-ranging house cats and cause significantly more wildlife death than previously thought. These feral cat colonies are "likely the single greatest source of anthropogenic mortality for US birds and mammals." (Loss, Scott R. and Tom Will and Peter P. Marra. The impact of free ranging domestic cats on wildlife of the United States. Nature Communications, 1396 (2013), doi:10.1038/ncomms2380)

This proposal has good intentions to try to limit cat populations, however, the effectiveness of TNR has not shown largely effective. It is impossible to treat, monitor and account for feral cats within communities because it's a dynamic open system in which no TNR program can effectively treat. No one organization can claim to be able to effectively manage feral cat populations.

The Board of Game should not limit the management of feral cat populations to TNR only. The State of Alaska should not give up its authority to use other forms of control to limit feral cat populations to effectively control the degradation of an ecosystem.

Sincerely,

Anissa Berry
PO Box 1222
Haines, AK 99827

Submitted By
Anissa Berry
Submitted On
10/24/2017 8:51:17 AM
Affiliation

Phone
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Dear Board of Game,

I am in support of Proposal 63.

I have already submitted comments in opposition to Proposal 62.

The research concludes that TNR programs do not effectively eradicate feral cat populations. Feral cats are invasive species which heavily predate on birds and small mammals. Their impact to native fauna has serious implications with the decline of migratory songbird populations. Not only do they heavily predate on wildlife, they can host disease, transmissable to humans.

The TNR programs cannot effectively manage wild cat populations. The only way to eradicate them is via extermination via lethal means. The research included in the Proposal supports this claim.

Thank you,

Anissa Berry

Submitted By
Tim Bleicher
Submitted On
10/26/2017 7:29:45 PM
Affiliation
None

Against 62 and for 63. NO FERAL CATS. Feral cats are a public health risk. They will kill Alaska small mammals and songbirds including those that are rare or threatened already . They will displace Alaska natural animals such as ermine, fox and lynx. Just look at the mess worldwide with invasive animals. Not here in Alaska. NO FERAL CATS.

Submitted By
Mary
Submitted On
10/27/2017 7:41:17 AM
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Anchorage, Alaska 99522

Proposals 63/62

I do not agree w turning feral cats loose. They are a huge detriment to songbirds and other small animals. And this would reduce the levels of birds even more than w just people who let their cats out of doors. This is not well thought through at all

Submitted By
Scott Christy
Submitted On
10/25/2017 6:55:09 PM
Affiliation
none

Phone
907 248-3363
Email
Scott512@gci.net
Address
P.O. Box 240552
Anchorage, Alaska 99524

I favor proposal 63. All cat kill epic numbers of song birds. They also carry very serious dieases humans can aquire from cat droppings.

Cats are a very invasive species and we do not need them lose to destroy our wildlife.

Thank you,

Submitted By
Karen Coady
Submitted On
10/26/2017 8:30:17 PM
Affiliation

Phone
602-3111
Email
theavery12@gmail.com
Address
6521 Bridget Circle
Anchorage, Alaska 99502

I have volunteered to help wild birds for over 18 years and during that time have seen too many baby and adult songbirds die in my hands due to injuries from cats. Even a small scratch is a death sentence for songbirds. Many of those migrate thousands of miles to breed and raise their young in the perceived safety of Alaska. Allowing feral cats to remain in the wild without restriction will further decimate populations already struggling with survival issues due to human development and natural dangers. Cats are an invasive species and should not be allowed to roam freely. Irresponsible pet ownership shouldn't be rewarded or supported on any level. Further, they can spread diseases which affect many other species of wildlife. Those who propose allwoing feral cats to form a community should come and hold a small bird that has tried so hard to live but was victimized by a cat and dies slowly.

Submitted By
Anthony DeGange
Submitted On
10/27/2017 1:45:00 PM
Affiliation

Phone
9072305020
Email
tdegange@gmail.com
Address
PO Box 671264
Chugiak, Alaska 99567

I am writing to voice my opposition to Proposal 62 that would allow the release of neutered cats into the wild. Trap, Neuter and Release programs for domestic cats, feral or otherwise, are misguided and have no place in Alaska. Domestic cats are effective predators and are important sources of mortality for small birds and mammals. They also have the potential to vector disease as noted in Proposal 63. I suggest you vote in the affirmative for Proposal 63. The only place for domestic cats are in the home, inside. Please do the right thing on this one. Thanks

Anthony DeGange

Submitted By
Dave Dorsey
Submitted On
10/26/2017 3:26:30 PM
Affiliation
Alaskan

Phone
9073514968
Email
davedorsey@gci.net
Address
1161 E Dan Street
Wasilla, Alaska 99654

I am in support a proposal number 63 and against number 62. Feral cats are invasive species that are a danger to the natural wildlife in Alaska. Feral cats are the main cause of death for songbirds. Catch neutering and re-releasing back to the wild this invasive species he will continue to devastate The song bird population specifically in the urban areas. I care not of the commercial businesses in favor of proposition 62 for they are supporting that proposal for their own gain. Proposition 63 will continue to support the wildlife in Alaska as it should be.

Submitted By
Louis J Dupree
Submitted On
10/25/2017 9:52:20 AM
Affiliation

I'm totally against releasing cats into the wild. They kill millions of song birds every year along with thousands of small animals.

Submitted By
MaryAnn Dyke
Submitted On
10/25/2017 3:29:22 PM
Affiliation

Phone
907-304-1089
Email
akspruceitup@hotmail.com
Address
POB 408
Clam Gulch , Alaska 99568

Feral cats have been disastrous to small mammal and bird populations around the world. Cats have contributed to the extinction of 33 species of birds worldwide. To protect the wildlife, I am in favor of proposal #63 and against proposal #62.

Dear Board of Fish and Game, October 25, 2017 Homer, Alaska

I am opposed to Proposal 62 that seeks to allow the release of feral cats into the wild, which is now illegal., and to have them considered community cats.

Roaming feral cats would be the demise of many songbirds. %

I support Proposal 63 that emphasizes that feral cats would be a considerable health risk. %

Please be kind to all animals and don't allow the release of feral cats. Please don't support Proposal 62. %

Thank you, %

Wendy Erd %

Submitted By
Joan
Submitted On
10/25/2017 12:15:30 PM
Affiliation

Phone
6149371647
Email
dkrajdp@aol.com
Address
2765 Golden Plover Court
Homer, Alaska 99603

~~

Hello,
Please do not allow the release of domesticated cats into our wilderness. Feral cats prey on indigenous species, especially birds. Many cat owners brag about the successful hunts of their house/outdoor cats, and this already creates problems.
Humans have created the problem of surplus domesticated cats, and we should not force other species to bear the ravages of our actions.
Joan Frederick
Homer, AK

To the Board of Game - Regarding Proposals 62 & 63

AGAINST Proposal 62:

It is widely acknowledged in scientific, ornithology and conservation circles, that both domestic and feral cats are the largest predator of song birds **world wide**.
Cats have contributed to the extinction of 33 species and continue to adversely impact a wide variety of other species, including those at risk of extinction.

This from Migratory Bird Center, Smithsonian Conservation Biology Institute:

“We estimate that free-ranging domestic cats kill 1.4-3.7 billion birds and 6.9-20.7 billion mammals annually. Un-owned cats, as opposed to owned pets, cause the majority of this mortality. Our findings suggest that free-ranging cats cause substantially greater wildlife mortality than previously thought and are likely the single greatest source of anthropogenic mortality for US birds and mammals.”

Cats do not just hunt adult birds; many birds are ground nesters, and the eggs and chicks are exceptionally vulnerable to predation. Plus, all birds are vulnerable when they first fledge from their nests.

Being ***non-native*** animals, these are invasive animals in the wild. Many municipalities in Canada already have bylaws that obligate residents to keep their pets indoors.

If anything, there is a good case for obliging all cat-owners to keep their pets inside at all times.

FOR Proposal 63:

For all the reasons stated above, coupled with the significant health hazards presented by cats, domestic and feral, I am favor of Proposal 63.

Thank you for your time.

Charles Graham,
Fritz Creek, AK 99603

Submitted By
Matthew Hardwig
Submitted On
10/25/2017 1:27:36 PM
Affiliation

My name is Matthew Hardwig and I am writing this comment in opposition of PROPOSAL 62 – 5 AAC 92.029. Permit for possessing live game. This proposal will allow the release of sterilized, feral cats into the wild.

I have seen the direct harm loose/feral cats cause the enviroment. From the destruction of property to the effect they have on the wildlife. One example was a lady that was allowing numerous cats to run loose (and breed), while I was working as a Village Public Saftey Officer, in Pilot Point. The amount of song birds that were killed was beyond my imagine. Once I addressed the problem with the person, the song birds started to return. If you've ever gardened and found a "present" in your carrots.

There is no benefit to a community or the state, to allow a new species, such as a domestic cat, to take root in Alaska.

Submitted By
Matthew Hardwig
Submitted On
10/25/2017 2:22:26 PM
Affiliation

My name is Matthew Hardwig and I am in FULL support of PROPOSAL 63– 5 AAC 92.029. Permit for possessing live game. Prohibit the release of feral or stray domesticated cats into the wild.

Alaska can not support the introduction of this species, in its ecosystem. Allowing feral/stray/domestic cats into the wild has no benefit to individual communities or the state of Alaska.

Submitted By
Nancy Hillstrand
Submitted On
10/25/2017 9:09:50 PM
Affiliation

Phone
907-399-7777
Email
bear@alaska.net
Address
P.O. Box 674
Homer, Alaska 99603

Greetings,

OPPOSE Proposal 62 All cats, including sterilized feral cats must remain on the list of species " that may not be released into the wild". Cats unfortunately have become a human induced invasive species killing billions of wild birds and mammals each year. Alaska is a critical nesting habitat for a diversity of migratory birds and the resident birds have enough to contend with during harsh winters. Many of these migratory species are having conservation concerns and are in declines. Our diverse wildlife must not be subjected to a human introduced invasive predator, especially cats/Felis catus a known very very destructive predator.

SUPPORT Proposal 63

Supporting 63 supports our diversity of birds and wildlife from a human introduced predator.

Thank-you kindly

Submitted By
Suzan Huber
Submitted On
10/25/2017 2:04:32 PM
Affiliation

Please reject Proposals #62 and 63, Feral cats should not be released into the wild. Feral cats and

TNR programs are disastrous small mammal and bird populations. Cats are non-native animals and introducing them to the wild in Alaska is irresponsible. Alaska has had to deal with invasive predators that were introducted by man, you would think we had learned something from that.

I would favor passing laws making it illegal to allow any cats to roam freely outdoors.

Thank you,

Susan Huber

LAW OFFICES OF
KENNETH P. JACOBUS
A PROFESSIONAL CORPORATION
310 K Street, Suite 200
ANCHORAGE AK 99501-2064
TELEPHONE (907) 277-3333
FAX (907) 264-6666

October 7, 2017

RECEIVED
OCT 13 2017
BOARDS

Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau AK 99811-5526

Re: Feral cats, a menace to Alaska
Meeting of November 10 - 17, 2017
Proposals 62 and 63

Dear Board Members,

Proposal 62 suggests that cats be allowed to be turned loose in the State of Alaska to establish feral cat colonies. This is a truly terrible idea.

Cats, particularly feral cats, are disease and parasite ridden, with diseases and parasites that are dangerous to human beings. They pass these parasites through their feces, making them particularly dangerous to children who play outdoors in locations where cats deposit their feces. This issue is addressed in detail in the published comment to Proposal 63, with which I totally agree. In addition, we need to recall that some years ago our beloved polar bears at the Alaska Zoo in Anchorage were killed by disease after catching and eating a cat or cats that had found their way into the polar bear cage.

In addition, cats decimate bird populations. Native birds are much more desirable to have in Alaska than disease-ridden useless felines, which are not a native species to Alaska in any event. Mice, shrews and voles, which are also destroyed by feral cats, should be allowed to proliferate to provide food for our native species, such as foxes and owls.

Please reject the idea of making the cat problem in Alaska worse. People should not be allowed to turn their house cats loose whenever they want to do so. It would also seem to be cruel to expect a cat that has spent its entire life eating Fancy Feast from crystal dishes to have to fend for itself. Cats should be kept confined in the houses of their owners.

In my own neighborhood, we have two scofflaw cat owners who let their cats run loose. These cats kill native birds whenever they can get them, for no purpose other than to kill the birds.

The most useful thing to do would be for the Board to authorize the hunting and trapping of cats, utilizing any and all methods and means, including poison, and having unlimited open seasons and no bag limits. A reasonable bounty should be paid, if the State can afford it. The goal should be extermination of feral cats and their colonies. Feral cats are vermin, with no redeeming value whatsoever.

Don't make the problem worse. Reject Proposal 62 and adopt proposal 63. Thank you.

Sincerely,

Ken Jacobus

Submitted By
Barbara Johnson
Submitted On
10/26/2017 1:15:25 PM
Affiliation
None

Phone
907-229-6891
Email
sbejohn1@mac.com
Address
PO Box 670874
Chugiak, Alaska 99567

To whom it may concern,

I am horrified that the Board of Game would consider proposal #62 given all of the research showing how destructive feral cats are to birds. I cannot understand why this proposal could ever be even considered by a board designed to care for native wildlife. We already have so many impacts to birds from habitat loss and other impacts, why would introducing a known predator that is not a natural part of the ecosystem be discussed? I am strongly opposed to this proposal and hope it is voted down. I hope on the other hand, that proposal # 63 be unanimously supported. Feral cats are already a huge problem in this state and we do not need to make it a bigger problem.

Thank you for considering my comments and the welfare of Alaska's native wildlife.

Submitted By
Amy Kilshaw
Submitted On
10/26/2017 1:23:49 PM
Affiliation

Ludicrous to even consider releasing invasive species into the wild.

Cats are the most harmful invasive species. Cats are recognized as the top source of direct, human-associated mortality to birds in the United States. Each year, cats kill approximately 2.4 billion birds.

Yes to 63

No to 62

Submitted By
Eric Knudtson
Submitted On
10/25/2017 8:15:19 AM
Affiliation
Mr.

Phone
9074357000
Email
epknudtson@gmail.com
Address
PO Box 3528
Homer, Alaska 99603

I strongly oppose proposal #62 and support for #63 because of the impacts that feral cats have on wildlife. Cats are the primary cause of mortality in songbirds.

Submitted By
Christine Maack
Submitted On
10/26/2017 11:37:45 AM
Affiliation
Bird Treatment & Learning Center

Phone
9072784265
Email
cmaack@gci.net
Address
3522 Alexander Ave
Anchorage, Alaska 99508

I wish to speak out in opposition to Proposal #62 and in favor Proposal #63 regarding feral cats. Having volunteered for 27 years at the Bird Treatment & Learning Center, I have seen the damage inflicted on songbirds by cats, both feral and domestic. Rescuers often bring us birds that appear to have hardly a mark on them, but were rescued from a cat. Despite different antibiotic treatments tried over the years, they die. The bacteria in a cat's mouth is the kiss of death for any bird that comes in contact with it, usually taking 3-4 days to do the job.

Birds are wildlife, and it is up to the Board of Game to guard against avoidable courses of action that will harm them. The cat issue is notorious nationwide, since it is estimated that just free ranging domestic cats bring about the death of over a billion (with a B) songbirds a year in North America. No one knows how many more fall prey to feral cats which must hunt to live. The steep decline in songbird populations should tell us that they need all the help they can get.

Christopher Mannix
Box 401
Talkeetna, Alaska 99676
cmannix@mtaonline.net

October 25, 2017

To: Alaska Board of Game

RE.: Proposal #62- Allow the release of sterilized, feral cats into the wild.; Proposal#63- Prohibit the release of feral or stray domesticated cats into the wild.

Members of the Board of Game,

Thank you for the opportunity to comment on these proposals. I will keep it short. I am totally opposed to Proposal #62 which would allow for the release of feral cats into the wild. Feral cats pose an extremely high threat to wildlife populations through both predation and as vectors of disease. To allow for their release into the wild, despite the good intentions of the Proposal's authors, is to invite disaster. No on Proposal #62.

I support Proposal #63 which would prohibit the release of feral or stray domesticated cats into the wild. The State of Alaska does not need to encourage predation of wildlife populations, both game and non-game, by enabling the release of these animals into the wild. Nor does the State need to aid and abet the spread of disease into the wild or into humans. Prohibit Trap, Nueter, Release.

Sincerely,

Christopher Mannix

MUNICIPALITY OF ANCHORAGE

Planning Department
Long-Range Planning Division

(907) 343-7921

Mayor Ethan Berkowitz

October 11, 2017

Ms. Kristy Tibbles, Executive Director
Alaska Board of Game
SOA Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Ms. Tibbles:

As staff to the Municipality of Anchorage's Watershed & Natural Resources Advisory Commission, I offer the enclosed resolution that addresses two proposals before the Alaska Board of Game concerning feral cats.

The Anchorage Watershed & Natural Resources Advisory Commission deliberated at five meetings between April and September on the proposal that is before the Alaska Board of Game. The Commission adopted Resolution No. 2017-01 on September 13, 2017.

Please add the enclosed resolution to the record of public input for these feral cat proposals.

Thank you.

Sincerely,

Thede Tobish
Senior Planner

Enclosure: WNRC Resolution No. 2017-01

RECEIVED
OCT 17 2017
BOARDS

MUNICIPALITY OF ANCHORAGE
WATERSHED & NATURAL RESOURCES ADVISORY COMMISSION
RESOLUTION NO. 2017-01

A RESOLUTION RECOMMENDING AGAINST A PROPOSAL TO ALLOW THE RELEASE OF STERILIZED FERAL CATS INTO THE WILD.

(WNRC Case No. 2017-02)

WHEREAS, the State of Alaska is considering a proposal submitted by Mojo's Hope and Alaska's KAAATs, both Anchorage-based cat advocacy organizations, to allow individuals to release sterilized feral cats into the wild, so that they may establish and maintain outdoor feral cat colonies; and

WHEREAS, based on American Veterinary Medical Association and Humane Society of the United States estimates, there are a projected 103,000 cats already inhabiting the Municipality of Anchorage, including about 30,000 feral cats; and

WHEREAS, cats can exist in densities many times higher than native predators, and are believed to be more abundant than any native predator because they are fed by humans; and

WHEREAS, even well-fed cats hunt and kill wild animals; and

WHEREAS, Anchorage's cats may kill at least 1,148,000 birds and 5,975,000 mammals annually, based on conservative national estimates in a peer-reviewed journal (Loss, Scott R., Tom Will, and Peter P. Mara. 2013. The impact of free-ranging domestic cats on wildlife in the United States. Nature Communications 4. http://www.nature.com/articles/ncomms2380); and

WHEREAS, cats are considered one of the world's 100 worst invasive species by the Invasive Species Specialist Group of the International Union for the Conservation of Nature; and

WHEREAS, cats are the primary source of all *Toxoplasma gundi* oocysts in soil, water, and human foods, and cats are the leading cause of rabies infections in humans from domestic animals; and

WHEREAS, trap-neuter-return (TNR) programs for feral cats, such as those advocated by Mojo's Hope, have been established in hundreds of other communities; and

WHEREAS, no TNR program has ever successfully eradicated feral cats from a large area like the Municipality because 71% to 94% of the cats must be sterilized to reduce population growth; and

WHEREAS, in fact, cities like Chicago that have hundreds of designated feral cat colonies appear to have more cats, and rats, now than ever before; and

WHEREAS, outdoor cat-feeding stations, which are prohibited by state law, attract other invasive species—house mice, rats, and pigeons—as well as wildlife such as foxes, coyotes, and bears; and

WHEREAS, the presence of maintained cat colonies encourages release of cats into the wild because the owners believe the abandoned cats will be cared for.

NOW, THEREFORE, BE IT RESOLVED that the Anchorage Watershed & Natural Resources Advisory Commission:

A. Opposes the proposal before the State of Alaska Board of Game (#62) to allow the release of feral cats into the wild; and

B. Opposes any efforts to establish a Track, Neuter, Release program in the Municipality of Anchorage.

PASSED AND APPROVED by the Anchorage Watershed & Natural Resources Advisory Commission on this 13th day of September, 2017.

Hal H. Hart
Secretary

Tamás Deák
Chair

WNRC Case No. 2017-02

Submitted By
Megan O'Neill
Submitted On
10/25/2017 11:05:48 AM
Affiliation

I urge the Board of Game to vote against proposal 62 and vote for proposal 63. feral cats are a danger to Alaska's wildlife, birds and human populations. There are over 70 million feral cats worldwide. One study estimates feral cats kill up to 24 billion wild animals and birds every year. The greatest toll is on small birds. Furthermore the Center for Disease Control and Prevention warns feral cats can lead to an increase in rabies transmisions to humans. Feral cats also transmit other diseases to humans including typhus (cases in CA), bubonic plague (case in OR) and toxoplasmosis.

For the safety of all Alaskans, our wildlife and bird populations, vote NO on proposal 62 and YES on proposal 63.

Submitted By
Jill Parson
Submitted On
10/26/2017 4:20:28 PM
Affiliation

Phone
907-892-4404
Email
jparson@mtaonline.net
Address
PO Box 521315
Big Lake, Alaska 99652

I adamantly oppose proposal 62, for reasons including that feral cats kill many birds and are proven carriers of disease. I know you have other documentation about these concerns. But I wish to add my personal concerns:

I'm a cat person. I have had cats for pets for many years. A few years ago an unfamiliar cat came up to me in my yard and started rubbing my ankles and acted very friendly. I reached down to pet the cat and it clamped onto my hand such that I had to pry its mouth open with my other hand to get free. It ran off, my hand swelled, and I ended up in the emergency room having antibiotics via IV every 8 hours for 24 hours, then antibiotic pills for an additional week. The doctor said that cat bites are almost always infectious, needing immediate antibiotics to prevent serious illness, even life-threatening infections. The doctor and I also discussed rabies shots but at that time the MatSu Valley had not had any incidence of rabies, confirmed by a couple calls I made, so I did not have the shots. I'm not sure that is still the case in the Valley now and I know rabies is an issue elsewhere in the state.

In short, the cat was a stray sleeping under my neighbor's shed. My experience was likely not unusual, and I've heard of a number of other friends' experiences with stray cats that reinforce my concerns about strays, not just feral cats but also cats that have escaped from their owners.

To me, releasing cats intentionally into the wild is irresponsible, potentially injurious to others, and inhumane for the cat. Let me expand on why this is inhumane.

Once trapped and released, capturing that cat again is unlikely, if necessary. Thus, if the cat is injured from a cat or dog fight, how will it get proper medical care? Even if you can catch the cat, who will pay its medical bills? How often do you see a pile of flat fur in the road? Did the cat die immediately when hit by a car or did it take several cars, and time, to finally die? Have you had a cat disappear in the talons of an eagle or owl, possibly to be ripped apart still alive to be fed to its nestlings? Have you ever seen a cat with frost bitten ears and toes? When injuries or age prevents it from getting food, how humane is it to slowly starve to death? Have you ever had a cat in your neighborhood shot or poisoned because someone just got tired of its destructive presence on their property?

Cats are meant to be pets with regular food, veterinarian care, and a warm lap to curl up on. If a cat is antisocial or some other reason prevents it from having a safe, healthy home, then the kindest step is to euthanize the cat, not simply neuter it and let it fend for itself. Proposal 62 just does not make sense. Please vote NO on this proposal.

Thank you for your consideration. Jill Parson

October 26, 2017

Ted Spraker, Chair
Members of the Alaska Board of Game

Via e-mail: dfg.bog.comments@alaska.gov

Dear Mr. Spraker and Members of the Alaska Board of Game,

We hope you're well. PETA is the world's largest animal rights organization, with more than 6.5 million members and supporters worldwide, including nearly 14,000 Alaska residents. We hereby submit the following comments **opposing Proposal 62-5 AAC 92.029. Permit for Possessing Live Game**, which would allow for the abandonment of domestic cats in trap-neuter-return (TNR) programs, and **supporting Proposal 63-5 AAC 92.029. Permit for Possessing Live Game**, which would prohibit this practice.

PETA is an animal-protection organization, so our opposition to TNR arises from animal-welfare concerns. Public officials should be concerned about the practice for a number of reasons, in addition to those related to animal welfare—e.g., the spread of rabies and other zoonotic diseases, the impact on wildlife populations, and more. According to the **National Association of State Public Health Veterinarians (NASPHV)**, "[N]o evidence exists that maintained cat colonies adequately reduce human public health risks or appropriately address their impact on pets or native wildlife. Several reports suggest that support of 'managed cat colonies' may increase the public's likelihood of abandoning unwanted pets in lieu of more responsible options."[1] In its "Compendium of Animal Rabies Prevention and Control, 2016," the NASPHV states that "[s]tray dogs, cats, and ferrets should be removed from the community, and mechanisms should be put in place to facilitate voluntary surrender of animals to prevent abandonment."[2]

The Centers for Disease Control and Prevention reports that cats are the main domestic animal linked to human exposure to rabies.[3] Recently, a cat who'd been sterilized, **vaccinated**, and abandoned as part of a TNR program in Florida bit a resident who was trying to help the suffering animal. **The cat tested positive for rabies**, and the resident required post-exposure treatment for the fatal virus.[4]

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

[1]National Association of State Public Health Veterinarians, "Free-Roaming/Unowned/Feral Cats," Position Statement, Sept. 1996 <http://www.tnrrealitycheck.com/media/NASPHV.pdf>.
[2]National Association of State Public Health Veterinarians, "Compendium of Animal Rabies Prevention and Control, 2016," *JAVMA*, 248.5 (2016): 505–17 <http://www.nasphv.org/Documents/NASPHVRabiesCompendium.pdf>.
[3]A.D. Roebling *et al.*, "Rabies Prevention and Management of Cats in the Context of Trap–Neuter–Vaccinate–Release Programmes," *Zoonoses and Public Health* 61.4 (2014): 290–96 <http://www.coloradonativebird.org/uploads/3/3/7/5/3375180/catsrabiestnvr-article.pdf>.
[4]Steve Andrews, "Target 8: Trapped, Neutered, Vaccinated and Released Rabid Cat Bites Victim in Hillsborough County," 7 June 2017, WFLA.com <http://wfla.com/2017/06/07/target-8-trapped-neutered-vaccinated-and-released-rabid-cat-bites-victim-in-hillsborough-county/>.

Feces deposited by cats in children's sandboxes, along creeks and streams, in gardens and parks, and in other areas carry parasites that are dangerous to humans, their animal companions and livestock, and native wildlife. Common diseases that are more rampant in the excrement of cats allowed to roam than in that of cats kept indoors include toxoplasmosis, hookworms, and roundworms. Outdoor cat colonies have also led to flea infestations, spreading typhus[5] and even the plague.[6] And feeding stations set up for cats attract wildlife—including coyotes, skunks, raccoons, and bears—which increases the risk of disease and parasite transmission among these animals and to human residents and companion animals.

Cats who are abandoned on the streets face daily battles against parasites, deadly contagious diseases, extreme temperatures, speeding cars, predators, and more—battles that they'll inevitably lose. The average life expectancy of an outdoor cat is just 2 to 5 years, compared to 12 to 15 years for a cat who lives indoors. We receive countless reports of incidents in which cats—"managed" or not—have suffered and died horribly because they were forced to fend for themselves outdoors. PETA's caseworkers routinely handle cruelty cases involving "outdoor cats" who have been poisoned, shot, mutilated, tortured, set on fire, skinned alive, or killed or injured in other cruel ways, often by property owners or neighbors who just didn't want them there, **regardless of their reproductive or vaccination status**.

It's cruel even to propose trapping, neutering, and re-abandoning cats on the streets and natural areas of Alaska, where winter temperatures can fall below minus-50 degrees. Every winter, we receive reports about cats suffering in the cold, including those who lose ears, tails, and feet to frostbite. Others are found frozen to the ground or with their eyes frozen open, are slashed to ribbons when they crawl into car engines seeking warmth, or endure other such horrors. Last year, a cat who had escaped from her home in Anchorage was found 18 hours later frozen to a sidewalk. She was unresponsive, severely hypothermic, and covered with her own feces and urine, and her tail (which may have required amputation) was frozen nearly solid.

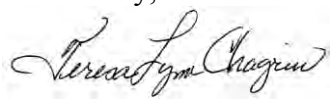
It's also of serious concern that roaming cats terrorize and kill countless birds and other wildlife who aren't equipped to deal with such predators. A 2013 *New York Times* article reports that feral cats account for the majority of human-caused wildlife deaths in the U.S., an astounding "2.4 billion birds and 12.3 billion mammals a year, most of them native mammals."[7] The American Bird Conservancy reports that "cat predation is one of the reasons why one in three American bird species are in decline."[8] We agree with the Alaska Department of Fish and Game that **cats should be kept indoors**: "The average number of small animals each cat kills annually has been variously estimated at between a dozen, to as many as 1,000. Multiply this by the number of households and farms with such cats, and you see the magnitude of the concern for wildlife

[5]Ron Gonzales, "Santa Ana Announces Flea-Borne Typhus Alert," *The Orange County Register*, 25 May 2012 <http://www.ocregister.com/articles/santa-356066-control-typhus.html>.
[6]The Associated Press, "Stray Cat Found Near Albuquerque Died of Plague," 10 Apr. 2017, LCSun-News.com <http://www.lcsun-news.com/story/news/local/new-mexico/2017/04/10/stray-cat-found-near-albuquerque-died-plague/100311036/>.
[7]Natalie Angier, "That Cuddly Kitty Is Deadlier Than You Think," *The New York Times*, 29 Jan. 2013 <http://www.nytimes.com/2013/01/30/science/that-cuddly-kitty-of-yours-is-a-killer.html?_r=4&>.
[8]Elizabeth Weise, "House Cats Kill More Critters Than Thought," *USA Today*, 7 Aug. 2012 <http://usatoday30.usatoday.com/news/nation/story/2012-08-06/house-cats-kill/56831262/1>.

conservation. …The single most effective action a cat owner can take to help protect wildlife is to keep their cat indoors."[9]

Please let me know if PETA can provide additional information or assistance. Meanwhile, thank you for your consideration and all your hard work for the citizens of Alaska.

Yours truly,



Teresa Chagrin
Animal Care and Control Specialist
Cruelty Investigations Department

Attachment
PETA Flier: "Homeless Cats Are Not Super-Felines"

[9]Alaska Department of Fish and Game, "Pets and Livestock: Wildlife Interactions," ADFG.Alaska.gov <http://www.adfg.alaska.gov/index.cfm?adfg=pets.interactions>.

HOMELESS CATS ARE NOT SUPER-FELINES

Cats who have been abandoned to fend for themselves are biologically identical to the cats who share our homes, and they deserve—and require—the same care.

Trap-neuter-release (TNR) involves sterilizing and then abandoning homeless cats instead of sheltering them. Rather than reducing homeless cat populations, TNR actually causes populations to increase. More people are likely to abandon cats if they think the cats will be "cared for," and food set out for "managed" colonies makes untrapped cats better able to reproduce. Additionally, it attracts more cats (as well as wildlife, including foxes, raccoons, and rats).

TNR also fails to protect cats from the many dangers they face on the streets, including extreme temperatures, deadly diseases, parasites, speeding cars, and attacks by dogs, wildlife, and cruel people.

PETA PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

DFG,

I have a comment on Proposals 61 and 63. I have lived for 22 years on the Beluga Lake Critical Habitat area in Homer, on the north side of the lake. I have a boardwalk from the driveway, gravel pad around the house, deck on the south side, and a narrow boardwalk to the south. So I can see cats using this handy facility and watch them hunt and catch small mammals and birds successfully. Of the many colors of cats, I have seen one with a collar. I use binoculars and have often clapped and yelled to scare them away.

I believe free-roaming cats take a toll on the food chain, taking prey from raptors and coyotes, and threatening the abundance of song birds.

I support Proposal 63 and hope it becomes a law. Public education is needed to make it successful. I believe that most cat owners are unaware of the issues and of the law. Perhaps notices in the newspapers.

Thank you,

Alice Porter
1318 Iris Court

Submitted By
David & Sandra Porter
Submitted On
10/25/2017 4:31:03 PM
Affiliation

Sirs: We are strongly opposed to Proposal #62 and very much in favor of Proposal #63.

Peer-reviewed studies published in accredited scientific journals show that loose cats (feral and owned) are the single largest mortaility factor for songbirds in North America, north of Mexico. Best estimates are that between 1.5 - 3.2 BILLION birds a year are killed. Loose cats are an exotic that should be eiiminated, not fostered. Trap-Neuter-Release do not work and are just a balm for those who support it.

Do the right thing for wildlife in Alaska and adopt Proposal #63. Thanks.

I object to proposals #62 and 63, and urge the Board to reject them. Releasing feral cats into the Alaskan environment is a ridiculous and cruel idea. Cruel because of our weather conditions, and ridiculous for a number of reasons.

Cats are predatory and kill small mammals and birds. Last summer I watched as my neighbor's cat, a fat, well-fed pet, raided a squirrel nest, killing one of the three babies. The cat did not eat it, nor did it go after the other two. It was entirely a sporting thing. A feral cat would have killed and eaten them. At that time I asked my neighbor to put a collar and bell on the cat, explaining that there would be nesting birds in the neighborhood and the cat would be stalking them. I even provided the collar. Two weeks later the cat was back, without a collar, with a sparrow in its mouth. Quite a few of our birds next on the ground and cats are their number one predator. I cannot even imagine why it makes sense to promote releasing wild cats. You would be releasing an INVASIVE animal into our environment. Cats carry diseases. I already have to cover my grandchildren's sandbox to keep domestic cats out of it, I will not put up with feral cats.

It should be illegal for domestic cats to roam freely as well, but entertaining the idea of releasing feral cats makes my blood boil. By the way, after watching my neighbor's cat stalking and killing another bird last summer, it seems to have disappeared. If you do pass these proposals I hope the punishment for destroying said cats is not too harsh, there are plenty of people who would find great sport in getting rid of 'community' cats.

Thank you for your time and service,

Tamara Reiser

Submitted By
Tamara Reiser
Submitted On
10/25/2017 2:07:58 PM
Affiliation

In regard to the proposals about releasing feral cats and allowing them to become 'community cats' - NO! Please reject these proposals. Cats kill small mammals and birds. They carry diseases and poop everywhere. We do not need community cats. Feral cats should be humanely disposed of.

Thank you,

Tami Reiser

Dear Board of Game members,

I am concerned about the release of feral cats (Felis catus) into the environment. I cannot think of a more devastating thing to do for our native as well as migratory songbirds that come from all over the world to nest in Alaska. Many of these birds are ground nesters and cats are top-of-the-line predators on small creatures. Cats are well-documented predators of birds and small animals, having contributed to the extinction of at least 33 species of birds. Birds in particular are a group of animals that are under duress in the environment and adding feral cats to the mix just causes more stress on the populations.

When you are tasked with protecting the many animals of Alaska, to add a creature that is not indigenous to the environment makes no sense. Alaska cannot and should not release non-native animals into the wild. If anything, it should become illegal to allow ANY cats (Felis catus) to roam freely in our natural environment.

Thank you for your service to the State of Alaska.

Francie Roberts

Homer, Alaska

Submitted By
Charlotte Sartor
Submitted On
10/25/2017 6:36:03 PM
Affiliation

Phone
907-355-4578
Email
Cbsartor@gmail.com
Address
5900 S. Our Rd
Palmer, Alaska 99645

I support proposal 63 & stringlu oppose proposal 62. Cats are the leading killer of birds in the US. Releasing feral cats into the wild increases the danger to wild birds

October 22, 2017

Attn: Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Board of Game members:

These are my recommendations for two proposals to be considered at the November 2017 Board of Game meeting in Anchorage: Proposals 62 and 63.

My comments are guided and supported by The Wildlife Society's (2011) position statement on feral and free-ranging domestic cats, particularly the following two policies:

- "Support the passage and enforcement of local and state ordinances prohibiting the feeding of feral cats, especially on public lands, and the release of unwanted pet or feral cats into the wild."

- "Oppose the passage of any local or state ordinances that legalize the maintenance of "managed" (trap/neuter/release) free-ranging cat colonies."

Proposal 62 – Oppose. This proposal would allow the release of sterilized feral cats into the wild by excepting them from 5 AAC 92.029 "Permit for Possessing Live Game."

Proposal 62 is focused on humane treatment of domestic cats illegally released into the wild. The proponent wants to legalize this practice to establish and maintain colonies of feral cats outdoors. Nowhere does the proponent acknowledge the environmental impacts of feral and free-ranging cats on Alaska's wildlife.

The "case studies" and scientific papers cited in Proposal 62 (including its appendix) do not support the multiple assertions that trap-neuter-return (TNR) programs are effective at reducing feral cat populations. More to the point, feral cats are considered one of the world's 100 worst invasive species by the Invasive Species Specialist Group of the International Union for Conservation of Nature (IUCN); feeding, vaccinating and releasing cats into the wild will only exacerbate an already serious environmental and human health problem by increasing numbers and longevity of feral cats; and food left outdoors at feral cat colonies will attract moose, wild predators like coyotes and foxes, and deleterious exotic wildlife like mice and pigeons, which is prohibited by state law.

I will address some of Proposal 62's mischaracterizations below.

- *Trap-Neuter-Return (TNR)*

TNR programs live-trap feral and free-ranging cats, which are then spayed or neutered and vaccinated. Any cats not adopted – and the proposal acknowledges that feral cats are largely "unadoptable" – are returned to the wild.

The proposal claims that "TNR stabilizes or reduces community cat populations by increasing the number of cats who are spayed or neutered and by decreasing the number

of unwanted litters" and "is recognized worldwide as the most effective, sustainable, and humane approach to community cat management." These assertions are false.

None of the "case studies" cited in Proposal 62 conducted an objective, scientific estimate of feral cat numbers before, during or after TNR was implemented. Reducing the number of complaints, or cats brought in to shelters, or cats euthanized is not evidence of a population reduction. Feral cat advocates compile and report cat numbers for these programs, which is a potential source of bias. Contrary to what Proposal 62 claims, TNR has never been shown to work on a scale larger than a single, small, isolated colony.

For instance, the densities of rats in Baltimore alleys prowled by feral cats is "remarkably stable," according to research conducted in 2004 which compared rat and cat population estimates from a half century earlier (Glass et al. 2009). The researchers found that cats did not rely on rats as their primary food source, but scavenged on many of the same food resources as the rats. In other words, the cats were eating garbage.

With an estimated 187,000 feral cats (Mead 2007), Baltimore passed an ordinance legalizing TNR in 2007 (Alley Cat Allies 2017). By 2013 the feral cat population had increased to an estimated 200,000 cats (Bell et al. 2013). In 2016, with 1,100 feral cat colonies established, residents were still complaining about too many cats (Simms 2016).

Chicago, which has some 650 managed feral cat colonies (Danner 2016), was named "the rattiest city in the nation" by Orkin, the pest control company, in 2013 and 2014 (Braff 2016). In 2015, the city allowed a local TNR organization to release 3,500 more feral cats. Subsequently, the estimated rat population climbed from 33,000 in 2014 to an anticipated 50,000 rats in 2016, leading Orkin to name Chicago the rattiest city once again (DeBat 2017).

According to the American Veterinary Medical Association and the Humane Society of the U.S. estimators (AVMA 2017, Levy et al. 2014), Chicago is home to 660,000 pet and at least 270,000 feral cats. So the Windy City has 20 times as many cats as rats. Undoubtedly, these cats do far more harm to the environment than the rats.

European cities like London and Rome that have practiced TNR for five decades have documented no declines in their free-ranging cat populations.

Here's a more typical scenario. In 1996 the Chico Cat Coalition was formed to trap and adopt an estimated 12 feral cats in Bidwell Park, an area of less than six square miles (Urseny 2010). According to Levy and Crawford (2004) "the high visibility of the project encouraged more abandonment, and new cats and kittens are found regularly." By 2012 about 1,000 cats had been removed, with more than 700 adopted (Urseny 2012). People keep abandoning cats in the park because owners believe it is a "cat-friendly place" with lots of birds to eat and places to hide. This was a trap-remove program, not TNR. Nevertheless, it demonstrates the kind of problems that arise when well-meaning volunteers attempt to avoid simply eradicating the feral cats.

The appendix to Proposal 62 cited five scientific articles in support of TNR. Two of the studies cited (Finkler et al. 2011, Neville and Remfry 1984) were not designed to measure population effects of TNR. Instead, the researchers were studying cat aggression.

Hughes and Slater (2002) assessed a TNR program on a Texas campus during a two-year period. The researchers, who did not estimate cat population size before or after the test,

concluded “It cannot be stated definitively that the total number of cats on campus has decreased because the study was not designed to determine this.”

Levy et al. (2003) investigated a TNR program on a Florida campus and found a significant decrease in the number of cats after 11 years. However, the first population estimate didn’t occur until halfway through the study, and of 155 identifiable cats 47% were adopted, 15% had disappeared, 11% were euthanized, and 6% had moved into a nearby wooded area. In other words, at least 74% of the cats removed from the study did not benefit from TNR, and additional stray and abandoned cats continued to turn up. In a subsequent study (Foley et al. 2005) of which Levy was a co-author, the researchers concluded that the TNR program she studied would have had to remove, spay or neuter at least 94% of all cats to reduce population growth, a rate that was never achieved.

Levy et al. (2014) evaluated another TNR program in a Florida county over a two-year period. Feral cat population estimates were based on surveys of residents, which is not an objective metric. In a subsequent modeling exercise (Miller et al. 2014; Levy was once again a co-author) that incorporated immigration from adjacent areas and newly abandoned cats, the researchers concluded that trapping and removing cats would be more effective than TNR at reducing feral cat populations. In their words, “Successful population management under conditions of demographic connectivity would require removing 20% of the population, or sterilizing 30% of the untreated segment of the population, every six months, on a sustained basis.”

Thus, the five scientific articles cited by Proposal 62 do not support the assertion that TNR works. To the contrary, many scientific articles have come to the opposite conclusion. I will cite a few.

Natoli et al. (2006), who studied decades of TNR efforts in Rome, Italy, concluded that “all these efforts without an effective education of people to control the reproduction of house cats (as a prevention for abandonment) are a waste of money, time and energy.”

Castillo and Clarke (2003) found that TNR programs in two parks in Miami, Florida, didn’t reduce feral cat populations during a one-year period. The number of original cats decreased due to adoption and mortalities; however, the cat populations in both parks increased due to immigration or illegal abandonment. The authors believed that the existence of TNR programs encouraged local cat owners to abandon their cats.

Anderson et al. (2004) showed control strategies that target survival are more effective at reducing cat populations than those that target fecundity (i.e., TNR). Spaying 75% of reproductive females yielded a lamda of 1.08. Thus, 88% must be spayed to stabilize the population. However, removing 50% of female cats yielded a lambda less than 1.0 while a 75% reduction resulted in a lambda of 0.47, meaning the population could be halved each year, absent immigration or abandonment of new cats.

Schmidt et al. (2009) also modeled feral cat populations, but factored in immigration. Euthanasia was comparable or more effective than TNR or a combination of euthanasia and TNR at reducing population size at all treatment rates (25%, 50%, 75%) and immigration rates (0%, 25%, 50%), except the 25% treatment rate with 50% immigration. Euthanasia resulted in greater total population decreases than did TNR and a combination of euthanasia and TNR; however, the total effort required to reduce each population by 1% was highest for euthanasia.

Lohr et al. (2013) compared TNR with euthanasia over a 30-year period for cat populations on Oahu, Hawaii. Abandonment reduced effectiveness of both methods; however, without abandonment, euthanasia extirpated colonies in at least 75% of the model's simulations within the second year, whereas it took 30 years for TNR. Including a 10% annual increment from abandoned cats, the colony returned to carrying capacity within 6 years and the euthanasia program had to be repeated, whereas TNR never reduced the population to zero within the 30-year time frame. TNR was approximately twice as expensive as euthanasia, weighing the TNR-related costs of food, veterinary care, and microchips (with all other activities done by volunteers) versus euthanasia-related costs of drugs, wages of professional trappers, and trapping equipment.

McCarthy et al. (2013) also employed a population simulation model and found that TNR was always less effective than lethal control. The authors found that "multiple studies have suggested that decreased survival rate is more effective than decreased fecundity at reducing population size."

Loyd and DeVore (2010) compared feral cat management options using a decision analysis network. Their model predicted that "TNR strategies [with kitten adoption] would be the optimal management decision for populations of less than 50 cats while trap-euthanize would be the optimal management decision for populations greater than 50 cats." According to the authors, "removal is predicted to reduce feral cat populations quickly and prevent cats from taking a large number of wildlife prey." They also concluded that "TNR programs alone have never been shown to stabilize a feral cat population in the scientific literature" and "TNR programs increase adverse effects on native wildlife."

Longcore et al. (2009) compared the arguments in support of TNR by many feral cat advocates with the scientific literature. Advocates promoting TNR often claim that feral cats harm wildlife only on islands and not on continents; fill a natural or realized niche; do not contribute to the decline of native species; and are insignificant vectors or reservoirs of disease. Advocates also frequently make claims about the effectiveness of TNR, including claims that colonies of feral cats are eventually eliminated by TNR and that managed colonies resist invasion by other cats. The authors found that scientific literature contradicts each of these claims.

- *"Vacuum effect"*

Proposal 62 places a great deal of emphasis on the "vacuum effect," by which the proposer believes that removing feral cats won't work because "Sooner or later, the empty habitat attracts other members of the species from neighboring areas, who move in to take advantage of the same resources that attracted the first group (like shelter, food, and water)."

Proposal 62 is written from the perspective of a person who wants to maintain a small feral cat colony in an area surrounded by other feral cats. It fails to account for the big picture.

Applying the concept of a vacuum effect to feral cats is problematic. First, feral cats are invasive exotic species – they aren't supposed to be there in the first place. Second, in Alaska feral cat populations are largely confined to limited areas inhabited by humans.

Thus, the habitat in question is not and never was "empty." Even in and near Alaska communities, habitats support, or should support, native predators – like lynx, foxes, and marten – with which cats compete and infect with diseases like rabies and toxoplasmosis.

The vacuum effect requires the presence of a contiguous population adjacent to the treated area. Unlike a native species like lynx, which are widespread in suitable habitat, once a feral cat population is reduced or eradicated in a community in Alaska, immigration from surrounding natural areas is often unlikely.

- *Large numbers of feral cats kill and compete with native species*

Proposal 62 repeatedly fails to acknowledge that cats are an exotic, invasive species that competes with native furbearers and fur animals by killing millions of small birds and mammals. This is the crux of the issue and the reason why cats should never be released into the wild.

Cats have become the most popular pet in North America, with an estimated 84 million in homes. Credible national estimates of feral and other unowned cats range from 30 million to 80 million.

Hundreds of scientific studies have documented numbers of birds and mammals killed by cats. A meta-study conducted by Loss et al. (2013) and summarized by Marra and Santella (2016) combined the best of these studies into an estimate of the total number killed by cats in the Lower 48 states. According to their analysis, cats kill an estimated 1.3 to 4 billion birds and 6.3 to 22.3 billion mammals annually. Most of the species are native to the area, not pests like rats or house mice. Free-ranging cats kill more birds than wind turbines, automobiles, windows, pesticides, poisons and all other human causes combined.

Anchorage residents own more cats than dogs, more than 73,000 pet cats based on an estimate provided by Anchorage Animal Control, which uses the American Veterinary Medical Association pet calculation tool (AVMA 2017).

That figure does not include feral or unowned cats. Two veterinarians who co-authored a scientific paper entitled “Humane Strategies for Controlling Feral Cat Populations”, found it reasonable to estimate a community’s feral cat population at one cat for every two households, or about 50,000 feral cats for a city the size of Anchorage (Levy and Crawford 2004). The Humane Society of the United States and several scientific studies (Levy et al. 2014) estimate a community’s feral cat population at one-tenth the human population, which suggests approximately 30,000 feral cats in Anchorage. I’ll use the lower number.

Thus, Anchorage alone has an estimated 103,000 cats.

I’ve estimated the number of birds and mammals killed by cats in Anchorage based on the national data and formulas used by Loss et al. (2013). **Owned** cats killed an average of 3.4-13.2 birds and 8.7-21.8 mammals, while **unowned** cats killed an average of 30-47.6 birds and 177.3-299.5 mammals annually. **Owned** cats were allowed outside, on average, by 40-70% of households and an estimated 50-80% of these cats hunted while outside. **Unowned** cats were all outside, by definition, and an estimated 80-100% hunted. Using only the lowest figures in each range above, Anchorage cats kill at least 1,148,000 birds and 5,975,000 mammals annually. If that figure seems high, consider this: that’s less than 1 bird per month per cat. I suspect the actual predation rate is higher.

The high levels of predation are primarily due to unnaturally large populations of cats. Feral and free-ranging cats are often subsidized by garbage and other foods provided by humans; therefore, they can survive at much higher densities than native predators. Estimates of feral cat populations in and near large cities are 100 to 1,000 times higher than

estimates of populations of native predators like foxes, marten, lynx, ermine, river otters, and mink in suitable habitat (Turner and Bateson [2000], Feldhamer et al. 2003), and feral cats are also much more numerous than native predators in many rural areas. Crooks and Soule (1999) have observed numbers of hunting, outdoor cats 10-15 times more abundant in California natural areas than wild predators like foxes and coyotes. Obviously, any bird or small mammal consumed by a cat is not available to a native predator.

There is an indirect cause of bird mortality attributable to free-roaming cats. Seeing a cat near its nest decreased parental feeding rates of songbirds, which has been linked to significantly lower nestling survival and increased nest predation during the following 24 hours. Indirect losses generated by fear or avoidance of an overabundant predator have not been factored into cat-caused mortality estimates (Bonnington et al. 2013).

- *Feral cat diseases infect wildlife and humans*

Proposal 62 states “Opponents of TNR argue free-roaming cats are a threat to public health, but there is a lot of misinformation in their claims.” Once again, the misinformation is being propagated by the proposal.

According to Gerhold and Jessup (2013) and the Cornell University College of Veterinary Medicine (2014), people are infected by cat-borne diseases. These include bacterial infections (e.g., cat scratch disease, salmonella), parasites (e.g., fleas, scabies, roundworms, hookworms), fungal infections (e.g., ringworm), protozoal infections (e.g., cryptosporidiosis, giardiasis, toxoplasmosis), and viral infections (e.g., rabies).

Proposal 62 doesn’t consider it significant that cats accounted for 61% of the rabid domestic animals reported in 2014. Feral cats are less likely than domestic cats to be vaccinated for rabies (Gerhold and Jessup 2013). Since 1988 cats have been the leading cause of rabies infections in humans from domestic animals. Feral cat feeding stations attract native species that are infected by rabid cats. Bites and scratches from free-ranging cats result in approximately one-third of rabies post-exposure prophylaxis treatments in humans in the United States, and “cases of rabies exposure owing to free-roaming cats are likely underestimated.”

The proposal also claims “the last documented case of human rabies from exposure to a rabid cat was in 1975.” Gerhold and Jessup (2013) describe a case of rabies in an 8-year-old girl from California who had multiple cat bites from free-roaming cat colonies near her home in 2010.

Proposal 62 also claims that ingestion or contact with raw or undercooked meat is the most common source of toxoplasmosis in humans. This is correct; however, the source of infection in the meat is ultimately due to oocysts shed in cat feces.

It’s important to note that, while there are many intermediate hosts, the only creature in which *Toxoplasma gondii* can reproduce sexually – the definitive host – is a member of the cat family. Cats are largely unaffected by toxoplasmosis; they transmit the parasite to the rest of us.

Toxoplasma oocysts are extremely persistent in the environment and can exist for months or years in soil or water, even in saltwater. Toxoplasmosis infects and kills river otters, sea otters, seals, sea lions, walruses, and beluga whales.

Cats can infect moose and other game animals, and humans may acquire toxoplasmosis from eating undercooked moose meat (Siepierski et al. 1990). In 2011 an Alaskan woman, Lauren Hamm, ate a medium-rare steak from a moose shot by her husband on Joint Base Elmendorf-Richardson when she was 24 months pregnant (Brasch 2013). Her son was born prematurely 8 weeks later with an irregular heart rate, fluid around his organs and lesions on his eyes and brain. The moose was infected with *Toxoplasma gondii* excreted in cat feces.

Up to 22 million Americans are infected with *Toxoplasma gondii*, a little less than half of them from swallowing oocysts excreted into the environment by cats. In most healthy adults, physical symptoms are similar to the flu. However, if infected with toxoplasmosis in the first trimester, one in ten human fetuses will be aborted or become malformed.

Toxoplasmosis also changes human behavior, and individuals with latent toxoplasmosis are susceptible to an array of mental illnesses, including severe depression, bipolar disorder, obsessive-compulsive disorder, and schizophrenia. Women infected with toxoplasmosis are twice as likely to commit suicide than women without the infection.

Allowing cats to be released into the wild and encouraging the establishment of outdoor cat colonies will inevitably increase the number of free-ranging cats in Alaska. We need fewer, not more feral cats. Therefore, I strongly oppose adoption of Proposal 62.

Proposal 63 – Support with amendment. This proposal seeks to maintain the status quo with regard to the release of domesticated cats into the wild. However, it also states that "The alternative solution I propose would be to reclassify feral cats as 'vermin' and allow unlimited take, year round."

I support the intent of this proposal; however, because Alaska does not have a classification for "vermin," the board should amend the proposal to **add feral and free-ranging cats to the state's list of deleterious exotic wildlife (5 AAC 92.990[a][52]).** This would automatically add feral and free-ranging cats to the list of animals that may not be intentionally or negligently fed by a person per 5 AAC 92.230.

Unconfined or unrestrained feral cats are listed by the Invasive Species Specialist Group of the International Union for Conservation of Nature (IUCN) as one of the world's 100 worst invasive species along with rats, starlings, and rabbits, which are already listed as deleterious exotic species in Alaska. Another meta-analysis – comparing past and present impacts of invasive predators on worldwide bird, mammal and reptile populations – placed feral cats at the top of a list which included rats and mice, dogs, red foxes, pigs, mongooses and stoats (Doherty et al. 2016).

Domestic cats, primarily feral and free-ranging cats, kill an estimated 1.3 to 4 billion birds and 6.3 to 22.3 billion mammals annually in the contiguous United States. Food left outdoors for feral cats – a necessary component of maintaining outdoor cat colonies for trap-neuter-release programs – would also attract bears, foxes, coyotes, and deleterious exotic wildlife such as rats, rock doves (pigeons), and starlings. This, of course, is already prohibited by state law.

Feral cat-feeding stations attract more than cats. A trail camera monitoring a cat-feeding station for 11 days in California documented only 4% of visits by feral cats (Urban Wildlife Research Project 2013). Wildlife, including foxes, made up 96% of the visits.

Another study in California found native rodents and birds were less abundant and invasive house mice were more abundant in parks where people fed cats (Hawkins et al. 2004). Cat-feeding stations also attracted birds and mammalian omnivores such as foxes. However, almost twice as many native birds were observed in parks without cat-feeding stations.

Cats infect moose, deer, and other game animals with toxoplasmosis (The Wildlife Society 2014). Humans are also infected by *Toxoplasma* by consuming raw or undercooked meat that is infected by oocysts shed in cat feces. Infection has been linked to schizophrenia and can lead to miscarriages, blindness, memory loss, and death.

In summary, feral cats are an invasive species not native to North America. Feral cats now kill billions of wild animals annually in North America, and by killing these animals cats compete with native furbearers and fur animals. Cats pose a serious risk of disease to wildlife and humans. Feeding outdoor cats will inevitably attract and feed wild animals, including deleterious exotic wildlife like pigeons, starlings and house mice. The Wildlife Society recommends that feral cats not be released into the wild or fed outdoors. Two feral animals – ferrets and swine – are already classified as deleterious exotic wildlife in Alaska. Feral cats are arguably the most deleterious exotic species found in Alaska. For all of these reasons, feral cats should be added to the list of deleterious exotic wildlife.

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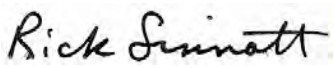
Sincerely,



Rick Sinnott
Certified Wildlife Biologist
Chugiak, Alaska

Submitted By
Carla Stanley
Submitted On
10/25/2017 11:50:18 AM
Affiliation

Phone
9072994559
Email
4rdog24@gmail.com
Address
40891 Morning Star Road
Homer, Alaska 99603

My concern is about the release of Feral Cats (Felis catus) into the environment. I cannot think of a more devastating thing to do for our migratory as well as native song birds which come from all over the world to nest in Alaska. It seems like an idiotic thing to do in a place like Alaska! Many of these birds are ground nesters and cats are top of the line predators on small creatures.

It should be noted that cats (domestic and feral) are the largest predator on song birds world wide.Cats have contributed to the extinction of 33 species and continue to adversely impact a wide variety of other species, including those at risk of extinction. Globally, the number of at-risk bird species has increased from 47 to 87 between 2001 and 2015

Studies in the US have reallized that cats kill between 1.4 & 3.7 billion birds every year, more than window strikes (a distant 2nd), wire strikes, road kill, and wild animal predation.

Being ***non-native*** animals, it would be introducing an INVASIVE animal into the wild. That is totally against logic and the law. Many municipalities in Canada already have bylaws that obligate residents to keep their pets indoors,

USFW has spent millions of dollars in Alaska ridding islands of the Aleutians from invasive predators introduced in the last few centuries, including marmots, foxes, reindeer, and rats. It is far easier and cheaper to PREVENT invasive predators from disrupting nature than to try to correct after the fact

Alaska cannot and should not do that. If anything, it should become illegal to allow ANY to roam freely in our natural environment.

Thanks for listening

Carla Stanley

Homer, Alaska

October 25, 2017
3833 Aprill Pl.
Homer, AK 99603

To Whom It May Concern:

I would like to address my great concern regarding the release of feral cats (Felis catus) into the environment. I cannot think of a more devastating thing to do for our native as well as migratory song birds, which come from all over the world to nest in Alaska. It seems like an unwise and foolish thing to do in a place like Alaska! Many of these birds are ground nesters and cats are top-of-the-line predators on small creatures.

The numbers of birds killed by feral cats is truly astounding. Studies in the US have realized that cats kill between 1.4 and 3.7 billion birds every year, more than window strikes (a distant 2nd), wire strikes, road kill, and wild animal predation!

It should be noted that cats (domestic and feral) are the largest predator on song birds worldwide. Cats have also contributed to the extinction of 33 species and continue to adversely impact a wide variety of other species, including those at risk of extinction. Globally the number of at-risk bird species has increased from 47 to 87 between 2001 and 2015

Being ***non-native*** animals, it would be introducing an INVASIVE animal into the wild. That is totally against logic and the law. Many municipalities in Canada already have laws that obligate residents to keep their pets indoors,

USFW has spent millions of dollars in Alaska ridding islands of the Aleutians from invasive predators introduced in the last few centuries, including marmots, foxes, reindeer, and rats. It is far easier and cheaper to PREVENT invasive predators from disrupting nature than to try to correct the problem after the fact.

Alaska cannot and should not do that. If anything, it should become illegal to allow ANY cats (felis catus) to roam freely in our natural environment.

Thank you for your time and consideration of the above information.

Sincerely,

Joanne Thordarson

Board of Game Proposal

I understand you are thinking of allowing feral cats to be released into the wild to be community cats. I am very much opposed to this. Cats are a very real threat to the lives of wild birds. They are the cause of the death of more birds than anything other thing. I have worked with bird rehabilitation organizations and have seen birds come in who have been attacked by cats – they do not live even with the best of care. Please do not pass #62.

Joanna Walch.

Submitted By
Jack Wiles
Submitted On
10/25/2017 12:41:36 PM
Affiliation

Phone
9072993995
Email
wilesmichaud@msn.com
Address
PO Box 639
Homer, Alaska 99603

I am writing in opposition to Proposal 62 to allow the release of feral cats (domestic) into the wild. I support Proposal 63 to prohibit the introduction of a feral predator like a feral cat into the wild.

The best available science strongly shows that feral domestic cats, even if sterilized, belled, or declawed, are major predators to birds and small mammals. Respect the 'wild' of wildlife by preventing the introduction of this invasive predator.

Date: October 18, 2017

To: Alaska Board of Game:
Ted Spraker, Chair
Nathan Turner, Vice Chair
Stosh Hoffman
Teresa Sager Albaugh
Karen Linnell
Larry Van Daele
Tom Lamal

Re: Opposition comments to Proposal 62 to allow Trap/Neuter/Re-abandonment of feral cats.

From: (Ms.) Page S. Williams, 2234 Ashford Hollow Lane, Houston TX 77077

Ladies and Gentlemen, I understand that you prefer comments from Alaskans, but when I saw the enclosed posting on the Alley Cat Allies website, claiming that trap/neuter/re-abandonment (releasing sterilized feral cats into the wild) would be a humane and effective approach to community cat populations, I had to speak out. I have owned and loved both dogs and cats for 78 years, and there is nothing humane about abandoning them on the streets - not in Texas, and certainly not in an Alaskan winter. Those re-abandoned cats will continue maiming and killing your wildlife for the short duration of their brutal lives. They will continue spreading zoonotic diseases to your wildlife and to your citizens, suffering from lack of routine veterinary care.

I enclose information from the Centers for Disease Control about the dangers of both rabies and toxoplasmosis from feral cats. The CDC states that four times as many cats are reported rabid than are dogs, thus pose a greater threat to the health of people and wildlife than dogs. The reason? We do not maintain "community colonies" of feral dogs that lack the requisite booster shots for rabies. Ask any veterinarian how often rabies shots are needed. (Nor do Texans maintain colonies of feral hogs to control their populations.)

Felids are the only vector for toxoplasmosis; it can only reproduce in their intestines. The oocysts which are shed in their feces can live for 18 months and infect any warm-blooded animal, from humans to eagles to walruses. They are implicated in miscarriage, fetal deformity, blindness, deafness, dementia, schizophrenia, suicide - and death for the immunocompromised (AIDS/organ transplant/chemo patients). Therefore TNR is cruel to both wildlife and humans, while humane euthanasia is a gift we give to our beloved pets and to our wounded wildlife.

I enclose more information about toxoplasmosis dangers to wildlife by USGS's National Wildlife Health Center, from the Wildlife Society, and from Field and Stream. I also enclose some information from Texas Parks and Wildlife Department and Georgia Department of Natural Resources as examples of state biologists who have studied, and who cite, the peer-reviewed research proving that TNR of non-native predators is not effective or humane, as the Proposal 62 supporters claim. Their major financial support is from Petco and Petsmart, the companies that want to sell more cat food, which should give a strong clue to their true goals.

The goal of animal control should be to remove strays, as per CDC recommendations, in order to protect public health. The goal of a Board of Game should not be to "save (domestic) cats' lives", which is the goal of Alley Cat Allies. Their goal is to have more cats on the street. For the sake of Alaska's wildlife, people and pets, I hope that you will not support Proposal 62, and enter my comments in the public record.

#

FYI, I list my enclosures sent to individual board members on the back of this statement

ENCLOSURES FROM PAGE WILLAIMS ON PROPOSAL 62
TO ALASKA BOARD OF GAME, 2017

1. Copy of alert from Alley Cat Allies website, claiming TNR is humane and effective.
   Reverse side: Queensland, Australia's cheaper, permanent AND humane solution.

2. Field Notes from Field and Stream: feral cats cause toxoplasmosis in Ohio deer.

3. Centers for Disease Control: toxoplasmosis infection cycle showing cats are only vector.

4. Centers for Disease Control: Burden of rabies recommends cat kept indoors.

5. Pertinent excerpts from USGS's National Wildlife Health Center Circular 1389, Toxoplasmosis

6. Texas Parks and Wildlife Department issue briefing paper on feral cats and TNR

7. Georgia Department of Natural Resources letter against feral house cats roaming freely.

8. The Wildlife Society issue statement on feral and free-ranging domestic cats.

9. PLOS ONE excerpts on opinions and goals of cat colony caretakers.

Posted on Alley Cat Allies website

Alaska Board of Game Considers Proposal to Allow Trap-Neuter-Return

October 12, 2017

Alaska could soon allow communities across the state to implement Trap-Neuter-Return (TNR) programs to save cats' lives. If the Alaska Board of Game passes Proposal 62, communities statewide will be allowed to practice TNR, the only humane and effective approach to community cat populations. With such an important proposal at stake, Alley Cat Allies is asking residents to submit comments to the Board in support of Proposal 62.

Under current state regulations, cats are one of many species prohibited from being "released into the wild." Consequently, TNR programs—through which community cats are humanely trapped, spayed or neutered, vaccinated, eartipped (the universal sign that a cat has gone through TNR), and returned to their outdoor homes—are also prohibited.

Proposal 62 has been introduced to revise this regulation to allow TNR. If the Board of Game passes the proposal, "sterilized feral cats" will be allowed to be "released into the wild." That means Alaskan communities that want a humane and effective approach to community cats will finally be able to start TNR programs.

This is a rare opportunity to make TNR legal throughout an entire state, and we need Alaska residents to raise their voices to help ensure the proposal's passage. Alaskan communities deserve the choice to do TNR.

If you live in Alaska, please submit a comment in support of Proposal 62 by Friday, October 27, and ask other animal advocates to do the same.

Queensland's Banana Shire Council introduces $10 feral cat bounty

Cameron McCrohon, Rockhampton Morning Bulletin, October 12, 2017 10:14pm

FERAL cats are now a hunted species after Banana Shire introduced a bounty on the pest.

The council will pay $10 for an adult cat's scalp and $5 for a kitten.

The bounty is designed to stop the growing population of feral cats in rural areas of the central Queensland shire, where they are having a devastating effect on the native bird and mammal populations, The Morning Bulletin reports.

The council has allocated $25,000 in its Land Protection budget to cover the cost of the bounty and will continue the program until this funding is exhausted.

Environment and planning manager Chris Welch said a similar program recently introduced in the McKinlay Shire had a significant impact on the feral cat population.

"An increase in feral cat numbers has been observed, particularly though the rural areas of the shire, and council has received information from the Upper Dawson branch of the Queensland Wildlife Preservation Society raising the issue of impacts from feral and uncontrolled cats," he said.

Mr Welch said the bounty would be restricted to feral animals destroyed on rural properties.

He said a property owner didn't need to be the party destroying the animal and requesting payment, but must sign the payment request form giving a hunter permission to be on their property.

A recent study carried out by the Threatened Species Recovery Hub of the National Environmental Science Program found feral cats kill 316 million birds every year, while pet cats kill 61 million birds.

Lead researcher Professor John Woinarski said everybody knew cats killed birds, but this study showed the amount of predation was staggering at a national level.

"We found that the birds most likely to be killed by cats are medium-sized birds; birds that nest and feed on the ground, and birds that occur on islands or in woodlands, grassland and shrub lands," he said.

"For Australian birds, cats are a longstanding, broadscale and deeply entrenched problem that needs to be tackled more effectively.

"Our knowledge of the impacts of cats on threatened mammals was a major stimulus for our first-ever national Threatened Species Strategy, which prioritised actions to control feral cats."

FIELD NOTES
DAILY DISPATCHES FROM THE SPORTING WORLD

January 6, 2015

More Than Half of Deer in NE Ohio Infected by Feral Cats

by Phil Bourjaily

Deer hunters in areas with large feral cat populations are being encouraged to thoroughly cook their venison to avoid danger of infection from a parasite. According to an Ohio State University study published in the journal EcoHealth, researchers took tissue samples from 444 deer and 200 free-roaming cats in the greater Cleveland area. Sixty percent of the deer and more than 65 percent of the cats tested positive for *Toxoplasma gondii*, the parasite that can infect humans with toxoplasmosis. This disease causes flu-like symptoms, brain or eye damage, and possibly schizophrenia and suicidal behavior in humans, according to Cleveland.com.

The parasite can infect all warm-blooded animals, but members of the felid (cat) family are its primary hosts. It is deposited on the ground along with cat feces and can remain infectious for up to 18 months.

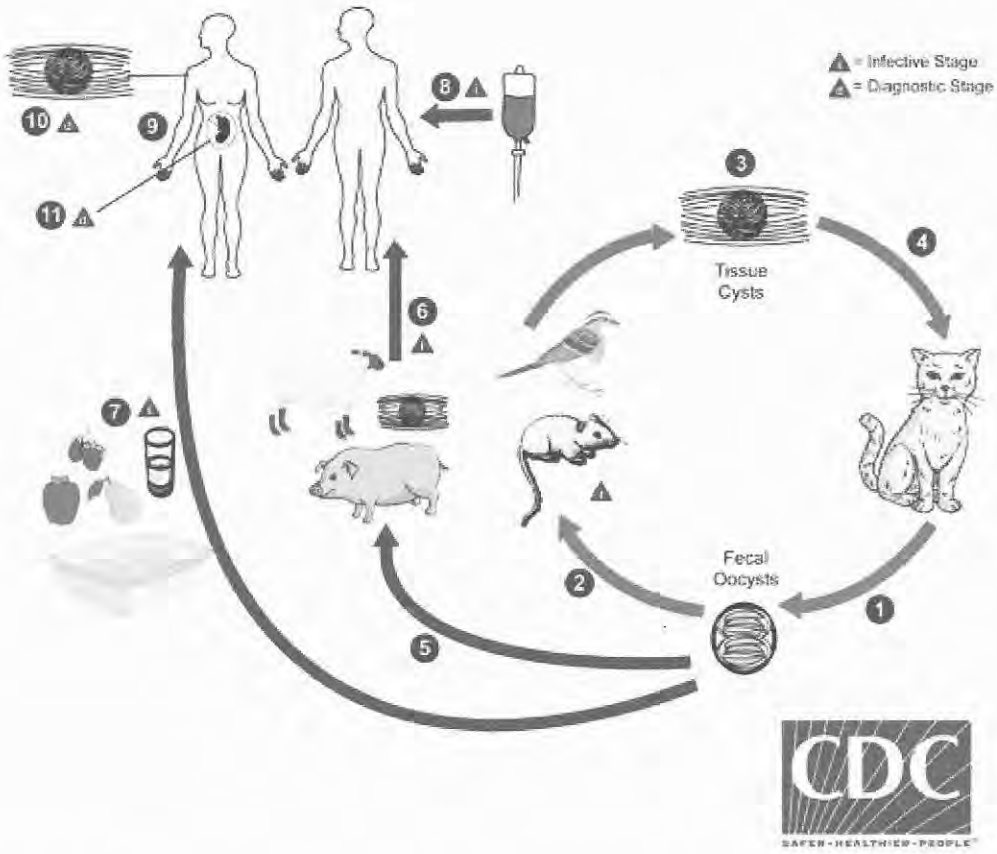
Other studies have shown whitetails in Iowa, Pennsylvania, and Mississippi to be infected with *toxoplasma gondii*. Urban deer have been shown to have three times the odds of being infected as deer in suburban areas, probably because of the greater density of free-roaming domestic cats around cities.

https://www.cdc.gov/parasites/toxoplasmosis/biology. html

Causal Agent:

Toxoplasma gondii is a protozoan parasite that infects most species of warm blooded animals, including humans, and can cause the disease toxoplasmosis.

Life Cycle:



The only known definitive hosts for *Toxoplasma gondii* are members of family Felidae (domestic cats and their relatives). Unsporulated oocysts are shed in the cat's feces ❶. Although oocysts are usually only shed for 1-2 weeks, large numbers may be shed. Oocysts take 1-5 days to sporulate in the environment and become infective. Intermediate hosts in nature (including birds and rodents) become infected after ingesting soil, water or plant material contaminated with oocysts ❷. Oocysts transform into tachyzoites shortly after ingestion. These tachyzoites localize in neural and muscle tissue and develop into tissue cyst bradyzoites ❸. Cats become infected after consuming intermediate hosts harboring tissue cysts ❹. Cats may also become infected directly by ingestion of sporulated oocysts. Animals bred for human consumption and wild game may also become infected with tissue cysts after ingestion of sporulated oocysts in the environment ❺. Humans can become infected by any of several routes:

- eating undercooked meat of animals harboring tissue cysts ❻.
- consuming food or water contaminated with cat feces or by contaminated environmental samples (such as fecal-contaminated soil or changing the litter box of a pet cat) ❼.
- blood transfusion or organ transplantation ❽.
- transplacentally from mother to fetus ❾.

In the human host, the parasites form tissue cysts, most commonly in skeletal muscle, myocardium, brain, and eyes; these cysts may remain throughout the life of the host. Diagnosis is usually achieved by serology, although tissue cysts may be observed in stained biopsy specimens ❿. Diagnosis of congenital infections can be achieved by detecting *T. gondii* DNA in amniotic fluid using molecular methods such as PCR ⓫.

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LEARN MORE ABOUT HOW CDC WORKS FOR YOU.

The Burden of Rabies (2014)

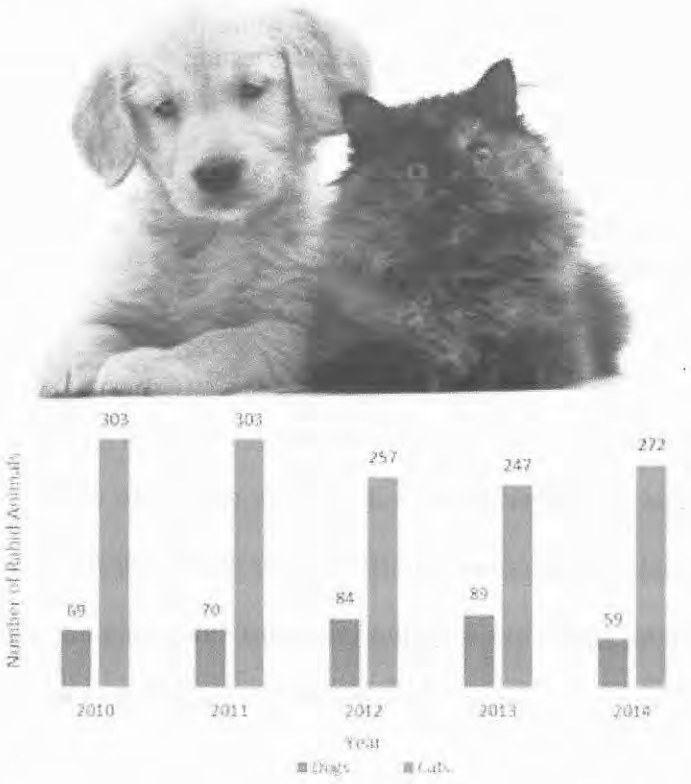
Learn how to help prevent rabies, a deadly virus that threatens the health of people and animals.

Rabies is a dangerous virus that is spread through the saliva of animals sick with rabies. Anyone can get it if they handle or get bitten by an animal that has the disease.

Rabies in the U.S.

Rabies continues to be a serious threat to the health of people and animals. Every year, about 40,000 people receive a rabies prevention treatment called **post-exposure prophylaxis (PEP)** because they had contact with potentially rabid animal.

More than 90% of all rabid animals reported to CDC each year occur in wildlife. The animals that get rabies the most are raccoons, skunks, foxes, and bats. However, most people in the U.S. get PEP due to close contact with domestic animals such as cats or dogs.



Rabies cases among dogs and cats reported in the U.S. from 2010 to 2014 gradually decreased.

Rabies in Cats

While dogs have historically been associated with spreading rabies to people, more cats than dogs are reported rabid in the U.S. each year. Cats are often in close contact with both people and wild animals, including those that primarily spread rabies, like raccoons and bats. Thus rabies may be more easily spread to people from cats.

Over the past few years, public health officials saw a small decrease in the number of reported cases of rabid cats. **However, in 2014, over four times more rabid cats were reported than rabid dogs.** Importantly, cat owners are less likely to visit a veterinarian's office, where they can get their cat shots that can keep it safe from rabies. According to the American Veterinary Medical Association (AVMA), only 55 percent of U.S. cat owners visited a veterinarian in 2011, a significant decrease compared with 64 percent in 2006. This is much less compared to dog owners (81 percent in 2011 and 83 percent in 2006).

Protecting You and Your Family

The best ways to protect yourself and your family from rabies is to:

- **Vaccinate your pets and other domestic animals** (like cows, goats, sheep, and horses)
- **Avoid contact with wild animals** – do not feed or handle them, even if they seem friendly. If you see a wild animal acting strangely, report it to animal control.

If you or someone in your family is exposed to a rabid animal, rabies can be prevented through a series of shots called **rabies post-exposure prophylaxis (PEP).**

If you are bitten by any animal (domestic or wild):

- Immediately wash the wound well with soap and water and see a healthcare provider
- Contact animal control to assist in capturing the animal for observation or rabies testing

Family pets can get rabies if they are bitten by rabid wild animals.

Cats, dogs, and ferrets that have not gotten their rabies shots and are bitten by an animal may have to be quarantined for six months or euthanized. In general, pets have a higher risk of coming into contact with wild animals that may have rabies than people do. This increases the risk of rabies to us because of our close contact with our pets.

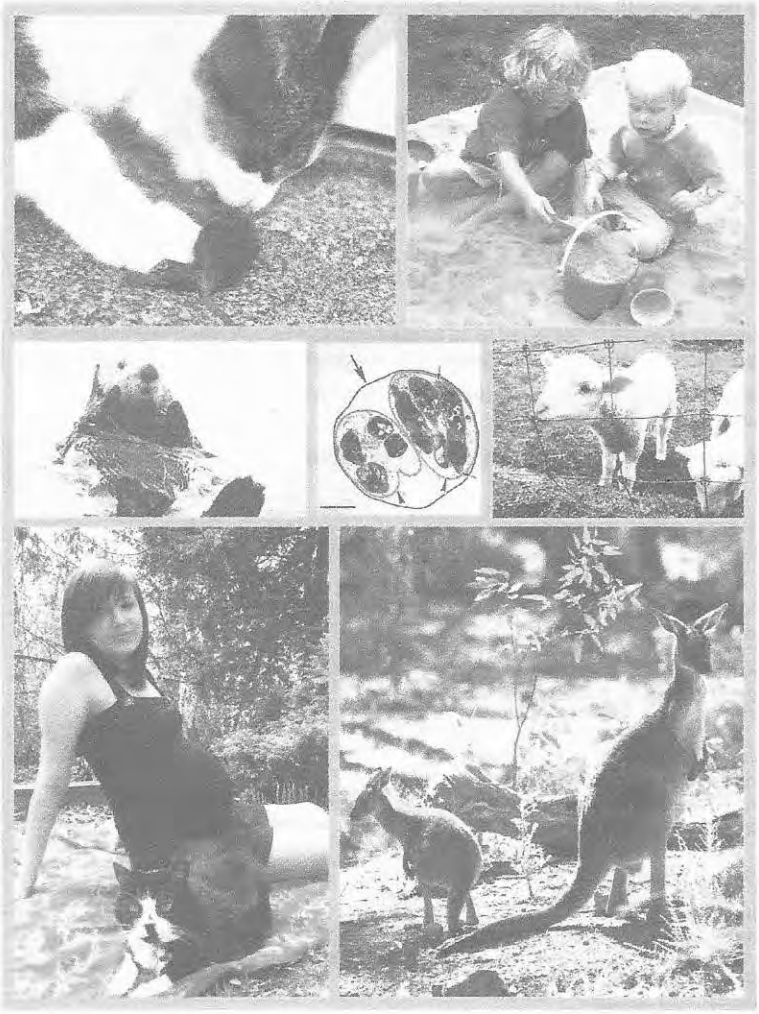
To help reduce this risk:

- Visit your veterinarian with your pet on a regular basis and keep rabies vaccinations up-to-date for all cats, ferrets, and dogs.
- **Maintain control of your pets by keeping cats and ferrets indoors** and keeping dogs under direct supervision when outdoors.
- Spay or neuter your pets to help reduce the number of unwanted animals that may not be properly cared for or vaccinated regularly.
- **Call animal control to remove all stray animals from your neighborhood since these animals may be unvaccinated.**
- **Do not feed or water your pets outside** and keep your garbage securely covered. These items may attract wild or stray animals.

USGS
science for a changing world

National Wildlife Health Center

Toxoplasmosis



Circular 1389

U.S. Department of the Interior
U.S. Geological Survey

U.S. Department of the Interior
SALLY JEWELL, Secretary

U.S. Geological Survey
Suzette M. Kimball, Acting Director

U.S. Geological Survey, Reston, Virginia: 2014

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Toxoplasmosis

By Dolores E. Hill[1] and J.P. Dubey[1]

"Before the discovery of the oocyst in 1970, who would have thought that we would be living in a universe of *Toxoplasma*." (Dubey, 2010)

Synonyms

Litter box disease

Overview

Toxoplasmosis is a **zoonotic** protozoal **disease** of humans and animals caused by the **coccidian parasite**, *Toxoplasma gondii* (Nicole and Manceaux, 1909). Infection by *T. gondii* is widely **prevalent** in humans, and nearly one-third of humanity has been exposed to this parasite (Dubey and Beattie, 1988; Montoya and Liesenfeld, 2004; Dubey, 2010). Although *T. gondii* usually causes only mild disease or **asymptomatic infection** in **immune**-competent adults, it can cause devastating disease in congenitally infected children and in adults and children with depressed immunity. *T. gondii* utilizes **felids** as **definitive hosts** and has an unusually wide **intermediate host** range. Many species of **domestic** and wild animals, including **birds**, can be infected (table 1). This broad spectrum of intermediate hosts contributes to *T. gondii* being one of the most common **parasitic** infections of humans and other **warm-blooded** animals (Dubey and Beattie, 1988). *T. gondii* has been found worldwide from Alaska to Australia. Serologic surveys indicate that infections are common in wild pigs and **carnivores**, including bears, felids, foxes, raccoons, and skunks. **Clinical** and **subclinical** forms of toxoplasmosis have been reported in wild **cervids**, **ungulates**, **marsupials**, monkeys, and marine **mammals**. **Mortality** from toxoplasmosis has recently been reported in sea otter populations, and the disease is of growing concern as a sea otter mortality factor (Cole and others, 2000; Miller, Gardner, Kreuder, and others, 2000; Kreuder and others, 2003; Jessup and others, 2007; Thomas and others, 2007). Toxoplasmosis is a common cause of fetal death and abortion in sheep and goats. Adult goats and **swine** also are subject to serious illness. **Central nervous system** signs are common manifestations of *T. gondii* infection in cats and dogs (Dubey and Beattie, 1988).

Background

T. gondii is transmitted via the **fecal-oral route**, as well as through consumption of infected meat and by **transplacental** transfer from mother to fetus (Frenkel and others, 1970; Dubey and Beattie, 1988). Although cats are the definitive host for *T. gondii*, a wide range of other warm-blooded animals serves as intermediate hosts (Frenkel and others, 1970). These hosts often have **infective** stages of *T. gondii* in their tissues, thereby serving as sources for infection when their flesh is consumed raw or undercooked. Because *T. gondii* is one of the most common parasites of animals, consumption of infected meat contributes to the growing importance of toxoplasmosis as a zoonotic disease. For example, a recent study in the Slovak Republic found *T. gondii* infection to be common in wild boars, emphasizing the need to maintain high standards of hygiene during the handling of this important game species when it is prepared as food (Antolová and others, 2007).

T. gondii was initially discovered in the gundi (Nicolle and Manceaux, 1908), a small **rodent** that inhabits rocky areas on hills and mountains of the northern part of the African continent (Walker, 1964). About the same time, independent discovery of this parasite was made in a laboratory rabbit in São Paolo, Brazil (Splendore, 1908; Dubey, 2008). In retrospect, these widely geographically separated discoveries were somewhat of a bellwether relative to the broad geographic distribution of *T. gondii* and the variety of species it would be found to infect. It was another 30 years before *T. gondii* was found to cause disease in humans and an additional 47 years after that discovery before the full life cycle for this parasite was determined (box 1).

[1]U.S. Department of Agriculture, Agricultural Research Services, Animal Parasitic Diseases Laboratory.

Table 1. General summary of nonhuman species naturally infected with *T. gondii*.

Species type	Minimum number of species[1]
Domestic animals	
Livestock	8
Poultry	3
Cats	1
Dogs	1
Wild animals	
Ungulates	25
Carnivores	8
Felids	10
Marsupials	20
Marine mammals	10
Birds	11
Small mammals (rodents/lagomorphs)	9
Monkeys	18
Bears	3

[1]The number of species indicated is merely a minimum; more species may have been infected but have not been reported. The numbers should not be interpreted relative to each other, because some groups may be overrepresented due to higher susceptibility to clinical or fatal disease or both.

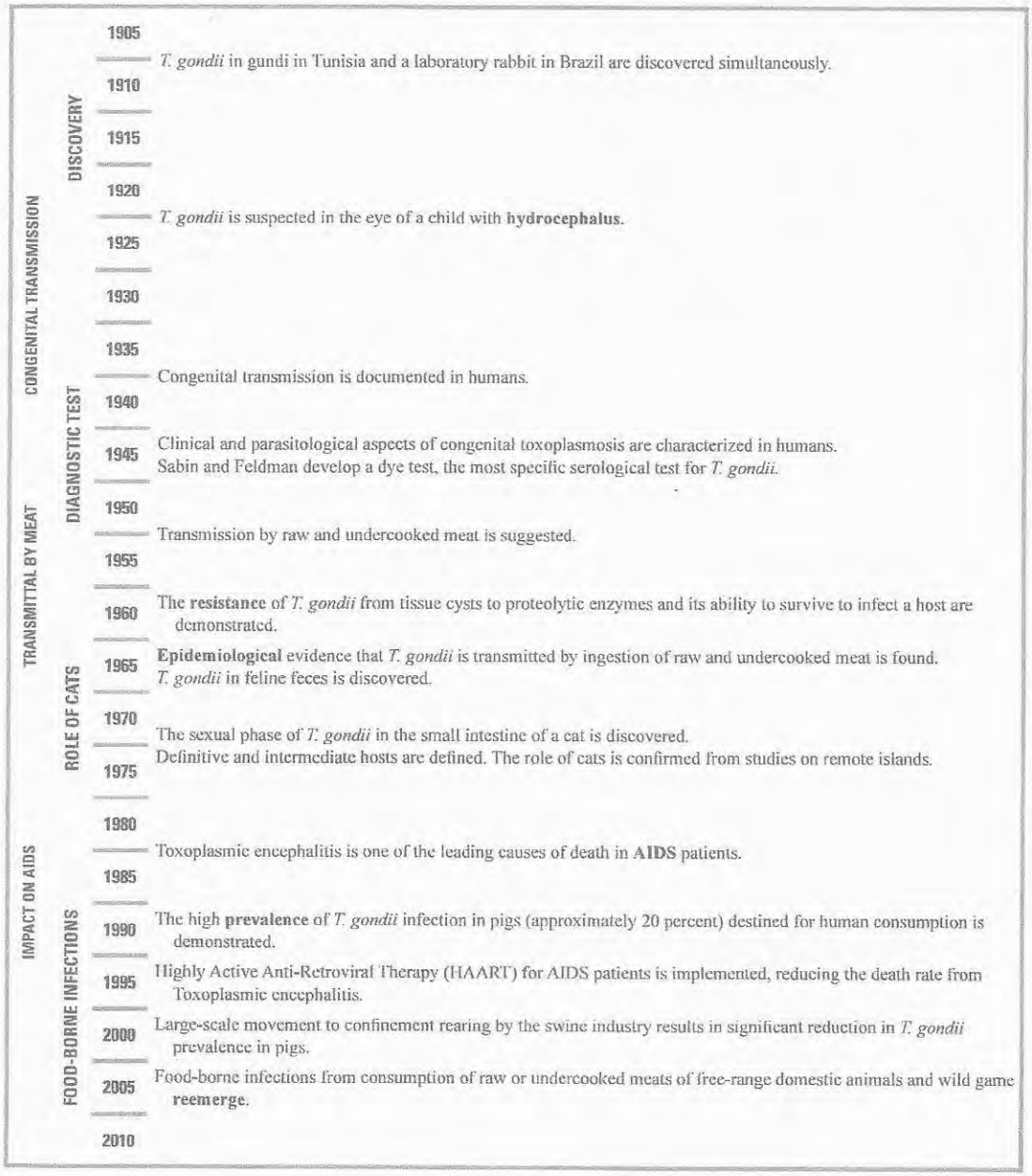
The name *Toxoplasma* (toxon = arc, plasma = form) is derived from the crescent shape of one of the three **infectious** stages of the parasite, the tachyzoite stage (fig. 1*A*). This stage rapidly multiplies in intermediate host cells and in nonintestinal **epithelial** cells of the definitive host. Bradyzoites (fig. 1*B*) and sporozoites (fig. 1*C*) are the other infectious stages. In contrast to tachyzoites, bradyzoites multiply slowly within a tissue **cyst**, while sporozoites are generated by sexual processes in the definitive host intestine and develop to maturity within oocysts released into the environment in cat feces (Dubey, 2008).

Past scientific literature suggests that different species of *Toxoplasma* have been identified over time (Keymer, 1981; Levine, 1985). However, modern technology has clarified the speciation of **protozoans** by replacing **morphology** and other physical characteristics with molecular descriptions. It is now generally accepted that there is only one species of *Toxoplasma*, *T. gondii*.

Strain differences exist that may affect the **pathogenicity** of the parasite in a given host (Dubey, 2010). Prior to the development of genetic markers, *T. gondii* **isolates** were grouped by their **virulence** to outbred mice. During the 1980s and 1990s, methods were developed to recognize genetic differences among *T. gondii* isolates from humans and animals (Pfefferkorn and Pfefferkorn, 1980; Dardé and others, 1988; Tibayrenc and others, 1991; Sibley and others,1992; Howe and Sibley, 1995; Dardé, 2008). Based on deoxyribonucleic acid (**DNA**) restriction fragment length polymorphisms (**RFLP**), Howe and Sibley (1995) classified *T. gondii* into three genetic Types (I, II, III) and linked virulence in mice to genetic type. They proposed that Type I isolates were 100 percent lethal to mice, irrespective of the dose, and that Types II and III generally were avirulent for mice (Howe and others, 1996). Circumstantial evidence suggests that certain genetic types of *T. gondii* may be associated with clinical **ocular** toxoplasmosis in humans (Khan and others, 2006). It has been suggested that Type I isolates or **recombinants** of Types I and III are more likely than Type II isolates to result in clinical toxoplasmosis, but genetic characterization has been limited essentially to isolates from patients ill with toxoplasmosis (Khan and others, 2005). There is very little information regarding the genetic diversity of *T. gondii* isolates circulating in the general human population. Therefore, we must be cautious in claiming a linkage between parasite **genotypes** and disease presentations without clear and discerning information regarding the parasite's biology in the human population and environment.

Acquisition of direct oral transmission by *T. gondii* appears to be a recent evolutionary change achieved by **recombination** between competing, distinct clonal lines of the parasite. This route of transmission has facilitated widespread distribution of *T. gondii* (Montoya and Liesenfeld, 2004).

Box 1 100 Years of *Toxoplasma gondii*



Causative Agent

T. gondii is a protozoan parasite belonging to the subclass Coccidiasina (Leuckart, 1879) (table 2). Coccidia, in general, have complicated life cycles (fig. 2), and *T. gondii* is no exception (box 2). As noted above, *T. gondii* has three infectious stages (fig. 3): the tachyzoites (in groups; fig. 3*A*), the bradyzoites (in tissue cysts; fig. 3*B*), and the sporozoites (in oocysts; fig. 3*C*).

The tachyzoite is often crescent shaped and is approximately the size of a red blood cell (fig. 4). The anterior end of the tachyzoite is pointed, and the posterior end is round. It has an outer covering, or pellicle, enclosing various **organelles**. Bradyzoites differ structurally only slightly from tachyzoites. They have a nucleus situated toward the posterior end, whereas the nucleus in tachyzoites is more centrally located. Bradyzoites are more slender than are tachyzoites and are less **susceptible** to destruction by **proteolytic enzymes** than are tachyzoites. Intact tissue cysts containing bradyzoites probably do not cause any harm and can persist for the life of the host.

Table 2. Taxonomic classification of the parasite causing toxoplasmosis.

Classification	Designation
Kingdom	Protista
Phylum	Apicomplexa
Class	Sporozoasida
Subclass	Coccidiasina
Order	Eucoccidioridia
Suborder	Eimeriorina
Family	Toxoplasmatidae
Genus	*Toxoplasma*
Species	*gondii*

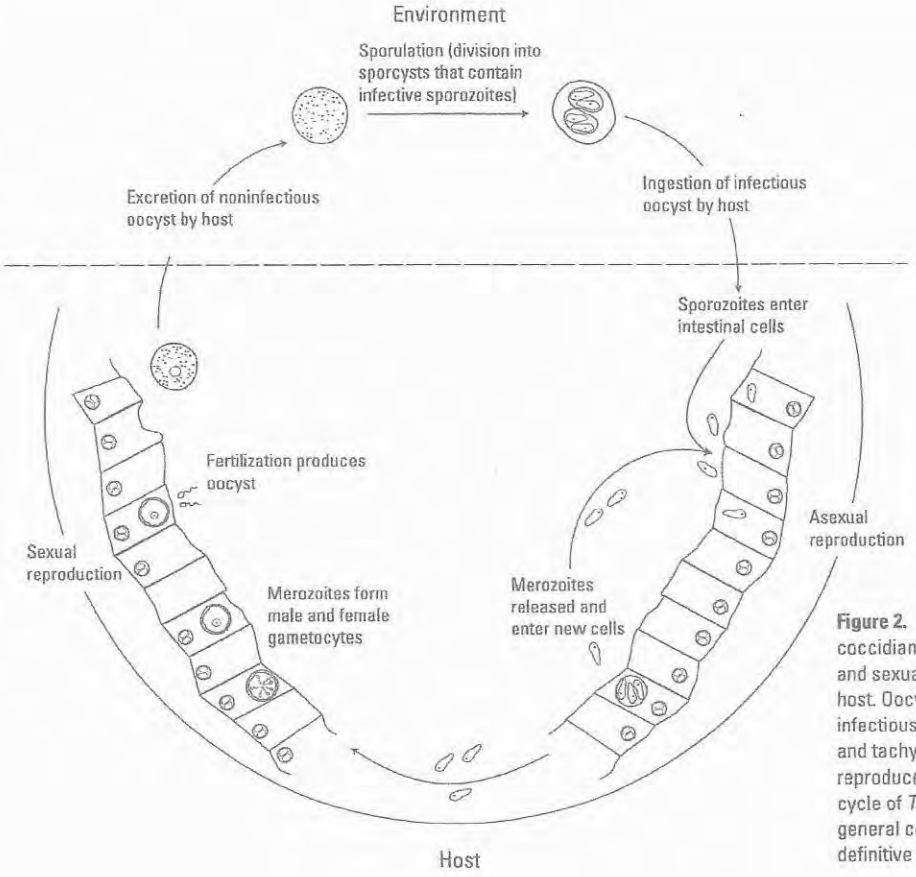
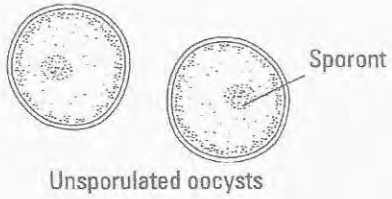


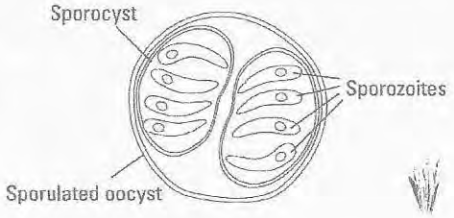
Figure 2. The life cycle of a typical coccidian parasite involves asexual and sexual reproduction within the host. Oocysts sporulate and become infectious in the environment, and tachyzoites and bradyzoites reproduce within the host. The life cycle of *T. gondii* is similar to this general coccidian life cycle in its definitive host, the cat.

Box 2 Life Cycle of *T. gondii*

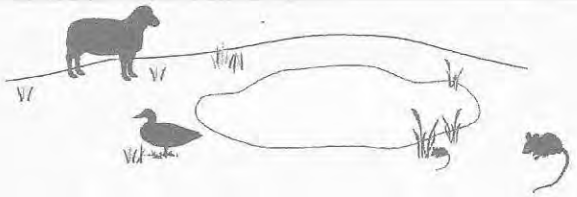
1.
Noninfective parasite oocysts (eggs) containing a single cell referred to as the sporont are passed by cats in their feces into the environment.



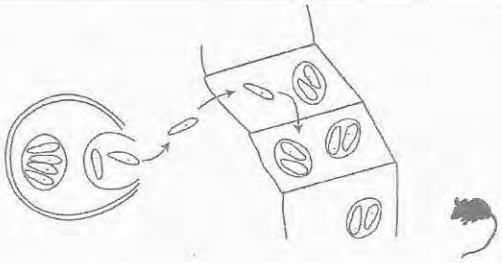
2.
Oocysts become infective within 1 to 5 days in the environment through sporulation (sporogony), which is a developmental process that results in the sporont dividing and forming two sporocysts, each containing four infective sporozoites.



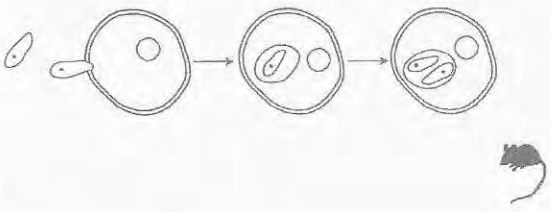
3.
Infective oocysts are ingested by intermediate hosts or humans in contaminated feed, water, soil, or other ingesta.



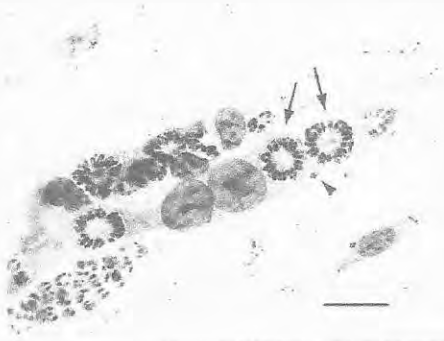
4.
In the small intestine, the sporozoites escape from the sporocysts and oocysts and enter the epithelial cells lining the internal surfaces of the intestine. The sporozoites multiply asexually by endodyogeny, resulting in the formation of tachyzoites.



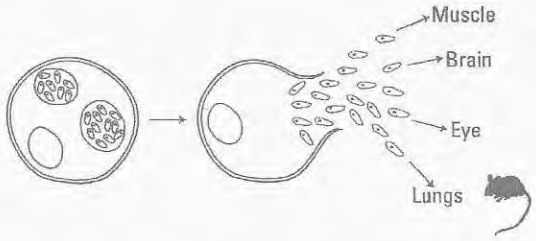
5.
Tachyzoites can tilt, extend, and retract as they search for host cells, and they then enter the host cells by active penetration of the host cell membrane. After entering the host cell, the tachyzoite becomes ovoid in shape (*A*) and becomes surrounded by a **parasitophorous vacuole** in which it is protected from host defense mechanisms. Tachyzoites multiply asexually within the host cell by repeated divisions in which two progeny form within the parent parasite, consuming it.



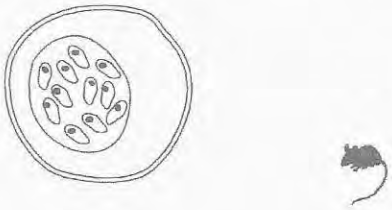
A. This photograph shows tachyzoites grown in cell culture in human foreskin fibroblasts. An ovoid tachyzoite can be seen surrounded by a vacuole (arrowhead). Also seen are groups of tachyzoites arranged in rosettes (arrows). Contrast was enhanced by the use of an immunohistochemical stain with a tachyzoite-specific polyclonal antibody. The scale bar is 20 micrometers (µm) in length. (Photo by Dr. J.P. Dubey)



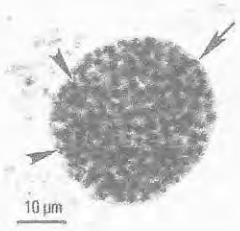
6.
Tachyzoites continue to divide until the host cell is filled with parasites. Tachyzoites accumulate in groups of 8 to 32 within the host cells and then break out of the host cell. The tachyzoites enter new host cells and undergo further divisions.



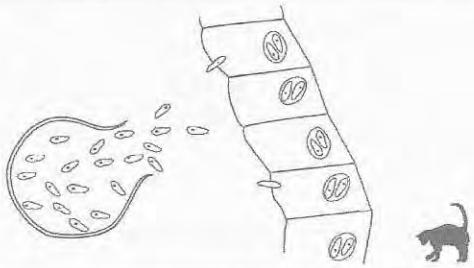
7.
As infection becomes **chronic**, immunity builds up, and multiplication of tachyzoites slows. Bradyzoites, as they are now called, accumulate in large numbers within a host cell and become surrounded by a thin, elastic wall to form tissue cysts, which vary in size from 5 to 70 µm and remain **intracellular** (*B*). A tissue cyst may enclose hundreds of bradyzoites. Tissue cysts are most prevalent in muscular and neural tissues, including the brain, eye, skeletal, and cardiac muscle, but they may also occur in **visceral** organs, including lungs, liver, and kidneys.



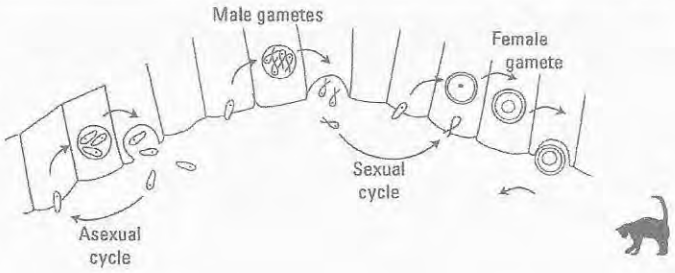
B. Tissue cyst in a section of mouse brain. Numerous bradyzoites (arrowheads) are surrounded by cyst wall (arrow). Contrast was enhanced by the use of periodic acid Schiff hematoxylin (PASH). The bradyzoites stain bright red with PAS but appear black in this photograph. The scale bar is 10 micrometers (µm) in length. (Photo from Dubey and others, 1998)



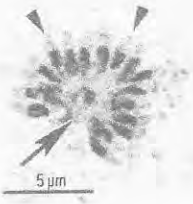
8.
After a cat ingests tissue cysts in meat, the tissue cyst wall is dissolved by proteolytic enzymes in the stomach and small intestine, thus releasing the bradyzoites. The bradyzoites then penetrate the epithelial cells of the small intestine and initiate development of numerous generations of asexual and sexual cycles of *T. gondii* (Dubey and Frenkel, 1972).



9.
Within cats, the bradyzoites multiply profusely in intestinal epithelial cells; this is known as the entero-epithelial cycle, and these stages are known as schizonts (*C*). Merozoites are released from schizonts and form male and female gametes. The male gamete (*D*) uses its two flagella to swim to the female gamete, which it then enters. After the female gamete is fertilized, oocyst wall formation begins. Three to 10 days after ingesting tissue cysts, oocysts are discharged into the intestinal lumen by the rupture of intestinal epithelial cells and released into the environment with the feces.

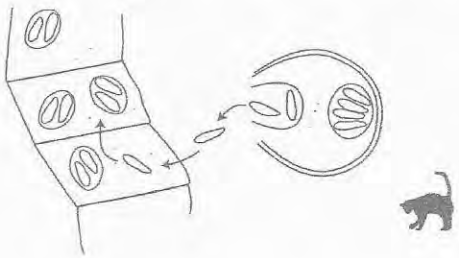


C. This image of an impression smear of infected cat intestine shows a schizont (arrow) with several merozoites (arrowheads) separating from the main mass. Contrast was enhanced by use of Giemsa stain. The scale bar is 5 micrometers (µm) in length. (Photo from Hill and others, 2005)



D. This image of an impression smear of infected cat intestine shows a male gamete with two flagella (arrows). Contrast was enhanced by use of Giemsa stain. The scale bar is 10 micrometers (µm) in length. (Photo from Hill and others, 2005)

10.
As the entero-epithelial cycle progresses, bradyzoites penetrate the lamina propria of the feline intestine and multiply as tachyzoites. Within a few hours after infection of cats, *T. gondii* may disseminate to extraintestinal tissues. *T. gondii* can persist in intestinal and extraintestinal tissues of cats for at least several months, and possibly for the life of the cat.



Marine Mammals

A variety of marine mammals have been found to be infected by *T. gondii* (tables 16–17), suggesting contamination of coastal waters and survival of *T. gondii* oocysts in seawater on the Atlantic and Pacific coasts of North America (Lindsay and others, 2001; Miller, Gardner, Kreuder, and others, 2002; Conrad and others, 2005). *T. gondii* is considered a significant cause of encephalitis in sea otters (Cole and others, 2000; Lindsay and others, 2001; Conrad and others, 2005) (box 6). Two new *T. gondii* genotypes (Types A and X) have been characterized from sea otters collected in California and Washington States (Miller and others, 2004; Conrad and others, 2005; Sundar and others, 2008).

Table 16. Examples of clinical toxoplasmosis in marine mammals.

[From Dubey, 2010. Confirmed by histology, tachyzoites, or cysts]

Species	Location	Living condition	Remarks
Elephant seal	California	Wild	Encephalitis.
Northern fur seal	California	Wild	Encephalitis.
Pacific harbor seal	Cold Bay, Alaska	Wild	1 day old, 11.5 kilograms, hepatitis.
Monk seal	Hawaii	Wild	1 adult male, good nutritional condition, lymphadenitis.
Sea lion	Pennsylvania	Captive	10 days old, disseminated.
	California	Captive	Adult, myocarditis.
	Florida	Captive	9-year-old male, disseminated, myocarditis.
Atlantic bottlenose dolphin	Florida	Wild	1 adult and her calf, disseminated.
	Florida	Wild	Young male, hepatitis, adrenalitis.
	Tuscany	Wild	2 adults.
	United States	Wild	1 of 97 stranded adults.
	Canada	Captive	2 with encephalitis.
Striped dolphin	Spain	Wild	Lymphadenitis, encephalitis, 4 of 110 stranded animals.
	Tuscany	Wild	4 wild adults, encephalitis with coinfection with morbillivirus.
Indo-Pacific bottlenose dolphin	United States	Wild	Late term fetus, myocarditis, encephalitis.
Spinner dolphin	Hawaii	Wild	Adrenalitis.
Risso's dolphin	Spain	Wild	Adult and her fetus, disseminated.
	Italy	Wild	1 adult.
Tucuxi dolphin	Rio de Janeiro	Wild	1 adult, lymphadenitis.
Indo-Pacific humpbacked dolphin	Queensland	Wild	4 of 4 stranded adults.
Walrus	Canada	Wild	Seizure.[1]
West Indian manatee	Florida	Wild	Encephalitis.
	Georgetown, Guyana	Wild	Myocarditis.
Beluga whale	Quebec	Wild	6 months old, encephalitis.
	Spain	Wild	31 years old, disseminated.

[1] *T. gondii* found by polymerase chain reaction.

Table 17. Serologic prevalence of *T. gondii* antibodies in marine mammals.

[From Dubey, 2010. DT, dye test: ELISA, enzyme-linked immunosorbent assay; IFAT, indirect fluorescent antibody test; IHAT, indirect hemagglutination test; LAT, latex agglutination test; MAT, modified agglutination test]

Species	Location	Test	Number of animals tested	Animals tested positive, in percent
Sea otter	California; live	IFAT	80	36
	Dead	IFAT	77	61
	Dead	MAT	100	82
	Dead	MAT	25	52
	Washington; live	IFAT	21	38
	Dead	MAT	10	100
Walrus	Alaska	MAT	53	5.6
Monk seal	Hawaii	MAT	117	1.7
Sea lion	Alaska	MAT	27	29.6
	California	MAT	18	61.1
Harbor seal	Washington	MAT	380	7.6
	Alaska	MAT	311	16.4
	Canada	MAT	34	9
Grey seal	Canada	MAT	122	9
Hooded seal	Canada	MAT	60	1.6
Ringed seal	Alaska	MAT	32	15.6
Bearded seal	Alaska	MAT	8	50
Spotted seal	Alaska	MAT	9	11.1
Bottlenose dolphin	California	MAT	94	96.8
	Florida	MAT	47	100
	Florida; South Carolina	MAT	146	100
	South Carolina	MAT	49	53
	Canada	MAT	8	100
	Japan; Solomon Island	LAT	[1] 58	13.7
	Japan	IHAT	59	10.1
	Spain	MAT	7	57.1
Common dolphin	United Kingdom	DT	21	28.6
	Spain	MAT	4	50
Striped dolphin	Spain	MAT	36	11.1
Humpback whale	United Kingdom	DT	1	100
Harbor porpoise	United Kingdom	DT	70	1.4
	Spain	MAT	1	100
Steller sea lion	Russia	ELISA	189	13.8

[1] Pacific bottlenose dolphin (*Tursiops aduncus*).

Box 6 Toxoplasmosis and Sea Otters

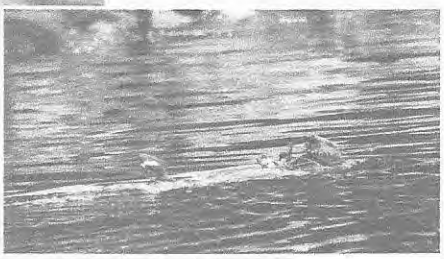
Most people who sit on the California coastline watching sea otters frolicking in the water or floating lazily on the surface don't realize how interconnected their lives are. Southern sea otters make their homes in the nearshore marine habitat alongside more than one-half of the population of Californians who reside in coastal communities (Conrad and others, 2005). The coastal waters have become the collection point of runoff from human activities containing various types of pollutants, including bacterial and protozoal organisms that are having a serious impact on the health of southern sea otters and their ability to survive as a species.

Photo courtesy of Milton Friend, U.S. Geological Survey

In the late 1800s, the southern sea otter was hunted to near extinction by the fur industry. After gaining federal protection in 1911, their numbers began to recover. However, the species was listed as "threatened" in 1977 under the U.S. Endangered Species Act, and in the 1990s, the recovery appeared to be much slower than expected. Research determined that an increased mortality rate was responsible for this slow recovery rather than a decreased birth rate or migration (Estes and others, 2003; Kreuder and others, 2003; Gerber and others, 2004). In 1992, **pathologist**s at the U.S. Geological Survey's National Wildlife Health Center in Madison, Wis., determined that infectious diseases were responsible for 38.5 percent of sea otter deaths (Thomas and Cole, 1996). Since then, protozoal **meningoencephalitis** (inflammation of the brain and membranes covering the spinal cord and brain) caused by *T. gondii* has been shown to be a primary cause of 16.2 percent of otter deaths and a contributing factor in 11.4 percent of deaths (Kreuder and others, 2003). Encephalitis caused by *T. gondii* may cause abnormal behavior of otters, making them more susceptible to shark attacks (Kreuder and others, 2003). Most of these mortalities have been subadults and prime-age adults, thus these deaths have a direct impact on potential population growth and recovery. In addition to their value as a tourist attraction, sea otters play a crucial role in the health of the nearcoastal ecosystem. They act as a "**keystone**" species to help maintain the health of coastal kelp forests by feeding on sea urchins, which can destroy kelp forests by their herbivorous behavior if left unchecked. Kelp forests are important habitats for many marine species and also act to protect the coastline from erosion.

Center and bottom photos courtesy of Tania Larson, U.S. Geological Survey

Studies have revealed an important connection between the land environment adjacent to marine coastal habitats and the high mortality rate among sea otters (Miller, Gardner, Kreuder, and others, 2002; Fayer and others, 2004). Coastal freshwater runoff contaminated with *T. gondii* oocysts has been strongly associ-



ated with infections of *T. gondii* in southern sea otters; 42–62 percent of southern sea otters in areas along the Pacific coast have been shown to be infected by *T. gondii* (Miller, Gardner, Kreuder, and others, 2002; Miller, and others, 2008). Because felines are the only definitive host for this parasite, infective oocysts must have come from terrestrial habitats. Sea otters may ingest these oocysts directly from contaminated water or indirectly by feeding on mussels, snails, and other shellfish, which can concentrate protozoans during filter-feeding (Cole and others, 2000; Arkush and others, 2003; Lindsay and others, 2003; Miller and others, 2008; Johnson and others, 2009). Northern anchovies may also serve as a source of infection for marine mammals (American Society for Microbiology, 2008). Because toxoplasmosis is a zoonotic disease, humans recreating in these waters or eating uncooked shellfish harvested in these areas are also at risk of becoming infected by *T. gondii*.

Southern sea otters are acting as a sentinel species for the detection of the presence of *T. gondii* in the marine environment. This contamination is a reflection of the level of contamination in the terrestrial environment. Although the proportion of infected cats that shed oocysts is generally low (Dabritz and others, 2007), each infected cat may shed 1 million oocysts after initial infection. Because of the large number of outdoor cats, both owned and feral, this level of shedding could lead to substantial environmental contamination and a high risk for both human and animal infection (Dabritz and others, 2006).

Cat owners may be unaware of the consequences of allowing their cats to defecate outdoors and their role in maintaining the health of their immediate environment as well as more distant habitats that may be connected by water runoff patterns. Disposing of feline feces by flushing them down the toilet may not be a safe method of disposal, because water treatment methods may not totally inactivate *T. gondii* oocysts, thus making sewage discharges into ocean waters a possible source of contamination and subsequent infection for sea otters. Where precautions exist to prevent environmental contamination from landfills, bagging cat feces and disposing of them in landfills may be preferable to flushing them down the toilet. By becoming aware of the interconnectedness of the habitats of humans, domestic animals, and wildlife, people can alter their behaviors in simple ways that can have much larger impacts on the health of both animals and humans.

Obtaining a Diagnosis

Clinical signs of toxoplasmosis are nonspecific and are not sufficiently characteristic for a definite diagnosis. Toxoplasmosis, in fact, mimics several other infectious diseases. Thus, biologic, serologic, or **histologic** methods, or some combination of these methods, are used to obtain a diagnosis (Dubey, Thulliez, and Powell, 1995). Detection of *T. gondii* antibody in patients may aid diagnosis. Numerous serologic procedures are available for detection of **humoral** antibodies; these include the Sabin-Feldman dye test, the indirect hemagglutination assay, the indirect fluorescent antibody test (IFAT), the direct agglutination test, the latex agglutination test, ELISA, and the immunoabsorbent agglutination test (IAAT). The IFAT, IAAT, and ELISA have been modified to detect immunoglobulin (Ig) M antibodies (Frenkel and others, 1970; Remington and others, 1995), which appear sooner after infection than the IgG antibodies and disappear faster than IgG antibodies after recovery (Remington and others, 1995).

Disease Ecology

The environmentally resistant stage (oocyst) is part of the life cycle of all coccidian parasites. Oocysts of *T. gondii* are formed only in cats, probably in all members of the family Felidae (fig. 11). Cats shed oocysts after ingesting any of the three infectious stages of *T. gondii*, that is, tachyzoites, bradyzoites, and sporozoites (Dubey and Frenkel, 1972, 1976; Dubey, 1996). The time to the shedding of oocysts after initial infection (prepatent period) and the frequency of oocyst shedding vary according to the stage of *T. gondii* ingested. This time period ranges from 3 to 10 days after ingestion of tissue cysts and 18 days or more after ingestion of tachyzoites or oocysts (Dubey and Frenkel, 1972, 1976; Dubey, 1996; Dubey, 2010). Less than 50 percent of cats shed oocysts after ingesting tachyzoites or oocysts, whereas nearly all cats shed oocysts after ingesting tissue cysts (Dubey and Frenkel, 1976). In freshly passed feces, oocysts are noninfective subspherical to spherical forms (fig. 11). These oocysts become infectious (sporulate) outside the cat within 1–5 days depending upon aeration and temperature. Sporulated oocysts contain two ellipsoidal sporocysts (fig. 11), each of which contains four sporozoites (box 7).

Toxoplasmosis may be acquired by **congenital** infection, by ingestion of tissue-inhabiting stages of the parasite, or by ingestion of oocysts in the environment (fig. 12). Most natural infections are probably acquired by ingestion of tissue cysts in infected meat or ingestion of oocysts in food or water contaminated by cat feces (fig. 13). Oocysts of *T. gondii* have been reported from the feces of naturally infected Iriomote cats (Akuzawa and others, 1987), jaguar and ocelots (Patton, Rabinowitz, and others, 1986), cheetah and bobcats, (Marchiondo and others, 1976), and Canadian cougars (Aramini and others, 1998). An outbreak of acute toxoplasmosis in humans was attributed to contamination of a Canadian water reservoir by oocysts shed by domestic and feral cats, as well as cougars (Bell and others, 1995; Bowie and others, 1997).

The bradyzoites from the tissue cysts or the sporozoites from the oocyst penetrate host intestinal epithelial cells and multiply in the intestine as tachyzoites within 24 hours of infection. *T. gondii* may spread first to mesenteric lymph nodes and then to distant organs by invasion of **lymphatics** and blood. *T. gondii* can multiply in virtually any cell in the body. All extracellular forms of the parasite are directly affected by antibody, but intracellular forms are not. It is believed that the cellular **immune system**, including **lymphocytes** and **macrophages**, is more important than humoral factors, such as antibodies, in immune-mediated destruction of *T. gondii* (Renold and others, 1992). However, how *T. gondii* is destroyed in immune cells is not completely known (Renold and others, 1992).

Immunity does not **eradicate** infection. *T. gondii* tissue cysts persist several years after acute infection. The fate of tissue cysts is not fully known. For example, it is not known whether or not bradyzoites can form new tissue cysts directly without transforming into tachyzoites. It has been proposed that tissue cysts may at times rupture during the life of the host. The released bradyzoites may be destroyed by the host's immune responses, or there may be formation of new tissue cysts.

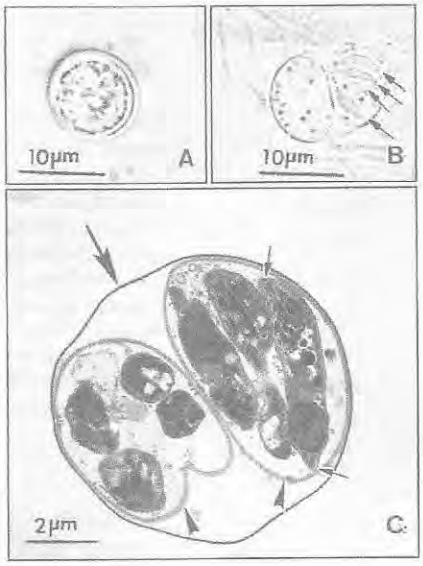


Figure 11. Oocysts of *T. gondii*. *A*, Unsporulated oocyst. Note the central mass (sporont) occupying most of the oocyst. *B*, Sporulated oocyst with two sporocysts. Four sporozoites (arrows) are visible in one of the sporocysts. *C*, Transmission electron micrograph of a sporulated oocyst. Note the thin oocyst wall (large arrow), two sporocysts (arrowheads), and sporozoites, one of which is cut longitudinally (small arrows). (From Hill and others, 2005. µm, micrometer)

In immunosuppressed patients, such as those given large doses of immunosuppressive agents in preparation for organ transplants and in those with acquired immunodeficiency syndrome (AIDS), rupture of a tissue cyst may result in transformation of bradyzoites into tachyzoites and renewed multiplication. The immunosuppressed host may die from toxoplasmosis unless treated. It is not known how **corticosteroids** cause relapse, but it is unlikely that they directly cause rupture of the tissue cysts.

Domestic cats, rather than wild felids, probably act as the primary source of infective oocysts in the environment, leading to infections in humans and animals, both domestic and wild. Food-borne transmission of the parasite is an important route of infection, particularly for people eating undercooked meat (box 8). Numerous wild species of animals may be infected with *T. gondii* (see Species Susceptibility) without showing clinical signs, thus presenting risks to humans who eat wild game or who skin animals for their fur. Because of the presence of viable organisms in subclinically infected animals (Dubey, 1982, 1983b; Dietz and others, 1993), careful and hygienic pelting practices may mitigate the risk of infection with *T. gondii*. In Texas, discussions are underway to regulate the translocation of feral hogs for hunting purposes because of the possible spread of porcine diseases (Leggett, 2008). If the hogs are also infected with *T. gondii*, they may spread the parasite to new areas and present a risk to the hunters consuming them.

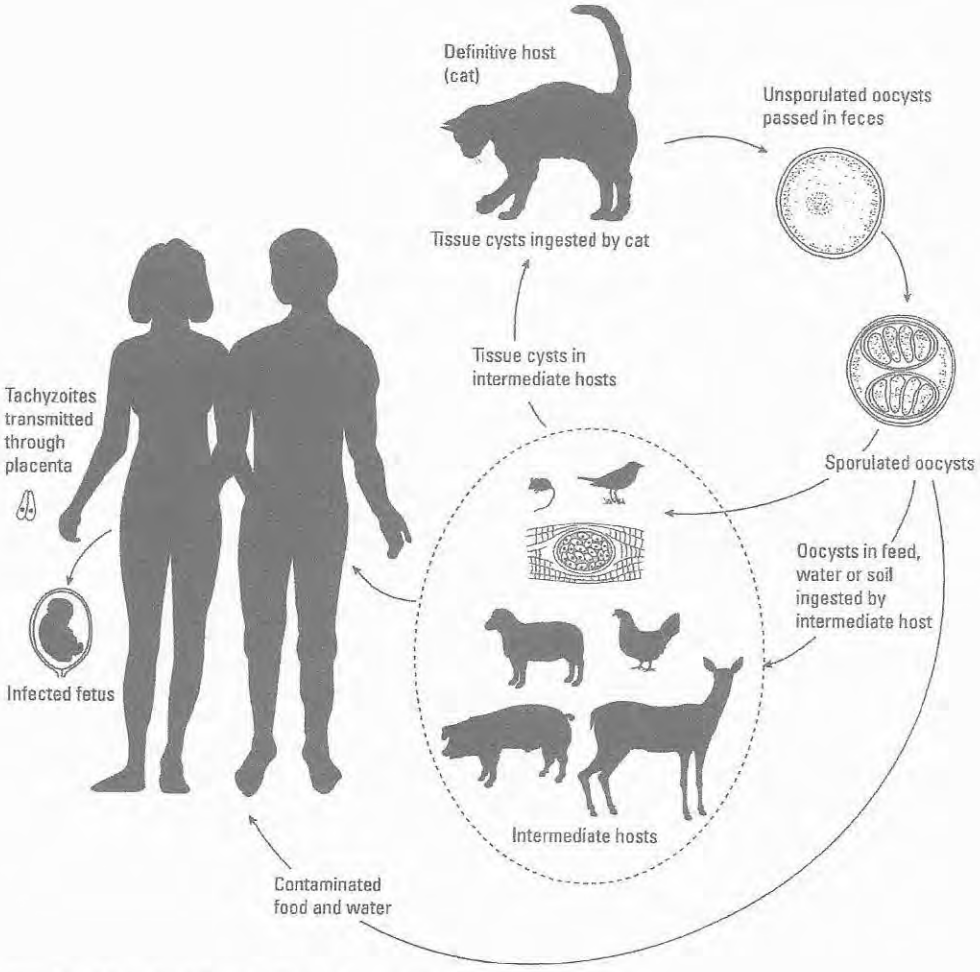


Figure 12. Life cycle of *T. gondii*. (From Dubey and Beattie, 1988)

Box 7 Cats and Toxoplasmosis

Fact or fiction: "The most efficient way to get toxoplasmosis from a cat is to eat the cat undercooked!" (Colville and Berryhill, 2007)

Cats are the most common pet in the United States according to the American Veterinary Medical Association (2007). Thirty-three percent of U.S. households own at least 1 cat, totaling 81 million owned cats (Conrad and others, 2005; Robertson, 2008). Large numbers of pet cats also exist in other countries. There are nearly as many feral cats (approximately 73 million) as there are household cats in the United States; both populations contribute to contamination of the environment with oocysts of *T. gondii* (Dabritz and others, 2006, 2007). Domestic cats, rather than wild species, are probably the major source of contamination because of the large number of owned and feral cats and because oocyst formation is greatest in domestic cats. Cats may excrete millions of oocysts after ingesting as few as one bradyzoite or one tissue cyst, resulting in widespread contamination of the environment (Frenkel and others, 1970; Dubey, 2001).

Countries with the largest numbers of pet cats.

[From Maps of World]

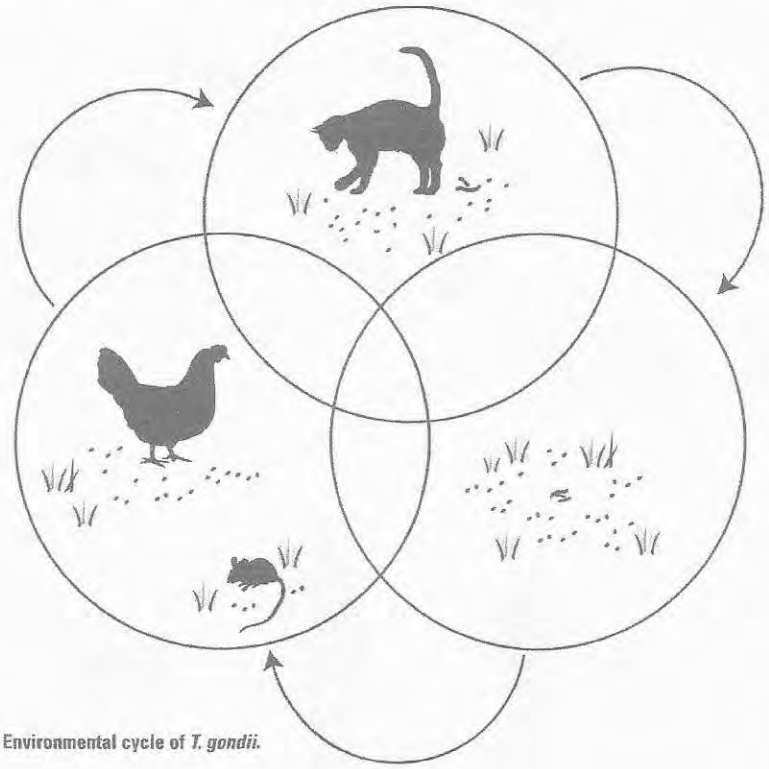
Country	Number of pet cats
United States	76,430,000
China	53,100,000
Russia	12,700,000
Brazil	12,466,000
France	9,600,000
Italy	9,400,000
United Kingdom	7,700,000
Germany	7,700,000
Ukraine	7,350,000
Japan	7,300,000

There are some who feel that the domestic cat is unjustly maligned relative to its role in the **maintenance** and spread of toxoplasmosis in humans (Colville and Berryhill, 2007). That feeling is reflected by the quotation highlighting this highlight box, yet the quotation and the belief are, in fact, untrue. Transmission by oocysts in cat feces is the most efficient means of transmission. Because felids are the only definitive host for *T. gondii*, this parasite could not complete its life cycle without cat species, and, thus, would cease to exist. Sporulated oocysts survive for long periods under most ordinary environmental conditions and for months even in harsh environments. They can survive in moist soil, for example, for months and even years (Dubey and Beattie, 1988). Oocysts in soil can be mechanically transmitted by **invertebrates** such as flies, cockroaches, dung beetles, and earthworms, which can spread oocysts onto human food and animal feeds.

Infection rates in cats are determined by the rate of infection in local avian and rodent populations, because cats are thought to become infected by eating these animals. The more oocysts there are in the environment, the more likely it is that prey animals will be infected, and this in turn will increase the infection rate in cats. Infection among food animals increases the risk of transmission to humans.

In certain areas of Brazil, approximately 60 percent of 6–8-year-old children have antibodies to *T. gondii* linked to the ingestion of oocysts from the environment, which is heavily contaminated with *T. gondii* oocysts (Bahia-Oliveira and others, 2003). The largest recorded outbreak of clinical toxoplasmosis in humans was epidemiologically linked to drinking water from a municipal water reservoir in British Columbia, Canada (Aramini and others, 1998; 1999). This water reservoir was thought to be contaminated with *T. gondii* oocysts excreted by cougars. Although attempts to recover *T. gondii* oocysts from water samples in the British Columbia outbreak were unsuccessful, methods to detect oocysts were reported (Isaac-Renton and others, 1998). An outbreak of toxoplasmosis at a riding stable in Atlanta, Ga., was attributed to either ingestion or inhalation of oocysts from dust in the stable contaminated with cat feces (Teutsch, and others, 1979).

Cat feces contaminated with oocysts are not only an outdoor risk—they are an indoor risk to cat owners who are unaware of the risk of acquiring toxoplasmosis from indoor cats. A diet of only high quality commercial pet food—never raw or undercooked meats—and clean, fresh drinking water will decrease the chance of a pet cat becoming infected. Hunting by pet cats, and their ingestion of infected prey, can be limited by keeping them indoors. Daily cleaning of litter boxes limits the time for newly defecated oocysts to become infectious. Pregnant women and immunocompromised people can decrease their risk of infection by asking other, immunocompetent people to clean litter boxes. Basic rules of hygiene, including washing hands after emptying litter boxes, after handling cats, and before eating can decrease the risk of infection. With proper precautions and education, cat ownership need not be detrimental to one's health or to the environment.



Environmental cycle of *T. gondii*.

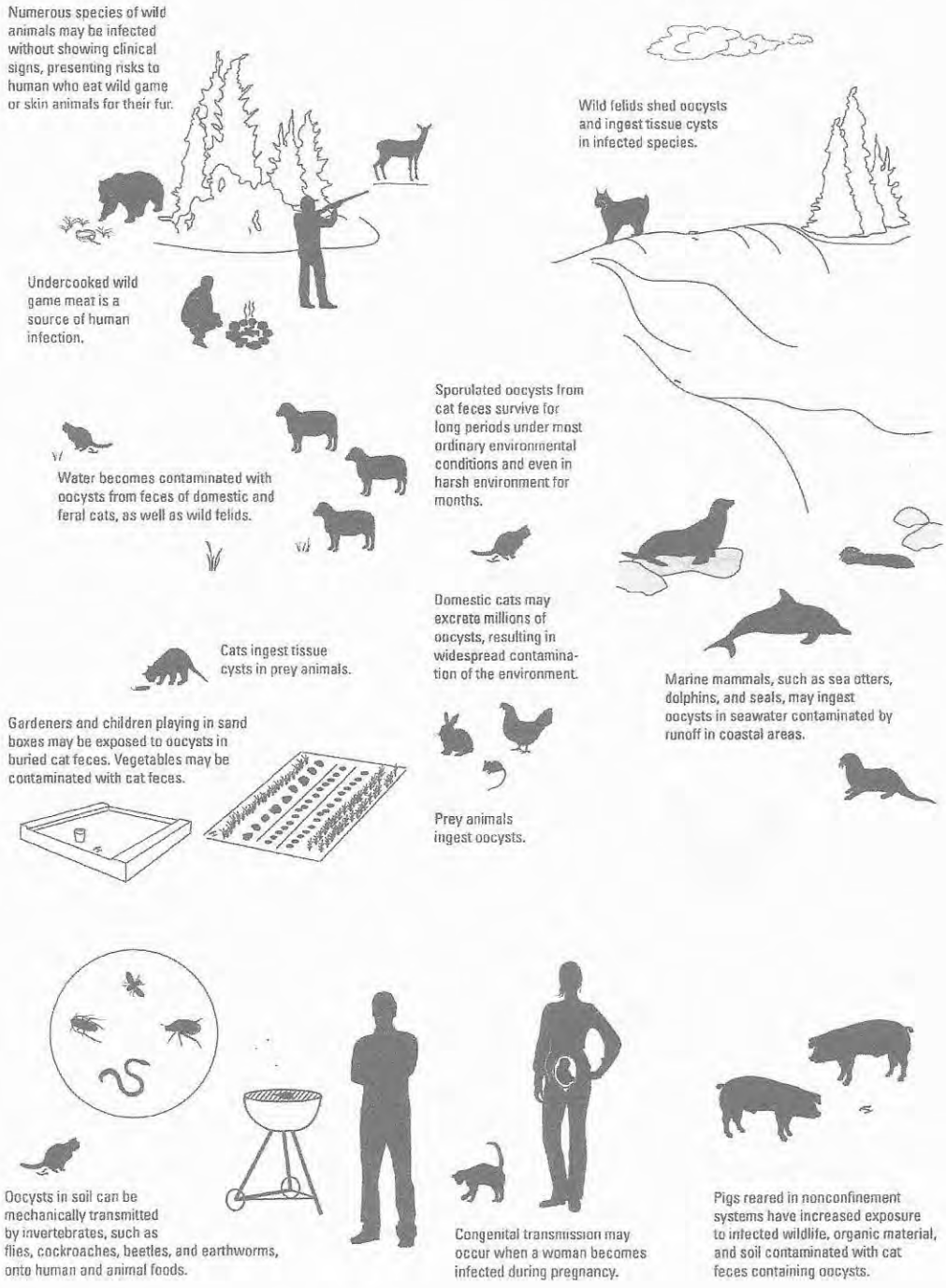


Figure 13. General pathways for infection with *T. gondii*.

ISSUE BRIEFING PAPER
ISSUE: Management of feral cat colonies & Trap, Neuter, and Release (TNR) Programs
Last updated: June 2014

STAFF CONTACT: Richard Heilbrun, TPWD Conservation Outreach Program Coordinator, Richard.Heilbrun@tpwd.texas.gov

COMMUNICATION GUIDANCE: This document is intended to provide information to the public, municipal or governing organizations, and Texas Parks and Wildlife Department (TPWD) staff regarding the management of local feral cat populations and the efficacy of Trap, Neuter, and Release (TNR) programs.

BACKGROUND: Municipalities are often asked to mediate public debate on the issue of managing feral cat populations and provide solutions to address the conflicting priorities of different stakeholders within a community. TNR programs are sometimes suggested as a humane way to address public concerns about the threats feral and free-roaming cats pose. TPWD provides this objective, science-based statement to organizations and governments tasked with balancing the needs of feral and free-roaming cats, public health, and local ecosystem health.

TPWD POSITION: Feral (non-owned) and free-roaming cats pose a direct threat to the health of our natural resources. Feral cat colonies negatively impact songbirds, small mammals, amphibians, and other native wildlife populations. Feeding programs are not recommended because they concentrate cats and wild animals into single areas, which can increase disease transmission and pose greater threats to native wildlife in the area. Neither intentional feeding of free-roaming cats or the sanctioning of managed cat colonies addresses ecological, animal health, or public health concerns, nor does it address population control.[1,2] Additionally, TNR programs are not effective at alleviating the threats of feral and free-roaming cat colonies on feline health, human health or native wildlife populations. Sterilization programs are ineffective in managing feral and free-roaming cat populations,[3] and do not address the ecological impacts that these cat populations can have on our natural resources.[4,1] For these reasons, which are explained in detail below, TPWD does not support the creation or perpetuation of feral or free-roaming cat colonies or feeding, sterilization, or Trap, Neuter, and Release programs.

KEY INFORMATION:

- **ECOLOGICAL EFFECTS ON WILDLIFE:** Because hunting is a deeply instinctive behavior of cats, even well-fed cats will prey on native wildlife.[5] They prey on native species, especially impacting declining, rare, or sensitive populations, including birds, reptiles, and mammals. Domestic and feral cats are not native predators in Texas, and their hunting behaviors disrupt natural ecological processes. Feral and free-roaming cats alter the ecological balance of a region, as does any other feral non-native (exotic) animal. Feral cats' diets have been shown to consist of 69 percent mammal (including native voles, rabbits, and mice), 24 percent birds, and around 5 percent reptiles/amphibians.[6] Scientific research shows that free-roaming domestic cats kill between 1.4–3.7 billion birds and 6.9–20.7 billion mammals

annually and that free-roaming cats are likely the single greatest source of anthropogenic (human caused) mortality for US birds and mammals.[7,8] Studies have also shown that food provisions from colonies attract immigrating cats and other wildlife species,[9,10] and that native wildlife closest to feeding stations are at the greatest risk of depredation by feral cats.[11] This is of particular concern when managed cat colonies are located in sensitive or particularly diverse natural areas.

- **PUBLIC HEALTH EFFECTS.** Rabies in cats is more than twice as common as in dogs or cattle,[12] and cats are the domestic animal most commonly reported rabid.[10] Zoonotic diseases and their agents known to be associated with cats include rabies, toxoplasmosis (*Toxoplasma gondii*), cat scratch disease (*Bartonella spp.*), roundworm (*Toxocara cati*), ringworm (*Microsporum canis*), cryptosporidiosis (*Cryptosporidium spp.*), campylobacteriosis (*Campylobacter spp.*), plague (*Yersina pestis*), *Cheyletiella* mites, and tularemia (*Francisella tularensis*).[13] Feeding stations intended for cats actually attract a variety of animals such as rats, raccoons, skunks, opossums, and foxes, putting these animals in unusually close contact with humans, cats, and each other. This close contact increases the risk of contracting and spreading diseases, including rabies, to other wildlife, cats, and humans.[14,2]

- **HEALTH OF INDIVIDUAL CATS.** Wild and free-roaming cats lead a stressful life. Diseases, depredation, and accidental or intentional injuries significantly decrease the quality of life for feral and free-roaming cats, even if municipal staff or volunteers have the resources to intensively manage a colony. In addition to the zoonotic diseases listed above, several diseases commonly found in cat colonies impact the health of cats, including rabies, feline leukemia, feline immunodeficiency virus, roundworm, ringworm, fleas, ticks, ear mites, abscesses, respiratory infections, urinary tract infections, and eye infections. Some of these maladies are incurable, and others require multiple treatments or vaccinations. Cats that have been previously trapped to administer medical treatment often become shy of traps and are difficult to trap again for immunization or continued treatment for illness or injury. Feral cats are also particularly vulnerable to vehicle impacts, injury, and depredation by native wildlife.[2] Cat colonies lead to a stressful, painful and unhealthy existence for individual cats within a colony.

- **EFFICACY OF TNR PROGRAMS.** TNR programs are ineffective. Managers of these programs cannot prevent new cats from being added to a population, and they cannot neuter the vast majority (70% to 90%) of the population, both of which are required assumptions for population reduction.[9,15,] TNR programs repeatedly fail to eliminate or control cat colonies due to ongoing cat immigration from surrounding areas.[9] Scientifically vetted studies have demonstrated that TNR programs do not prevent overpopulation of feral cats, reduce population size over time, prevent losses to native wildlife, or prevent disease transmission.[15,16,17,18,19,20, ,21,22]

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GEORGIA
DEPARTMENT OF NATURAL RESOURCES
WILDLIFE RESOURCES DIVISION

MARK WILLIAMS
COMMISSIONER

DAN FORSTER
DIRECTOR

January 2, 2015

Columbus Council
3111 Citizens Way
Columbus, Georgia 31906

Dear Councilors:

On behalf of the Nongame Conservation Section of the Wildlife Resources Division, Georgia Department of Natural Resources, I am writing to express concern about the establishment of Trap-Neuter-Release (TNR) colonies as a means of dealing with feral house cats in Columbus, Georgia. We strongly recommend against the practice of allowing domestic or feral house cats (*Felis catus*) to roam freely because of the significant adverse impacts these cats can have on native wildlife, including federally protected birds and other rare species.

House cats are non-native predators that are responsible for killing hundreds of millions of birds annually in the United States[1]. Many free-ranging cats are fed by people directly or use human-generated food sources such as garbage. This food subsidy can allow large numbers of cats to live in an area and often results in excessive predation of native wildlife. Research has shown that predation by house cats can lead to locally depressed populations of birds and other wildlife, and in extreme cases some wildlife species can be extirpated from an area or driven to extinction[2].

While spaying and neutering cats at colonies will reduce their reproductive output, it does not eliminate those individuals as a source of mortality on wildlife while they roam freely at the site and in surrounding areas. In addition, studies have shown that there are often significant numbers of cats at colonies that never get spayed or neutered because they elude capture[3]. The house cat's instinct to hunt is not driven solely by hunger, so feeding cats at TNR sites will not stop them from hunting and killing wildlife[4]. Supplemental feeding will allow survival of larger

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numbers of cats at colonies and exacerbate the predation problem. Studies have shown that TNR colonies often experience a significant influx of new cats that are abandoned by people at these sites because they know the cats will be fed. Other feral cats are commonly drawn to the colony site from surrounding areas by the supplemental feeding. In fact, many colonies have been found to increase substantially in size over time rather than remain stable or decline[5].

Feral house cats are subjected to virulent and pathogenic diseases and internal and external parasites, particularly when living in high densities, such as at a colony site. These diseases and parasites often lead to poor health and reduced life expectancy in feral individuals. House cats have also been documented as vectors in the spread of virulent diseases among native wildlife populations[6]. In some cases, these diseases have caused significant negative impacts to populations of native wildlife species[7]. This is a particularly important concern when rare or endangered species are involved.

There are also human health risks associated with TNR colonies and feral cats. Cats can carry and transmit the rabies virus, and in fact have been identified as a significant source of human infection[8]. Even when TNR cats are vaccinated, the vaccination only lasts a few years, and unless that particular cat is captured and vaccinated again it could contract rabies. Other zoonotic diseases transmitted by cats include salmonellosis, bartonellosis, and toxoplasmosis[9].

Cats from TNR colonies, as well as other feral and free-ranging cats, can directly conflict with the rights of property owners who want to maintain, encourage, and enhance native wildlife populations on their property. They can also infringe on the rights of citizens who want native wildlife populations maintained on public properties such as parks, natural areas, and other sites.

In summary, we support control and management of feral and free-ranging cats and recommend against the use of TNR programs. Numerous studies have shown that TNR is not an effective mechanism to control feral cat populations and is not a responsible approach to dealing with feral cat issues. Additionally, TNR contributes to poor health in these cats, can increase health risks for wildlife and humans, and can facilitate excessive predation on native wildlife species that are valued by many citizens[10].

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[9] Ballash et al. 2014

[10] Longcore et al. 2009.

We offer the following recommendations for control and management of feral and free-ranging house cats:

1) Control populations of feral cats through humane capture, medical evaluation, neutering, vaccination, and adoption, if possible. Humane euthanasia of diseased or otherwise unadoptable cats will be a necessary component of this program.

2) Prioritize removal of cat colonies and free-ranging cats in natural areas, sites with rare species, areas managed for wildlife, and public parks.

3) Require that cats trapped, neutered, vaccinated, and adopted by individuals or organizations be kept indoors or in an enclosed or fenced facility that prevents the cats from roaming outside of these areas.

4) Support the American Bird Conservancy's "Cats Indoors" educational program.

5) Encourage micro-chipping of all cats held as pets. Require micro-chipping of all cats sold commercially, adopted through animal welfare or control facilities, or released into managed enclosures or fenced areas. This will help identify owners of lost cats or the facilities from which these stray cats came.

Thank you for the opportunity to provide comments on this issue. If you have any questions or need additional information on the impacts of feral and free-roaming cats on native wildlife, please contact Todd Schneider at 478-994-1438 or todd.schneider@dnr.state.ga.us

Sincerely,

Jonathan Ambrose, Ph.D.
Chief, Nongame Conservation

C: Todd Schneider

THE WILDLIFE SOCIETY
Leaders in Wildlife Science, Management and Conservation

Issue Statement

Feral and Free-Ranging Domestic Cats

Feral and free-ranging domestic cats are exotic species to North America. Exotic species are recognized as one of the most widespread and serious threats to the integrity of native wildlife populations and natural ecosystems. Exotic species present special challenges for wildlife managers because their negative impacts on native species are poorly understood by the public to the point that many exotic species are perceived as a natural component of the environment. Some exotic species have advocacy groups that promote their continued presence, and few policies and laws deal directly with their control. Perhaps no issue has captured more of the challenges for contemporary wildlife management than the impacts of feral or free-ranging domestic cats and their impacts on native wildlife.

Domestic cats originated from an ancestral wild species, the European and African wild cat (*Felis silvestris*). The domestic cat (*Felis catus*) is now considered a separate species, and is found on all 7 continents, with 600 million cats worldwide and 148-188 million within the U.S.. Domestic cats have great reproductive potential. Individuals become sexually mature as early as 6 months of age, and reproduction can occur throughout the year. A single female may produce as many as 3 litters each year with 2 to 4 kittens per litter, with the capacity to successfully raise as many as 12 offspring in any given year.

A growing body of literature strongly suggests that domestic cats are significant predators on small mammals, birds, reptiles, and amphibians. Feral and free-ranging cats also serve as reservoirs for several diseases, including rabies, toxoplasmosis, bartonellosis, typhus, and feline immunodeficiency virus, that can have significant effects on the health of humans, wildlife, and other domestic animals. Because humans often feed free-ranging cats, they can reach population levels that may result in abnormally high predation rates on wildlife and increase the spread of diseases. Domestic cats have tremendous impacts on wildlife and are responsible for the extinction of numerous mammals, reptiles, and at least 33 bird species globally. Effects of cat predation and disease spread are most pronounced in island settings (both actual islands and islands of habitat), where populations of wildlife are already low or stressed by other factors. Effects are also significant in natural areas where cat colonies become established. Competition with native predators, disease implications for native wildlife populations, and pet owners' attitudes toward wildlife and wildlife management also are important issues.

Extensive popular debate over absolute numbers or types of prey taken by feral and free-ranging cats is not productive. The number of cats is undeniably large. Even if conservative estimates of prey taken are considered, the number of prey animals killed is immense. The supplemental feeding of cats does not deter them from killing wildlife; often they do not eat what they kill. Likewise, population-level impacts of diseases associated with cats have only been established in a few wildlife species, such as southern sea otters (*Enhydra lutris nereis*), but negative individual impacts clearly occur in an extremely wide range of species. Humans introduced cats to North America, and humans are ultimately responsible for the effects these animals have on native wildlife species.

The policy of The Wildlife Society regarding feral and free-ranging domestic cats is to:

1. Support and encourage the humane elimination of feral cat populations, including feral cat colonies, through adoption into indoor-only homes of eligible cats and humane euthanasia of unadoptable cats.

2. Support the passage and enforcement of local and state ordinances prohibiting the feeding of feral cats, especially on public lands, and the release of unwanted pet or feral cats into the wild.

3. Oppose the passage of any local or state ordinances that legalize the maintenance of "managed" (trap/neuter/release) free-ranging cat colonies.

4. Support educational programs and materials that provide scientific information on feral cats and the negative effects on cats from living outdoors, and call on pet owners to keep cats indoors, in outdoor enclosures, or on a leash.

5. Support programs to educate and encourage pet owners to neuter or spay their cats, and encourage all pet adoption programs to require potential owners to spay or neuter their pet.

6. Support the development and dissemination of information on what individual cat owners can do to minimize predation by free-ranging cats, and to minimize potential disease transmission to humans, wildlife, cats, and other domestic animals.

7. Pledge to work with the conservation and animal welfare communities to educate the public about the effects of free-ranging and feral cats on native wildlife, including birds, small mammals, reptiles, amphibians, and endangered species.

8. Support educational efforts to encourage the agricultural community to keep farm-cat numbers at low, manageable levels and use alternative, environmentally safe rodent control methods.

9. Support efforts to reduce risks to the health of humans and other animals posed by diseases and parasites of feral cats, including but not limited to removal of free-ranging cats and elimination of feral cat colonies. Encourage researchers to develop, obtain, and disseminate information on the impacts of feral and free-ranging cats on native wildlife populations, relative to predation, competition, and diseases.

10. Recognize that cats as pets have a long association with humans, and that responsible cat owners are to be encouraged to continue caring for the animals under their control.

The Wildlife Society's ***Position Statement on Invasive and Feral Species*** *states that the Society opposes "introduction or maintenance of invasive species and feral species that threaten the survival of indigenous species" (TWS 2016).*

Opinions from the Front Lines of Cat Colony Management Conflict

M. Nils Peterson[1*], Brett Hartis[1], Shari Rodriguez[1], Matthew Green[2], Christopher A. Lepczyk[3]

1 Fisheries, Wildlife, and Conservation Biology Program, Department of Forestry & Environmental Resources, North Carolina State University, Raleigh, North Carolina, United States of America, **2** Department of Entomology, North Carolina State University, Raleigh, North Carolina, United States of America, **3** Department of Natural Resources and Environmental Management, University of Hawai'i at Mānoa, Honolulu, United States of America

Abstract

Outdoor cats represent a global threat to terrestrial vertebrate conservation, but management has been rife with conflict due to differences in views of the problem and appropriate responses to it. To evaluate these differences we conducted a survey of opinions about outdoor cats and their management with two contrasting stakeholder groups, cat colony caretakers (CCCs) and bird conservation professionals (BCPs) across the United States. Group opinions were polarized, for both normative statements (CCCs supported treating feral cats as protected wildlife and using trap neuter and release [TNR] and BCPs supported treating feral cats as pests and using euthanasia) and empirical statements. Opinions also were related to gender, age, and education, with females and older respondents being less likely than their counterparts to support treating feral cats as pests, and females being less likely than males to support euthanasia. Most CCCs held false beliefs about the impacts of feral cats on wildlife and the impacts of TNR (e.g., 9% believed feral cats harmed bird populations, 70% believed TNR eliminates cat colonies, and 18% disagreed with the statement that feral cats filled the role of native predators). Only 6% of CCCs believed feral cats carried diseases. To the extent the beliefs held by CCCs are rooted in lack of knowledge and mistrust, rather than denial of directly observable phenomenon, the conservation community can manage these conflicts more productively by bringing CCCs into the process of defining data collection methods, defining study/management locations, and identifying common goals related to caring for animals.

Citation: Peterson MN, Hartis B, Rodriguez S, Green M, Lepczyk CA (2012) Opinions from the Front Lines of Cat Colony Management Conflict. PLoS ONE 7(9): e44616. doi:10.1371/journal.pone.0044616

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from the peer-reviewed open-access journal PLOS One, is available

at http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0044616

Table 2. Response distributions for opinions about feral cats and feral cat colony management among cat colony caretaker (CCC, n = 338) and bird conservation professional (BCP, n = 239) respondents from across the United States during 2011.

Question	Group	Agreement level (%)				
		Disagree strongly	Disagree a little	Neither agree nor disagree	Agree a little	Agree strongly
1. Feral cats should be treated as protected wildlife	CCC	3	5	14	20	59
	BCP	94	4	1	1	0
2. Feral cats should be treated as pests	CCC	96	3	1	0	1
	BCP	11	8	4	17	61
3. Feral cats fill a natural role as predators	CCC	5	13	23	32	27
	BCP	88	6	3	2	1
4. Feral cats are a reservoir for disease	CCC	72	14	8	5	1
	BCP	4	8	26	28	35
5. Feral cats ONLY harm wildlife on islands	CCC	39	20	39	2	1
	BCP	90	5	2	0	3
6. Feral cats contribute to decline of native birds	CCC	41	19	19	16	4
	BCP	8	1	5	12	75
7. Feral cats are eventually eliminated by TNR	CCC	12	11	9	29	40
	BCP	61	16	15	6	3
8. Feral cat colonies should be managed using euthanasia	CCC	96	3	0	1	0
	BCP	5	7	13	30	45
9. Feral cat colonies should be managed using TNR	CCC	1	1	1	3	95
	BCP	54	14	9	13	9

doi:10.1371/journal.pone.0044616.t002

Peterson MN, Hartis B, Rodriguez S, Green M, Lepczyk CA (2012) Opinions from the Front Lines of Cat Colony Management Conflict. PLoS ONE 7(9): e44616. doi:10.1371/journal.pone.0044616
http://127.0.0.1:8081/plosone/article?id=info:doi/10.1371/journal.pone.0044616

Submitted By
Robert A. Winckler
Submitted On
10/25/2017 4:05:56 PM
Affiliation
NA

Phone
907-376-8594
Email
winckler@mtaonline.net
Address
P.O. Box 87738
Wasilla, Alaska 99687

I am strongly opposed to Proposal 62 (5 AAC 92.029), that would allow the release of sterilized, feral cats into the wild.

I am strongly in favor of Proposal 63 (5 AAC 92.029), that would prohibit the release of feral or stray domesticated cats into the wild. Cats are not native to the wild in North America, yet they are the number one predator of wild birds. Under no circumstances should cats be released into the wild.

October 25, 2017

To the Board of Game - Regarding Proposals 62 & 63

AGAINST Proposal 62:

It is widely acknowledged in scientific, ornithology and conservation circles, that both domestic and feral cats are the largest predator of song birds **world wide**.
Cats have contributed to the extinction of 33 species and continue to adversely impact a wide variety of other species, including those at risk of extinction.

This from Migratory Bird Center, Smithsonian Conservation Biology Institute:

“We estimate that free-ranging domestic cats kill 1.4-3.7 billion birds and 6.9-20.7 billion mammals annually. Un-owned cats, as opposed to owned pets, cause the majority of this mortality. Our findings suggest that free-ranging cats cause substantially greater wildlife mortality than previously thought and are likely the single greatest source of anthropogenic mortality for US birds and mammals.”

Cats do not just hunt adult birds; many birds are ground nesters, and the eggs and chicks are exceptionally vulnerable to predation. Plus, all birds are vulnerable when they first fledge from their nests.

Being ***non-native*** animals, these are invasive animals in the wild. Many municipalities in Canada already have bylaws that obligate residents to keep their pets indoors.

If anything, there is a good case for obliging all cat-owners to keep their pets inside at all times.

FOR Proposal 63:

For all the reasons stated above, coupled with the significant health hazards presented by cats, domestic and feral, I am favor of Proposal 63.

Thank you for your time.

Clark T Winne,
P.O.Box 15112, Fritz Creek, AK 99603

October 25, 2017

To the Board of Game - Regarding Proposals 62 & 63

AGAINST Proposal 62:

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Cats do not just hunt adult birds; many birds are ground nesters, and the eggs and chicks are exceptionally vulnerable to predation. Plus, all birds are vulnerable when they first fledge from their nests.

Being ***non-native*** animals, these are invasive animals in the wild. Many municipalities in Canada already have bylaws that obligate residents to keep their pets indoors.

If anything, there is a good case for obliging all cat-owners to keep their pets inside at all times.

FOR Proposal 63:

For all the reasons stated above, coupled with the significant health hazards presented by cats, domestic and feral, I am favor of Proposal 63.

Thank you for your time.

Victoria Wilson Winne,
P.O.Box 15112, Fritz Creek, AK 99603

Submitted By
Kathy
Submitted On
10/13/2017 9:04:58 AM
Affiliation

Please Do Not do this.

You will spread disease to your game (Toxoplasmosis) and also the children are vulnerable to this parasite. Your gamebird chicks will be at risk Look at Australia You do not want your beautiful ecosystem to end up with cats.,

Submitted By
Christina Abel
Submitted On
10/26/2017 7:17:57 PM
Affiliation

Prop 64 is a waste of time and money. There is not enough evidence to support the need for regulation of domestic goats and sheep. This has not been a problem in Alaska. The state is already so broke you had to rob the PHD fund. Tell these outsiders to take a hike! Unneeded and unnecessary.

Submitted By
David Abel
Submitted On
10/26/2017 7:55:02 PM
Affiliation

Phone
907-488-3727
Email
Salcha.cowboy@gmail.com
Address
7250 dehalden lane
Salcha, Alaska 99714

I'd like to speak out against proposition 64! The state board of fish and game has no right to regulate domestic animals that are used for food sources, this is just another case of an outside organization trying to rule what happens in Alaska. I would support protecting the mountain goats and sheep if their had ever been an issue but there hasn't, and the idea of putting domestic sheep and goats on the unclean list is plan stupid! There is a thriving agricultural market for goats, mind your own damn business and leave sheep and goats to the dept of agricultural!!

Submitted By
Jason Afrank
Submitted On
10/27/2017 4:52:04 PM
Affiliation

Phone
402 672 0888
Email
Jaafrank@gmail.com
Address
P.o. box 116
14044 N Glenn Hwy
Sutton , Alaska 99674

I oppose proposition 64.

Submitted By
Theresa Afrank
Submitted On
10/27/2017 5:12:16 PM
Affiliation

Phone
402-957-5208
Email
Tmafrank@gmail.com
Address
PO Box 116
Sutton, Alaska 99674

I oppose proposition 64 - Take no action

ALASKA FARM BUREAU, INC.

Bryce Wrigley, President
bjwrigley@gmail.com

Amy Seitz, Executive Director
amy.seitz@gmail.com

October 23, 2017

Alaska Board of Game
PO Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Game:

The Alaska Farm Bureau, Inc. is urging the Board of Game to vote down Prop 64 – removal of domestic sheep and goats from the "clean list". This issue was originally brought up as Prop 90 for the 2016 statewide meeting cycle. Prop 90 was a shock to the agriculture community, as there were no attempts to have a discussion on the issue behind the proposal and there has been no indication that such drastic measures are needed in Alaska.

After the Board of Game postponed prop 90, suggesting the different parties come to the table and try to find an agreeable way to move forward, the Alaska Farm Bureau put together a working group consisting of sheep and goat producers, Wild Sheep Foundation, Dept. of Fish and game, the State Veterinarian and Division of Agriculture. The Alaska Farm Bureau and sheep and goat owners have spent time educating themselves on the issue of respiratory disease in domestic and wild sheep and goats; reading studies performed on bighorn sheep and gathering facts relevant to Alaska.

Sheep and goat owners, the Alaska Farm Bureau, individual veterinarians and the Office of the State Veterinarian have not only spent time educating themselves on the issue, but also taking time out of their normal, busy work load and covering costs to voluntarily participate in a study to gather facts specific to Alaska and the prevalence of mycoplasma ovipneumoniae (Movi) in the state.

The basis of this proposal is from a situation happening in the lower 48. There is no evidence to show that Alaska is going to experience population losses like the bighorn sheep have experienced in western states. The facts and science are showing that we have a very low risk of domestic sheep or goats transferring the pathogens of concern to Dall sheep.

When the original proposal (prop 90) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

- According to the National Ag Statistics (NASS), in the late 1960's Alaska had 27,000 domestic sheep with declining numbers since - 2014 NASS has domestic sheep and goats at 1400.

- There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.

- There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi

- Studies have been conducted on bighorn sheep, but very little is known about the impact on thinhorn or Eurasian sheep – neither of which have experienced population-limiting respiratory disease outbreaks.

- Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi.

- Alaska is a fence in state with no open grazing on public lands.

Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the fencing requirement being pushed (double fencing with a "buffer" zone) would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not a preponderance of evidence that domestic sheep and goats in Alaska are a threat to our wild sheep or goats, the Department of Fish and Game does not have authority to manage livestock, this authority falls in the Office of the State Veterinarian.

Voting down prop 64 will be the best way to move forward with discussions on this issue. The best approach to move forward would be a working group continued for three years to 1) review results of the current study, 2) perform a risk assessment and 3) hash out options that match the level of risk. While waiting on final results of the Movi study, the group would work on developing an education and outreach program.

The suggestion that the agriculture community would only come to the table with a threat like this, and that postponing instead of failing the proposal to ensure the discussion continues is offensive. Our producers have demonstrated that they are taking this issue seriously and willing to discuss options based on facts and science, but are unwilling to bend over and accept burdensome, costly restrictions based on fear instead of facts. In contrast to this effort, representative from WSF have not demonstrated a willingness to work in good faith and find a solution that works for all stakeholders.

Prop 64 seems to be a solution looking for a problem, we urge you to base your decision on these Alaska specific facts and fail the proposal. The Office of the State Veterinarian already has the authority to implement permitting, testing, etc. if the facts and science demonstrate the need.

Respectfully,

Bryce Wrigley, President
Alaska Farm Bureau, Inc.

37075 Nicholas View Lane Soldotna, AK 99669 Telephone: 907-252-5064

Submitted By
Virginia Altenberger
Submitted On
10/26/2017 9:15:04 PM
Affiliation

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907-315-5205
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Ginnafred1@yahoo.com
Address
3230 E Escondido Ave
Wasilla, Alaska 99654

TAKE NO ACTION on Prop 64!

The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska.

Please take this comment and Take No Action on Prop 64.

Submitted By
Kristi alton
Submitted On
10/26/2017 6:25:23 PM
Affiliation

Phone
9073703940
Email
Lilcricket1279@gmail.com
Address
3190 4 D Court
North Pole, Alaska 99705

Do not limit our ability to raise small farm animals such as goats. That is a huge example of government overreach!

Submitted By
Jacqueline Ambrus
Submitted On
10/27/2017 12:26:52 PM
Affiliation
Tanngrisnir Nubians

Phone
2245958438
Email
j.ambrus@aol.com
Address
120 Tall grass
Clovis, New Mexico 88101

I am an Alaska resident outside of the state with my husband who is in the military. I find it highly frustrating that goats will not be allowed in Alaska and will definitely impact my choice to live in the state following his military career if you decide to remove them from a clean animal that can be owned by citizens of the state. We had always intended to come back to Alaska but we now have a herd of dairy goats and if we cannot bring them with us we will never return to Alaska.

Submitted By
John Anderson
Submitted On
10/26/2017 12:58:15 PM
Affiliation

Phone
9074908117
Email
anderson.john118@gmail.com
Address
2473 Green Acres Driv
Fairbanks, Alaska 99712

Dear Board of Game-

I am commenting today on Proposition 64, as presented for your consideration.

I am adamantly opposed to the removal of domestic sheep and goats from the "clean list", and the proposition in its entirety for the following reasons:

1) The State of Alaska has not identified or mapped the "typical range" of wild sheep and/or goats.

2) Alaska is not a free range state, as domestic livestock are fenced due to predator threats.

3) Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi.

4) Domestic sheep and goats represent food security for many Alaska homesteaders and hobbyists, and the explosive growth of the local food movement includes a number of smaller farms and ranches who are investing in Alaska's rising livestock production numbers.

5) The Office of the State Veterinarian has been instrumental in maintaining the health and well being of animals within Alaska's borders. They already shoulder the responsibility of assisting in protecting Alaskan wildlife, through their many programs.

6) Removing domestic flocks from the clean list will also punish 4-H participants, their supporters who purchase the animals at various fairs across the state, and the sponsors of those auctions.

Adopting Prop64 will have wide ranging effects state wide. Not only will it cause 100s of residents to destroy their investment without reimbursement, it will shutter quite a number of cottage businesses for fiber and fiber arts, the myriad of products created with sheep and goats milk, chartcuterie endeavors, specialty cuts for our local restaurants and markets, and many other uses and entrepreneurial efforts. The approval of Prop64 would have real world, long lasting consequences on Alaska's already struggling agriculture sector. Most importantly, it will serve only to make Alaska's food security even more precarious going forward.

The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska specific facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

John Anderson

Fairbanks, AK

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Submitted By
Margaret Anderson
Submitted On
10/27/2017 12:49:10 PM
Affiliation

I oppose regulations being considered against owning sheep or goats in Alaska.

Submitted By
Anastasia Anisimova
Submitted On
10/26/2017 9:59:40 PM
Affiliation

I oppose prop.64 - we need protection for people, their lifestyles and their animals, not more government regulations !

Submitted By
Shamarie Apling
Submitted On
10/27/2017 11:41:22 AM
Affiliation

Phone
9077150566
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shawnc_me@hotmail.com
Address
3360 N Travelair Dr
Wasilla , Alaska 99654

I oppose Prop 64

Submitted By
James Armitstead
Submitted On
10/8/2017 12:54:04 PM
Affiliation
Mr.

This all stems from an outside special interest group spreading propaganda regarding a virus that doesn't exist in the State of Alaska.

It is already illegal to use pack animals while hunting, and we do not free range herds on public lands like L48; keeping the domestic and wild populations separate. All animals imported into the State are required to have health certificates already....

Volunteer testing is underway, double checking the health of the domestic population.

This proposition is ridiculous, there are other ways to protect our wild and domestic animals. My family owns a herd share in a milk goat herd, and we buy goats and sheep to fill our freezer in the fall. My wife and daughters spin wool and mohair (from goats) to make winter clothing. I oppose more regulations on keeping these valuable domestic animals that are so important to food security in Alaska.

Submitted By
Theresa Armitstead
Submitted On
10/8/2017 12:51:43 PM
Affiliation
Mrs.

This all stems from an outside special interest group spreading propaganda regarding a virus that doesn't exist in the State of Alaska.

It is already illegal to use pack animals while hunting, and we do not free range herds on public lands like L48; keeping the domestic and wild populations separate. All animals imported into the State are required to have health certificates already....

Volunteer testing is underway, double checking the health of the domestic population.

This proposition is ridiculous, there are other ways to protect our wild and domestic animals. My family owns a herd share in a milk goat herd, and we buy goats and sheep to fill our freezer in the fall. I also spin wool and mohair (from goats) to make winter clothing. I whole heatedly oppose more regulations on keeping these valuable domestic animals that are so important to food security in Alaska.

Submitted By
Nanette Arneson
Submitted On
10/27/2017 8:36:52 AM
Affiliation
Animal owner/ farm land owner

Please take no action on the proposition regulating domestic goats and sheep.

Submitted By
Brittney Ashcraft
Submitted On
10/27/2017 5:12:13 PM
Affiliation
4H youth

Phone
9079782431
Email
callie14onyx27@gmail.com
Address
915 Haman St.
Fairbanks, Alaska 99709

Vote no on Prop 64. I am in 4H and have taken a goat project for 6 years. I want to be able to continue my goat projects. I take good care of my animals and provide all that they need but I don't have the money to meet the criteria to have my goats if you pass this. Fencing is expensive. Double fencing would be impossible for me to afford. I have other friends in 4H who also do goat projects. All of our animals are not anywhere near the Dall sheep populations.

Please vote no so we can continue having the freedom to have the animals that we would like. Goats and sheep are great assets to our lifestyle.

Thank you,

Brittney Ashcraft

Submitted By
Susan Ashcraft
Submitted On
10/27/2017 5:01:20 PM
Affiliation
4H Leader/Goat owner

Phone
9074795371
Email
susanashcraft86@gmail.com
Address
915 Haman St.
Fairbanks, Alaska 99709

To whom it may concern:

Please vote NO on Proposition 64!! This prop serves only those who created , the Board of Game. It does not take into consideration all of those of us who are small farmers who rely on our animals to benefit our families, and our communities. My daughter is in 4H- and this youth organization helps to keep kids from being "idle". One of the sucessful ways they do this is through livestock projects. My daughter and many, many other youth in the state of Alaska take Market projects. Meat goats are one of those projects. If this prop passes you are denying youth the opportunity to grow and learn about their world through animals.

Thanks,

Susan Ashcraft,

4h leader, mom and resident of Alaska

Submitted By
Kathryn Athow
Submitted On
10/27/2017 5:34:26 PM
Affiliation
North American Packgoats Association (NAPgA)

Please don't pass propositon 64. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. All the current information, and forced captive studies, has been done with Big Horn Sheep in the lower 48. The Alaska Department of Fish & Game has not done mapping of Dall sheep habitat to define areas of true concern. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment (to date only 6 domestics out of 334 have tested positive for M.ovi bacteria) and determine a risk versus regulation protocol, the current Proposal 64 should be shelved. The Wild Sheep Foundation is trying to restrict personal rights, without due cause, to own domestic small ruminants on personal property. If you love seeing domestic goats and sheep at the Fair, if you enjoy a dairy herd share for raw milk, if you purchase local lamb or goat meat, if you spin fiber for art or warmth- please vote no action on Prop 64. Thank you.

Submitted By
Gary Baldwi
Submitted On
10/27/2017 9:12:53 PM
Affiliation

I appose prop 64.

Submitted By
Marie Baldwin
Submitted On
10/27/2017 12:40:11 PM
Affiliation

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

- Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
- There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
- There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
- Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
- Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi

Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,

Marie Baldwin

Submitted By
Keith Barkwood
Submitted On
10/8/2017 1:28:00 PM
Affiliation

Prop 64. Please do not restrict our ability to freely own goats and sheep in our Great State. Removing goats and sheep from the clean list because of pressure from one special interest group would be a tremendous mistake, and compromise our already fragile food security in the state. It is appalling you would consider this proposition in light of the lack of any information which would demonstrate that our wild sheep population is at risk of contracting pathogens from domestic species. Thank you in advance for rejecting prop 64.

Submitted By
Kim Barrett
Submitted On
10/8/2017 8:30:01 AM
Affiliation

I oppose Prop. 64. To ban domestic sheep & goats is just moronic. There has to be another way to control disease.

Submitted By
Audrey barrington
Submitted On
10/27/2017 12:15:20 AM
Affiliation

Phone
907-351-3382
Email
Audrey99654@yahoo.com
Address
4801 Canterbury way
Anchorage, Alaska 99503

TAKE NO ACTION ON PROP 64

Submitted By
Melissa Bayer
Submitted On
10/27/2017 8:39:00 AM
Affiliation

I OPPOSE Proposition 64, removing domestic goats and sheep for the “clean” list and request that NO ACTION is taken in the matter.

Many Alaskans depend on the keeping and raising of domestic goats and sheep for food and..... pets. These animals are family members in many cases and treated just like cats and dogs and do not leave the immediate vicinity of their homes and towns for vet visits. Many of these animals are part of children’s 4-H projects at the Alaska State Fair.

To remove these animals from the “clean” list would cause major disruption in local state agriculture, the Alaska State Fair and the Alaska 4-H program. Many small business owners that provide breeding for personal milk and meat animals would lose everything.

During all my research, I have yet to come across a direct link of M.ovi causing any Dall Sheep deaths in Alaska. I understand this may be an issue in other states, where open grazing is allowed. This is not a cause for concern in Alaska. There are many natural barriers separating domestic sheep and goats from the wild. The M.ovi virus can only be transmitted by close contact between animals.... which is almost impossible with all these natural barriers Alaska has to offer.

I again ask the Board of Game to take NO ACTION on Proposition 64.

Submitted By
Teresa Beck DVM
Submitted On
10/27/2017 8:50:15 AM
Affiliation

Phone
9077467387
Email
tbeck@mtaonline.net
Address
840 S Cobb St
Palmer, Alaska 99645

Please say NO to Prop 64. This is bad for Alaskan agricultural growth. We need Alaska to develop our agricultural producers for FOOD Security and sustainability. Prop 64 is a direct attack on Alaskan Agriculture. There is NOT enough evidence mycoplasma in the very few domestic sheep and goats in Alaska would pose a remote risk to the wild populations. This is an extreme over reach of government. How much would this cost the taxpayer to regulate and enforce? Alaska does NOT need this at this time. Please oppose Prop 64. Sincerely, Teresa Beck DVM, a practicing and licensed Veterinarian in Palmer, Alaska

Submitted By
Kaitlyn benedict
Submitted On
10/26/2017 10:41:33 PM
Affiliation

Alaska needs sustainable agriculture. Sheep and goats are part of the livelyhood of many of our neighbors. I am opposed to prop 64.

Submitted By
Rebekah Bennett
Submitted On
10/27/2017 3:43:39 AM
Affiliation

Dear Board of Game,

I am writing to ask you to oppose and take no action on proposal 64. My husband, five kids and I have a small farm that includes dairy goats and Icelandic sheep. We rely on the milk from the goats as a part of our healthy diet as well as using it in handcrafted soap that we sell and use ourselves. Our Icelandic sheep provide meat for our family as well as wool that my daughter spins and sells at the local yarn shop to boost her college fund. Our animals are a big part of our lives, and help us grow our own sustainable food and fiber. I ask the Board of Game to take no action on Proposal 64.

Sincerely,

Rebekah Bennett

Submitted By
Anne Benson
Submitted On
10/27/2017 8:43:47 PM
Affiliation

Phone
9072320085
Email
Anniembannany@icloud.com
Address
PO Box 1844
Palmer , Alaska 99645

I oppose Prop 64!

Submitted By
Kim Bergey
Submitted On
10/17/2017 6:08:08 PM
Affiliation

Dear Board of Game Members,

Alaska is very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in state, meaning all animals are to be fenced on your property at all times. Alaska has many natural barriers (rivers, mountains, predators and highways) to help prevent wild Dall sheep & domestics from coming into contact. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. All the current information, and forced captive studies, has been done with Big Horn Sheep in the lower 48. The Alaska Department of Fish & Game has not done mapping of Dall sheep habitat to define areas of true concern. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment (to date only 6 domestics out of 334 have tested positive for M.ovi bacteria) and determine a risk versus regulation protocol, the current Proposal 64 should be shelved. The Wild Sheep Foundation is trying to restrict personal rights, without due cause, to own domestic small ruminants on personal property. It is my belief, that the State Veterinarian should complete the risk assessment to determin if a "real" risk is present. Therefore, I recomment that the Board of Game take no action on Prop 64. Alaska is in great need of realistic regulations that are reflective of the special conditions that exist in Alaska. It is never in Alaska's best interest to blanket adopt what others are doing, so I again recommend no action on Prop 64.

Respectfully Submitted,

Kim

Submitted By
Marguerite Bishop
Submitted On
10/27/2017 10:26:09 PM
Affiliation

Leave people alone about their goats. We have less than a million people here in this state and it's three times the area of Texas! Take care of real business and stop getting into people's lives We live here because there is less red tape Let owners gave their goats I oppose the bill that takes their rights away to have them

Submitted By
Debra Blaylock
Submitted On
10/27/2017 1:48:23 PM
Affiliation
Dodo's Garden

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

Members of the Alaska Board of Game
I ask that you do not enact Proposal 64. The proposal will adversely affect domestic sheep and goat owners. The proposal places unneeded requirements on owners which are extremely costly and will adversely affect them. Many sheep and goat owners rely upon the animals to supplement their food security (which is tenuous at best in Alaska) as a source of meat and milk. To others, these animals are simply pets which are an important part of their family. These animals are also a valuable learning tool for our children involved in the 4-H and FFA programs. Yet others use these animals as a source of wool and other commercial products as a source of income.

On our farm, the animals are an important source of compost material for my small gardening and farming business. I rely on them as a source of manure for my compost piles. The sheep we have is a companion animal to our horse and the goats are important to weed control and fall clean-up on the farm. They are also a source of much joy and entertainment. We value them and rely on them.

There are many unanswered questions about this proposal and until factual and reliable information is brought forward, this proposal and any future similar proposals should not even be considered.

Stop pursuing this! Invest your time and efforts into something more productive. Stop harassment of small scale farmers for no factual reason. We are an important asset to the food security of the State.

Thank you for your consideration.

Submitted By
Aurora Boney
Submitted On
10/26/2017 9:44:35 PM
Affiliation

Sheep and goats SHOULD be allowed, and kept on the clean list.

Submitted By
Wade Boyle
Submitted On
10/27/2017 10:23:05 AM
Affiliation

Please take no action on prop 64. There is no reason to make goats and sheep illegal for the full state of alaska. There is no evidence that thereis a Movi outbreak in alaska and most residents would not impact the sheep population as they don't live near sheep.

Submitted By
Jodi Bradison
Submitted On
10/25/2017 11:57:14 AM
Affiliation

I am opposed to Proposition 64. 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 64 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 costly testing.

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.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Submitted By
Trina Brandt
Submitted On
10/27/2017 7:05:47 PM
Affiliation

Oppose proposition 64. Take no action. Alaska is a fenced state, livestock pose minimal to no threat to our wild sheep and goats. This proposition is a slippery slope that should be avoided for agricultural growth of our state.

Submitted By
Kathy Briggs
Submitted On
10/27/2017 9:12:29 AM
Affiliation

Please take no action on Prop 64.

There is not enough evidence that this bacterium is a threat to the wild populations of sheep and goats. the impact of prematurely acting in our already stressed economy would be devastating.

thank you

Submitted By
Samantha brose
Submitted On
10/17/2017 7:17:48 AM
Affiliation

To whom it may concern: I'm writing this comment for all my fellow friends and 4-h menerbs who will be affected by prop 64, one I can't even begin to tell how I feel about this being back again. It's so frustrating. This will greatly affect the 4-h community and our farm community by having no goats or sheep in Alaska. It should not even be an issue there is no cases in the state of Alaska with hosts or sheep affecting the doll sheep or getting them sick. This will mean no goats or sheep at the fair, no kids will be able to show or market at the fair, no farmers selling goats milk (lots of people have allergies to milk) no handmade soaps and potions. This makes me sick... this is wrong. No one should decide weather or not we have an animal or not. Farm goats and sheep are confined and have to contact with doll sheep this should not be an issue. I am strongly against prop 64.

Submitted By
Jenifer
Submitted On
10/23/2017 11:46:28 AM
Affiliation

Dear Board of Game,

Proposition 64 is not only unnecessary it's also written as a contradiction. One cannot legally own a sheep or goat if they are removed from the "Clean List", as a permit will not be issued to any animal that isn't on the "Clean List". This means that this proposition is to eradicate all sheep and goats from the state of Alaska. One must question how this will impact the agriculture and self-sustainability of Alaskans. It will affect many within the state as those who raise them will no longer be able, the State Fair will no longer have sheep or goats for exhibit, no local fiber or fiber exhibit at the fair, 4-H will be limited, and those who rely on sheep and goats to help sustain their families will be forced to give up that right.

The sample testing of M.ovi in the state proved that it's not a relevant factor. It was way below prediction. Even if the numbers had been higher the Alaska predators make it a moot point, as no domestic livestock would survive long enough to make it into the wild sheep habitat. Owners of sheep and goats work hard to keep their livestock safe, healthy, and disease free. We understand the WSF desire to do the same for the native wildlife population, but M.ovi isn't an issue in domestic livestock in the State of Alaska. There has never been a documented case of disease transmission between domestic sheep/goats and wild sheep in Alaska. It simply isn't very probable with the states conditions and predator population. This Proposition will not affect Dall sheep positively or negatively. It will do nothing positive for the wildlife, the people, or the state. I ask the Board of Game to take no action on Proposition 64.

Jenifer Buck

Submitted By
Joe Buck
Submitted On
10/27/2017 2:36:44 PM
Affiliation

Dear Board of Game,

I'm writing to you to oppose Proposition 64 and ask that you take no action. This proposition isn't just asking to rid the state of domestic goats and sheep; it's asking families to give up their family raised, beloved pets; their self sustainability, their way of life. I have watched my children bottle feed goat kids at all hours, spent time together watching in anxiety and excitement as our goats kidded, even mourned the loss of the few goats that we've had pass. Our children devote a part of their morning and evenings making sure they have water that's warm in the winter and cold in the summers, that the hay feeders are always full, minerals and baking soda is fresh, and that each goat that desired attention received it. I've watched my wife, heavily pregnant, up all night waiting for a goat to kid in freezing temps, so she could be sure that everything went well and that the kids got dried and fed.

These aren't just nameless livestock that hold no emotional or financial value. We spend countless hours and dollars choosing and buying our goats, caring for them, testing annually for diseases, making sure they are receiving the right vitamins and minerals throughout the year, watching over them for any changes in their health, supplying adequate housing in our harsh winters, and the time we spend just bonding with them. In return our goats call out in demand for attention when they see us, they provide milk for our family which we also use to make cheese, caramels and soaps; and they teach responsibility to our children. This proposition will devastate our family and many others.

This state can't afford to put more restrictions and another burden on its residents over something that was brought before this board without any evidence of a problem, testing or investigating, into M.ovi and whether it even has an affect or is a threat to the Dall sheep population. There has never been a die off of Dall sheep due to M.ovi. Even still, only testing on domestic sheep and goats has been analyzed or even called for. The chances of contact is so limited and the sample testing showed nothing that points to a possible future exposure. Sheep and goats have been in this state since at least the 60s and not one report has been made of cross contamination or contact. This Proposition will not affect Dall sheep positively or negatively. It will do nothing positive for the wildlife, the people, or the state. I ask the Board of Game to take no action on Proposition 64.

Submitted By
Kimberly Burns
Submitted On
10/26/2017 10:55:54 PM
Affiliation

Phone
9073782529
Email
Sleepyhollowfarmsak@gmail.com
Address
1080 Ichabod St
North Pole , Alaska 99705

Dear Board of Game, I am writing to you to oppose Proposal 64 and ask that you take NO ACTION. Domestic goats and sheep mean so much to our family for meat, milk, and fiber. We each have a story unique to us for why we own domestic goats and sheep. The devastation of taking goats and sheep off the clean list will cause us to have our children suffer. We depend on the milk for our children. The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep only 6 (2%) have tested positive for the bacterium. It's a screaming low risk factor in opposition to the "sky is falling" stance the Wild Sheep Foundation has been painting. Another point – If domestic goats and sheep are removed from the clean list owners are left in purgatory. Per the Alaska Dept. of Fish and Game website, animals not on the "clean list" cannot be permitted. That makes them illegal to own. The Alaska Dept. of Fish and Game needs to map the critical habitat areas of the most concern for contact with domestics. Oh And another point – M.ovi needs a host, it does not live in the environment and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators. I ask the Board of Game to take NO ACTION on Proposal 64."

Submitted By
Barbara Burrill
Submitted On
10/27/2017 1:02:32 PM
Affiliation

Phone
907-745-4984
Email
blazerak@yahoo.com
Address
PO Box 617
Palmer, Alaska 99645

To Whom It May Concern:

Please do NOT remove domestic Goats and Sheep from the "clean list". There is no hard evidence in Alaska to support such a "knee-jerk" reaction to what happens in the Lower 48. Many locals in our community rely on their flocks to survive. Do not remove their only means of supporting their families!

Sincerely,

Barbara J Burrill

Submitted By
Kari Butler
Submitted On
10/25/2017 1:04:00 PM
Affiliation
Alaskan Resident

Please consider who you are harming by taking sheep and goats off Alaska clean list. It is the self sufficient farmer who relies on goats/sheep for food, milk, cheese, chores and to raise their children with chores. I for one could not afford the expensive fence fixes or more testing per year, I test my goats for relavent dieseases and health concerns and that is costly per year, but it is important to me to keep my herd healthy.

Please put this issue to rest and ignore the future requests to do the same. Alaska is different than the lower 48, we don't have wondering herds of goats and sheep roaming the mountain side, and if we did they would be bear bait or starve.

While I wrote maybe more for the last time, I am fed up with people continuing this conversation and wanting the small guy to bend over and get out of the way. The bottom line for me is this conversation needs to go away. Goats and sheep should remain clean and fences that WSF have recommended should be dismissed.

The Board of Game have so much other important items on the list. Please address those items and don't just table this - eliminate it - WSF doesn't have a scientific leg to stand on.

Submitted By
Narda Butler
Submitted On
10/10/2017 9:46:16 AM
Affiliation

Phone
907-250-6987
Email
Nardalyn@gmail.com
Address
10501 Schuss Dr.
Anchorage, Alaska 99507

I am opposed to Prop 64. I am a sheep owner in Anchorage and I do not think the state should be creating regs for a problem not yet shown to exist. The State Veterinarian is currently conducting a study to document the presence within domestic sheep and goats of the specific mycoplasma bacteria whose transfer to wild populations is the concern of Prop 64. Until the data indicates this a real concern, the proposition is addressing a myth. When and if the data supports the risk of transmission of the bacteria from domestic to wild populations, the proposition warrants consideration. Until then, it is a hasty, knee jerk reaction to unsubstantiated fear.

Submitted By
Natalie Butts
Submitted On
10/27/2017 11:51:12 PM
Affiliation

Phone
907 3570579
Email
grdnbug@yahoo.com
Address
3151 S Dawn Lake Dr
Wasilla, Alaska 99623

Please do not ban goats and sheep in Alaska, The likelihood of them coming into contact with wild ones is very, very low and testing of private animals is very high in this state. Alpacas and Llamas can also carry the same diseases so you'd have to ban them also. It's an Americans right to own animals and enjoy them.

Submitted By
Veronika Byers
Submitted On
10/27/2017 9:08:12 PM
Affiliation

I oppose Prop 64. Please take no action.

Submitted By
Aubrey Byrne
Submitted On
10/24/2017 2:27:20 PM
Affiliation
Goat Herd Share Member

Phone
9076963473
Email
aubreybyrne@me.com
Address
17423 Alice Loop
Eagle River, Alaska 99577

I am a owner in a Goat Herd Share, and my daughter has been a 4-H member with team members who raised sheep and goats. We raise chickens for both eggs & food in addition to our goat herd share ownership. We appreciate the chance to be able to raise our own animals the way we want to for our own health, while at the same time helping to secure Alaska's food supply. This is a basic right of all people! The goat raiser with whom I own a share of her herd recently emailed me very concerned about Proposition 64. Last year this was called Proposition 90, was also vehemently opposed in public comments, and was deferred to this year reincarnated as Proposition 64. I have attached a letter she wrote which opposes Prop 64 with facts, reason, and passion. Hopefully I am not the only concerned Alaskan submitting this and similar letters to you. Thank you for your time in reading and carefully considering your decision on this ill-conceived proposition.

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden on existing owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on 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 thinhorn sheep in the wild, including both Dall sheep and Stone sheep. In light of the fact that the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Sincerely,

Aubrey Byrne

Submitted By
Anton Bzowy
Submitted On
10/26/2017 11:35:39 PM
Affiliation

I am asking that you reject Prop 64 for the following reasons; 1) There is not a proven threat to the wild sheep in this state.(just a theory) 2) The wild sheep in Alaska probably have a better chance of disease from the dirt from the boots or equipment of a sheep hunter that has previously harvested a Big Horn who now is hunting Dall Sheep than from a domestic stock animal living miles away from Dall Sheep habitat. (similar to water shed contamination from felt wader soles)

I also do not own or receive economic benefit from domestic sheep or goats but I do support the idea of others being free to do so in an enviromentally friendly way. I enjoy hunting sheep in Alaska when I can and take very seriously the ability for not only me but future generations to have greater opportunity via both herd and habitat mangement.

Submitted By
Amanda Camargo
Submitted On
10/3/2017 6:49:44 AM
Affiliation

Good day,

In regards to Prop 64, I believe it is a rash and inappropriate move to remove domestic goats and sheep from the clean list. This regulation is in response to moves in the lower forty-eight and data showing cross contamination of Big Horn sheep from domestic animals. However, the board must bear in mind that we, Alaska, are not the like the lower forty-eight. We have a huge sparse of land, with natural barriers already in place to prevent the mingling of domestic sheep and goat sheep with Dall Sheep. I'd also like to point out that there isn't no existing evidence to support claims that domestic livestock has cross contaminated any Dall Sheep and that Dall Sheep are not Big Horn sheep. There is current research in progress to either validate or Prove false these claims. If any actions are to be taken it should be to shelve Prop 64 until all research and results have been completed and analyzed to their fullest extent.

If any futur regulations are to be implemented it should include regular testing of animals for common diseases, as well a proper containment fences. Which I can assure you, most responsible owners do already.

Prop 64 would change the lives of thousands of local farmers, hobbyists and families. It would also mean no more 4H for domestic sheep and goats at the Alaska State Fair, which would adversely affect the economy. People rely on the milk, meat, wool and products from these amazing animals. Please consider all the comments and concerns that have been submitted addressing Prop 64 and make the right choice for Alaska and it's residents, no Prop 64.

Submitted By
Bill Campbell
Submitted On
10/27/2017 12:37:41 PM
Affiliation

Please TAKE NO ACTION on Prop 64 as the small dairy and home herds of domestic goats and sheep DO NOT present hazards to the wild populace of wild and indigenous herd of sheep and goats. Please do not let the boisterous few take away from the many in regards to this subject

Submitted By
Dan/Teresa Campbell
Submitted On
10/27/2017 10:43:45 AM
Affiliation

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi
Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,
Dan & Teresa Campbell

Submitted By
Carmen Cancio
Submitted On
10/8/2017 12:37:53 PM
Affiliation

I strongly oppose the proposition to restrict domestic livestock production. Period!!!!

Submitted By
Valerie Carlson
Submitted On
10/26/2017 3:31:18 PM
Affiliation

Phone
9078416544
Email
Valleygirl_58@hotmail.com
Address
PO Box 585
Palmer, Alaska 99645

To Whom it May Concern,

I have been a goat owner, learning from and about them for the past 2 and a half years. I have never in my life been so instantly fascinated and in love with an animal like I have our Alpine goat family members. Raising and caring for them has been such a joy for me and my two young girls. I am so excited they get to grow up living the "farm life", and learning responsibility as we do our twice daily milking and feedings. They adore their "goat buddies" just as much as our dog and cat and have already learned so much from them and I am forever grateful living this lifestyle is shaping them to be kind, caring and responsible human beings.

My husband is lactose intolerant which is why we got ourselves involved in goats to begin with, as he can drink goat milk and consume the dairy products I make from it with no medical issues. His health and quality of life have improved tremendously. My daughters prefer their creamy goat milk goodness to cows milk, and my youngest it is all she has ever known. I cannot even imagine our lives without these invaluable animals.

I was recently informed of the proposition to take goats off the clean list, and essentially make owning them illegal without permission from the state. I am not normally a politically involved citizen but I was shocked and scared at the thought of someone saying we could no longer own our precious goats. I read the proposal and understand they say a "permit can be obtained", but I have done research and Heard that this is not true since "permits cannot be obtained for unclean animals". This therefore sounds like an attempt to make this law sound less scary than it is. I am shocked that it is even being considered. Farming and subsistence living is a right all Americans have the option of pursuing, better living and better health are something everyone is pursuing. Permits are not required for farming or owning any other domestic animals. No permits are required for any other farm animals, even though chickens are constantly in contact with wild birds and eaten by wild carnivores, as well as horses and cows coming in contact with moose. I have owned all of these animals and have seen this happen uncountable times and know innumerable stories of similar encounters. Never once have I seen an illusive dall sheep or mountain goat anywhere near my goats, or even ever heard of this happening to others. I have no idea how data has been gathered but this incidence is non existent or negligible in Alaska according to my research. And if the incidence of them coming in contact is so low or non existent it makes sense that the data for Alaskas "wild goats and sheep" obtaining diseases from domestic goats or sheep is also non-existent or so low it shouldn't even be considered. With all this data, as well as Americans constitutional rights, I have no idea why or what the rational for this meeting and consideration of this prop are considering the actual data as well as the freedom of citizens to farm and own farm animals without permits.

I can only pray common sense and justice are the only considerations, and that thousands of Alaskans as well as goats aren't negatively affected by a personal agenda by the Board of Fish and Game that is not in the best interest of Alaskans, Alaskan wildlife or Alaskan domestic creatures. As a registered nurse I understand communicable diseases, and there is no data that makes this seem in any way that the wild sheep population will display any benefits from this law since the amount of contact is negligible. The risk vs benefit ratio is so unbelievably on the side of the hundreds of thousands of humans benefitting from farm fresh goat milk and healthy lifestyles that even if there were a small risk to wildlife this benefit to humans should outweigh it no questions asked.

Submitted By
lisa carpenter
Submitted On
10/26/2017 10:14:20 PM
Affiliation

My family has a small, hobby farm in wasilla. Our goats are our family! Two are even from the local animal shelter. Please, please allow us to keep our goats. This proposed regulation is ludicrous! I've read as much as I can and spoken to other people in the community and we are adamant: Let us keep our farms with goat and sheep.

Submitted By
Charlene Chase
Submitted On
10/27/2017 4:32:02 AM
Affiliation

Please do not act on Prop 64. Goats and sheep have been a very important part of farming and agriculture for many, many years. Because we are a fenced in state, unlike the lower 48, Alaska does not have the same problems and should not be treated the same.

Submitted By
Laurie Childers
Submitted On
10/26/2017 10:02:55 PM
Affiliation

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Michelle Church
Submitted On
10/24/2017 4:12:02 PM
Affiliation
none

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Email
moonstonefarm05@gmail.com
Address
2141 S Church Street
Palmer, Alaska 99645

I strongly oppose this regulation! It is unnecessary government overreach into the decisions of individuals to decide what foods to feed themselves and their families. There is absolutely ZERO evidence that this regulation will provide protection to wild sheep and goats. There is ABUNDANT evidence it will negatively impact the livelyhoods of sheep and goat owners and ABUNDANT evidence of a negative impact on our ability to make personal food choices. Please follow the advice of the professionals in this area and remove this ridiculous and burdensome regulation.

Submitted By
Charlene Clark
Submitted On
10/27/2017 11:24:31 AM
Affiliation

Phone
4193770244
Email
tlc3199@yahoo.com
Address
6267 Aldona Cir
Anchorage , Alaska 99504

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Karen Clary
Submitted On
10/27/2017 9:13:05 AM
Affiliation

Phone
(997)315-8859
Email
Hqrse49@yahoo.com
Address
Po box 876712
Wasilla, Alaska 99687

Please know that I'm against prop 64.

Submitted By
Brandy Coe
Submitted On
10/27/2017 4:50:24 PM
Affiliation

Phone
907-373-7383
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Address
3800 N. McCormick Ln
Wasilla, Alaska 99654

I oppose prop. 64. Goats and sheep are an important part of Alaskan farming and way of life. Local meat, fiber, and dairy are a necessary component to becoming a more sustainable State.

Submitted By
Sage cohen
Submitted On
10/9/2017 5:52:52 AM
Affiliation

Allow domestic animal husbandry. Regulate it. But allow it. I support being able to raise domestic sheep and goats for milk meat and/or wool and hide. Why not? Higher quality products than commercially available. Not everyone can hunt. Food security. Less need for imports.

Submitted By
ALEXANDER COKER
Submitted On
10/26/2017 9:39:37 PM
Affiliation

TAKE NO ACTION on Prop 64

Submitted By
Tobias Comley
Submitted On
10/27/2017 7:34:50 AM
Affiliation

I would like to oppose prop 64. As a family I do not own sheeps or goats, but very dear friends of mine depend on the resource the goats and sheeps offer. Such as milk and meat. I would like them to keep their valuables reaources. As, once again I appose prop 64.

Submitted By
Benjamin Cook
Submitted On
10/26/2017 7:24:56 PM
Affiliation

Phone
907 299-4743
Email
Akcharris@yahoo.com
Address
35642 Sun Eagle Dr
Anchor Point, Alaska 99556

Dear Board of Game members: No to taking goats and sheep off the clean list When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted: Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics) There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America. There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks. Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this. Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game. Respectfully, Benjamin Cook

Submitted By
Garnett Coonrad
Submitted On
10/17/2017 8:38:19 AM
Affiliation

Please take no action on proposition 64. This regulation, if approved, would take away my freedom to own domestic sheep or goats on my own property in Alaska.There are currently studies being done to assess the risk of sickness to wild sheep populations in Alaska. Taking action before these studies are completed is ridiculous, since there have been no cases of a wild sheep death in Alaska due to contagion from a domestic animal. Alaska is vastly different from the lower 48 states in geography and wild animal habitat. Using data from outside of Alaska is illogical. Please wait to move on proposition 64 until data from within our great state of Alaska has been gathered and studies by veterinary experts have been completed. Thank you. Garnett Coonrad

Submitted By
Kai Copeland
Submitted On
10/8/2017 12:09:31 PM
Affiliation

Dear Sir/Ms I hear by state that I oppose the proposition to restrict domestic livestock production. I am against taking domestic goats and sheep off the clean list.

Submitted By
Shara Cormier-Podobinski
Submitted On
10/27/2017 5:19:36 AM
Affiliation
Alaskan resident

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907-982-8000
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afsnowangel@gmail.com
Address
3861 Tyburn Dr
Beale AFB, California 95903

Please TAKE NO ACTION on Prop 64

Submitted By
Christie Cox
Submitted On
10/26/2017 11:34:38 PM
Affiliation

Please vote no on Prop 64. In Alaska, there are already laws regarding fencing and livestock that help prevent issues. We are also a proud group of people who are self sufficient. Goats and sheep are incredibly hardy, and easy to maintain in comparison with other larger livestock such as cows. Removing goats and sheep removes a lot of people's self sufficiency as well. This is a bad law that hurts the people of Alaska and does NOT help our wildlife.

Submitted By
Suzy Crosby
Submitted On
10/26/2017 5:05:45 PM
Affiliation
Cottonwood Creek Farm

Phone
9078631276
Email
scrosby@ak.net
Address
PO Box 873406
Wasilla, Alaska 99687

Dear Board of Game,

I am opposed to Proposal 64, and ask you to TAKE NO ACTION on it. The requirements of this proposal (obtaining permits, building "department-approved" fencing, and completing costly testing) are ill-conceived, hugely exaggerated, and according to ADF&G, essentially unenforceable. Although the proposal makes casual reference to the ease of obtaining a permit, it's not that simple according to the ADF&G website, which states the following: *"If a particular mammal, bird, or reptile species does ot appear o this list, it may ot be imported i to Alaska or possessed as a pet or livestock i Alaska, a d the Departme t of Fish a d Game ca ot issue a permit allowi g its importatio or possessio ."*http://www.adfg.alaska.gov/index.cfm?adfg=pets.exotic Removal of domestic sheep and goats from the Clean List would simply put livestock owners into a state of legal limbo, meanwhile providing not a single benefit or safeguard to the health of the wild sheep population.

The premise of Prop 64 references the lower 48 model of large commercial domestic herds in open-range grazing areas that adjoin or overlap bighorn sheep habitat, where wild sheep die-offs have been linked to extensive and on-going exposure to domestic sheep. In contrast, Alaskan sheep and goat owners maintain their flocks and herds on small private fenced acreages, with no access to Dall sheep habitat due to the existing natural barriers such as rivers, highways, towns and subdivisions. It is both irrational and unreasonable to use anecdotal evidence from the lower 48 when considering regulations for Alaska's unique environment. Any valid risk assessment whose findings are to be used in Alaska must be done in Alaska, and be based on fact and science instead of suspicion and assumptions.

In what can only be described as a freak incident, a wild mountain goat did find its way into downtown Palmer in September of 2016. (Although unverifiable, both the timing and the logistic challenges make it easier to believe that human intervention was involved than that the goat managed this unlikely journey alone and unaided.) The Mat-Su Borough's website says: *"Mat-Su Borough A imal Care Chief Matt Hardwig arrived o sce e i disbelief. He k ows about sheep a d goat habitat. "I've ever heard of a goat or sheep o this side of the Mata uska River," Hardwig said. Biologists from the Alaska Dept. of Fish & Game darted a d tra quilized the goat a d retur ed it to its habitat, Hardwig said."*https://www.matsugov.us/news/mountain-goat-takes-a-rest-downtown-palmer The only logical conclusion to be drawn from this: if ADF&G's policy is to return an untested animal to the wild after possible exposure to any number of domestic pathogens, this entire discussion is rendered moot.

There has never been a single documented case of Mycoplasma Ovipneumoniae (M. ovi) transmission from domestic sheep or goats to Dall sheep in Alaska, or in the bigger picture, to Dall or Stone sheep in the wild in either Alaska or Canada. In 2016 when faced with the loss of wilderness access the North American Pack Goat Association worked together with the Animal Disease Research Unit in Pullman WA to develop a testing protocol for the purpose of determining the prevalence of M. ovi in their pack goats. The completed 3-part test series included 468 goats, and final results showed a 4% prevalence rate for the disease. While testing was underway, the WSF's head vet, Dr. Tom Besser published the following statement in the summer 2016 edition of Wild Sheep Magazine: *"This expected low prevale ce of carriage of M. ovip eumo iae by pack goats is curre tly bei g tested through a program spo sored by the USDA Agricultural Research Service A imal Disease Research U it i Pullma , WA. If that lowprevale ce is co firmed, a d u less ew i formatio to the co trary arises, I believe that M. ovip eumo iae test- egative pack goats represe t a egligible risk for triggeri g p eumo ia outbreaks i bighor sheep a d that it would be reaso able to take this i to accou t whe setti g public la ds policies."*

Encouraged by that response, Alaskan sheep and goat owners followed suit in 2017 with voluntary participation in a study using the same protocols as NAPgA, and supervised by our state vet. This was done at no small expenditure of time and money on the part of each of the participating farmers, and under the risk of not knowing what the results would be. The study is still on-going, but to date 334 domestic sheep and goats in Alaska have been tested for M. ovi. Of that number under 2% (a total of six animals, consisting of four sheep and two goats) tested positive. This extremely low prevalence (less than half of the NAPgA study's 4%) certainly does not justify enacting the sweeping regulation called for by Prop 64.

Besides causing a severe economic burden to Alaskan sheep and goat owners and the businesses that provide feed and other services for them, the passage of Prop. 64 would also have significant cost impacts to the State of Alaska, at a time when budgets are being cut at every turn. The last thing the state needs is a new regulatory compliance program to implement and administrate, for the sake of purportedly preventing a hypothetical crisis that has neither occurred, nor been proven to likely occur in the future.

Finally there is the matter of the personal freedom of private citizens to raise their own food on their own private land. At no time or place in the history of our nation has there ever been a measure imposed on any segment of the population that would so drastically impair the

capability of families to provide for their own needs, meantime devastating an entire community whose lives are intertwined with and dependent on their animals. 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. The passage of this proposal would set a disturbing precedent that could be used to push even more restrictive measures elsewhere, or with other livestock species.

I ask you to not pass Proposal 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal is fundamentally flawed in its underlying assumptions and proposed requirements, and neither individuals nor the State can afford the costs of implementing and enforcing this program. It is incumbent on you to make a decision that is reasonable, farsighted, equitable to all involved, and fully defensible in the aftermath -- not one that merely appeases the insistent demands of a well-heeled special-interest group. Please follow the advice of the ADF&G, the DEC and State Vet's Office, the Division of Ag, and the Dept. of Law and TAKE NO ACTION on Proposal 64.

Respectfully submitted,

Suzy Crosby

Submitted By
Amanda CROSS
Submitted On
10/27/2017 5:40:59 PM
Affiliation

I oppose proposition 64. Do not pass.

Submitted By
Jayme cupples
Submitted On
10/26/2017 9:16:01 PM
Affiliation

To whom this may concern:

As a life long Alaskan, born and raised in Eagle River, I have always loved this state. However, as of late, the governing bodies have been sending Alaska into a tailspin. Making this beautiful state even more difficult to live in. I have livestock, including having goats. What kind of state are we living in that would place laws on one of the most important livestock in the state? That would force people to register their animals or have them slaughtered? To force citizens to restrict their activities with their animals to their registered properties so they can't even go on walks, go hiking, go to the fair or transport their goats for whatever reason it may be? What kind of controlling government are you looking to create? The vast majority of wild goats and sheep in Alaska live far beyond where people take their goats. Why not just ban certain mountains in high risk areas and not a blanket ban across the state for most likely the most popular farm animal in the state?

If this bill passes, the shock wave will hit everything from the state fair, local small business feed stores, raw milk and meat producers, families, important breeding programs, and so much more. Alaska is already suffering enough, why make this place more miserable by allowing one control-freak of a vet and a small band of governing leadership to dictate what is best for the biggest state in the US and all the people that would be impacted by such a terrible ban? Please understand that the more Alaska is crushed under this current government body, the more people will leave. There's no reason to stay if everything that makes Alaska a great place to live (dispite the inherent difficulties) is taken away. Don't pull the trigger on Alaska .. Don't be the straw that breaks the camel's back. Do not pass prop 64.

Submitted By
Sandra Daniels
Submitted On
10/27/2017 12:07:31 PM
Affiliation

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2064590093
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18418 Driftwood Dr East
Lake Tapps, Washington 98391

REGARDS to PROP 64 which is to prevent the "possible" transfer of a bacterium. It's not fair for people who raise goats and sheeps to have their rights taken away. People raise these animals for food, milk and pets. They do not spred deseases. AND MOST people do not live anywhere near wild goats and sheep.

ALASKA is not the lower 48! Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska has natural barriers to prevent wild Dalls & domestics from forming friendships.

There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. There have been no baseline studies on Dall sheep as carries of M.ovi until recently. All the current information, and forced captive studies, have been done with Big Horn Sheep in the lower 48. The Alaska Department of Fish & Game has not done mapping of Dall sheep habitat to define areas of true concern. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment and determine a risk versus regulation protocol the current Proposal 64 should not be acted on.

Submitted By
Heather DeBolt
Submitted On
10/27/2017 5:00:35 AM
Affiliation

Please take no action on prop 64.

Submitted By
Alivia DeBusk
Submitted On
10/9/2017 9:01:19 AM
Affiliation

I'm not sure why we're letting special interest groups from outside dictate what happens in Alaska. In Alaska it is already illegal to use pack animals to hunt, and goat and sheep are not intermingling with wild sheep and goats. All this bill would do is force Alaskan businesses to close based on laws that are not right for our state. Please say no to this regulation.

Submitted By
Kelly Dellar
Submitted On
10/11/2017 11:55:33 PM
Affiliation
N/A

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Address
2171 S Yukon Circle
Wasilla, Alaska 99654

The foundation for Prop 64 by the WSF is to prevent the possible transfer of a bacterium, Mycoplasma ovipneumoniae (M.ovi), to the wild Dall sheep population. M.ovi has been associated with pneumonia outbreaks in Big Horn sheep in the lower 48.

However, there has not been a single documented case of M. ovi transmission in the State of Alaska, British Columbia, or the Yukon between domestic livestock and wild thinhorn sheep populations. Ever. In light of the fact that there were 30,000 domestic sheep in Alaska in the 1970's, a number which dwindled to 20,000 in the 80's and is finally down to approximately 1000 at present, there is absolutely no evidence to support the notion that domestic livestock in this state are putting our wildlife at risk.

All of the current information and studies have been on Big Horn sheep in the lower 48. No studies have been completed on Thin Horn sheep, (Dall sheep) susceptibility to the bacterium in the State of Alaska.

Alaska is very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would commingle . Alaska has many natural barriers to help prevent wild Dall sheep & domestics from coming into contact.

In 2017, Alaskan sheep and goat owners participated in a voluntary testing program using the same protocol as NAPgA, with duplicate samples sent to a second lab for added reliability. Out of the 334 animals tested to date, a total of six animals (under 2%) were positive for M. ovi. This extremely low prevalence in Alaska demonstrates a negligible risk as well, especially when combined with the lack of commingling between wild and domestic species. As part of an overall risk assessment this study clearly validates the point that removing domestic sheep or goats from the clean list would serve no useful purpose.

Removing domestic sheep and goats from the clean list as Prop 64 requests would have far-reaching negative impacts on farming and sustainable living in Alaska. Prop 64 was haphazardly written prior to determining if a risk exists, and without careful consideration of a logical and workable plan to reasonably address that risk. Please remove Prop 64 from the BOG proposal list as it serves no useful purpose.

Thank you.

Submitted By
Kimberly Delph
Submitted On
10/26/2017 9:31:14 PM
Affiliation

I am opposed to Proposition 64. If this proposition is put in it will affect our small farmers. Goats and sheep are a large part of our agriculture and by passing proposition 64 and making it ilegal to own them you will see a trickle down affect through the entire state in our agriculture. I do not personally own any farm animal but I full support all of our state's farmers both small and large. Thank you for taking the time to look at my message and consider my concerns.

Submitted By
Teresa denton
Submitted On
10/27/2017 1:57:34 AM
Affiliation

Phone
9077152125
Email
teresadenton94@hotmail.com
Address
2400 W Lake Lucille Dr
Wasilla , Alaska 99654

Leave sheep and goats on clean list

Submitted By
Gerald DeVilbiss
Submitted On
9/15/2017 7:22:45 PM
Affiliation
farmer

Phone
746-2575
Email
windyriverfarm@gmail.com
Address
6505 N. Wolverine rd. Palmer, Ak. 99645
Palmer, Alaska 99645

Please do not take sheep and goats off of the clean list. There is no scientific data that conclusively proves domestic sheep and goats transfer diseases to wild sheep and goats. If you arbitrarily take them off the clean list it would devistate small sector family farm production and all those farms and business that supply products to these small farms.

Sincerely,

Gerald DeVilbiss

Submitted By
Kristine DiBartolo
Submitted On
10/27/2017 7:05:11 AM
Affiliation

Phone
9073151654
Email
Kristineinalaska@gmail.com
Address
2040 n Midtown dr
Palmer, Alaska 99645

I oppose goats and sheep to be taken off the clean list.

Submitted By
Mellissa Dishman
Submitted On
10/16/2017 11:26:45 PM
Affiliation

Prop 64: Please be sure to look at all the data that has been gathered regarding prop 64. The Wild Sheep Foundation's own research shows that domestic sheep/goats have never posed a threat to our wild sheep here in Alaska. Removing domestic sheep/goats from the clean list would only harm the lifestyles and way of life for Alaskans and do nothing to protect or benefit the wild sheep in our great state. The Wild Sheep Foundation has a history of being a bully organization, please do not subject us to their made up scare tactics. Thank you

Submitted By
Kristen M Donchess
Submitted On
10/8/2017 8:51:51 AM
Affiliation
1989

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4257367037
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kristen.donchess@gmail.com
Address
1696 N OGrady Cir
Wasilla, Alaska 99623

Prop 64 is ridiculous. We raise goats and really enjoy it. Please don't change Alaska. There are other ways to protect the wild animals.

Submitted By
Connie Duran
Submitted On
10/27/2017 1:25:56 PM
Affiliation

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

Why on earth would the Government want to do this to the small farmer and hobby people?? There seems to be a want to keep people who love their animals from having a good life style. There are no credible stats up here in Alaska to even warrent such a move. Why do the few get to ruin it for the many in this issue? Seems big money may be the problem here, and possibly the eliet hunters who couldn't give a hoot about the little guy. My goats are smarter than the usual progressive. Please, just leave us little guys alone and quite trying to think you are smarter than God!! Most of us who have goats or sheep work HARD to keep our animals healthy. Please do not put this in to a law!!!! Thank you for your time.

Submitted By
Maureen Eldridge
Submitted On
10/27/2017 2:56:19 PM
Affiliation

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Thom Eley
Submitted On
10/24/2017 8:57:46 AM
Affiliation
None

Phone
9075622496
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thom@mapmakers.com
Address
4611 Pavalof St.
Anchorage, Alaska 99507

Do not ban goats from Alaska. That is the dumbest idea that I have ever heard (herd). Goats are a livelyhood to many folks. Deal with some real issues.

Submitted By
Theresa Elliott
Submitted On
10/27/2017 5:10:22 AM
Affiliation

Phone
907-715-6134
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yankeegal@mtaonline.net
Address
PO BOX 877207
Wasilla, Alaska 99687

Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska.

Submitted By
Shonda Erickson
Submitted On
10/27/2017 7:45:04 PM
Affiliation

I oppose prop 64

Submitted By
Renee Everhart
Submitted On
10/27/2017 2:41:27 PM
Affiliation

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1551 E Tattler Drive
Wasilla, Alaska 99654

Take No Action on Prop 64. If more studies are needed, it would be a shame to separate Alaskans from their livestock and pets.

Submitted By
Judith Faber
Submitted On
10/26/2017 12:06:21 PM
Affiliation

Phone
907-376-2648
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msjudithf@yahoo.com
Address
6191 S Hayfield Rd
Wasilla, Alaska 99623

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden onexisting owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on 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 thinhorn sheep in the wild, including both Dall sheep and Stone sheep. In light of the fact that the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Judith Faber

Submitted By
Desiree Ferguson
Submitted On
10/27/2017 4:48:05 PM
Affiliation

Say no to prop. 64 do not do this to alaskans we should be sble to keep our sheep and goats this will weaken alaska econimics. Sincerly a conserned alaskan goat farmer

Submitted By
Alexa Fetta
Submitted On
10/26/2017 9:21:12 PM
Affiliation

Phone
907-355-8343
Email
lexy@wealthxpro.com
Address
2160 E 56th Ave
A108
Anchorage, Alaska 99507

Please do NOT take action on Prop 64!

Submitted By
Vincent Feuilles
Submitted On
10/26/2017 9:54:27 PM
Affiliation

Phone
9073288161
Email
feuilleslives@gmail.com
Address
15182 W Big Lake Lodge Rd
Big Lake, Alaska 99623

Please vote no on Prop 64. In Alaska, there are already laws regarding fencing and livestock that help prevent issues. We are also a proud group of people who are self sufficient. Goats and sheep are incredibly hardy, and easy to maintain in comparison with other larger livestock such as cows. Removing goats and sheep removes a lot of people's self sufficiency as well. This is a bad law that hurts the people of Alaska and does NOT help our wildlife.

Submitted By
Paul Finch
Submitted On
10/16/2017 8:26:13 PM
Affiliation

Phone
907-687-0722
Email
pfinch58@gmail.com
Address
PO Box 55156
North Pole, Alaska 99705

North Country Farm on Eielson Farm Rd, North Pile maintains a Boer meat goat herd of about 30 winter breeding stock and up around 70 head after kidding time through summer forage time to be marketed for meat and breeding stock. The whole process of Prop 64 is burdensome on already difficult agricultural work. The fear, anger, and division this has caused among farmers against hunters, and vice versa, (both are good, solid Alaskan and American groups) is totally not worth the perceived benefit as the actual risk has not been adequately assessed and the actual benefit has not been justified. Furthermore, any enforcement of this measure will be difficult, expensive, and problematic at best if not violent and unconstitutional at worst. If passed, this would signal the demise of our goat operation as the financial and regulatory burden is simply unbearable. We will look back and regret this wasted effort and angst as history is written. We have much greater work to do both on the farm and other issues in our great state. Please defeat Prop 64, otherwise it will undoubtedly be decided after a protracted legal battle in the courts. Thank you

Submitted By
Marcia Fischer
Submitted On
10/27/2017 9:18:38 AM
Affiliation

Please continue to allow us to keep our sheep and goats. No not remove them from the clean list. These animals do not roam free in this state and pose no risk to wildlife. Thank you

Submitted By
Colleen R Fisk
Submitted On
10/24/2017 3:25:22 PM
Affiliation

Phone
9078919608
Email
colleenrfisk@gmail.com
Address
2310 Eagle St
Anchorage, Alaska 99503

Dear Board Members,

Regarding Prop 64, I would encourage the Board of Game to REJECT this proposal. The impact on the sheep and goat owners throughout the state would be harmful to small business owners who sell the meat or wool from their and those who receive some of their food for the year from their animals. The difficulties in fencing the domestic animals in, not to mention the extra permit and testing required, to protect the wild goats and sheep are unreasonable and unnecessary. The initial findings of the *Movi* survey show that few domestic goats and sheep have the infection, and there is little evidence that the wild sheep and goats even have contact with domestic sheep and goats.

I grew up in the Mat-Su Valley and raised sheep as a 4-H project to sell at the Palmer State Fair each year. The money I raised from those sheep went towards a college education, and I know there are many other youth around the state who do the same. While my family probably would have been able to have the space and ability to build up a double fence and get permits disease free certification, many other families would not, and if Prop 64 passes, many 4-H youth will be deprived of the ability to raise sheep as a project animal. Of course they could choose another animal, but sheep are easy to care for and handle compared to other project animals such as pigs and steers, but still able to earn a significant amount of money compared to the smaller market animals such as turkeys.

Please take into consideration the economic impact on small business, youth learning livestock care, and those who depend on the animals for their own sustenance.

Thank you for your consideration.

Sincerely,

Colleen R. Fisk

Anchorage, AK

Submitted By
Louise Fode
Submitted On
10/27/2017 9:18:59 AM
Affiliation

Phone
907-980-1880
Email
louisefode@gmail.com
Address
1340 W 73rd Cir
Anchorage, Alaska 99518

I oppose Prop 64. We need goats and sheep for sustainable agriculture in AK. The risk of domestic goats and sheep interacting with wild goats and sheep is very low. I am concerned that this Prop is being supported by an Outside lobbyist that has no knowledge of or concerns for true Alaska issues.

Submitted By
sara foose
Submitted On
10/26/2017 6:11:43 PM
Affiliation

I strongly oppose this measure. I do not think this should be a law. As far as I Know, we have no sheep/goats near the area where wild ones are. The risk of passing diseases is minute & does not warrant this attention.

Submitted By
Kelly Fox
Submitted On
10/26/2017 9:01:00 PM
Affiliation

No to Prop 64. Domestic sheep and goats are vital for our local economy as well as for small farmers, homesteaders, and local business.

Submitted By
Grace Franklin
Submitted On
10/27/2017 1:53:34 PM
Affiliation

Passing a law to restrict the ownership of certain livestock such as goats, to the point where it is illegal to own them, is plainly ridiculous. The risk they pose to the natural ecosystem in Alaska is all of 2%. I am certain that the benefits these animals offer are far greater than that 2% risk. Don't illegalize goats.

Submitted By
Kimberly Fuchs
Submitted On
10/26/2017 8:50:14 PM
Affiliation

No on 64. Sheep and goats are needed in alaska for our agrucultural needs and economy.

Submitted By
Gavin Gaffney
Submitted On
10/26/2017 10:26:03 PM
Affiliation

This prop will affect far to many family's who rely on goats and sheep. Passing this on a "this might happen" basis will do far more harm than good to Alaskans. Please do not let this pass.

Submitted By
Sara Garsha
Submitted On
10/23/2017 7:12:35 PM
Affiliation

Please consider the following:

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden onexisting owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on 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 thinhorn sheep in the wild, including both Dall sheep and Stone sheep. In light of the fact that the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Submitted By
Jerika George
Submitted On
10/27/2017 6:12:21 PM
Affiliation

I oppose proposition 64! Alaska needs small farming and better agricultural options!

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of [illegible] Conservation

DIVISION OF ENVIRONMENTAL HEALTH
Office of the State Veterinarian

5251 Martin Luther King Jr. Avenue
Anchorage, AK 99507
Phone: 907.375.8215
Fax: 907.929.7335
www.dec.alaska.gov/eh/vet

August 30, 2017

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

Re: PROPOSAL 64 - 5 AAC 92.029. Permit for possessing live game.

The Department of Environmental Conservation (DEC) Office of the State Veterinarian (OSV) submitted comments strongly opposing adoption of Proposal 90 in March 2016. Proposal 64 is a reissuance of Proposal 90, and these comments are now re-submitted, with additional information regarding the work that DEC has undertaken on this topic in the 18 months since Proposal 90 was tabled.

First, it must be made extremely clear that neither the Board of Game nor the Alaska Department of Fish and Game (ADF&G) has statutory authority over domestic mammals that are confined and under the care of a human being. That authority lies with DEC at AS 03.05.

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 64, like Proposal 90 in 2016, 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 ADF&G and Board of Game lack authority or jurisdiction over domestic animals, including sheep and goats as listed in Proposal 64. Only in the case where domestic mammals are released or escape into the wild and no longer under the care and husbandry of a human being, are they considered feral. It is only at that time could they fall under the authority of the Board of Game and ADF&G.

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.

Due to the structure of farms in Alaska, (fewer and smaller flocks of sheep or herds of goats than other states, no free grazing with a requirement for fencing, fewer imports) the risk of disease transmission from domestic livestock to wildlife is lower than in other areas of the country. According to ADF&G, Dall sheep populations in Alaska are generally considered to be healthy. Mass die offs due to respiratory diseases that have decimated wild sheep in the Lower 48 are not known to have occurred in Alaska.

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. Towards this end, a working group was established in 2016 by the Alaska Farm Bureau and the Wild Sheep Foundation to address the concern of maintaining the health of the wild sheep populations in Alaska. Representatives from ADF&G, the Department of Natural Resources, and DEC participate in the meetings to provide technical expertise.

To better understand the prevalence and distribution of respiratory disease and the impact, if any, on wild sheep and goats in Alaska, at the urging of the multi-agency working group, the OSV is conducting a voluntary study in collaboration with the USDA Agricultural Services Laboratory in Washington State and the Washington State Animal Disease Diagnostic Laboratory to determine the prevalence of *Mycoplasma ovipneumonia* (Movi) and *Mycoplasma conjunctivia* in domestic sheep and goats

and captive ungulates. This study will proceed for the next 18 months attempting to reach sheep and goat owners in all regions of the state. Additional information about this study can be found here: https://dec.alaska.gov/eh/vet/Movi.html. In addition, the ADF&G Wildlife Veterinarian, Dr. Kimberlee Beckmen, has also initiated a study with USDA Agricultural Services Laboratory to screen wild sheep, goats, and ungulates for Movi.

The collection of information from both of these projects will help identify *actual* health threats and guide state agencies to develop strategies within their respective statutory authorities to reduce risk of introduction of disease pathogens to wild sheep and goats, while still allowing the growth and development of agriculture in our state.

Reiterating my comments in 2016, I strongly urge the Board of Game to reject Proposal 64, and for ADF&G to take no further action to remove domestic sheep and goats from the "clean list".

Sincerely,

RF Gerlach, VMD

Dr. Robert F. Gerlach, VMD State Veterinarian

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

Submitted By
Pamela Gjertson
Submitted On
10/26/2017 9:56:32 PM
Affiliation

Regarding Proposition 64, I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Nicole Goolsby
Submitted On
10/25/2017 9:41:23 AM
Affiliation

Hello, last year I sent in a comment with many details on why I opposed prop 90, and now with this prop 64, I want you to know I oppose it as well. I will share a comment which sums this up pretty well. "It is utterly outrageous that a group of hunters should attempt to push for a ruling which, although providing them no guaranteed benefit, would do irreperable damage to our food supply, our lifestyle, our livelihood and our passion in the process. Hunters and farmers have peacefully co-existed in Alaska for a long time and should be able to continue to do so."

I started my adventure with goats three years ago and I completely fell in love with them. They have given my family and I much joy. I am lactose intolerant and the goats milk is much better on my stomach than cows milk . My goat provides my family and I with milk and cheese. I have spent many hours training another of my goats to pull a small cart and my nephew loves getting rides in it. I have also raised goats for meat, a cow would be out of the question because of it's large size and massive appetite but it is quite realistic for us to raise a meat goat every year or so.

My animals are kept in an enclosure on my property for their protection and I have gotten them tested for some of the main goat diseases because I believe health is important. I think you will find that most goat and sheep owners around Alaska do the same for the safety of their animals.
- Thank you for your time

Submitted By
Neil Gotschall
Submitted On
10/17/2017 10:19:44 AM
Affiliation
Alaska Resident

I understand if the BOG should pass Prop 64 domestic goats and sheep would be illegal to own in the State of Alaska. No permits are issued for animals not on the clean list.

I am against the passing of Prop 64.

Submitted By
Julia Graham
Submitted On
10/26/2017 10:54:30 PM
Affiliation

Phone
9078414335
Email
Juliag@mtaonline.net
Address
900 A Grantham Road
Wasilla, Alaska 99654

Oppose proposition 64!

Submitted By
Lena Green
Submitted On
10/27/2017 4:56:36 PM
Affiliation

i would like to oppose proposal 64. I have a 10 year old daughter who was born with down syndrome and can not drink cows milk. So we have invested a few thousands $ in milk goats. They are from top of the line breeding for Heath. If I was unable to provide this healthy food for my family it would impact us greatly. Along with the milk we make keifer and cheeses as well. Please to not take away my right to provide my own healthy food to my family. Than you Lena Green

Submitted By
Michelle Greensfelder
Submitted On
10/27/2017 12:17:17 PM
Affiliation
None - resident

Phone
907 707 0266
Email
Chaoswoman@msn.com
Address
1460 N Branding Iron Ln
Apt 2
Palmer, Alaska 99645

Take no action on Prop 64.

Submitted By
KEN GRIDLEY
Submitted On
10/26/2017 9:29:33 PM
Affiliation

TAKE NO ACTION ON PROP 64. LEAVE AS IS.

Submitted By
Kim Gross
Submitted On
10/27/2017 1:17:54 AM
Affiliation

Phone
907 885 4771
Email
Kimeca@googlemail.com
Address
9132 Cranberry st
Anchorage, Alaska 99502

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Kim Gross

Submitted By
Mary P. Groth
Submitted On
10/25/2017 8:38:29 AM
Affiliation

Farming is a tradition in our community. Government overreach of this magnitude is criminal. To assume that Dall Sheep can be contaminated by domesticated goats and sheep on local farms is outrageous. They do not even remotley share the same habitat and I cannot fathom how they would come into contact.

Submitted By
Dana Guidi
Submitted On
10/27/2017 4:59:10 PM
Affiliation

Phone
907-226-2070
Email
gigglesguidi@yahoo.com
Address
64193 Diamond Ridge Rd.
Homer, Alaska 99603

I am opposed to prop 64 please take no action

Submitted By
Sarah H.
Submitted On
10/26/2017 10:05:30 PM
Affiliation

My family raises goats in the Matanuska Susitna Borough. We oppose Prop. 64. I would like to echo the statement of Tina Starr Judd, a fellow goat owner and respected member of the agricultural community: "The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska." Please do not allow this to pass. Many Alaskans depend on this type of agriculture and this is an important issue to us.

Submitted By
Dianne Haddox
Submitted On
10/26/2017 10:20:02 PM
Affiliation

I am writing in opposition to Prop 64 and the removal of domestic sheep and goats from the clean list in Alaska. The powers promoting this proposition are, among other things, limiting or even completely eliminating an entire category of livestock farming and thus increasing food insecurity in a state that has got to do everything possible to encourage and develop local food sources for the long term food security of Alaskans. Once again Alaska's unique situation is not being taken into consideration. There is no evidence to support the need to remove domestic goats and sheep from the clean list in Alaska. The testing has not been done to show they are a threat and domestic sheep and goats are required to be appropriately penned in on private property in this state thus all but eliminating the potential problems found in states allowing these animals on open range. This Proposal restricts people's freedom to raise livestock, feed their families and generate income using private property in a misguided effort to prevent a problem that hasn't been shown to exist in Alaska and before mapping of the wild populations is even complete. Domestic sheep and goats should remain on the clean list and Prop 64 should be permanently shelved.

Submitted By
Jean Hale
Submitted On
10/27/2017 6:47:11 PM
Affiliation

Phone
9077450357
Email
rjhale@gci.net
Address
10355 E Cody dr
Palmer, Alaska 99645

Currently listed as prop 64, putting ownership of domestic livestock (sheep and goats) at risk by removing them from the *clean* list. This is a ridiculous proposition. Farm animals have been part of our history in the state since the trading company days. They were part of the colonization of this state, with goats even being used as pack and sled animals as well as for milk and food. They are a very important part of our food security, which quite frankly, is pretty scary up here- a much worse situation that a manufactured fear of *disease* being pushed by people that don't live here and are far removed from farm reality. Needless to say, I opposed this.

Submitted By
Carissa Haley
Submitted On
10/26/2017 9:08:01 PM
Affiliation

I am severely opposed to the proposition to add domestic goats/sheep to an unclean list. I see no reason for it to be implemented as it would be nothing more than a budren on the community, rather than a protection to Alaskas wildlife.

Submitted By
Betty Hall
Submitted On
10/27/2017 4:11:08 PM
Affiliation

Phone
907-229-6589
Email
betty_hall@icloud.com
Address
1853 Concord Hill Drive
Anchorage , Alaska 99515

I oppose Prop 64 and support the rights of Alaskans to raise goats and sheep.

Submitted By
Cayla Hall
Submitted On
10/26/2017 11:08:58 PM
Affiliation

Phone
3307633376
Email
Cayhall91@gmail.com
Address
19334 N Glenn Hwy
Sutton, Alaska 99674

If goats and sheep are removed from the "clean list" I will seriously lose all hope in the management of our wildlife/livestock. This would impact so many Alaskans ways of life and until there is proven research that they are determential to our dall sheep and mountain goat population I feel it is completely uncalled for. If it Is necessary to go on a witch hunt please don't punish the common Alaskan and take aim at commercial fisheries because I for one am sick of not being able to catch enough fish to get my family through the winter.

Submitted By
Kate Halsey
Submitted On
10/26/2017 9:44:07 PM
Affiliation

Regarding Prop 64- I am asking that you NOT remove goats and sheep from Alaska's clean list! They are not able to commingle with the wild doll sheep and should pose minimal if any threat to their population. I have many friends who have goats and love them and love raising them. Please, please do not remove them from the clean list! Thank you

Submitted By
Megan Hamlin
Submitted On
10/27/2017 1:45:00 PM
Affiliation

Take no action on proposition 64.

I can't say anything that hasn't been said 1,000 times already about this. It all fell on deaf BOG ears last year.

October 20, 2017

To whom it may concern regarding Proposition 64,

I am Katrina Hammond, small meat goat producer in the Matanuska-Susitna Valley. I have been involved in agriculture since I was five or six years old and got my first goat to help fill our families freezer and have a source of fresh natural milk. I was in 4-H programs growing up in the valley and participated in the annual livestock auction at the State Fair, on the teen council as president and still continue to support 4-H families and to produce quality meat goats. Goats are a huge part of my life, and raising them is a self sufficient lifestyle that us as Alaskans cherish greatly. Like many Alaskans, we hunt, fish and raise our own produce and livestock, it's a way of life, and respect for all resources is a topic that hits close to home.

I strongly oppose proposition 64, this proposition would make it very difficult for a small time producer like myself to keep goats. I have my herd tested annually for diseases through Washington Animal Disease Diagnostic Laboratory (WADDL), with negative results every year for; Caprine Arthritis Encephalitis, Caseous Lymphadenitis and Johnes. Raising goats here in Alaska is already a tough challenge, due to feed prices, shipping costs for new bloodlines and caring for the health of our herds. Domestic goats and sheep in Alaska do not comingle with the wild sheep populations, unlike the Lower 48 where there are issues with transmitting disease in Bighorn sheep flocks due to free ranging domestic flocks. Studies showed that less than 2% of goats tested in the volunteer program here were "positive" for the M. Ovi virus, and that was just a small number of volunteers. There is no evidence of Dall Sheep being directly affected, we must remember we are not the Lower 48.

I trust the Board of Game will read the comments from the local farmers and see that this is very important to us, we don't want our livestock labeled "unclean", that would affect every aspect of raising goats, including USDA processing, I couldn't market my animals, I cannot put perimeter fencing around my property, and will not pay the state for a permit to keep my goats that I've had for years without infecting flocks of wild sheep.

" We must be free not because we claim freedom, but because we practice it."
- William Faulkner

Respectfully,

Katrina Hammond

Submitted By
Lisa Hampton
Submitted On
10/27/2017 7:25:25 PM
Affiliation

Phone
9073547228
Email
Elda.aranel@gmail.com
Address
POB 877690
Wasilla, Alaska 99687

I oppose Prop. 64, take NO action!

Submitted By
Hershey Haney
Submitted On
10/27/2017 9:29:20 PM
Affiliation

TAKE NO ACTION PROP 64

Submitted By
Kunuyaqauluk Hank
Submitted On
10/26/2017 9:44:47 PM
Affiliation

Phone
907-891-1716
Email
Kunuyaqauluk@icloud.com
Address
5500 w Limberlost ave
Wasilla, Alaska 99623

Take no action on prop 64!

Submitted By
Chelsey Hanson
Submitted On
10/26/2017 9:26:09 PM
Affiliation

Phone
9072297807
Email
Chanson1218@yahoo.com
Address
3220 west riverdell
Wasilla, Alaska 99654

Hello, I'm writing this in regards to the proposition of taking domestic goats and sheep off the clean list. I oppose the idea that domestic sheep and goats are a risk to wild dall sheep in Alaska. I have two goats that are kept as family pets and kept behind a 6 foot fence at all times. Due to the data I've digested I feel strongly that it is completely unnessesry to take domestic sheep and goats off the clea n list. My herd is dearly loved, healthy and well cared for. Thank you for your consideration, time and understanding.

Submitted By
Colin Harrington
Submitted On
10/24/2017 6:29:52 PM
Affiliation

Phone
7069877351
Email
colinharrington@hotmail.com
Address
6186 N Sunset
Wasilla, Alaska 99623

We rely on having goats to raise for food and to milk for dairy products. It offsets the high cost of living in Alaska. If you changed the laws and rules regarding these animals on the "clean list" it would severely impact my family and cause issues with trying to feed the family. Meats and dairy products that we get from raising goats is a viable and sustainable option. Please don't pass such absurd regulation.

Submitted By
Carrie Harris
Submitted On
10/26/2017 12:19:26 AM
Affiliation

Phone
907 299 7916
Email
Everydayingenuity@yahoo.com
Address
35642 Sun Eagle Dr
Anchor Point , Alaska 99556

Domestic Goats and Sheep provide meat, cheeses, milk to many families in the State. Taking goats and sheep off the clean list is taking food out of Alaskans mouths to benefit big game hunters for a problem that does not exist. Do not take Sheep and Goats off the clean list.

Submitted By
Carrie Harris
Submitted On
10/26/2017 7:15:28 PM
Affiliation

Phone
907 299 7916
Email
Everydayingenuity@yahoo.com
Address
35642 Sun eagle Dr
Anchor Point, Alaska 99556

Dear Board of Game members: Please Don't take food from our families mouths. Do not take goats and sheep off the clean list When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted: Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics) There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America. There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks. Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this. Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game. Respectfully, Carrie Harris

Submitted By
David Harris
Submitted On
10/26/2017 7:19:43 PM
Affiliation

Phone
907 299 4485
Email
Dharris766@gmail.com
Address
35642 Sun Eagle Dr
Anchor Point, Alaska 99556

Dear Board of Game members: When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted: Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics) There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America. There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks. Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this. Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game. Respectfully, David Harris

Submitted By
Lacey Harris
Submitted On
10/27/2017 5:12:31 AM
Affiliation

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907-841-6924
Email
arcticharris@hotmail.com
Address
4981 W. Beverly Lake Rd
Wasilla, Alaska 99623

Take no action. Let Alaskans continue to have their small farm animals. So many used for various reasons that benefit many different people of Alaska. This is a give.....take no action!

Submitted By
Rebecca Harvey
Submitted On
10/27/2017 12:01:17 PM
Affiliation

Phone
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Address
PO box 3612
Palmer, Alaska 99645

Please do not take action on the proposal to remove goats and sheep from the "clean" list for Alaska. It is proven that these animals are not a threat to wild sheep/ goats as they are not herded in open spaces. Owners have them on personal property, fenced in. These animals are important to many families. Especially goat milk. We are not like the lower 48. Don't let this happen here just because it's an issue there.

Submitted By
Hllary Hatfield
Submitted On
10/27/2017 12:13:42 AM
Affiliation

I oppose Prop 64.

Submitted By
Lan Hecimovich
Submitted On
10/27/2017 4:01:44 PM
Affiliation
Farmer

Phone
9074418072
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lan@mtaonline.net
Address
PO Box 488
Palmer, Alaska 99645

Board:

I am in opposition to proposition 64 because there is a limited amount of research therfore more research needs to be conducted.Also for the following reasons:

1. I atteneded the meeting held in Palmer with the person who did all of the research on Mycoplasma ovipneumoniae (M. ovi). The study accordiing to her can only verify that M.ovi is a pathogen. The study can not predict what could happen if a thin horned sheep came into contact with M. ovi in the wild. There are several reasons for this 1) The study was done under controlled conditions in which the wild sheep were penned up with domestic sheep. This creates untatural stress on the wild sheep which are not use to captivity. Then we introduce a pathogen to them with a weakened immune system due to stress making them more succeptible to the disease. 2) It is unknown as to how long the pathogen can exsist outside of the host body in the wild. According to the resaearcher it could be up to 48 hours under the right conoditions, but nobody really knows. In that time a thin horned sheep would have to come up and smell it in order for it to become infected.
2. There is currently grant funded research to determine the extent of M. ovi in the domestic flocks. To date only 2% have tested positive for M. ovi.
3. Unlike the lower 48 where sheep can graze on gevernment land our sheep are fenced. This makes it highly unlikely that they would ever have any contact with domestic sheep in Alaska. Even if a domsticated sheep were to get loose the chances of it coming into a thin horned sheep in are just about ZERO as the thin horned sheep live in the mountains and are mostly remote. Even if domstic sheep were to found in their range they would have to be infected, the current study shows that only 2% of domestic sheep infected with M. ovi. The virus would have to survive outside the host up to long enough for a thin horned sheep to become infected, not a very likely scenario.
4. We are currently required by law to fence our sheep.
5. If we place sheep on the unclean list then there is no way to legally raise sheep in Alaska.
6. I personally like most Alaskans do not like big money and thats what the wild sheep association is is big money coming into our state telling us what we need to be doing.
7. As the ressearcher stated in the meeting more research needs to be done to see what impacts if any could there be in the wild.
8. I am asking the board to not do anything drastic at this time but to allow for there to be enough research to be completed so that an educated research based solution can be reached. It would be wise to make a snap decision or a political decsion without all of the facts that could have a huge impact on the food supply in Alaska. We live in a remote corner of the world up here where if there were a disruption in the shipping where would we get our food. Certainly not from the mountain sheep or the mountains themselves.
9. Thank you for your time and consideration in this matter.

Submitted By
Lee Hecimovich
Submitted On
10/24/2017 3:03:53 PM
Affiliation
4-H, FFA, farmer

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907-745-8009
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lan@mtaonline.net
Address
PO Box 488
Palmer, Alaska 99645

Please do not give this ridiculous Prop 64 former 90, any merit. No positive tests have been found and even Biologists and Vets think it is unfounded. I am a sheep farmer, 4-H agent, FFA supporter, Alaska agriculture supporter as well as a hunter with a BS in Wildlife Mgmt so I understand all aspects. It would be impossible for farmers, 4-H youth, etc to affort the fencing and other compliance requirements and would deal Alaska livestock as well as other agriculture aspects a killing blow, for no good reason other than so that a few trophy hunters are happy. State resources are tight enough that compliance would also be difficult at best. Please consider the whole picture, not just where the money is!

Submitted By
Tiani R Heider
Submitted On
10/11/2017 3:49:39 PM
Affiliation
Su Valley Farm

Phone
9073570542
Email
suvalley@gmail.com
Address
7479 W. Born Lazy Way
Wasilla, Alaska 99623

Dear Board of Game-

I am commenting today on Proposition 64, as presented for your consideration.

I am adamantly opposed to the removal of domestic sheep and goats from the "clean list", and the proposition in its entirety for the following reasons:

1) The State of Alaska has not identified or mapped the "typical range" of wild sheep and/or goats.

2) Alaska is not a free range state, as domestic livestock are fenced in due to predator threats.

3) Voluntary preliminary testing is currently underway of a small percentage of domestic Alaskan flocks. The results of these tests as of the date of this submission, show a 2% positive rate for m.Ovi, well below other risk groups.

4) Domestic sheep and goats represent food security for many Alaska homesteaders and hobbyists, and the explosive growth of the local food movement includes a number of smaller farms and ranches who are investing in Alaska's rising livestock production numbers.

5) The Office of the State Veterinarian has been instrumental in maintaining the health and well being of domestic animals within Alaska's borders. They already shoulder the responsibility of assisting in protecting Alaskan wildlife, through their many programs.

6) Removing domestic flocks from the clean list will also punish 4-H participants, their supporters who purchase the meat cuts at the Alaska State Fair, and the sponsors of those auctions.

7) Alaskans chose sheep and goats for personal consumption. These choices can be based on allergen, ethnic, or religious factors. These consumers rely upon Alaskan livestock producers to fill these needs.

Adopting Prop64 will have wide ranging effects state wide. Not only will it cause 100s of residents to destroy their investment without reimbursement, it will shutter quite a number of cottage businesses for fiber and fiber arts, the myriad of products created with sheep and goats milk, charcuterie endeavors, specialty cuts for our local restaurants and markets, and many other uses and entrepenureal efforts. The approval of Prop64 would have real world, long lasting consequences on Alaska's already struggling agriculture sector. Most importantly, it will serve only to make Alaska's food security even more precarious going forward.

I encourage all the Board Members to think through the consequences carefully. The risk of domestic flocks passing along m.Ovi to wild sheep is miniscule at best, and such overreach into so many Alaska residents homes, homesteads, and pocketbooks, should be reconsidered.

Respectfully-

T Heider

Wasilla

Submitted By
Sharon Hein
Submitted On
10/8/2017 9:01:16 AM
Affiliation

Prop 64 - I am opposed.

This prop would destroy a burgeoning economic growth field in Alaska while gaining no discernible benefit to the ecology of our state. There is no credible science to support this prop, but plenty of special interest funds. How many times do we have to fight this battle?

Submitted By
Meg Helmer
Submitted On
10/26/2017 9:01:37 AM
Affiliation

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907-547-2213
Email
mhelmer@agsd.us
Address
PO Box 13
Eagle, Alaska 99738

The goats I own provide a needed supply of milk for my family. Our community does not have a steady supply of milk at the store, and of course there is no organic option at all. This milk has kept me from being sick for more than 2 years, and I work in a school environment where there is sickness all the time. I give another community member goat milk because she cannot drink any other kind. I would also like to say that anyone owning dairy goats does not let them wander in the mountains where wild sheep are. That would not happen. Even if the dairy goat gets loose, it stays near its home. People who are milking goats also make sure they are in the best of health and disease free, or the milk they drink won't have the qualities they desire. Thank You

Submitted By
Susan Helmericks
Submitted On
10/27/2017 10:36:24 PM
Affiliation

Phone
907-841-7711
Email
Helmericks@ak.net
Address
411 S Jerome Dr
Wasilla, Alaska 99654

Please vote no on prop 64. We need to have goats in alaska.

Submitted By
BethAnne Henry
Submitted On
10/27/2017 3:48:55 PM
Affiliation

Dear Board of Game Members,

I am writing you in regards to proposition 64, and ask that you NOT vote in favor of it's proposals.

My family and I have been raising goats for ten years and sheep for three and a half. When I was twelve years old I learned to spin fiber from our local crafting group. After spinning for a year I decided I wanted to raise my own sheep and learn to process the raw fiber from the animal.

With previous knowledge from owning and caring for our goat herd, (and more researching in the specific care of sheep) I became the owner of my first two Shetland sheep at the age of thirteen. I learned to shear them myself, have taken blood draws from them for disease testing and have learned to process their fiber going from raising the animal, to shearing, skirting, washing, teasing, carding, and spinning. I am responsible to feed and care for them daily.

I am sixteen now and my love for them, their well being, and the beauty and respect for the resources they provide for me will never diminish. They have taught me many lessons about responsibility, seeing a task till the end, work ethic, life and death and about God. They have provided me with a small income as I sell yarn and process fiber for other people. I love them dearly.

My journey with dairy goats has been much the same. My family bought our first four goats when I was six and steadily my interest in them has grown. I began asking my mom if I could start doing some of the barn chores, and the rest is history. I enjoy talking about goats with my mom and helping make decisions regarding our breeding program, selling, buying and monthly maintenance. I love milking them every morning, watching and snuggling their bouncy kids and the sweet, but stinky, buck goats.

Working with them on an average of two hours a day has solidified my decision to become a veterinarian technician after graduation. I believe it's a job I will love because I love the animals it revolves around. That's my story in a very small nut shell, though there is so much more that could be said.

I know that this is getting long and that you have a lot on your schedules, but I believe that is't very important you understand where I am coming from; my heart and knowledge behind the issues at hand. I always strive as a responsible animal owner, to do what's in the best interest of my animals. We do yearly disease testing on all of our ruminates to ensure that we are selling and producing a healthy, sound animal. We always do our best to find responsible, informed owners for the animals we sell. Monthly hoof trimming is required on most of our herd as is daily and monthly vitamin supplements to meet their high mineral requirements. There are always ways that we can do better and I am consistently looking for ways that we can be more efficient, organized, and timely to meet the constant needs of those under our care.

I tell you all this so you can hopefully glimpse the time and effort I put into making sure I go above and beyond the requirements that they need. I do this because it's my responsibility and I enjoy the resources they give in return. I love the animals and it's my life. I would't have it any other way.

Please consider very carefully the proposals of this proposition and how they will effect my life and the lives of many other farms in Alaska. I assume you already know the statistics of the recent testing and of past research and hope you make your decision based on the facts. Please, please, don't take this decision lightly. Know this as you vote, your decision effects our lives.

Thank you for your time,

BethAnne Henry

Submitted By
Sarah Henry
Submitted On
10/27/2017 3:26:18 PM
Affiliation

To the Alaska Board of Game,

I know you have all heard the data, research and statistics on this issue for over the past year and possibly longer, so I'm not going to bring all that before you again. Instead I want to tell you my personal story, because after all this is a personal issue.

After a year of research, gleaning information from other goat owners, building a barn and setting up fencing, I purchased my first goats 10 years ago and had them flown out to the village where we lived so our family could have a fresh milk supply. Living in a village and shopping at the local AC store helps one realize the fragile state of our food supply in remote areas and Alaska in general. The prices are high and if the plane doesn't make it in on time then the shelves are empty. Owning goats (and chickens) were a way to ensure our family had fresh milk, eggs and meat. Along with planting a garden, fishing, hunting and berry picking, the animals we raised just made sense and fit along nicely with a self-sustaining lifestyle in a state where a sustainable food supply is a must.

I have food allergies and health conditions where raising my own food also makes sense. I can know where my food comes from, how it was raised and what it was fed. The raising of goats, chickens and now sheep are not just a hobby, they meet a physical health need.

My children have been raised with the knowledge of caring for our animals, where their food comes from, being responsible stewards, learning a good work ethic, compassion and the trails and joys of life and death. Because of this lifestyle my daughter is now working for a local veterinarian in the summers and is planning to pursue a degree in veterinary medicine after she graduates from high school. She has learned animal husbandry from the ground up and even shears the sheep, processes the wool, spins it into beautiful yarn and knits it into a useful product. It is such a special thing to see one's children doing something they love, are good at and are passionate about. Raising our goats and sheep has done that for us.

Because of the sheep and goats we raise and the lifestyle we live, we have met so many neat and wonderful people in the Alaska ag community. It has opened up doors and opportunities -especially for my daughter- that I never even imagined when we brought our first goats home 10 years ago.

We no longer live in a village, but have purchased our dream property for our farm. We have built barns, put up fencing, purchased a tractor and hay equipment in order to feed our livestock. We have spent hours and hours in sweat equity, shed many tears, landscaped and planned. It is a work in progress and a labor of love that has taken years to get to this point and we are far from finished, but it is our dream, our goal and our passion.

Please consider the impact the decision of Proposition 64 will have on families like ours - and there are many of them all over this great state of Alaska. Raising goats and sheep is not just a hobby, it's a source of food for those with health concerns, food security, a good and honest way to raise one's children with important life lessons, a sense of community with other farmers and opens doors of opportunity for future generations. This is our way of life, please don't make a decision that will take that away from us.

I ask that you oppose Proposition 64 and take NO ACTION.

Thank you,

Sarah Henry

Submitted By
Danielle Henson
Submitted On
9/2/2017 12:15:08 AM
Affiliation

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907-521-9659
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spyrogeek@aol.com
Address
7226 N King Cove Dr
Wasilla, Alaska 99654

Ummm sorry but this is really stupid; we should be able to own them because it helps us become self sufficient; what would we do with the ones we already own? Like hell we would get rid of them; please do not let this bill pass

Submitted By
Patty Hert
Submitted On
10/17/2017 9:34:33 PM
Affiliation

Phone
1-907-776-3789
Email
Pahert@att.net
Address
Po Box 8354
Nikiski, Alaska 99635

I would like to ask you to strike down Proposal 64 regarding the delisting of domestic sheep and goats in Alaska and requiring a permit to own them within 15 miles of wild sheep habitat.

How can you say who is within 15 miles of wild sheep habitat when wild sheep habitat has not been mapped? If someone lives on the opposite side of a body of water too big for a wild sheep to cross but is still within 15 air miles, they should not be treated as if they are a "threat" to wild sheep.

Alaskans have to feed themselves and their neighbors with healthy meat and milk year round. The best way to do that is to raise that food ourselves. Please don't make it difficult for us to provide our own food. Once a toehold is gained into regulating and restricting farming in Alaska, who is to say that pigs and chickens aren't next?

omestic sheep and goats in Alaska are much less likely to infect a wild sheep than anywhere else in America. http://packgoats.com/packgoats-bighorn-sheep/. Put an end to Proposal 64.

Submitted By
Jerome Hertel
Submitted On
10/25/2017 11:45:47 AM
Affiliation
Alaska State Fair

~~Dear Board of Game,
Please consider delaying any action on Proposition 64 until more input and solutions can be researched by all the stakeholders involved in this issue. 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. This proposal would place an undue burden on sheep and goat owners and limit the ability of producers to produce milk, meat, and fiber in Alaska. I feel the topic deserves more discussion and input from all the stakeholders and a more reasonable solution can be obtained to protect the wild goat and sheep population in Alaska.
The proposal is flawed in its original format with underlying assumptions and proposed requirements. Sheep and goat owners cannot afford to comply and the State cannot afford to administer and enforce compliance. Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.
Sincerely,
Jerome Hertel
Alaska State Fair

Submitted By
Jennifer Hilterbrand
Submitted On
10/22/2017 10:38:28 PM
Affiliation

I am writing to defend my rights to possess goats in Alaska without permits or other invasive requirements. They are an inexpensive source of meat and milk for my family- who though we make little money manage to stay just out of your welfare system but the use of subsistence and our small farm. We are nowhere near any wild goats and maintain proper fences to prevent escape or mingling with other wildlife. It is an amazing educational opportunity for my growing homeschool family. We have saved and invested hard earned money and time in acquiring and maintaining our small herd that cannot be calculated or replaced. I believe it is our legal right to keep what we've built for the support, feeding and education of our families without impediment.

Submitted By
Karen Hoeft
Submitted On
10/27/2017 8:00:36 AM
Affiliation

Please vote no on 64. There is no need for this prop other than to make the hunters happy. There is no evidence to support the need for this Prop.

Thank you

Karen Hoeft

Submitted By
Marli Holden
Submitted On
10/27/2017 12:35:36 PM
Affiliation

Phone
907-631-1933
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akmholden@msn.com
Address
5001 E Brumage Dr.
Wasilla, Alaska 99654-8619

To Whom it May Concern:

For fifteen (15) years, in the Mat-Su Valley, we owned and operated a kitten rescue, and became a 501c3 in 2014. We retired in February of 2017 after rescuing nearly 800 kittens, with or without their mothers. For the last 6 years, we accepted donations of goat's milk for the kittens, and saw a great deal of increase in their health.

The owners of the goats are legal, committed to cleanliness, give outstanding care to their animals, and go far and above the guidelines regarding care of the goats' milk. Removing these animals from the "clean list," as proposed in Proposition 64 will have a devastating affect on more than just these owners. Studies have shown that the disease M.ovi is so slight within our state that no wild animals have been infected. The "trickle down" resulting from the passage of this bill will affect many more people and businesses in our communities, and cost more than you can see right now.

Please remove consideration of this bill from your agenda, allowing Alaska to continue to do the outstanding job of protecting our wild life as we have always done. Thank You.

To the board members of Alaska Board of Game,

I ask that you do not enact Proposal 64. There are a number of problems with the premises and requirements of Proposal 64, 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 64'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. It's not just about the owners' animals, it's about the freedom as taxpaying landowners to use their land to grow their own food.

I have researched this topic extensively and I have yet to find any factual evidence that domestic sheep and or goats have had any impact on any wild sheep populations. I know there are "ideas" that there may be some impact but it has not been able to be proven. What has been proven, is stress on the animals caused by hunting, aircraft, weather changes and natural predators.

This proposal will place an undue financial burden on all Alaska small scale and hobby farmers for no f a c t u a l l y based good reason. Also undue financial stress on the already overloaded Alaska Department of Fish and Game. How will this be enforced? By who? Who will pay for the administration and the oversight of this proposal?

Please do not pursue Prop 64!!

Thank you for your time

Will Holden
16241 Parksville Drive
Chugiak Alaska 99567
(907)854-8577

Submitted By
Sabrieta Holland
Submitted On
10/27/2017 5:05:53 PM
Affiliation
Citizen/hunter/farmer/veterinarian

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2299 S Falk Lane
Palmer, Alaska 99645

Oppose Proposition 64. Take no action.

Submitted By
dona holliman
Submitted On
10/27/2017 12:46:16 PM
Affiliation

opposed to prop 64 and 90 this proposal is not necessary only creates more regulations that

are harmful to individuals who depend on these animals(goats) for food. I have lived here

for 50 yrs and have never seen a goat other than in a penned area, I am all for protecting our wild sheep but this purposal serves no purpose

Submitted By
Malina Holm
Submitted On
10/27/2017 9:31:35 PM
Affiliation

My family has always proudly lived a subsistence lifestyle here in Kodiak. Currently we have two goats who provide us with wonderful milk and food along with enriching activities for the entire family to participate with. I know many other families who benefit from owning goats. Everyone I know keeps their livestock well contained. We don't even have any wild goats or sheep that are native to Kodiak. Please do not make this especially healthy family activity illegal for us. Please, take no action on prop 64!

Submitted By
Darlene Holmberg
Submitted On
10/27/2017 10:14:27 AM
Affiliation

Phone
9076760425
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aniaksdh@yahoo.com
Address
169 Boundary Avenue
Aniak, Alaska 99557

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats; we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska-specific information, there is more evidence that such measures are unwarranted:

Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi.

Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi. Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Please consider who planted the seed; the evidence refutes that claim, or any assumptions that are based on fear.

Respectfully,

Darlene Holmberg

Submitted By
Gretchen Holt
Submitted On
10/27/2017 3:29:42 PM
Affiliation

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(907) 227-5684
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Address
7362 W Parks Hwy., #574
Wasilla, Alaska 99623

Please take NO Action on Prop 64. There is no scientific proof that domestic goats and sheep are causing medical issues for the wild sheep. This state needs to encourage businesses that reduce our reliance on the lower 48. To remove goats and sheep from the 'clean list' will ruin small Alaskan owned businesses and increase our dependence on imported products. SUPPORT Alaskan owned businesses.

Submitted By
Linda Hoxworth
Submitted On
10/27/2017 9:25:03 AM
Affiliation

I am opposing Prop 64. Domestic goats are mostly far removed from wild sheep and wild goats. People who own these animals usually consider them pets and taking them away or forbidding them would be unfair. Besides, what would become of them?

Submitted By
Esther Huddleston
Submitted On
10/26/2017 8:15:38 PM
Affiliation

NO on Prop 64

There's no scientific evidence on domesticated goats spreading diseases to wild goats and dall sheep in Alaska. The wild goats and dall sheep are one of the most difficult hunts in Alaska. You have to take a plane to be dropped off on the mountains and hike for days just to reach the wild goats and dall sheep. The Matanuska Susitna Borough is a farming community. Domesticated goats and sheep are vital to the Mat-Su Borough. I have lived in Alaska for 40 years and domesticated goats and sheep have not created a problem ever; in regards, to the wild goat and dall sheep species in Alaska. Please be considerate of Alaskan residents and to the farming community. Don't let outside groups who make a living off on fundraising for political reasons to change the fate of Alaskans who live here. Please vote NO on Prop 64!

Submitted By
Priscilla Hudson
Submitted On
10/23/2017 7:12:34 PM
Affiliation

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden on existing owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on 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 thinhorn sheep in the wild, including both Dall sheep and Stone sheep. In light of the fact that the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Priscilla Hudson- Wasilla AK

Submitted By
Kimberly Hughes
Submitted On
10/26/2017 6:10:04 PM
Affiliation

I wanted to voice my disappointment in reading about the proposal of prop 64. I dreamed of eventually raising goats and sheep again after moving to Alaska and now come to find out that dream may be taken away from me. Goats are a excellent producer of meat, milk and fiber (some breeds). Sheep are also good producers of meat, fiber, and in some breeds milk. Some families have no choice but to raise goats for their own raw milk due to the laws here, and now their only option could be taken away from them. I thought this state was about freedom, but it seems they are taking the peoples freedom to raise their own livestock away. What will they take away next? Swine, cattle, poultry, waterfowl?

Submitted By
Kristlyn Hunnicutt
Submitted On
10/27/2017 5:10:22 PM
Affiliation

I oppose prop 64!

Submitted By
Leanna Hunter
Submitted On
10/27/2017 11:52:58 AM
Affiliation
Private citizen

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leannarein@gmail.com
Address
PO Box 874472
Wasilla , Alaska 99687

I am opposed to banning goats and sheep being kept by private citizens. These farmers provide a valuable resource and a natural alternative for meat and milk. They also boost and support local economy vs. big box stores. This proposal smacks of yet another unnecessary attempt at government over reach.

Submitted By
William Hunter
Submitted On
10/27/2017 11:55:56 AM
Affiliation
None

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PO Box 874472
Wasilla, Alaska 99687

I am opposed to banning goats and sheep being kept by private citizens. These farmers provide a valuable resource and a natural alternative for meat and milk. They also boost and support local economy vs. big box stores. This proposal smacks of yet another unnecessary attempt at government over reach.

Submitted By
Kenneth Ivie
Submitted On
10/24/2017 5:06:12 PM
Affiliation

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9072017665
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Address
PO box 3131
Valdez, Alaska 99686

There is no sound scientific reason to remove domestic goats and sheep from the clean list.

Submitted By
Brianna Jense
Submitted On
9/21/2017 12:36:47 AM
Affiliation

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435-224-3133
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Address
3250 N Eve's Drive
Palmer, Alaska 99645

To the Board of Game, I am writing to let you know **I oppose proposition 64!** This proposition, if passed,is a huge regulatory overreach by the government and takes away the freedoms of many Alaskan farmers. The damage it would do to the goat and sheep farmers of this state would be devistating. Our farming communities in Alaska need help, not crippling regulations that would strip us from our rights to own livestock. Proposition 64 would make owning goats and sheep illegal by taking them off the clean list, cause expensive fencing, testing, and permitting. A well funded special interest group is trying to take away the right and the ability of countless Alaskans to feed their families good clean locally produced milk and meat for a few outside interests. Please vote no. I know I will be watching very closely and will vote accourdingly on Election Day. Thank you for your consideration. Brianna Jensen

Submitted By
Melissa Jensen
Submitted On
9/2/2017 12:29:39 AM
Affiliation

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435-224-3133
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moosewoodartstudio@gmail.com
Address
3250 N Eve's Drive
Palmer, Alaska 99645

To whom it may concern,

I am writing in regard to the upcoming meeting to discuss Prop 64. I am opposed to the propossal given by the local Chapter of the Wild Sheep Foundation to the Board of Game to remove domestic sheep and goats from the clean list in the State of Alaska.

We are not the lower 48! Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska has natural barriers to prevent wild Dalls & domestics from forming friendships. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. There have been no baseline studies on Dall sheep as carries of M.ovi until recently. All the current information, and forced captive studies, have been done with Big Horn Sheep in the lower 48. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment and determine a risk versus regulation protocol the current Proposal 64 should not be acted on. Thank you for your consideration.

Submitted By
Mike Jensen
Submitted On
9/21/2017 12:01:27 AM
Affiliation

Phone
435-830-6932
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3250 N Eves Drive
Palmer, Alaska 99645

Dear board of game, I am writing in response to the upcoming meeting to discuss **proposition 64. I STRONGLY OPPOSE** the implementation of this proposition and feel it takes away the rights of many Alaskan families. I own goats and this would greatly impact my family by adding undue burdens of permitting, testing, expensive fencing, and freedom. My children participate in the 4H program and enjoy the honest work of caring and showing their animals. All you have to do is go to the sate fair and see how much goats and sheep are a mainstay in Alaska. We take very good care of our goats and do all we can to keep them healthy and in good condition. My family also keeps goats to help save in the cost of milk. Up here in Alaska we are so isolated. If something were to happen where our chain of supplies were interrupted, we need local farmers,like myself,to be able to feed my family and others who may be in need. Please don't impose more costs on us by making owning goats and sheep illegal! Please don't impose restrictions on goat and sheep owners to the point it is too costly to even have them as livestock. It already cost so much to live here in this great state. A state where we have many freedoms other states are losing with unnecessary regulations. Please say NO to proposition 64! Many Alaskan families are counting on you to stop this damaging proposition becoming law.

Submitted By
Eda A Jewett
Submitted On
10/27/2017 11:40:28 AM
Affiliation
General Member, Fairbanks Chapter--Alaska Farm Bureau, Inc.

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kgjewett@mtaonline.net
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P.O. Box 318
Healy, Alaska 99743

~~

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

• Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
• There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
• There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
• Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
• Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi
Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,

Eda A. Jewett, General Member
Fairbanks Chapter—Alaska Farm Bureau, Inc.

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

- Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
- There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
- There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
- Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
- Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi

Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,

Karl G. Jewett

Karl G. Jewett, General Member

Fairbanks Chapter—Alaska Farm Bureau, Inc.

Submitted By
Debbie Johnson
Submitted On
10/27/2017 11:53:28 AM
Affiliation
Ms.

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28208 303rd AVe SE
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This is in regards to PROP 64. Please do not take away the rights for people to own and raise goats. People who are allergic to cos milk will raise goats for this. Thay also make great pets and bring joy to families who raise them. They are kept fenced in like any farm animal and do not spred disease.

If the rights are taken away from people raising goats and sheep this will put a lot of people out of business who grow hay. They are not dirting animals. They are pets and supply needs for people.

People that raise sheep and goats don't even live near WILD goats and sheep. Please do not take this away from people to raise their own farm animals. Goats and sheeps are a necessity.

Submitted By
Jennifer Johnson
Submitted On
10/27/2017 7:09:34 PM
Affiliation

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Palmer, Alaska 99645

Oppose proposition 64 take no action!

Submitted By
Katya Johnson
Submitted On
10/27/2017 4:55:44 PM
Affiliation

I was born and raised in Alaska in a hunting and fishing family, and am raising my children in the same Alaska lifestyle. I understand the importance of protecting our wildlife and habitat resources. Another huge aspect of our lifestyle is breeding and raising goats at a hobby level. We put a lot of time, effort, and money into our goats, but feel that it is worth it. Goat milk is the primary source of dairy for my children and family and we butcher several goats a year for our personal use. Our meat goat sales provide food for the Kodiak community with the majority of our goats going to local Filipino families, who are extremely grateful to be able to share the traditions of butchering and cooking goat with their families.

As a producer, I have been researching Proposal 64 and trying to decide if the added regulation is justified. I have read through WSF and joint agency literature describing Big Horn sheep die off in the lower 48 and the involvement of *Mycoplasma ovipneumoniae*. I have talked with multiple agencies - ADF&G, Farm Bureau, OSV, WADDL, and USDA-ARS, and I agree that *Movi* transmission to Dall sheep populations is a legitimate concern in Alaska and needs to be addressed. However, I strongly feel that proposal 64 is a premature and excessive maneuver. I feel that there needs to be more research on *Movi ,* and a professional science-based risk assessment specific to Alaska's unique livestock and wildlife populations before such burdens are placed on Alaska's agencies and producers.

Although *Movi* has been studied heavily recently, there are still many unknowns. One of the most important issues that I feel needs to be addressed is the detection limitations on current *Movi* testing accuracy. Talking with Dr Evermann at WADDL and Dr Highland at USDA, it sound like the current testing is doing a good job at detecting *Movi* in individual goats/sheep with high enough *Movi* levels to be chronic shedders. However it sounds like there are individuals (maybe more common in goats) with low levels of the bacterium present and these low levels may not be detected with high confidence. If we are not able to detect these low levels, would removing shedders be enough to eliminate *Movi* from a herd? Can there be a *Movi*-free status? In addition to detection limitations, there are big questions to be answered on *Movi* prevalence in wild and domestic ungulates (possible carriers), the parameters of transmission between individuals, species, infection levels, and possible virulence and host differences on distinct *Movi* geneotypes.

I am glad to see the current Alaska *Movi* prevalence study being undertaken by OSV (in conjunction with multiple other agencies) to determine the prevalence and distribution of *Movi* in domestic sheep and goats in Alaska. This seems like the first logical step to tackling the *Movi* threat to Alaska's wildlife. In addition, by using multiple labs and sample techniques, and taking multiple samples from individual animals, the data they are collecting can be used to improve, develop, and hopefully validate current testing methods for domestic sheep and goats.

As a producer, the idea of required *Movi* testing also brings up questions of affordability. What type of schedule would be required for *Movi* testing to remain permitted? Currently, I follow WADDL's "Small Ruminant Biosecurity Screen" recommendations and send in individual blood samples for my entire herd annually. This screen tests for Small Ruminant Lentivirus (CAE), Johne's Disease, and caseous lymphadenitis. This currently costs me $612.50 (not including supplies or fed-ex shipping) for a herd of 25 goats. I am able to take these samples myself. If annual PCR screening for *Movi* was required this would increase my annual cost to $1925 (not including supplies or shipping). This also doesn't take into account paying the approved technician or vet to take samples. The ELISA *Movi* testing is less expensive, and could potentially be used to confirm *Movi* herd negative status, but has not been validated for domestic goats at this time.

Along with more research on *Movi*, I would like to see a formal risk assessment done for Alaska. Throughout the literature posted on WSF's webpage, there are references to the importance of risk assessments in determining management strategies. Here are a couple examples:

"There is no "one size fits all" risk assessment of respiratory disease transmission between wild sheep and domestic sheep or goats. However, a comprehensive risk assessment (qualitative and quantitative) is a critically important component for managing the potential for disease transmission." (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5385708.pdf)

"Acknowledge the importance of science-based assessments of disease risk between wild sheep and domestic sheep and goats, and

promote strategies to reduce the disease transmission and mitigate disease outbreaks." (http://www.wildsheepfoundation.org/cache/DOC45_2015-03-09WS-DS_DiseaseTransmission_TWS-AAWV_JointStatement_APPROVED.pdf?201607180210 34)

Because of Alaska's unique situation, I feel that there is very little if any co-mingling between domestics and Dall sheep and the double fencing and testing requirements of Proposal 64 are excessive. Alaska currently has very low numbers of domestic sheep and goats (~1,400 according to 2014 USDA survey data) compared to prior Alaska domestic populations and current populations in the lower 48. According to the AK Farm Bureau, we have no grazing allotment/leases for sheep and goats on public lands. According to Fish and Game, because so much of Alaska is still pristine, our Dall sheep populations have adequate habitat which mostly consists of alpine and mountainous terrain. Luckily, we are not dealing with habitat loss or habitat restoration and don't currently have the spatial overlap of wild and domestic populations like the lower 48 is dealing with. In addition, because of these lower chances of interaction, I feel we need more analysis of actual risk of disease transmission before any policy decisions are made declaring "risk".

In summary, as an Alaskan who values both our wildlife resources and agricultural interests, I strongly appose this proposal. There is not enough research to support this proposal, I don't feel it will do anything to protect Dall sheep, and I feel it will create a divide between ADF&G and Wild Sheep Groups and local producers. We need a research based, customized solution to Alaska's unique livestock and wildlife situation. I am glad to see the Alaska prevalence study being prioritized and I feel optimistic that with adequate time, there will be solutions which will be acceptable to agencies and producers alike.

Submitted By
Miranda Johnson
Submitted On
10/27/2017 5:27:23 PM
Affiliation

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Palmer, Alaska 99645

I am adamantly apposed to prop 64, the adoption of this regulation would have such an adverse effect on the hard won farming and agricultural economy that has been developing in Alaska in the past decade. In addition to limiting the educational, positive community impact and beneficial growth of the youth in our 4H community. As some who has been born and raised in Alaska I have always been so proud and boastful of the freedom our wonderful state allows us, but this proposal would be limiting the use of my personal property.

Submitted By
Beth Jones
Submitted On
10/24/2017 6:56:23 PM
Affiliation

I get my lamb and goats milk from a local farmer. This would impact the well being of my household. Please do not restrict goats or sheep from our local farmers.

Submitted By
Terry
Submitted On
10/16/2017 4:37:00 PM
Affiliation

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Homer, Alaska 99603

As owner of a small goat farm on the lower Kenai Peninsula, I am totally opposed to Prop. 64. I do not think enough study has been done to determine if this is even a threat here in Alaska. If passed it will completely cripple the small farms in the state. Our goats never leave our farm and I have never in 47 years seen a wild sheep on our farm. Yet we do fall with in the proposed 15 mile distance to Wild sheep habitat.. they would have to swim Kachemak Bay and climb a 400 foot bluff to make contact with my goats. Oh yes also they would have to thread their way through a few hundred acres of beatle killed spruce and break into our electric fenced pasture. To make a blanket law that covers the state of Alaska is ridiculous. Please vote no on this matter.

Submitted By
Connie jorgenseno
Submitted On
10/18/2017 12:37:55 AM
Affiliation

Please take no action on proposal 64. It would be detrimental to the many farmers in Alaska who provide food for many. It would disable many from providing quality food for their families. Proposal 64, if adopted would decrease food security in the state of Alaska.

Submitted By
Jeff Judd
Submitted On
10/27/2017 3:58:42 PM
Affiliation
Alaska resident

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2051 S. Carr Street
Wasilla, Alaska 99654

Dear Alaska Department of Fish and Game - Board of Game,

Please accept my comments below in opposition to Proposal 64. I ask that you take NO ACTION on the proposal submitted by the Wild Sheep Foundation.

The Proposal, if adopted, would remove domestic goats and sheep from the "Clean List" of animals that Alaska residents may legally own in the State of Alaska. As stated by ADF&G officials, including as currently stated on the ADF&G website, and reiterated by other Agency representatives, once an animal is removed from the "clean list" **a permit cannot be issued for their ownership**, and therefore they would become illegal to own in the State of Alaska. The fact that Proposal 64 includes certain other provisions for owning goats, e.g., testing and double fencing requirements is irrelevant and not applicable given that the animal once removed from the Clean List can simply not be owned in the State.

Even if the Department of Law was to opine on post Clean List removal ownership ability subject to the issuance of a permit, State Officials have stated that the ADF&G does not have legal jurisdiction to regulate domestic (non-feral) animals, thus does not have the legal jurisdiction to issue conditional permits for owning domestic animals. Further, there is no scientific evidence to conclude that Proposal 64 is actually warranted. The Wild Sheep Foundation continue to premise their concern on studies of lower 48 Big Horn Sheep, and outside of Alaska conditions that do not exist in the State of Alaska.

There is not one single case in Alaska or Canada where a (thin horned) Dall Sheep has died as a result of exposure to Mycoplasma ovipneumoniae (M.ovi). To emphasize the lopsided position of the Wild Sheep Foundation, a group primarily interested in sheep hunting opportunities, hunters in Alaska kill between 500 – 1,000 Dall Sheep EACH YEAR! In 2016, 788 Dall Sheep were listed as harvested on the ADF&G website. Dall Sheep killed by M.ovi: 0. Dall Sheep killed by hunters over the last ten years: ~8,000!

I and my wife are hunters, in addition to being farmers and owners of domestic goats. We are not opposed to hunting, in fact we support hunting rights. What we do oppose if a special interest hunting group attempting to infringe on our farming lifestyle and ability to own domestic goats without a proven, substantial, scientifically based risk analysis and conclusion for conditions which exist in Alaska.

Alaska is very unlike the lower 48. It does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle – the single largest concern contributor outside of Alaska. M.ovi needs a host and it can not live in the environment, hence only being able to convey through close contact of Dall sheep and domestics. This condition does not freely exist in Alaska. In addition, Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators.

Adding to the disparity and disconnect regarding the true level of concern and risk of exposure in the State of Alaska, the ADF&G itself has not done its part to take appropriate actions to measure and mitigate any risk. At several of the initial Working Group meetings attended by ADF&G staff, the staff reported that they were going to conduct thorough study and mapping of critical Dall Sheep habitat, around which perhaps appropriate mitigation measure could be identified. Yet, in a recent public meeting we were told that the critical wildlife habitat mapping effort was not initiated and not being pursued due to internal conflict within the ADF&G.

Additionally, we were told by ADF&G that should a wild sheep or goat range out of its natural habitat area that it was their protocol to destroy that wild animal due as a prudent risk measure. Yet, they did exactly the opposite of this when a Wild Goat ranged into Palmer and visited McDonald's this past summer. The darted the animal and returned it to the Knik River Valley. The State of Alaska, and the ADF&G, can not have it both ways. You can not say there "might be a risk", to which they have failed to actually prove scientifically through a formal risk assessment, say that they will dispatch the wild animal if it ranges into urban environments, and then not do it!

At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. The domestic community is doing its part to participate in this testing protocol for purposes of risk assessment. To date out of 334 goats and sheep only 6, 4 sheep and 2 goats (2%) have tested positive for the bacterium. It's an extremely low rate and risk outcome in contrast with the Wild Sheep Foundation's extreme "sky is falling" position.

Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment and determine a risk versus regulation protocol, Proposal 64 should be denied. The Wild Sheep Foundation is trying to restrict Alaska Residents personal rights to own domestic small ruminants on my own personal property without true due cause of proven risk to the Dall sheep population by domestic goats and sheep in Alaska.

Domestic goat and sheep owners depend on their animals for meat, milk, or fiber, and many are treasured family pets. Domestic ownership, free of unnecessary and onerous, and costly regulatory oversight is a significant economic contributor to the State. The Board of Game's decision on Proposal 64 is of critical importance to an industry and to State residents who rely on, and enjoy their ownership of domestic goats and sheep. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy and agriculture in Alaska.

In closing, thank you for your thoughtful and balanced consideration of Proposal 64. I hope that you will conclude like I have that Proposal 64 is not balanced, is not appropriate, and is has not yet been proven to be justified. I ask you to please take NO ACTION on Proposal 64.

Sincerely,

Jeff Judd

Submitted By
Tina Starr Judd
Submitted On
10/27/2017 3:24:32 PM
Affiliation

Phone
907 376-6590
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2051 S Carr St.
Wasilla, Alaska 99654

~~Dear Alaska Department of Fish and Game - Board of Game,

Please accept the comments below in opposition to Proposal 64 and I ask that you **TAKE NO ACTION** on the proposal submitted by the Wild Sheep Foundation.

If passed, the Proposal would remove domestic goats and sheep from the "Clean List" of domestic animals that you are legally able to own in the state of Alaska, effectively devastating the ability of individual goat and sheep enthusiasts, 4-H programs, and small family farms to own goats or sheep. The proposal also requires that owners of domestic goats and sheep obtain a permit from the State to own such livestock, and if within 15 air miles of Dall Sheep habitat to further require "Department approved facility (double fence, etc.)"), and be "certified disease free when testing becomes available". **Per the ADF&G website once animals are taken off the "clean list" a permit cannot be issued for their ownership.** Therefore domestic goats and sheep would be illegal to own after they are removed from the clean list and the rest of proposal 64 requirements are just nonsense and not applicable.

The foundation for Prop 64 by the WSF is to prevent the possible transfer of a bacterium, Mycoplasma ovipneumoniae (M.ovi), to the wild Dall sheep population. Movi has been associated with pneumonia outbreaks in Big Horn sheep in the lower 48, but in the state of Alaska there have been no Dall sheep deaths due to M.ovi cause by domestics. For that matter, NO deaths in Alaska or Canada. All the current information and studies have been on Big Horn sheep in the lower 48. No studies have been completed on Thin Horn sheep susceptibility to the bacterium in the State of Alaska. To date – **NOT ONE** Dall sheep has died from this bacterium being spread to wild Dalls from domestics that have been in Alaska in great numbers since the 1960's. But in fact, every year Dall sheep hunters harvest anywhere from 500 to 1000 Dall sheep. Last year 788 Dall sheep were listed as harvested on the ADFG website. Jeff and I are hunters so we are not opposed to hunting, but what we are opposed to is a special interest hunting group who wants to preserve Dall sheep so they can kill Dall sheep trying to infringe on our lifestyle without true due cause of risk to the Dall sheep population as exhibited by history in our State. Let me state those numbers again; Dall sheep deaths caused by domestics and M.ovi – 0, Dall sheep deaths cause by hunters in 2016 – 788.

As the Board of Game already knows, Alaska is very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle which seems to be the largest threat to the spread of any disease, virus or bacteria. M.ovi bacteria needs a host, it cannot survive in the environment, and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, humans, subdivisions and predators. Alaska is also a "fence in state" and all animals are to be "fenced in" on an owners property.

To add to the controversy of the current situation, remember the wild goat that went through the drive through at McDonalds in Palmer last summer? If the Alaska Department of Fish and Game is truly concerned about the spread of disease from domestics to wild through contact why was this animal not shot and donated to charity? Instead Biologists from the Alaska Dept. of Fish & Game darted and tranquilized the goat and returned it to its habitat in the Knik River area. This goat was out of its normal habitat range, who knows what it encountered before it ended up at McDonalds in the city of Palmer. The early sheep/goat working group meetings I sat in on concerning Prop 90/64 where the control of contact between domestics and wild were discussed, the Wild Sheep Foundation and AK Dept. of Fish & Game both proposed any animals out of their normal historical habitat that may have come into contact with domestics be dispatched before they return to the wild population. This was obviously a wild Mountain Goat and not a Dall Sheep which Prop 64 seems to be most concerned with, and I'm unaware of any concern about disease transmission in the wild goat population, but goats are members of the family Bovidae closely related to the sheep as both are in the goat-antelope subfamily Caprinae. So, why was this wild goat returned to habitat range with other wilds if the AK Dept. of Fish and Game is solid in their belief that contact between domestic livestock and the wild sheep population could bring disease transmission and death to Alaska Dall Sheep? Sad, but the fact is, the wild goat was out of its normal habitat range in the city of Palmer and his first Big Mac should have been his last.

At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory (WADDL). To date out of 334 goats and sheep only 6, 4 sheep and 2 goats (2%) have tested positive for the bacterium. It's a screaming low risk factor in opposition to the "sky is falling" stance the Wild Sheep Foundation has been painting to anyone who will listen. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment and determine a risk versus regulation protocol, the current Proposal 64 should be denied. The Wild Sheep Foundation is trying to restrict my personal rights to own domestic small ruminants on my own personal property without true due cause of proven risk to the Dall sheep population by domestic goats and sheep in Alaska.

Please also take into consideration many domestic goat and sheep owners depend on their animals for meat, milk, or fiber, and some are treasured family pets. Each family has a story that is unique to why they own domestic goats and sheep. It's the human side of this story that is the most devastating if goats and sheep are removed from the clean list. So much is at stake! The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool for warmth and fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy and sustainability in Alaska's agriculture. Domestic goats and sheep are a valuable sustainable and renewable resource in our great state.

One final point that I feel is very important to this debate of risk versus regulation. The Alaska Department of Fish & Game NEEDS to map critical habitat where the greatest possibility of contact between domestics and Dall sheep may exist. In the future it may prove those areas need special regulation to protect Dall sheep. To take domestic sheep and goats off the clean list in Alaska and disallow their ownership across the whole state is crazy and not called for based on risk.

In closing, thank you for reading my comments in opposition to Proposal 64 and I ask you as the Board of Game with the fate of so many people and animals in your hands to please **TAKE NO ACTION on Proposal 64.**

Thank you,
Sincerely - Tina Starr Judd

Submitted By
Vanessa jusczak
Submitted On
10/26/2017 2:38:00 PM
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I oppose any and all regulation regarding the keeping of sheep and goats in Alaska, by hobbiests .

Submitted By
Elizabeth Kandror
Submitted On
10/27/2017 4:43:23 PM
Affiliation

I oppose prop-64.

Submitted By
ellen kane
Submitted On
10/17/2017 1:06:37 AM
Affiliation

please table prop 64 . more research needs to be done. I am personally opposed to it.

Submitted By
Julie Kavanaugh
Submitted On
10/27/2017 6:42:55 PM
Affiliation
self

Phone
9079420058
Email
sylstar@acsalaska.net
Address
1533 sawmill circle
Kodiak, Alaska 99615

Proposal 64

Opposed

I am oppsoed to proposal #64. The cost to department to inspect and approve a facility would be cumbersome. The cost to livestock owners would also be beyond reasonable. And the proposer does not provide any scientific or existing examples of local issues. This proposal is concerning and president setting. Individuals that own goats or sheep rely on them for milk in cases of allergies to other dairy. They provide meat and wool. These animals provide opportunity for 4H projects, teaching life skills. The additional cost of building a approved facility would be a burden and possible barrier to participation.

Julie Kavanaugh

Submitted By
Gretchen Eloise Keim
Submitted On
10/27/2017 9:16:55 AM
Affiliation

Phone
1.907.715.7224
Email
Labmad49@gmail.com
Address
2320 E Villages Lp
Wasilla, Alaska 99654

I'm asking you to take no action on Prop 64. There isn't any evidence that this bacterium is in Dall Sheep and Mountain Goat populations in levels that are problematic or threatening. While no one would want to see that happen, removing domestic sheep and goats from the "clean list" would do more harm than good to Alaska's already weak agricultural industries. Small farmers are what keep agricultural going in Alaska and help Alaska to sustain itself and not rely solely on outside goods to sustain life in The Last Frontier.

Submitted By
Peggelee Kendro
Submitted On
10/27/2017 5:03:01 PM
Affiliation

Phone
907 782-8194
Email
allisawak@hotmail.com
Address
3500 S. Bodenburg Lp
Palmer, Alaska 99645

I oppose Proposition 64.

Submitted By
Julie Kenley
Submitted On
10/25/2017 4:33:29 PM
Affiliation

Dear Board of Game,

I am an active member of the 4-H program in the State of Alaska. I am opposed to Proposition 64. If passed, the Proposal would remove domestic goats and sheep from the “Clean List” of domestic animals, effectively devastating the abililty of goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 64 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 costly testing.

These requirement would be a huge burden on farmers and our state 4-H programs, not to mention costly to the state to regulate. These requirements would make it nearly imposibble for our 4-H youth to have sheep and goat projects in the state. Our animals are generally located miles from wild sheep populations and are not allowed to free range. It would be nearly impossible for them to come in contact with the wild sheep population.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to thinhorn sheep in the wild, including both Dall sheep and Stone sheep, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

Alaskan families benefit in so many ways from the ownership 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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Thank you

Submitted By
Yasmin Khan
Submitted On
10/28/2017 4:46:13 PM
Affiliation

I oppose prop. 64.

Submitted By
Kristine King
Submitted On
10/27/2017 4:51:27 PM
Affiliation

Phone
907-654-7381
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shyeeyore@gmail.com
Address
50491 Hi-Line Rd
10672 Kenai Spur Hwy STE 112
Kenai, Alaska 99611

I have a hobby farm, Fowl Goats and Rabbits. I don't see how my 3 little goats would harm anyone. I don't think it is fair that you would take them away from me. My goats are in their fenced in area, we live out in the "country" away from town. I just don't understand the reasoning behind this and how my goats could be a harm to anyone.

Submitted By
Karen Kirkpatrick
Submitted On
10/26/2017 9:53:38 PM
Affiliation

Phone
907-355-2854
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ka.kirk818@gmail.com
Address
PO Box 298915
Wasilla, Alaska 99629

Prop 64 makes no sense in Alaska. The "Chicken Little" attitude of the Wild Sheep Foundation has no basis in sound science and will harm agriculture in Alaska.

Submitted By
Kathleen Kitson
Submitted On
10/25/2017 10:05:37 AM
Affiliation

Phone
907-398-3758
Email
lcyhot@gci.net
Address
34395 Scout Lake Road
Sterling , Alaska 99672

Prop 64 is absolutely ridiculous. There is no proof that dall sheep contract any type of diseases from domestic sheep and goats. Dall sheep do not come into contact with domestic sheep and goats. Even the ones that live close to a habitat would rarely if ever have any contact. My children raise goats as 4-H projects and we drink the milk as we have allergies in our home to cows milk. We also raise them to butcher and eat. This proposal would quite literally be taking food out of my children's mouths if it is passed.

Submitted By
Emilie Knapple
Submitted On
10/27/2017 9:29:16 AM
Affiliation

Phone
9073550024
Email
scratney@gmail.com
Address
HC89 Box 270
Willow, Alaska 99688

Please take not action on Prop 64. Farming in Alaska is so important. I oppose Prop 64, and you should too.

Submitted By
Marcia Knowlton
Submitted On
10/27/2017 4:16:10 PM
Affiliation

Phone
9075980950
Email
marciaknowlton@yahoo.com
Address
PO BOX 2503
KENAI, Alaska 99611

Dear Board of Game,

Our family has a small farm down on the Kenai Peninsula and we oppose Prop. 64 and ask that you to drop this propostion all together. Prop. 64 is clearly a governmental overreach. It does not even pertain to our state. There are so many unaddressed issues within this Propostion that leave Alaska Farms at risk of losing our animals, farms and livelihoods.

Our family has dairy goats that we use for milk that makes yogurt, ice cream, eggnog, cheese and soap as well as teaches our children to be hard working, responsible contributors to our family farm and community. They also are our pets we use them for fire control, fertilizer as well as hauling. We chose these animals because they provide an alternative to us as we have 3 family members that cannot tolerate cows milk. We experimented for a period and after drinking goats milk for a few weeks the health issues subsided which is why we have our farm. Goats milk is very healing to the body and can help things like digestive & gastro issues, as well as many more and when used in soap it can help eczema & psoriasis. Taking away our goats would be devistating to our family and community because they are not only working farm animals but they are our pets as well, I say community because of the trickle down effect. Our farms buy hay and grain grown locally as well as support our local feed stores. I am taking into into account all our fencing, tools, barn supplies, building supplies, etc. More people will be affected not just the animal farmers. What about 4-H? Our State Fair? This decision will negatively impact Alaska more than we realize taking away our ability to be self sufficiant.

It is particularly concerning that the BoG is making a discision based on studies that have only been done in the lower 48 not in Alaska. Alaska has natural borders that seperate us from the Lower 48. There have not been any documented cases of M.ovi. in the state of Alaska or Canada...NOT ONE, in addition, we do not have open grazing on public lands here in our state so comingling of domestic and wild sheep is not a concern. M.ovi. needs a host, it does not live in the environment but needs close contact of Dall Sheep and domestics. If this was truly a concern I can think of so many more options that are better thought out than irratication of two domestic species that give back so much to our state. In states where this is TRULY a concern they have NOT removed domestic goats and sheep from the clean lists so why are we even moving in that direction? It seems like we could be putting our energy and resources to better use.

In closing, our family of 7 is asking you to please take no action on Prop. 64.

Best Regards,

Jim, Marcia, Samuel,Madeline, Jacob, Katherine and Joey Knowlton

Submitted By
Karen KOPF
Submitted On
10/27/2017 12:43:23 PM
Affiliation
Mrs.

Phone
208.669.9000
Email
kcanyonranch@gmail.com
Address
1176 BUTTE RD
MOSCOW, Idaho 83843

While I am not a resident of Alaska, I travel there frequently and consider it a second home. I value greatly the wilderness and abundance of wildlife, and wouldn't want to put them at risk in any way. That said, I do not believe that domestic goats present such a plausible risk to the wild animals to remove them from the clean list. Many studies have been done on MOVI, and it is at best a rare condition that goats can be tested and culled for. In all of the research there has been no documented cases of transmission between domestic goats and wild animals.

We acquired several goats from a ranch on the Washington/Canada border that had regular contact with the Big Horn Sheep. Fish and Game tested the goats annually, and they were always negative. They were allowed to continue to live in their fenced pasture, despite the proximity of the sheep.

Please take no action on this Proposition.

There are studies that have been conducted if you are interested in further reading. The 2016 GOAT MOVI STUDY CONDUCTED BY DR. MAGGIE HIGHLAND, a Veterinary Medical Officer and Researcher with the USDA-ARS-Animal Disease Research Unit, in collaboration with USDA-APHIS personnel is the most current best science available regarding the possibility of disease transmission from goats to Bighorn Sheep.

Before such a drastic measure is taken, please explore intermediary steps, to ensure that Alaskans retain their right to have domestic goats in your efforts to protect wildlife.

Respectfully Submitted,

Karen Kopf

Submitted By
Kanika Koruna
Submitted On
10/26/2017 10:45:26 PM
Affiliation

Phone
907-892-2912
Email
kanika7@hotmail.com
Address
4532 North Three Bees Road
Wasilla, Alaska 99623

Dear Board of Game,

I am opposed to Proposal 64. 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. Proposal 64 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, all to “solve” a problem that doesn’t exist. I have a small subsistence farm and have tested my goats and sheep for common communicable ruminant diseases. We started raising these animals due to my children’s allergies to other types of meat.

I have outlined my arguments against this proposal in the following categories:

1. Constitutional, 2. Moral, 3. Fairness

1. Constitutional:

This proposal violates my civil rights as outlined in the Alaska State Constitution.

“*1. Inherent Rights*

This constitution is dedicated to the principles that all persons have a natural right to life, liberty, the pursuit of happiness, and the enjoyment of the rewards of their own industry; that all persons are equal and entitled to equal rights, opportunities, and protection under the law; and that all persons have corresponding obligations to the people and to the State.”

This proposal treats my ownership of property (animals) that are kept on my private land as lesser than the rights of hunters to take public game on public property. I don’t understand why the rights of hunters to take game on public land can be elevated above my personal rights of my own property by the Alaska State Constitution.

“ *18. Eminent Domain*

Private property shall not be taken or damaged for public use without just compensation.”

The proposal is effectively a taking of private property (through burdensome, unnecessary regulation) without just compensation. Will the Board pay for the requirements of compliance under the proposal? To whom would I submit the bill to effectively prove myself innocent?

“22. Right of Privacy

The right of the people to privacy is recognized and shall not be infringed.”

There should be no State obligation to register private animals located on private land that never leave private land. There is no legal finding of fact that has established a valid reason to infringe nor to interfere with my right to privacy.

The proposal sponsors allude to Section 6, paragraph 4 “*Sustained Yield. Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses*.”

Resources which we all must share should be properly managed by the government like air, waterways, and the like. It is quite a stretch to say that regulation of private property (animals) on private land that never leaves private land that does not effect any public property in any way somehow is fulfillment of this clause. I could use similar reasoning and make an argument saying the board of game should regulate cars to garages and mandate double locked garage doors because cars kill many moose and per sustained yield principles cars negatively affect the resource. Actually a regulation like that makes way more sense than the proposal 64 regulation of animals since my animals never leave the garage so to speak.

2. Food Security Threatened:

My children have cow milk allergies but could drink goat milk. Some also have allergies to beef, chicken, turkey, but not goat nor sheep. I am not independently wealthy so our farm has provided a stable and affordable means of providing quality allergen free food to my family. This Proposal would undermine the food security of my children and the requirements will cause severe economic burden to my family personally.

3. Fairness:

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. My goats are confined to pens and barns and not allowed to free range and as mentioned earlier, are disease free. There has not been a single case documented 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. Without proof, or even a credible threat, why would rights be restricted? Does science even matter anymore or just hype and fear-mongering of special interest groups?

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. My animals do not pose any risk to the wild Alaska sheep populations. Why then must I be treated as guilty until I prove myself innocent and live under punitive regulations?

I ask you to not pass Proposal 64 due to the severe impact it will have on my and other small farm operations. Proposal 64 is unreasonable in that it puts such a hardship on Alaska's sheep and goat herders with rules that are overreaching. We all should be able to raise food and fiber on our private land for our families without government restrictions because of a non-existent and undocumented threat to Alaska's wild sheep. I respectfully request the Board to not pass Proposal 64.

Thank you,

Kanika Koruna

Submitted By
Dan Krause
Submitted On
10/27/2017 2:36:35 PM
Affiliation

Phone
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Email
pastordaninalaska@gmail.com
Address
5173 W Christina Ct
Wasilla, Alaska 99654

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on
the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

- Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
- There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
- There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
- Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
- Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi

Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,
Dan Krause

Submitted By
Kelli Krause
Submitted On
10/24/2017 3:49:01 PM
Affiliation

Phone
9078911063
Email
kellikrause07@gmail.com
Address
2521 e mountain village Dr
Ste b pmb 827
Wasilla, Alaska 99654

I am writing to express my concern for sheep and goats being removed from the clean list. It would have a huge impact on the farm and 4H community. We raise dairy and meat animals and are concerned about the food insecurity in AK. With 98% of our food being shipped here we are vulnerable to a major food shortage, unless small farmers and backyard producers retain the ability to raise animals. With this proposal we will not be able to afford to meet the ridiculous rules proposed for owning our animals. The risk to dall sheep in our state in minimal at best based on recent tests and the fact that we do not have shared lease land for grazing. A group of hunters should not hold the power to effect our ability to raise animals here in AK. Their science is not proving the risk specifically in AK and they are trying to scare people into agreement with them without actual facts and test results in our state. This would be devastating to us, all backyard farms and kids in 4H. It would have an impact on our economy as well and prevent families from securing locally raised food for their families.

Submitted By
Elizabeth Kugler
Submitted On
10/26/2017 8:57:36 PM
Affiliation

Removing sheep/goats from the "clean list" in Alaska is ludicrous. The risks are very low our dall sheep would wander into someone's enclosed property and comingle with their domesticated counterparts much less contract an infectious bacteria from them. Alaska is a "fenced in" state, for all livestock. Do not punish those responsible for reaponsibly keeping themselves self sufficient for the fear of a minute chance something "may" happen. I would be singing a different tune if we had an epidemic, but it simply is not the case. Thank you.

Submitted By
Jonah Lange
Submitted On
10/27/2017 4:30:43 PM
Affiliation

Dear Board of Game, I am writing to you to OPPOSE Proposal 64 and ask that you take NO ACTION. My family relies on our goats for meat, milk and fiber. Without this substinance, our 1 income household will suffer greatly not only in the means of food and fiber, but also in the view of our pets. We have spent countless hours with our goats, making sure they've had the best life possible. So much blood, sweat and tears has been shed for each and every goat we own to make sure they're properly cared for. Our goats are such a huge part of our lives, ourselves and our livelihood. This is only the small picture for the families who depend on their goats for substinance. The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat or herd shares for milk or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do to the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None! The State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep only 6 (2%) have tested positive for M.Ovi. The bacteria can only be spread with close contact with Dall sheep and domestics. Rivers, highways, mountains, lakes, predators and subdivisions all help to keep the possibility of spreading down. I ask that the Board of Game take NO ACTION on Proposal 64, for Alaskas families and economy.

Submitted By
Stacy Lanser
Submitted On
10/26/2017 9:44:51 PM
Affiliation

Please take NO ACTION on prop 64.

Submitted By
Lisa Larmi
Submitted On
10/27/2017 10:18:17 AM
Affiliation

Please take no action on Prop 64. Sheep and goats are an important part of Alaskan agriculture, and are kept separate from wild stock.

Submitted By
Barbara Larson
Submitted On
10/27/2017 9:01:46 AM
Affiliation

Once again, the sky is not falling. Do your homework people. Alaska is not the same as the lower 48. You would be interfering with the rights of many Alaskans to lead a self sustaining, homestead type lifestyle, because of an obscure risk. Prop 64 is unnecessary.

Submitted By
Amanda
Submitted On
10/26/2017 9:43:19 PM
Affiliation

Phone
9073018343
Email
alaskafunnyfarm4@gmail.com
Address
1150 S Colony Way Ste #3 PMB 209
Palmer, Alaska 99645

Dear Board of Game

I am writing you to oppose Proposal 64 and ask that you take NO ACTION.

I have had goats for about 15 years and sheep the last 4 years. They play a big part of our life. We use them for milk. Milk for us, for puppies. for kids that are alergic to cow milk. The list can go on. We use the goats for soap also. They're our pets, a part of our family. We use the sheep for their wool. We use them for 4-H and FFA. Why are we even wasting time and energy and most of all taxpayer money? There are more things that are a priority than this that effect a great deal of us?

I am at a loss of why you would remotely put them on the unclean list. That is two more animals that the kids would not be able to use and show at the fair. The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska.

Alaska being very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. I orginally grew up in Wyoming and know about this greatly.
There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None! The Alaska Dept. of Fish and Game needs to map the critical habitat areas of the most concern for contact with domestics.

M.ovi needs a host, it does not live in the environment and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators.

I ask the Board of Game to take NO ACTION on Proposal 64

Thank You!

Amanda Leonard

Submitted By
Robin Letourneau
Submitted On
10/26/2017 9:37:08 PM
Affiliation

We need to be able to sustain ourselves. The government wants to control all of our food and make us completely dependent on them. This is both wrong and illogical. What is the point of living in a state with so much open land if we can't have farm animals to support ourselves? With all of the GMO products making people sick, we need to be able to raise our own food and dariry animals. I have never seen wild sheep be able to come anywhere near our domesticated livestock becauce the wild animals like to live on steep mountain slopes while we live in towns with independant yards with fences. And this point is only further proven by the fact that eveytime I go sheep hunting I have to climb a steep rocky mountain slope in order to access the sheep and mountain goats because they are not in the "easy to reach places". I do not see the wild and domesticated species co-mingling anytime soon.

Submitted By
Marchell Lilland
Submitted On
10/26/2017 7:20:03 PM
Affiliation

Phone
907.715.8316
Email
mplilland@yahoo.com
Address
5131 W. Lupine Lane
Wasilla, Alaska 99623

I am writing to you today to urge you to oppose & take NO ACTION on Prop.64!

Alaska NEEDS sustainable agriculture. Sheep & goats are a very large part of that in this state mainly because of the high cost of animal feed for larger animals. We do not have large grazing herds on federal land up here. We mostly have small farms with our animals contained on our own property. This prop. makes no sense at all for this state. I understand in the Lower 48 there are many problems concerning M.ovi but please consider that we have not had one case of Dall sheep dying in Alaska or Canada, NOT ONE!

Our State Veterinarian is working with the sheep & goat owners on a risk assessment of M.ovi. As of this letter, 334 goats & sheep have been tested & only 6 have tested positive. Thats 2%. Thats extremely low. That percentage also should show the Wild Sheep Foundation that not only are they being ridiculous in what they are asking in this Prop 64 but that the sheep & goat owners in this state care just as much about our natural habitat as they supposedly do. We are doing our part, now the state needs to do their part and get critical areas MAPPED OUT!

Together we can work on this and make sure it doesn't ever become a problem in our state. There needs to be some common sense used in dealing with this and taking sheep & goats off the clean list is NOT the answer. Again, we need to come together and make decisions based on science & fact in Alaska to remedy this issue.

Thank you for your time and PLEASE OPPOSE & TAKE NO ACTION ON PROP. 64

Marchell Lilland

Submitted By
Chantel lillard
Submitted On
10/26/2017 10:20:34 PM
Affiliation

Dear board of game for the state of alaska, I urge you to dismiss prop 64. Domestic goats are an incredibly valuable resource for many Alaskans and the introduction of prop 64 threatens the livelihood and survival of so many families, including mine. Please, take no action with this proposal! Alaska is so unique and so different from the lower 48, and one huge difference is that so many people in our communities are able to live a more sustainable lifestyle, and for so many people goats are an integral part of daily life. To put prop 64 into action would completely destroy the small farm that my family has and relies on.

Submitted By
Cheri Lindholm
Submitted On
10/27/2017 12:18:34 PM
Affiliation

Phone
0078410169
Email
Akcc.clindholm@gmail.com
Address
565 w crestwood ave
Wasilla , Alaska 99654

My family and our goats will be affected by this legislation. We had a small goat herd. My children are autistic with food sensitivities and need the goat milk. The goats also are recommended by their doctor as therapy animals. Interactive with the goats help with stemming and other behavior challenges for my children. Research does not show any cases in alaska where family goat herds have caused any harm to wild sheep. Please do not put this new legislation in place it will hurt my family and many others with small goat herds.

Submitted By
Kerry Logan
Submitted On
10/26/2017 9:03:30 PM
Affiliation
Ms.

Phone
5093933037
Email
cloudsinmotion@gmail.com
Address
3091 Stemilt Creek Rd
Wenatchee, Washington 98801

There has to be another way. Please do not take goats and sheep from the clean list of livestock allowed in the state. With mandated fencing, there is little risk that domestic and wild stock will mix. AND it doesn't seem that due diligence was done to access the real risk of infection of M.ovi spreading into Alaska or even Canada. Don't make this another case of doing something for the sake of doing something, especially when it means that rural Alaskans would be the most effected.

Submitted By
Billie Longfellow
Submitted On
10/27/2017 6:32:33 AM
Affiliation

Phone
9077752494
Email
bittysue@live.com
Address
15816 N. Glenn Hwy
Sutton, Alaska 99674

This is in regards to prop 64. Considering this proposition without valid study is folly. Sheep and goats in Alaska do not co-mingle or share habitat with wild sheep and goats. The number of domestic sheep and goats infected with anything that could be transferred to their wild cousins is around 2%. The only thing prop 64 will do is harm Alaskans. Please table this until a proper study can be conducted to determine if there is an actual risk. Thank you.

Submitted By
Charity Lovelace
Submitted On
10/26/2017 5:50:40 PM
Affiliation

I am opposed to regulation that would require permitting of domestic animals as well as the other regulations under consideration (fencing, etc) I believe it would place an undue burden on small operations domestic animal farming.

Submitted By
Janet Lueke-_Otto
Submitted On
10/26/2017 3:25:18 PM
Affiliation

Dear Alaska Board of Game As a Farmer in Alaska I ask that you do not pass Prop 64(90. There is recent scientific proof that M Ovi is not found in just domestic herds of sheep and goats. That domestic herds have a low inccidents of the disease based on the research of Dr.Highland. Taking all domestic sheep and goats off the clean list would destroy the food security of Alaska. Small ruminants multiply not just replicate. They eat less food and are more sustaineable for Alaska's animal feed resources. As Alaskans we need to strengthen our state with a balance of protecting our natnatural resources and keeping our state's food security and agriculture industry stable and feeding Alaskans. Thank you for your attention on this matter. Sincerely Janet Otto Farmer.

Submitted By
Relena Lyddon
Submitted On
10/4/2017 2:35:28 PM
Affiliation
Mrs.

Greetings Fish and Game Committee Members:

I am writing today to ask you to oppose Prop 64 (formally Prop 90). As an owner of domestic dairy goats for personal consumption, it is important to allow Alaska residents the right to own these animals for sustainability. There are no cases of M.ovi. in Alaska wild goat and dall sheep deaths in Alaska. This Proposal would cause great economic decrease in agricultural trade and commerce. Our goats are used for dairy products, this proposal would make it illegal to have domestic goats in Alaska, this is rediculous! Please oppose Proposal 64 (formally Proposal 90) banning domestic sheep and goats in Alaska.

Sincerely,

Relena M Lyddon

Submitted By
Meredith Mapes
Submitted On
10/26/2017 8:50:40 PM
Affiliation

Having raised both goats and sheep through 4H, and being involved with some friends who make and sell goats milk soap from their goats for a living, I think the new livestock regulations removing goats and sheep from the clean list are absolutely ridiculous. If you're so worried about them spreading disease to the wildlife population, make a regulation that says everybody has to test their animals, and if they'd come up positive quarantine them in a way to keep them well away from the wild populations. Do not destroy agriculture in Alaska, one of the few subsistence areas left in the country.

Submitted By
Stephanie Marchesseault
Submitted On
10/27/2017 10:16:04 AM
Affiliation

Take No Action on Prop 64! This is overreaching and unapplicable in our great state. It will not be saving the wild sheep or goats, only hurting our domestics ones and in turn, negatively effecting our Alaskan Grown agriculture!

Submitted By
Lisa Marcinek
Submitted On
10/27/2017 11:47:35 AM
Affiliation

Phone
907-232-8851
Email
marcinekfamily@gci.net
Address
2521 E Mtn Village Dr B346
Wasilla, Alaska 99654

I am writing in regards to Prop 64.

There has been no evidence that local domestic sheep and goats have any impact on wild populations, yet we know this proposition will have huge impacts on domestic sheep and goat farmers, veterinarians, feed producers and importers, and those that require fresh goat milk for health reasons. The State of Alaska is currently in a recession, this proposition would further destroy the economy by limiting agriculture in a time that we should be building industries up. Many people depend on their herds for income and food, the state does not have a viable substitution to help these people recover.

There have been no cases of Dall sheep dying from M.ovi. The current infection rate for the local domestic population is under 2%. The scientific information so far has not shown a risk great enough to warrant the action of Prop 64.

I urge you to protect Alaskan farmers and vote NO on Prop 64.

Submitted By
Dani Markham
Submitted On
10/27/2017 10:52:07 AM
Affiliation

To whom it may concern,

Regarding prop 64.

Proposition 64 if passed would be a huge detriment to Agriculture in Alaska.

Having grown up on an Alaskan dairy & participated in many areas of agriculture as a 4H member

and now a 4H leader, it has long been a huge concern in Alaska that the ability for Alaskans to feed themselves is in a massive downward spiral. We are in jeopardy of a major food crisis. In the past bad weather, catastrophes, and disasters in the lower 48 have delayed trucks and barges from reaching the Alaska communities, leaving the shelves of the local grocery stores bare and supplies scarce.

Sheep and goats have long provided a way for Alaskans to become producers on even the smallest scale, allowing each of us with the capabilities to help fill Alaskas self sufficiency when it comes to food sustainability.

The issues that prop 64 are concerning have not even become an issue and the grant-funded study has given us the sience to prove that M. Ovi is certainly not a threat to Alaskas wildlife.

Please consider the ramifications of outlawing sheep and goats in Alaska.

Once removed from the clean list it will be illegal for anyone to own sheep and/or goats in our state, setting off a huge chain reaction for Alaskas agriculture industry.

We all want what is best for Alaska. Restricting the agriculture industry does not benefit Alaska or Alaskans

Respectfully submitted,

Dani Markham

Submitted By
Kristine McBride
Submitted On
10/27/2017 6:00:24 AM
Affiliation

TAKE NO ACTION. As a state in the winter time we don't have as many natural or home grown food. Which leaves everything to the groceries stores. Goat and sheep provide a lot for a household. And most of them are more than just livestock, some of just pets.

Submitted By
Chandra McCain-Finch
Submitted On
10/8/2017 9:01:29 AM
Affiliation
Farm owner, 4H leader

Phone
907-715-9174
Email
Frostymeadowfarm@gmail.com
Address
6681 w fuller lake circle
7362 W Parks Hwy #153
Wasilla, Alaska 99623

Our farm is very small, yet very important to the community. Our animals do not get loose and are very well cared for. I have raised goats and sheep in 3 states over the last 40 years and have always been a responsible owner. Our son is the current reigning champion goat showman at the Alaska State Fair, and he is also learni my safe management and breeding/care practices. We eat goat and sheep, as well as our other farm animals. We are responsible with testing and vaccinations for all of our animals. We teach youth in the state, and their parents, as we have one of the largest 4H clubs known. Removing the rights to own these animals will hurt families that use them to browse and to eat them. Stronger standards in regards to fencing and keeping the animals healthy is necessary, but removing people's rights to own them is not the answer.

Submitted By
Paula McCarrol,
Submitted On
10/27/2017 5:35:59 PM
Affiliation

Phone
9088920661
Email
Poggy72@aol.com
Address
P.o. box 521222
Big lake , Alaska 99652

I oppose 64

Submitted By
Amanda McConnell
Submitted On
10/26/2017 9:01:37 PM
Affiliation

Prop 64 is based on situations in the lower 48, not alaska. We do not have the co-mingling problem with domesticated sheep and wild dall sheep like they have in the lower 48. There is no reason current and future animal owners shouldn't be allowed to continue raising their goats and sheep when there is no proven negative affect on the local wildlife.

Submitted By
Victoria L McConnell
Submitted On
10/27/2017 11:22:15 AM
Affiliation

Alaska is very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. Alaska has many natural barriers to help prevent wild Dall sheep & domestics from coming into contact. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. There have been no completed studies on the susceptibility of the local population of thin horn sheep (Dall sheep) to this bacterium. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep tested only 6 (2%) have tested positive for the bacterium. It's a screaming low risk factor in opposition to the "sky is falling" stance the Wild Sheep Foundation has been painting. If domestic goats and sheep are removed from the clean list owners are left in purgatory. Per the Alaska Dept. of Fish and Game website, animals not on the "clean list" cannot be permitted. That makes them illegal to own.
The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska.

Submitted By
Sally McGuire
Submitted On
10/27/2017 7:12:54 PM
Affiliation

Phone
907-766-3202
Email
chilkootmcguire@gmail.com
Address
P.O. Box 918
Haines, Alaska 99827

I am writing about Prop. 64 which would remove domestic sheep and goats from the "clean" list. This issue keeps coming up and still there is no evidence supporting your taking this step. Please do not try to take away our sheep and goats or any other of our domestic animals for that matter.

There are a lot of people in Alaska who keep sheep and goats, including myself. We consider our animals to be essential parts of our lives and essential parts of the food we produce for our families and/or for sale. They are also an essential part of local economies since we not only sell food but also buy locally most of the feed that our animals require.

Milk that is produced by these animals is truly essential to those people, especially children, who have intolerance for other milks. Also, many Alaskan families live where producing their own food makes the difference between food and no food. It is unacceptable that anyone might consider limiting this food source.

There are very few places in Alaska where domestic sheep or goats would have any interaction with wild sheep or goats. The only real exception to this that I can think of would be where someone might take pack goats up into the mountains. If you truly believe (after doing the research that is required and not yet done, as I understand) that such pack goats might transfer disease to wild populations, then the obvious solution is to ban the pack goats or require that they be immunized (if an immunization exists). That would have the other benefit that then wild animals would not be giving disease to our domestic animals. Or of course you could shoot all the wild sheep and goats, which would be no more extreme than shooting all our tame ones.

Thank you, Sally McGuire

Submitted By
Kevin mckinney
Submitted On
10/27/2017 4:49:00 PM
Affiliation

Phone
9073602117
Email
Kmoffroad@gmail.com
Address
1103 Southampton dr
Anchorage, Alaska 99503

I Oppose prop 64!

Submitted By
Pamela Means
Submitted On
10/27/2017 8:38:15 PM
Affiliation

Phone
9073552463
Email
Meansp@mtaonline.net
Address
P.O. Box 1127
Palmer, Alaska 99645

I oppose prop 64. Wildlife and domestic animals do not mingle in Alaska.

ALASKA STATE FAIR inc

October 26, 2017

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing. These requirements would place a severe economic burden on existing owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska.

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 thin horn sheep in the wild, including both Dall sheep and Stone sheep. In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting Prop 64 is not the way to mitigate such a negligible risk.

Alaskan families benefit in many 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 treasured as family pets and 4-H project animals. Domestic goats and sheep are an essential part of the educational component of our Exhibits program at the Alaska State Fair. It is a challenge for us to have ample livestock as it is, the loss of sheep and goats would be devastating. I ask you to not pass Proposal 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations.

The Proposal is fundamentally flawed in its underlying assumptions and proposed requirements. Please follow the advice of the ADF&G, the DEC and the State Vet's office, the Division of Ag, and the Dept. of Law and "Take No Action" on Proposal 64. Thank you for your consideration.

Pamella Meekin

Pamella Meekin
Exhibits Manager, Alaska State Fair
907-746-7159
pamella@alaskastatefair.org

907-745-6094

Submitted By
Bob Mennis
Submitted On
10/26/2017 10:08:34 PM
Affiliation
Private Citizen

Phone
907-575-7762
Email
bob_mennis@yahoi.com
Address
4933 SouthHamlton Dr
Anchorage , Alaska 99503

Please except my statement As a testimony to the need to say no To the elimination if rights of Alaskans to own and raise goats For foodd and milk . Many people and children need Goats milk do to being unable to consume Cows milk These families must be able to own and Raise goat I have friend and famliy members Not able to drink cows milk I believe they will fight And others including me will fight For their rights to raise and milk Goats Thank You Bob

Submitted By
Robert Mennis
Submitted On
10/26/2017 9:03:53 PM
Affiliation

Phone
907-602-5830
Email
Icefisher138@hotmail.com
Address
6591 w ocean ave
Wasilla, Alaska 99623

I send this comment to show my opposition of Proposition 64 I oppose prop 64 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 64 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 64, followed by a portion taken from the ADFG web page regarding the clean list: "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." "#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 64 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, Robert Mennis

Submitted By
Marilynn Methven
Submitted On
10/8/2017 2:54:53 PM
Affiliation

Phone
9075213557
Email
marilynnmethven@gmail.com
Address
PO Box 879669
Wasilla, Alaska 99687

I oppose the proposition to restrict domestic livestock production. I think this is not in the best interest of all Alaskans. I believe it will do more harm than good.

Submitted By
Jessica Meybin
Submitted On
10/27/2017 10:22:17 AM
Affiliation
Concerned Citizen

As a supporter and consumer of local produce, I believe the ban of domestic goats and sheep would be detramental to the availablility of local meat, and also damaging to our Alaskan smaller-but-quality livestock farming industry. Please do not pass this legislation that would prevent Alaskans from raising and eating these local meets for reasons that are not valid for this state - such as the contagion of the disease (AK livestock must be fenced in) and the spread/geographical distribution that would hinder or prevent the spread of any disease.

Thank You for your Consideration,

Jessie

Submitted By
Steve Mickey
Submitted On
10/17/2017 6:04:38 PM
Affiliation

Phone
828-689-4812
Email
mtnwizard@juno.com
Address
111 Hoot and Holler Lane
Mars Hill, North Carolina 28754

~~To those present and in reference specifically to goats and their interaction with sheep of any kind. I have worked with, raised, bred, and operated a farm with goats in some way or another, specifically dairy goats, for almost fifty years and in specific reference to sheep would like to state that the ruminating system and body operations of goats and sheep are very much different. Dairy goats demand a high amount of both copper and selenium in their diet and sheep cannot tolerate that level. Their body systems are quite different. Although they are deemed both ruminating animals they are not “more” related to each other than any other such as a horse or cow, but rather “less” related in any commonality of body function and shared illnesses or diseases. To be blunt- if goats are a threat to the native sheep population (which they are not) then the same rules need apply to all ruminating animals, and indeed, all domestic animals of any type to the common dog and cat. I think your own “findings” from the previous meeting of 2016, and may I quote “the lack of any information that would demonstrate that wild sheep populations are at risk of contracting pathogens from domestic species.” The freedoms of our country do not allow for spurious and injurious decisions that are odious and cumbersome to others for the un-based opinions of a few. Thank you.

Submitted By
Christina Miller
Submitted On
10/23/2017 9:13:21 AM
Affiliation

October 17, 2017

To Whom It May Concern:

I am writing in opposition to proposition 64 (formerly prop 90).

My husband and I moved to Alaska 18 years ago as young adults looking to make our own tracks. We were both born and raised in rural Wyoming where self-sustainability is a way of life. We chose Alaska as our new home because we believed it was full of opportunity and it afforded us the ability to be self-sufficient and surround ourselves with like-minded people. That is the great thing about Alaska, we love the outdoors, we love our neighbors and we love liberty. It draws a certain mindset here.

About 10 years ago we advanced our self-sustainability from just hunting and fishing to also raising our own white meat and eggs, and eventually we added the dairy goat. I have a great deal of pride in our lifestyle and that we have instilled this in our next generation. We have 3 boys that love to hunt and fish and do so with a purpose. The same purpose they farm and garden with, to put wholesome food on our table year-round. Proposition 64 threatens our livelihood, our freedom and our constitutional rights to our property!

I ask that you oppose Proposition 64 and protect the rights of every Alaskan

Thank You

The Miller Family

Submitted By
Nicole Miller
Submitted On
10/26/2017 10:25:07 PM
Affiliation

Board of Game,

I am writing to you to oppose Proposal 64 and ask that you take NO ACTION. My family is looking to add goats to our small farm in hopes of providing milk and cheese to our otherwise lactose children.

That being said, the larger picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None!

At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 4 goats and sheep only 6 (2%) have tested positive for the bacterium. It's a screaming low risk factor in opposition to the "sky is falling" stance the Wild Sheep Foundation has been painting. M.ovi needs a host, it does not live in the environment and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators.

I ask the Board of Game to take NO ACTION on Proposal 64.

The Miller Family

Submitted By
Janet Mischler
Submitted On
10/26/2017 10:20:30 PM
Affiliation
Ms.

Phone
9076943005
Email
janetinak@gci.net
Address
P.O. Box 670223
Chugiak, Alaska 99567

Please take no action on Prop 64. Thank you.

Submitted By
Robin L. Mitchell
Submitted On
10/27/2017 5:30:08 PM
Affiliation

Phone
6315989383
Email
darkdakota@aol.com
Address
12110 Business Blvd STE 6 PMB 183-
eagle river, Alaska 99577

Outlawing goats and sheep in Alaska is rediculous. They have been here for decades with no disease transfer to Dall sheep. Allow homesteaders to remain independent and raise their own meat, wool, milk etc by raising goats and sheep.

Submitted By
Heather Mize
Submitted On
10/26/2017 9:45:21 PM
Affiliation

I oppose 64. The risk of disease passing from privately owned animals and wild Dahl Sheep does not exist to the extent to nessicitate this. Make no change Alaska is not the same as the rest of the United States.

Submitted By
Erica moeller
Submitted On
10/26/2017 2:35:26 PM
Affiliation

Phone
908-251-7083
Email
Erica.m.moeller@gmail.com
Address
3921 Murphy Dome Rd
Fairbanks, Alaska 99709

I'm writing to voice my opposition to prop 64 (formerly prop 90). In light of the lack of concrete evidence that domestic sheep and goats cause harm to wild populations, the government should not restrict or infringe upon or right to subsistence. Many Alaskans rely on local, domestic populations of sheep and goats for soap, fibers, milk and meat. To restrict our access to these resources is not only criminal, but also dangerous, considering our lack of proximity to any major food/resource distribution center.

Submitted By
Michelle montecelli
Submitted On
10/27/2017 4:38:32 PM
Affiliation

I oppose Prop 64 - take no action

Submitted By
Lynda J Moon
Submitted On
10/27/2017 4:33:33 PM
Affiliation

I oppose Prop 64. It is completely unnecessary, and would cause a hardship for many hobby farmers. The studies and numbers do not back up the need for such a legislation.

Submitted By
Mike Moore
Submitted On
10/8/2017 9:10:34 AM
Affiliation

Phone
907 795 6660
Email
Mlmoore8489@gmail.com
Address
14067 Doc Mckinley Ave
Palmer , Alaska 99646

The proposed regulation of domestic sheep and goats only serves to hinder Alaskan agricultural. The live stock producers will be hurt and so will our fellow Alaskans. We test our livestock regularly. This proposal must be not allowed to be law.

Submitted By
Wendee Mooter
Submitted On
10/27/2017 4:54:52 PM
Affiliation

Dear Board of Game members: When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted: Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics) There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America. There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks. Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this. Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game. Respectfully, Wendee L Mooter

Submitted By
Matthew Morgan
Submitted On
10/26/2017 7:49:21 PM
Affiliation

Phone
9852109950
Email
Mjmorgano84@gmail.com
Address
P.O. Box 260
TALKEETNA, Alaska 99676

I have only one issue today ,Prop 64, an over zealous piece of legislation that the control freak transplants from the lower 48 are trying to ram down the Alaskan residents throats. Most people, including myself and my wife, moved up gere for the promises of less government. But as of late, it has been the opposite. This piece of legislation in no way has any benefits for farmers or even common folk, that raise these animals for sustenance (meat as well as the beneficial milk). So I ask that you vote nay and keep Alaska free through your vote!

Submitted By
Angela Motta
Submitted On
10/26/2017 9:00:23 PM
Affiliation

Phone
907 764 0439
Email
icyangel69@yahoo.com
Address
2811 Pribilof Street
Anchorage , Alaska 99517

Stand down on 64

Submitted By
Kerri Mullis
Submitted On
10/27/2017 8:31:04 PM
Affiliation

Phone
907 378 0103
Email
Kam63@rocketmail.com
Address
2441 Lawlor road
Fairbanks , Alaska 99709

I believe that there are so many people you will be impacting by changing the regulations on goats/sheep. Do you really feel it will stop there? Chickens, cows, the capability for families to feed, supply milk, provide clothing (yes-many people spin hair). I believe that if there are rules we will comply, but it does not feel like you are providing options -please consider other options. I feel for anything-the remoteness of Alaska -and food protection. One bad storm-and our grocery stores empty in a day. Help us help ourselves.

Submitted By
Lynn Murphy
Submitted On
10/27/2017 3:47:34 AM
Affiliation

Phone
907-240-6938
Email
akavi8tn@aol.com
Address
7085 Whitehall Street
Anchorage, Alaska 99502

I am seriously against Prop 64 and the desire of the Wild Sheep Foundation to remove domestic goats and sheep from the clean list if you live within 50 air miles of wild sheep/goat population.

Unfortunately that means that almost 100% of people in the Mat-Su Valley and Anchorage would not be allowed to have these animals.

In a state where we rely on our own resources, the ability to keep sheep and goats for milk and meat is a big factor and to limit this because of a low-risk disease is ridiculous.

Please vote down this horrible Proposition.

Thank you.

Submitted By
Victoria Murrow
Submitted On
10/26/2017 8:53:54 PM
Affiliation

Threatening the livelihood of a good number of Alaskans out of fear without considering alternative enforcement measures is a naïve and fearful move that's sure to leave nothing but bankrupt herd owners. We need to discuss plan A: measures we can take to ensure the safety of dahl sheep while preserving an Alaskan work force.

Submitted By
Danielle Musgrove
Submitted On
10/27/2017 6:34:26 AM
Affiliation

Phone
9072401552
Email
lmthemom@mtaonline.net
Address
1101 e McAdoo way
Wasilla, Alaska 99654

I stand by my fellow Alaskans who say that until further testing is done on Mycoplasma ovipneumoniae (M.ovi) and banning domestic goats and sheep in Alaska, we urge you to take NO ACTION on Proposition 64.

Submitted By
Patricia Muth
Submitted On
10/26/2017 10:30:36 PM
Affiliation

Phone
907-745-2311
Email
grammymuth@icloud.com
Address
P.O. box 201
Sutton, Alaska 99674

Please take no action on prop 64

Submitted By
Michelle Myers
Submitted On
10/26/2017 8:05:16 AM
Affiliation

Phone
9072500732
Email
tekmichelle@gmail.com
Address
PO Box 871069
Wasilla, Alaska 99567

Board of Game Prop 64: Removal of Sheep and Goats from the Clean List.

A) The Zones proposed are NOT BASED IN REALITY.

B) Clean Herds should be allowed in the zones.

C) Stop instigating war between factions. I realize what you are doing.

Submitted By
Tabitha Nardini
Submitted On
10/26/2017 3:31:34 PM
Affiliation

Please vote no to prop. 64

Submitted By
Tabitha nelson
Submitted On
10/1/2017 10:15:08 PM
Affiliation

Phone
907-518-0299
Email
Alaskanwilderness@hotmail.com
Address
Po box 1807
Petersburg , Alaska 99833

I'm contacting about prop 64 (formerly prop 90) regarding removing domestic sheep and goat from a clean list. I'm a hunter and livestock owner. I think it is equally important to protect both. We hunt for all our meat and grow the rest ourselves. Alaska's food security may sometime depend on the few small farmers there are throughout the state. Sheep and goat are ideal for this. The problem of protecting wild populations is not as simple as making it illegal to own domestic. I'm not anywhere near a wild sheep population as are many other livestock owners. As much as I hate to see the few farms that are get hurt it seams like a more logical plan would be target areas rather than statewide. I ask that you consider Alaskas fragile farming history and our growing interest in providing food for small communities. Owning domestic sheep and goats on private property is a fundamental right since the beginning of domestication. Constitutionally it doesn't seem like it is the board of games responsibility to regulate domestic animals on private property since there are no public grazing land in Alaska. Even though I don't want it to be harder to bring goats into the state, possibly higher screening on future imports, more regulations on sheep hunting, and the wild sheep foundation funding fencing in target areas are more fair than destroying domestic ownership. Please don't remove sheep and goat from the clean list.

Submitted By
Lori Restad
Submitted On
10/24/2017 10:31:23 PM
Affiliation
Northland Pioneer Grange

Phone
907.746.4900
Email
Lori.Restad@gmail.com
Address
PO Box 2304
Palmer, Alaska 99645

Dear Board of Game:

At its regular meeting on October 19, 2017, the Northland Pioneer Grange in Palmer, Alaska voted to submit comments in opposition to Proposition 64. The Northland Pioneer Grange has been active since 1934 to support agriculture in Alaska and improve rural life in our state. Proposition 64 would place a huge burden on owners of livestock, although the risk of disease transmission to wild sheep is negligible. Enforcing these new regulations would not be a wise use of public resources.

Northland Pioneer Grange urges the Board of Game not to adopt Proposition 64.

Submitted By
Erin C O'Connell
Submitted On
10/27/2017 12:53:08 PM
Affiliation

Phone
9078543388
Email
airinairout@hotmail.com
Address
4475 South Trellis Ave.
Palmer, Alaska 99645

I am writing in opposition to Prop 64. There is no evidence that domestic goats are a threat to Alaska's wild goats. There are many Alaskans in the MatSu Valley (and beyond) who are invested in their goats as livestock and/or pets.Banning domestic goats would be an unfair lifestyle change for people in my community.

Submitted By
James O'Connor
Submitted On
10/20/2017 3:19:42 PM
Affiliation

I would like to ask you to strike down Proposal 64 regarding the delisting of domestic sheep and goats in Alaska and requiring a permit to own them within 15 miles of wild sheep habitat.

Let me start off by stating the obvious: If an animal is *not* on the clean list, you cannot obtain a permit for one. The proposal's language about the possibility of obtaining a permit is straight-up dishonesty on WSF's part.

How can you say who is within 15 miles of wild sheep habitat when wild sheep habitat has not been mapped? Besides that, if someone lives on the opposite side of a body of water too big for a wild sheep to cross but is still within 15 air miles, they should not be treated as if they are a "threat" to wild sheep. Use common sense.

If contact between wild sheep and domestics was really such an issue, why was the infamous Palmer McDonalds mountain goat (Sept. 23, 2016) merely tranquilized and returned to habitat? Why was it not immediately euthanized to prevent the risk of disease spreading to the wild population, because who knows if it stopped off at someone's farm on its way to downtown Palmer? Clearly ADF&G doesn't think there is a risk. https://www.matsugov.us/news/mountain-goat-takes-a-rest-downtown-palme

When Proposal 90 (the original number of Proposal 64) was first brought before the Board, it was tabled for two years to give both sides of the issue time to sit down together and work things out. WSF's spokesperson Kevin Kehoe repeatedly refused to hold public meetings. This is evidence that WSF does not intend to play nice with Alaskan farmers and is only interested in getting his way. Farmers would have been happy to attend public meetings had any taken place, but the only meetings he would agree to were closed-door meetings with only two, maybe three, farmers to speak for our side. Since WSF wants to change the lifestyles and food security of thousands of Alaskans, he should have been willing to plead his case in a public forum. Instead, his tactics reek of manipulation and attempts to spread confusion. Were he above board on this, there would be nothing to hide, and he would have kept the promises he obviously hasn't.

In these economically uncertain times in the State of Alaska, food security should be actively supported; it should not be swatted down by hunting tourism bullies who are here today and gone tomorrow while full-time Alaskans have to feed themselves and their neighbors with healthy meat and milk year 'round. The best way to do that is to raise that food ourselves. The more difficult you make it for us to provide our own food, the more likely you are to put Alaskans in crisis if there is a disruption in the food supply from Outside. If our lifestyles and food security are compromised, people would have even less reason to make Alaska our home and there would be even fewer citizens to tax, leaving Alaska in even worse economic condition than it is in right now.

Once a toehold is gained into regulating and restricting farming in Alaska, who is to say that the next step might be to delist or oppressively regulate owning pigs? Or chickens? Do not open this door.

In a show of good faith, many domestic sheep and goat farmers had their animals tested for m. Ovi in 2017 as a part of Dr. Maggie Highland's study on the disease in domestics. The results were that only 2% of all animals tested positive - much lower than the results of Dr. Highland's 2016 study on pack goats in the Lower 48. Since our results were markedly better than the pack goat study, and since we do not open graze (for many obvious reasons), the logical conclusion is that domestic sheep and goats in Alaska are much less likely to infect a wild sheep than anywhere else in America.
http://packgoats.com/packgoats-bighorn-sheep/

There you have it. If common sense doesn't tell you that Proposal 64 should be thrown in the trash bin, then the science certainly should.

Defeat, overthrow, and put an end to Proposal 64.

Submitted By
Jim O'Connor
Submitted On
10/16/2017 10:17:14 PM
Affiliation

Phone
907-776-1160
Email
joconnor@alaska.net
Address
50701 Dossow St
Kenai, Alaska 99611

I write in opposition to Proposition 64.

The Board of Game can only control the Clean List. It can't do any of the other things requested in the proposition.
The conditions in the proposition are onerous impositions on people keeping domestic farm animals on their own private (fence in) property, which would require the effective surrender of 4th Ammendment guarantees.
The boundary of wild sheep and goat habitat is as yet unmapped.
Wild sheep wandering through town are returned by state agencies to natural habitat without testing -- odd procedure for such supposedly dire circumstances.

The presence of M.Ovi to date is simply not proven to be present in a significant portion of the domestic population, Wild Sheep Foundation's hyperventilating claims of ubiquity notwithstanding. I can understand why they were anxous to get commitments to a "final solution" before any results came back from the testing.

I don't believe that ADF&G is anxious to instigate the potential conflicts with property owners, on their own property, to enforce the terms of this Proposition.

In the lower 48 similar pretexts are used for harassing livestock owners for various reasons which are entirely unrelated to public welfare.

Submitted By
Joseph O'Neil
Submitted On
10/24/2017 8:16:50 AM
Affiliation

Phone
9072226354
Email
joneil907@yahoo.com
Address
8601 E 11th Ct
Anchorage, Alaska 99504

I am writing to express my opposition to Prop 64. The organization behind this Prop is tranparently self-interested and has failed to provide sufficient or compelling evidence that domesticated goats in Alaska pose any threat to the Dall Sheep population. Ruling in their favor would severely harm Alaska residents who rely on their goat herds for subsistence and call into question the credibility of your body. Please do the right thing and disapprove (not delay again) this measure.

Submitted By
Deanna OConnor
Submitted On
10/17/2017 1:33:38 PM
Affiliation

I would like to ask you to strike down Proposal 64 regarding the delisting of domestic sheep and goats in Alaska and requiring a permit to own them within 15 miles of wild sheep habitat.

Let me start off by stating the obvious: If an animal is *not* on the clean list, you cannot obtain a permit for one. The Wild Sheep Foundation clearly knows this and has added the empty suggestion of a permit as a distraction. We're not that stupid, WSF.

How can you say who is within 15 miles of wild sheep habitat when wild sheep habitat has not been mapped? Besides that, if someone lives on the opposite side of a body of water too big for a wild sheep to cross but is still within 15 air miles, they should not be treated as if they are a "threat" to wild sheep. Use common sense.

If contact between wild sheep and domestics was really such an issue, why was the infamous Palmer McDonalds mountain goat (Sept. 23, 2016) merely tranquilized and returned to habitat? Why was it not immediately euthanized to prevent the risk of disease spreading to the wild population, because who knows if it stopped off at someone's farm on its way to downtown Palmer? Clearly ADF&G doesn't think there is a risk. https://www.matsugov.us/news/mountain-goat-takes-a-rest-downtown-palme

When Proposal 90 (the original number of Proposal 64) was first brought before the Board, it was tabled for two years to give both sides of the issue time to sit down together and work things out. WSF's spokesperson Kevin Kehoe repeatedly refused to hold public meetings. This is evidence that WSF does not intend to play nice with Alaskan farmers and is only interested in getting his way. Farmers would have been happy to attend public meetings had any taken place, but the only meetings he would agree to were closed-door meetings with only two, maybe three, farmers to speak for our side. Since WSF wants to change the lifestyles and food security of thousands of Alaskans, he should have been willing to plead his case in a public forum. He was not. He counted on Alaskan farmers being uninformed, unorganized, and too spread out to be bothered. He was wrong. Do not give in to his tactics of bullying and intimidation.

In these economically uncertain times in the State of Alaska, food security should be actively supported; it should not be swatted down by hunting tourism bullies who are here today and gone tomorrow while full-time Alaskans have to feed themselves and their neighbors with healthy meat and milk year 'round. The best way to do that is to raise that food ourselves. The more difficult you make it for us to provide our own food, the more likely you are to put Alaskans in crisis if there is a disruption in the food supply from Outside. If our lifestyles and food security are compromised, people would have even less reason to make Alaska our home and there would be even fewer citizens to tax, leaving Alaska in even worse economic condition than it is in right now.

Once a toehold is gained into regulating and restricting farming in Alaska, who is to say that the next step might be to delist or oppressively regulate owning pigs? Or chickens? Do not open this door.

In a show of good faith, many domestic sheep and goat farmers had their animals tested for m. Ovi in 2017 as a part of Dr. Maggie Highland's study on the disease in domestics. The results were that only 2% of all animals tested positive - much lower than the results of Dr. Highland's 2016 study on pack goats in the Lower 48. Since our results were markedly better than the pack goat study, and since we do not open graze (for many obvious reasons), the logical conclusion is that domestic sheep and goats in Alaska are much less likely to infect a wild sheep than anywhere else in America.
http://packgoats.com/packgoats-bighorn-sheep/

There you have it. If common sense doesn't tell you that Proposal 64 should be thrown in the trash bin, then the science certainly should.

Defeat, overthrow, and put an end to Proposal 64.

Submitted By
Sheri Oler
Submitted On
10/27/2017 1:30:24 PM
Affiliation

Phone
9073571454
Email
Bldr2005@gmail.com
Address
681 E Susitna Drive
Wasilla, Alaska 99654

I am opposing Prop 64.....domestic goats and sheep should be called to stay in the 'clean list'. Alaska is not like the Lower 48, we are singular in our agriculture wants and needs.

Submitted By
Michelle Olsen
Submitted On
10/27/2017 2:05:13 PM
Affiliation

Phone
9073544184
Email
TowerRanchAlaska@gmail.com
Address
PO Box 3190
Palmer, Alaska 99645

Dear Board of Game

I am writing you to oppose Proposal 64 and ask that you take NO ACTION.

I was part of the working group that met with the Wild Sheep Foundation to try and come to a solution before this proposition went on the docket. Alaska sheep and goat producers brought option after option to the table but the WSF were uncompromising and not willing to hear any solutions that didn't involve mandatory testing, registration, and other onerous restrictions and penalties to livestock farmers.

I began raising sheep because I'm allergic to beef and pork. I have built my flock into one of the biggest and best fiber flocks in the entire state of Alaska. My sheep and goats provide food for my freezer and fleece that delights fiber artists all across this great state. I'm a 3rd generation Alaskan, born and raised here as is my husband. Our families hunt and fish all over Alaska, so I do not take threats to our wild populations lightly. In this case however, there is no actual threat.

Unlike the lower 48 where commercial herds number in the 1000s, Alaska flocks are generally 5 – 10 total animals. I have a flock of 31 sheep and goats right now meaning I'm one of the biggest in the state. This means each farmer sees every single one of their animals every single day, so our animals are healthier than large grazing flocks who only get looked over once or twice a year. Alaska does not have open grazing like they do in other states. If a sheep were to wander out of the safety of the pasture, a bear or other predator would make a quick meal out of it well before it had the opportunity to wander into wild sheep territory.

At this time there have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None! Our farm and many others have joined with the office of the State Veterinarian, working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep only 6 (2%) have tested positive for the bacterium. It's a ridiculously low risk factor when compared to the "sky is falling" stance the Wild Sheep Foundation has been painting.

If it is to be assumed that there is a risk, the Alaska Dept. of Fish and Game needs to map the critical habitat areas of the most concern for contact with domestics. M.ovi needs a host, it does not live in the environment and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators.

Proposition 64 will remove domestic goats and sheep from the "clean list" which means you need to be issued a permit from the State in order to keep domestics. However, the State has said that they will NOT issue permits for animals not on the clean list. If no permits will be issued it will be illegal to own sheep or goats anywhere in the state. I would have to destroy the animals I have nurtured for years. That is a pretty harsh penalty for an assumed risk with no scientific evidence.

Removing domestic sheep and goats from Alaska will devastate our food chain. We have many customers who cannot eat "commercial" meats from the grocery store due to allergies to what is fed in the feed lots. Local producers strive to support our local hay and grain farmers who grow clean feeds that our customers can eat safely without worry for massive allergy break-outs. It's not just the pain that the farming families will feel by taking goats and sheep off the clean list, it's the slow destruction of the agricultural community within Alaska. Alaska Ag and Alaska Grown are burgeoning industries and it would be a horrific blow to Alaskans if that part of their food chain were to suddenly just disappear.

Alaska has strict health requirements for importation, so strict that it's almost cost prohibitive to bring in new animals. This means that if a sheep or goat does get brought in, its super expensive (one of mine was $2000 – for just the one) and if you are spending that kind of money you are getting all kinds of tests to guarantee it's absolutely clean and healthy.

Because my animals are so valuable I need to keep them safe; I have worked to build strong fencing, and have worked to raise and train livestock guardian dogs to keep any foreign animals away. My fencing keeps the sheep and goats inside my pasture and keeps moose, neighbor dogs, and even bears out. My livestock dogs live with my sheep and they don't let anything come within sneezing distance of their sheep. Moose don't hop over, birds don't land, and bears think it's not worth the hassle. There is zero chance of a wild sheep getting in to co-mingle with my domestics, which again, leads to zero risk of infection.

The restrictions that WSF proposed in our working groups were overzealous to say the least, and would kill the sheep and goat industries here in Alaska. The testing and registration they were talking about would be cost prohibitive to most farmers who have to work day jobs to

help pay for their ability to farm. The double fencing requirement would eliminate any and all small farms as there would be no grazable space left once fenced. The 15 air-mile parameter would encompass the Alaska State Fairgrounds in Palmer, removing the option for sheep and goats to be shown there ever again. All of these “solutions” would be a heavy financial burden paid by the farmers and 4-H participants.

I hope you will do what’s right for our great state and protect the Alaska food chain, not just the special interests of one group. Especially when that group has proven that they don’t care about facts, don’t want to work on solutions, they just want to force their restrictions on innocent people.

With all due respect, I ask the Board of Game to take NO ACTION on Proposal 64.

Sincerely,
Michelle Olsen
Tower Ranch Alaska

Submitted By
Lidiia Olszowy
Submitted On
10/8/2017 2:26:45 PM
Affiliation

I oppose the proposition to restrict domestic livestock production.

Submitted By
Becky Oviatt
Submitted On
9/13/2017 5:49:53 PM
Affiliation
Self

Phone
521-9276
Email
bexterov8@yahoo.com
Address
4149 S Trellis Ave
Palmer , Alaska 99645

PROPOSAL 64 – 5 AAC 92.029. Permit for possessing live game.

I am opposed to this proposal. First, DOMESTIC goats and sheep are NOT live GAME.

Second, it has been proven that the wild sheep have NOT been infected by domestic sheep and goats. The bacterium being contested when carried by wild sheep, will cause no harm to healthy animals. It becomes opportunistic in animals who are stressed (ewes and newborns) who are experiencing a lack of nutrition, or habitat changes or sustained predation.

Just as pneumonia is harder on humans whose health is compromised by similar conditions.

Those of us who raise sheep and goats do so for meat, milk and fiber. This is a lifestyle for us, and income as well.

While you are trying to protect your income, you are taking away or compromising ours. how is that right or fair?

The livestock you are trying to regulate, while they may live within 15 air miles of sheep habitat, would need to cross highways, rivers, and land that is not easily traversed, such as swampland. We don't graze our animals near sheep habitat, if fact most feed them local hay, on dry lots.

I find your proposal obstructive and ill informed.

Submitted By
Hillary Palmer
Submitted On
10/26/2017 9:45:24 PM
Affiliation

Phone
907-841-8582
Email
hillary44@gmail.com
Address
325 N Chugach St
Palmer, Alaska 99645

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Jared
Submitted On
10/27/2017 7:36:46 AM
Affiliation
Citizen

Phone
9075702048
Email
Jaredpalmer@rocketmail.com
Address
2481 lyvona lane
Anchorage, Alaska 99502

Please don’t make it illegal to own goats. I have family that needs goats to thrive and survive. The family’s life would be so difficult and miserable without the goats due to the kids alllergies.

Submitted By
Heather Parker
Submitted On
10/26/2017 10:29:53 PM
Affiliation

Phone
9079828178
Email
cnatparker@yahoo.com
Address
PO Box 3676
Palmer, Alaska 99645

Dear Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden on existing owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska.

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 sheep in the wild, including both Dall sheep and Stone sheep.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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 64 due to the severe impact it will have on individual domestic goat and sheep small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Submitted By
Kristie Parsons
Submitted On
10/9/2017 10:15:15 AM
Affiliation
Arctic Curly Farm

Phone
9089823330
Email
arctic_kristie@yahoo.com
Address
PO Box 13198
Trapper Creek, Alaska 99683

I am a sheep owner and a farmer in Alaska.

Reasons not to support Prop 64

1) Bear, wolves, coyote, and predators will kill and eat sheep and goats long before they can find a fellow dull sheep in the mountains. We deal with predators killing in our good fenced pens in a semi-populated area, there is no way the domestic sheep or goat would survive in the wild without their sheppard to protect them from the Alaskan predators!!!!! The coyote in my area are bigger than a large dog and are in packs of 12 doing serious damage to domestic livestock. Coyote over-population control is more deserving of your time than Prop 64.

2) Alaska is a closed ecosystem and there has never been a sheep disease get into the Dull sheep herds in over 200 years of importing sheep.

3) Alaska already requires sheep/goat importation health certificates and appropriate testing, why add to the list which the State struggles to enforce?

4) The federal government ALREADY highly regulates sheep and goat inter-state and inter-country movements to prevent disease spread. I have been unable to buy a sheep and haul it to Alaska through Canada due to the federal regulations. Nor could I buy one in Canada and import to Alaska. I have had to pay top dollar to fly sheep to Alaska due to existing regulations. Do we need more restrictive regulations in place than this? NO

5) Sheep & Goat owners are limited, there are a small number of these types of animals in the state altogether! The life span of a sheep or goat in Alaska is very short, 6-10 years, is this really where the limited resources of ADFG should be spent? Not in my opinion

6) The majority of sheep and goats are NOT kept in dull sheep mountainous places, but in easy to access locations (not mountainous and on road system) due to the amount of care these animals require and the market to sell them. I live 75 miles north of Wasilla and people complain it is so far to drive to my farm to buy a sheep. Proximity to the market is important when keeping this sort of livestock which are sold between 2-8 months old.

Please stick to the facts and not the hype of a special interst group. I do not support prop 64, please vote this items down.

Submitted By
C Partridge
Submitted On
9/1/2017 7:52:32 PM
Affiliation

Please defer, or better yet vote no, on proposition 64. The vast majority of domestic sheep and goats in Alaska live in built up areas where there is no chance of the domestic animals coming into contact with wild sheep or goats.

Alaska as a state however, is remote and needs more food resources in state. Goats and sheep are much easier for the small suburban homesteader to manage than cattle. Goats and sheep are excellent choices in helping Alaskans have a more secure food base.

Until we know for sure that there is a proven verified risk, there is no reason to remove such an excellent food resource. Keep domestic goats and sheep fully legal, and easy to own.

Submitted By
Johnny Payne
Submitted On
10/16/2017 11:50:42 PM
Affiliation

Let it be known that I am absolutely opposed to the Proposition 64 which would remove domestic goats and sheep from the clean list of animals. This would do irreprepable harm to farmers here in Alaska. In addition, no reason has been proven to have this as a regulation.

Submitted By
Mary Pearson
Submitted On
10/26/2017 1:57:38 PM
Affiliation
Voting public

Phone
907-683-2702
Email
Domenica99@yahoo.com
Address
Po box 191
Denali Park, Alaska 99755

I would like the board to please consider ruling to NOT make the keeping of domestic sheep and goats illegal in the state of Alaska. Small livestock fills a small but vital spot in our Alaskan food chain. The vast majority of our food supply is shipped long distances making the supply tenuous. Please do not make the keeping of the domestic goat and sheep illegal in the state of Alaska. Thank you for your time. Mary Pearson

Submitted By
Kirsten Pedersen
Submitted On
10/27/2017 7:02:03 PM
Affiliation

Phone
99077464181
Email
info@cateralaska.com
Address
8086 East Timb Circle
Wasilla, Alaska 99654

Here we go again… Who in earth comes up with these ludicrous ideas? Is there some PITA person down in the lower 48 looking at the vast lay of the land for miles and tons of concrete and thinking that "Gosh, it would be terrible if our wildlife comingled with our domestic farm animals? They might get sick if they cavort with each other??!!"

Back in 2008, an aged black bear came into our area and started to harass local domestic farm animals. For reference, game management Unit 14A. If you recall, the summer season of 2008 was also the year of multiple rains, cold weather and terrible salmon runs. The older bear that was eventually shot was determined to be starving and lacking some teeth, which fish and game attributed to his aggressive behavior towards domestic animals. Given that he had been unable to eat his regular quota of fish, he obviously went looking for 'easier' meals. The goats and the chickens that were slaughtered, left a bloodbath all of our neighbors backyard and chicken coop. The one goat that managed to get away was discovered hiding in someone's backyard about a mile away, cowering from fear for for three days.

What is the point of that story? Let's talk about Proposition 64. There happens to be two natural regulators at play; one would be the terrain system and the other would be the bruins that would be more than happy to indulge on either domestic or wild goats and sheep, if either wandered into their territory. The idea of promoting Proposition 64 to protect the wildlife population from M.ovi has to have been something thought up by some very uneducated individual, who is not privy to the terrain or other natural boundaries that Alaska naturally sets on a geographical basis. Let's flip this debate the opposite way around. There is absolutely no way that any domesticated goats and sheep who might find themselves out of their fenced area are going to go trekking for miles, forging cold rushing rivers and then hike themselves thousands of feet up into the rocky terrain, hoping all along the way that a bear doesn't eat them, to go mingle with the wild population. Again whoever has thought up this ridiculous notion is obviously not privy to understanding the aspects of animal husbandry. (In fact I would seriously question their highly lacking education on the subject altogether.) Sheep in particular will not wander far from their shepard or owner. Goats might wander over to the neighbors flowers if they can see them but they too are certainly not about to depart the comfort and safety of their home of protection along with food and grain and other comforts.

Move over the silly proposition and get back to something that's really affecting the Alaskans. Something a little more it's affecting our natural fisheries and salmon what are you doing about the pike problem eating up all the salmon and the trout? If you want to address a real issue, focus on that problem.

Submitted By
Gerald Pelto
Submitted On
10/27/2017 8:04:45 PM
Affiliation

Phone
9073154300
Email
jere@cateralaska.com
Address
8086 East Timb Circle
Wasilla, Alaska 99654

I oppose Propisition 64. What's next? Chickens? Enough of this rediculousness.

Submitted By
Mike Pendergrast
Submitted On
10/26/2017 6:52:10 PM
Affiliation

Phone
907 715 499
Email
aklynx@hotmail.com
Address
P.O. Box 873406
Wasilla, Alaska 99687

This comment is in responce to Prop 64.

As a goat owner and breeder, We have spent the many hours researching this topic.

The way the proposal is written is confusing at best. The removal of sheep and goats from the clean list makes ownership illegal,. There is no permitting allowed that provides for any animal not on the "clean list" to be in Alaska. The bulk of the proposal's reference to seperation distances, testing, fencing and permits is nothing more than filler to confuse and cloud the facts.

All our goats are contained in fenced pasture, miles away from any possible wild populations. This is more than a hobby for us. Choosing to have goats is a 24/7 365 commitment. Our investment is sizable . Upkeep on shelters and fencing is an ongoing expence, We buy over a thousand bales of local hay annually, in addition to upwards of five hundred bags of feed from local suppliers. Annual testing and vet visits are also part of our investment. We spend time educating and consulting with new goat owners on the needs of the goats.

We are against the passage of this proposal.

If you have any questions, please feel free to contact me.

Thank you

Mike Pendergrast

Raven Run Alpines

I have taken part in the M ovi testing program organized the State Vet at a cost of four hundred dollars. My results were negative for the over 50 goats tested.

I attended the presentation by Dr. Highland on Aug 30 regarding her M ovi study. She stated that no studies are underway regarding thin horn sheep and the representative from the Alaska Department of Fish and Game confirmed that no studies or for that matter No evidence of M ovi infections have been reported in Alaska

Submitted By
Heather Percy
Submitted On
10/27/2017 12:56:13 AM
Affiliation

Phone
9708461035
Email
heatheravs@hotmail.com
Address
16831 Tideview Dr
Unit B
Anchorage, Alaska 99516

I am opposing prop 64 because Alaska needs sustainable agriculture. Too few domestic animals have been found with M.ovi for this to be a crisis. Please consider the good that local, domesticated goats and sheep provide. Especially since Alaska is not a free range state and these animals are confined thus providing barriers additional to the natural barriers between them and wild sheep. Thank you.

Submitted By
Daniel G Perkins
Submitted On
10/27/2017 3:58:41 PM
Affiliation
Alaskan Citizen

I am writing to oppose Prop 64. As a lifelong Alaskan who is raising my children (& hopefully my grandchildren) here, I oppose any proposition that limits the rights of Alaskans to freely raise animals currently and historically common to our homesteading heritage. Such animals as goats, sheep, rabbits, cows , chickens and others are a heritage and should remain a common right for Alaskans to keep, raise, sell, buy, and trade for the mutual good. Propositions that stop or even hinder those processes should be voted against by the people who represent us. There are many financial, health and community dependencies on these animals whether used as personal use or larger livestock applications. Alaskans need to the right to raise such livestock for themselves and for their neighbors. I implore you to vote no on Prop 64 because it goes the wrong direction in maintaining these rights for Alaskans.

Submitted By
Amber Pigeon
Submitted On
10/27/2017 10:39:11 AM
Affiliation

The pioneering spirit is something all Alaskans share with their farming neighbors. The shared values of hardwork, integrity, respect, and determination are what make our state and it's people great. Through farming we teach our children how to be self-sufficient in some of the most brutal and unforgiving climates on Earth. Agriculture has played such an important role in Alaska's history. Please, consider future generations and the pioneering spirit Alaska was built on before making your vote. My family depends (as do MANY others) on the food we produce.

Submitted By
Richelle Plummer
Submitted On
10/8/2017 10:27:51 AM
Affiliation
Mat Su Farm Co-Op

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Alaskangrownrevolution@gmail.com
Address
4590 N Almaden Drive
Palmer, Alaska 99645

As an advocate for ALL forms of local food, any proposition restricting the effort to produce food locally is not in the best interest for the State of Alaska. Growing our food industry is VITAL for the sustainability of our Great State. In the last year alone, the market has grown by leaps and bounds. You can now find more locally grown food in our grocery stores than ever before.

With the growth in domestic livestock production, we lessen the pressure on wildlife as a food source and build our economy from the ground up.

Lets not overreact to a change in a wildlife population we have no control over. It would be ignorant to restrict local industry without a concrete, local evidence of a threat to our wild population of sheep and goats.

Submitted By
Kimberley Potter
Submitted On
10/8/2017 12:39:28 PM
Affiliation

Phone
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nursing34yo@yahoo.com
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3283 Baker Rd
North Pole, Alaska 99705

Farmers have enough costs and regulations to protect our local wildlife. We don't need more! The cost of living up here is high enough to drive a lot of people away. Please stop adding laws and restrictions just because you want your name on something to prove you did something. How about you start pulling old laws and restrictions out and give us back some of our freedoms! That would be a GREAT way to show you're doing something! A lot of restrictions on us are from a time when we weren't already being tested before and after we bring livestock in. It's causing a lot of less reputable farmers to allow imbreeding in the lines because it's plainly too expensive and difficult for us to get new lines up here and make some sort of profit to live on. Adding more restrictions because some fantom disease is affecting a few sheep in a mountain range 3000 miles away that has not even been proven to have anything to do with livestock and has nothing to do with Alaska is not a way to cover the costs of running this state.. start cleaning house and cover your costs by cutting the costs. Stop stealing PFD's from people who live on them. I hear there's a 2 million dollar refirb going on over at the PFD building. Go tell them they need to share!

Submitted By
Karen Reeves
Submitted On
10/26/2017 1:46:00 PM
Affiliation

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360-296-0370
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lightstheatre@yahoo.com
Address
PO box 169
Denali park, Alaska 99755

I wanted to let you know my feelings about making domestic goats and sheep illegal in AK. Alaskans have often pursued an independent and self sustaining lifestyle. They should be allied to continue such pursuits without state interference. I agree with Zoning to protect those that don't choose such a life style, but it would seem there is enough room in our state for domesticated livestock and those that choose to raise and nourish them.Thank you.

Submitted By
Elizabeth Reeves-Ramos
Submitted On
10/26/2017 1:08:26 PM
Affiliation

~~10/26/2017
To whom it may concern

I am writing against Prop 64 and I would like to add my comments as follows. Per studies that have been completed the risk of Dall sheep and domestic goats and sheep coming into contact is very small. Unlike the lower 48 Alaska does not have grazing leases for sheep or goats. Alaska is a fenced in State, which to my understanding means all animals must be kept behind a fence. This practically eliminates the threat of contact between wild and domestic. Based on what I have read, it appears that there has been no die off of wild Dall Sheep in Alaska even though there have been large numbers of domestic goats and sheep in the State since the 1060's. Alaska Dept of Fish and Game needs to map Dall sheep habitat so that those areas of possible risk between Dall sheep and domestic can be identified. I have lived in Interior Alaska most of my life and the last time I saw a Dall sheep close to residential areas was in the 90's, it seems unfair to limit farmers, peoples ability to self-sustain themselves based on assumptions that there is a risk of wild and domestic to come in contact. Finally, I have read that there was a study done that tested 334 domestic animals for m ovi and the results came back with a 2% positive rate, which is less than the pack goats studies that have been done.
On a more personal note, I know a lot of people who have domestic goats and sheep, they depend on these animals for food, milk, fiber, companionship and if they were to be made illegal it could cause financial ruin or emotional trauma. I have watched young children become interested in animals, farming, gardening, because of their ability to interact with these animals. I know that the companionship and self-sufficiency I have felt being around domestic goats and sheep is unlike anything that I have ever experienced. They have brought joy to my life and the lives of all those that come into contact with them.
Again, I strongly oppose prop 64 and hope that you take my, and the many other comments that I know you have received to heart. Alaska is the last frontier, we live here because we value our independence and being able to rely on ourselves and our land/farm to provide for our families. Please do not take away this freedom by making it illegal to have these small ruminants in our lives.

Sincerely;
Elizabeth Reeves-Ramos
Fairbanks, Alaska

Submitted By
melissa reimers
Submitted On
10/26/2017 1:42:23 PM
Affiliation

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3141 w spence ln
wasilla, Alaska 99623

i am NOT in favor of taking goats and sheep off the clean list per prop 64. i am a local very small lamb producer and this would irrevocably kill the small ruminant ag industry in Alaska. there is no need for this, there has been NO study done to show any link from Alaska stock to wild populations. Please do not cave to the pressure and big money of the wild sheep federation. thank you for listening.

Submitted By
Rayne Reynolds
Submitted On
10/27/2017 1:47:47 PM
Affiliation
Frozen Oak Farms

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(907) 953-0093
Email
rayne63@yahoo.com
Address
POB 4270
Palmer, Alaska 99645

Alaska Board of Game: I am a third generation livestock rancher and have my made my home here in Palmer, Alaska for the past 12 years. Our family raises Alaska Grown beef, pork, and lamb here in Palmer. Not only do we contribute to Alaska's food security issues by raising animals, but we contribute greatly to the local economy, where we source hay and barley from Delta, we use a local veterinarian for our herd health, we pay booth fees at local farmer's markets, we buy livestock supplies and feed from Alaska Feed and Mill in Anchorage, we have our meat processed at Mt. McKinley Meats in Palmer, and we give back to our local and statewide FFA programs and 4-H programs all because we raise livestock that include our registered purebred Hampshire and Suffolk sheep. Just as hunters and guides depend on wild sheep populations for income and protein sources, so does my family depend on our sheep for income and protein. According to the Alaska state website on hunting licenses issued and numbers of sheep taken by Alaskans and Non-Residents, close to 700 - seven hundred!- sheep were taken in licensed hunts. Not one Dahl sheep in Alaska has died as a result of my sheep being on my farm, not one, ZERO! Why would you as a board of game put restrictions on our personal property rights to own, breed, and rear sheep when our sheep are not a threat to wild populations? Just as hunters have rights, so do ranchers. How does a special interest hunting group get to attack our way of life? Is our way of life any lesser than what they enjoy? Your biggest issue to wild sheep populations is not domesticated herds of sheep and goats, but hunters themselves. I urge you to vote down taking sheep and goats off the clean list. I also

request that you consider food security, local economies and a way of life that is just as important to my a family as hunting is to those families who enjoy living the lifestyle that they choose to do so. Thank you for your time. Sincerely, Rayne Reynolds

Submitted By
Terri Reynolds-Rogers
Submitted On
10/27/2017 6:22:28 AM
Affiliation
livestock owner

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907 602-2799
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akhorseman@hotmail.com
Address
1150 S Colony Way Ste 3 PMB 123
Palmer, Alaska 99645

I urge you to take no action in support of Proposition 64. The risk is very small, the exposure to wild sheep non-existent and the economic fallout will be disasterous for the livestock industry in Alaska. Small dairy animals, hair and wool sheep are an essential part of the domestic heritage of this state. Where we lack the facilities to care for cattle, we can keep dairy goats as individual pet owners. They have value in clearing land to minimize wild fire losses. Finally, they are an excellent tool for training our future livestock ranchers, small enough even for small children to raise and handle in 4H clubs and at the State Fair.

Please, do not outlaw our domestic dairy livestock. I urge you to TAKE NO ACTION on Prop 64.

Submitted By
Brianna Ridge
Submitted On
10/26/2017 10:46:31 PM
Affiliation

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agricultural infrastructure. Please do not pass this regulation without further research.

Submitted By
Kelli Riley
Submitted On
10/26/2017 9:44:16 PM
Affiliation

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P.o. Box 870829
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Please take NO ACTION on prop 64

Submitted By
Tyler Robinson
Submitted On
10/27/2017 11:34:45 AM
Affiliation

Please vote no on Proposal 64 to remove domestic sheep and goats in Alaska from the clean list. The proposal is ill-advised for several reasons.

The proposal seems like a direct “cut and paste” brought forward from the Wild Sheep Foundation. It is neither documented as being needed in Alaska nor does it respond to Alaska’s differences. The proposal mimics a regulation from the lower 48, and in the process ignores the uniqueness and individuality of the state of Alaska. Fenced in domesticated sheep and goats are quite different than open ranges. The bacterium has never been documented in Alaska. The proposal simply feels like a national single focus special interest group attempting to show its members it is accomplishing something.

The proposal completely ignores the impacts that such an action would have on farmers, hobbyists, and in some cases their shareholders who enjoy the Alaskan value of self-sufficiency and locally harvested animal products. While the taking of wild sheep is motivated by the same value, the Wild Sheep Foundation is more concerned about sport hunting. This action, if approved, would affect your Alaska neighbors and friends, and yet is not necessary by any demonstrated evidence.

My family has enjoyed fresh goal milk and cheese from a reputable and responsible Alaska farmer for eight years. The pride and care that they show in their husbandry is a value that the board of game should appreciate, and minimally, not interfere with. This proposal is an ill-advised approach to a problem that doesn’t exist and has consequences for values we as Alaskans should uphold.

Tyler Robinson

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Anchorage, AK 99508

Submitted By
Adam Rogers
Submitted On
10/25/2017 12:14:26 AM
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This comment is in response to Proposal 64 -- 5 AAC 92.029. Permit for possessing live game.

I am AGAINST this proposal and let me explain why.

I will first start with the Foundation's issue they are wanting redressed. They state in their filing, "Domestic sheep and goats have been proven to carry diseases that are devastating to wild sheep population." They present absolutely no evidence to show what diseases have been found in the domestic sheep and goats in Alaska carry, nor have they shown risk of spread. As far as I am aware, no such study has ever been conducted. Secondly, the Federation says that, "hobby farming is growing rapidly" in "areas that would be considered Dall sheep habitat." Again, they state this without any support to what Dall sheep habitat is being encroached upon, nor what types of livestock are on the lands found in this habitat. Lastly, they mention about entire populations of bighorn sheep being wiped out by disease transmission, and still do not present what populations are being wiped out (I am guessing they are all in the lower 48 since I do not know of any Bighorn in Alaska) nor if those diseases originated from domestic livestock or from the wild population itself.

Next, let me talk about their "Justifications." I rather enjoyed their first justification as having a "constitutional mandate." Yet again (this is a common plight throughout the proposal), they gave no reference to what mandate they are referencing. I searched the Supreme Law of our land, the U.S. Constitution, and found nothing about protecting sustainable yield, so I looked to the Law second to it, the Alaska Constitution. The best that I can figure is: AK Const., art. VIII, § 4. Sustained Yield which reads: "Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses." While I agree it does mean we the people must try to maintain a healthy wildlife population, I believe the Federation neglects the "subject to preferences among beneficial uses" clause. I do not have a precedent to cite, but I believe this to mean preferences must be given to those who have the greatest use of the land. In this case, unless they are proven to be harming the wildlife, the farmers must be given preference. I base this on AK Const., art. VIII, § 1 and AK Const., art. VIII, § 2. In both these references, the power and authority of the Natural Resources is for "the maximum benefit of its people." For the government to create a law restricting her people on a simply theory that their presence MIGHT cause harm is a flagrant defiance of the Alaska Constitution. This also defies the source of government, stated in AK Const., art. I, § 2. This proposal is not for the good of the people, but for the good of the sheep.

The Federation's second justification shows just how completely disconnected they actually are from Alaskans. "Online permitting has become mainstream and simple." Can there be a more naive statement? Half of Alaskans intentionally get away from technology, the last thing they want is internet, so they can be sure to stay compliant with new and confounding laws.

Finally, I would like to speak on their very proposal. "*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.* " The law they are wanting amended does not mention anything about required fencing, only what game need to have permits or not. I am also not sure where this idea of "15 air miles" comes from or how that can be defined. I am an FAA commercial certified pilot and "air miles" confuse the hell out of me, since I still measure distance on the ground. Also, what disease are we supposed to look for and why do we have to wait for testing to become available?

Then, there is the final problem with this proposal. This law, 5 AAC 92.029, deals with game, as defined by AS 16.05.940(19). The only way farm animals qualify under this definition is if they are feral, and cannot be captured within 48 hours. 5 AAC 92.029 already has the remedy the Foundation is seeking. If they have proof that the farm animals are causing harm to the indigenous life, then the law will expunge the offending animals from the exempt list.

Overall, this proposal reads like a Jr. High Social Studies project, and of that, it's a C grade quality at best. I am asking the committee to please have a good laugh at this proposal and promptly disregard it entirely. Unless it is found to be a sponsored Jr. High project, then it would be noble for the committee to reach out with a letter of appreciation for the child's interest in law and the legal system.

Submitted By
Maribeth Rogers
Submitted On
10/17/2017 9:48:42 PM
Affiliation

Proposition 64: Strongly Against

This proposal is ludicrous. The suggested regulations the Wild Sheep Foundation wishes to burden Alaska sheep and goat owners with are absurd. This proposition was based off data obtained from a study in the lower 48, focusing on bighorn sheep which has little to no relation to Alaska farming practices or dall sheep populations and concerns a disease that is rarely found in domestic goats and sheep. Alaska farmers already face a great number of challenges from the expense of obtaining new stock to making a living in a harsh environment, without facing additional burdens of unspecified new tests, unrevealed permit costs and penalties and unrealistic demands of double fences of unspecified height and material if their land falls within the range of a semi-migratory animal who notably avoids human contact. We live in troubled and uncertain times and it behooves Alaska to encourage more in state food production of sustainable and environmentally friendly livestock instead of imposing expensive, intrusive and violating regulations on owners of legal domestic animals. Alaska farmers choose to stay in Alaska because they love the state, including the wildlife and most are more than willing to take reasonable precautions to protect both the wildlife from domestic animal diseases and vice versa. The caveat is they must be reasonable expectations for obvious problems, affordable for already strained budgets and must not violate private property rights. The WSF fails to take any of these necessities into account with their ridiculous demands. Unlike Alaska farmers and homesteaders, these demands come from an outside interest group with no invested equity in the state or its people, only the concern of appeasing sporting financiers under the guise of conservation. It is troubling that this proposition was even made, let alone filed again for a second year in a row. The WSF claimed last year to have a desire to work with farmers to protect our wild sheep populations; however they have returned and presented the exact same position Alaska farmers expressed great uneasiness over last year, without any attempt to address the agricultural community's concerns or to work in coalition with them. That is a rather unsettling glimpse into the intentions of the WSF and their Alaska chapter. I hope our Wildlife department has the good judgement to disregard this asinine agenda to suppress the Alaskan agricultural industry.

Submitted By
Martin & Tamra Rosendahl
Submitted On
9/1/2017 8:39:40 PM
Affiliation
Select

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2561 E Hiawatha Dr
Wasilla, Alaska 99654

To Whom It May Concern: We are proud goat owners in Alaska. We have them as pets as well as breed them and milk them. Needless to say we love them as those that love their dogs and cats. Yearly, we have them tested for CAE, CL, & Johnnes. We are very concerned for this prop 64 that is trying to be passed. First off we are not in the lower 48 and these diseases that the WSF is concerned about has not been in Alaska or Canada. Most all of sheep & goat owners aren't even close to the Dall Sheep habitats. If this were to passhow will our local families/children learn in 4H about the wonderful creatures in their own backyards. The barn at the fair is full of excited people young and old as they pet and play with the lambs, sheep, & goats. Please don't allow this to pass. Put yourself in our shoes. What if someone told you that you would have to get rid of your pets that you care for. They aren't just livestock to most of us goat owners they bring us and our children much joy as eell as responsibility for God's creatures. Thank you for taking the time to read this comment. Sincerely, Martin & Tamra Rosendahl

Submitted By
Morgan Ross
Submitted On
10/27/2017 3:36:36 AM
Affiliation

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NO ON PROP 64

Submitted By
Teena M Ross
Submitted On
10/27/2017 11:16:49 AM
Affiliation

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The state game board should not have a say in privately owned livestock.

Submitted By
Caroline and Tim Roy
Submitted On
10/27/2017 12:10:29 PM
Affiliation

Phone
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PO Box 3606
Palmer, Alaska 99645

Dear Board of Game,

I, my husband and my daughters are opposed to Proposition 64. 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 owners, families involved in goat and sheep 4-H programs, and small farm owners to own goats or sheep. If passed, Proposal 64 would require us to obtain permits from the Department of Fish and Game to own goats who have been family members for decades. In addition, it already costs money to maintain our fencing for our goat's protection. The added expense of double fencing including annual maintenance would already place a burden on our small family hobby farm. Finally, the costs of testing including supplies, proper packaging, shipping, and analysis costs would add even more costs to the small farm owner or 4-H family. The testing costs would skyrocket if 4-H families or small farm owners have to rely of livestock veterinarians if they cannot do this testing themselves.

These requirements would place a severe economic burden on existing owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on flawed logic. As it is, we cannot sell goat and/or sheep milk or meat as there is no money for State programs to inspect small farms.

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. My goats are located many, many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, mountains, highways, towns and subdivisions.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to thinhorn sheep in the wild, including both Dall sheep and Stone sheep. With this in mind, the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the "Clean List" will do nothing to benefit the wild populations.

In a preliminary grant-funded study in 2017, 334 domestic sheep and goats in Alaska were tested for Mycoplasma Ovipneumoniae (M. ovi). Of that number less than 2% (a total of six animals including four sheep and two goats) tested positive. Enacting sweeping regulations such as Prop 64 is not the way to mitigate such a negligible risk.

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. My children participated in both 4-H and Future Farmers of America programs with their sheep and goats. Goats like Fluff-a-muffin, Pebbles, and Honey McFatty and sheep like Ebony, Ivory and Moo-Cow have been at the Fair, competed, and are regulars along with their babies in the petting zoo. In addition, they have been used in fiber, milking and cheese making demonstrations at the fair, during AG in the Classroom projects, and during Ag Day at the Cooperative Extension Service in Palmer. My kids benefited from all their hard work when they were awarded various scholarships from FFA, Ag in the Classroom, 4-H livestock committee, and 4-H Voluntary Leaders Association's scholarship all because they were able to raise, show, market, and produce products from our sheep and goats. All this was accomplished at our expense. I can't imagine placing even more of a burden on such hard working families.

Therefore, I ask you to not pass Proposal 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Respectfully,

Caroline and Tim Roy

Submitted By
Jill Rushing
Submitted On
10/27/2017 4:59:18 PM
Affiliation

I oppose prop 64 - please take no action!!

Submitted By
Raymond Russell
Submitted On
10/27/2017 9:09:22 AM
Affiliation

As a resident of Alaska and small farm owner and hunter. There is no reason to limit Alaskan's ownership of sheep or goats ect. Alaskas livestock are fenced and do not comingle with wild sheep or goats. Additionally please bind these outside groups from bringing this up again. There agenda has no place in Alaska.

Submitted By
Sara Russell
Submitted On
10/25/2017 2:05:21 PM
Affiliation
Mrs.

Alaska already has laws requiring domestic animals to be tied or fenced in, there is no large free grazing herds in the state, there is no scientific data showing significant risk of wild sheep populations from domestic animals. Trying to force regulations on what animals people can raise for food on their own private property in a state that has problems with food security will only end badly on both sides. Allowing out of state entity's to force their agenda on a state as diverse as Alaska is not a wise decision.

Submitted By
Daphni Ryan
Submitted On
9/5/2017 11:10:58 AM
Affiliation

I agree with maintaining a disease free herd, although I don't like the idea of anything being mandatory. I don't like the idea of having to have an "approved" enclosure and I REALLY don't like the idea of having to get a permit just to own goats and sheep. The worst thing about this is that it says right in the prop that this is only the beginning of regulations! We don't need more regulations! And where is the evidence that there are any domestic diseases that are affecting any wild populations. I'm not saying there aren't any, but I really don't think this is as much of a threat as they think it is/will be. Think about what this prop would do to thousands of small farmers/homesteaders around the state that depend on their animals for their survival. Think of all the 4H kids that are working so hard. They learn so much by taking responsibility for livestock and they can't get that kind of education anywhere else. If passed, this prop would stifle so many. This great land is built on people being able to support themselves and their families and being able to learn and grow in this way is a part of being Alaskan! Alaska is a homesteading state and sheep and goats play a very vital role in that lifestyle. This prop shouldn't be tabled again, it needs to be eradicated!

Submitted By
Kasey Ryan
Submitted On
9/11/2017 10:40:35 AM
Affiliation

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If this proposal passes, all those who have goats or sheep now who could not afford to keep them any longer, would have to either sell or dispose of them. With so many people selling animals and hardly any to buy, most would have to be put down and buried. Most of the diseases that goats and sheep have that can be passed to the wild population of sheep can still be passed on through the ground and the animal's feces.

Domestic goats and sheep within 15 air miles of a Dall sheep herd includes nearly EVERY farm. This would take away everyone's right to own these animals. I understand the concern for wildlife, but if made a law, this would take away much of our freedom in teaching the generations to farm. Farming isn't about permits, the number of miles away from a sheep herd and many many papers and regulations, it's about raising kids to know how to really work. The effects of domestic goats and sheep on the wild population of Dall sheep is not significant enough to take away the knowledge we gain from our freedom to farm on our own lands.

Furthermore, in the event of a fiscal crises, who would pay for people to travel and enforce these laws? It would be unwise to spend tight money on travel (Goat and sheep owners are spread all through Alaska!) and other finances attached to this proposition in such a perilous time.

Not only do goats and sheep have diseases that can be spread to wildlife, but so do cows and llamas. Would this law then come to eventually put regulations on them as well? Many people would lose farms that they have had for years. Alaska is a place where we can raise our herds without worry and where we can be free to do what we feel is best for our families. Please keep it that way.

Submitted By
Shawn Ryan
Submitted On
10/27/2017 8:08:18 AM
Affiliation

Prop 64 is WRONG and needs to be thrown away! Alaska is a farming and homesteading state and taking away a person's freedom to FREELY own sheep and goats should not happen! There are much bigger issues that need to be addressed here in Alaska! And in this fiscal crisis how would something like prop 64 be enforced? The people in Alaska live far and wide, often only accessible by plane and/or atv. A new special unit would have to be employed and transportation costs would quickly skyrocket for an official to actually come visit a small farm in order to enforce this egregious law. We have more important places to spend our resources and money!

This prop would take away the basic freedoms of the small scale farmer. Local people who are just trying to do what they love. Requiring a permit and other "hoops" to jump through would make it financially difficult and possibly even impossible to do something that makes them happy. And think about all the 4H kids. They learn so much in raising these animals. It teaches them life skills, responsibility, accountability, the need for and ability to work hard, and selflessness (have you ever gone outside 2-3 times a day to feed and water and care for animals when it's -20 and the wind is blowing, everyday for an entire Alaskan winter? That will teach anyone a lot!) Do we really want to punish our children who are doing something good with their lives? The answer is NO! Raising these animals is so important for so many! Why would you take away something that is helping the next generation to be better, more able and capable adults? These kids aren't hanging out on the streets or causing chaos. They're not involved in drugs or anything illegal and taking this opportunity away could have serious consequences for so many!

In short, Prop 64 would do a whole lot more damage than good. These examples are just a few of the negative consequences of this idea. Our state of Alaska is proud to be a state of freedoms, not overreaching laws. People move here to live out their life dreams, not be stifled by government. Please drop any and all ideas that regulate Alaskans ability to do good and be self sufficient, which is what this Prop would do if it were made law. I say a resounding NO to Prop 64!!!

Submitted By
Rebecca Sabroski
Submitted On
10/27/2017 3:52:59 AM
Affiliation
Interested citizen

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Take no action on Prop. 64. Alaska farm goats and sheep do not mix with wild varieties. All livestock are fenced. Please take no action on prop, 64.

Submitted By
Cayla Salyers
Submitted On
10/26/2017 8:45:14 PM
Affiliation

I oppose prop 64. Removing goats from the Clean List will tear goats away from people who depend on them to build their livelihood

Submitted By
Amber Schlesinger
Submitted On
10/26/2017 3:50:42 PM
Affiliation

I am writing to express my opposition to proposition 64. I am a lifelong resident of Fairbanks, and I want to share my positive experience and interactions with goats. Livestock animals have played An important role in my life and in the lives of the young people that i support. Having access to educational experiences with live animals was an important part of my childhood. I learned about sustainable food options, economic development and animal husbandry. I enjoy the opportunity to share thins knowledge children at this time. Please take this information into consideration and oppose prop 64.

Submitted By
Jennifer Schmetzer
Submitted On
10/26/2017 5:04:11 PM
Affiliation

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2860 Waldheim Drive
Fairbanks, Alaska 99709

I disagree with plans to disallow domestic goats and sheep in Alaska. Our state is filled with small rural farms. Many of these farms have goats and sheep. Many are small businesses that were formed around soaps, cheeses, milk, meat from goats and sheep. I understand there is concern with domestic diseases impacting dall sheep populations. I think there are better ways to ensure we protect wild populations than outlawing domestic populations. We need to find a balance. We bed to protect our citizens rights. Thank you for your consideration.

Submitted By
Sandra Shacklett
Submitted On
10/16/2017 10:13:33 PM
Affiliation
None

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4311 E Crane Rd
Wasilla , Alaska 99654

The banning of sheep and goats from Alaska based on information solely reliant on studies done in the Lower 48 is ludicrous. These animals are used for meat, wool, and pets. As 4-H projects, they teach children about responsibility, respect and where are food comes from. As pets they provide mental health support, companionship and give their owners a sense of purpose. And as most of you know, Alaska has a limited food supply at any given time. Goats and sheep, as livestock provide a meat source and milk supply. For some adults and babies with some allergy or dairy intolerance, goats milk provides a healthy alternative. Why any Alaskan would base such a wide ranging and negative impact to the sheep and goat populations in Alaska based on NO ALASKAN based information would do a great disservice to the entire Alaskan community. What's next? Banning cats and dogs? I've been told they may carry a myriad of diseases.

Submitted By
Leisl Shagen
Submitted On
10/21/2017 1:56:33 PM
Affiliation

Phone
907-715-2437
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2548 N Dana CT
Wasilla , Alaska 99623

Board of Game,

I'm writing in response to Prop 64 (formally Prop 90). Once again I urge you to not pass Prop 64! This will have a devastating effect on the Alaska farming/ livestock community. There is no research proving that the m ovi virus is even present here in Alaska. We are not a free grazing state & the chances of any domestic goat or sheep coming into contact with the wild population is none. We have already banned pack goats which would have been the only way in which there might have been contact. The way Prop 64 is written it would make it almost impossible for anyone to own goats or sheep. Also, delisting would make it illegal to even own them, so how would that work???? This Prop needs to go away all together!

My animals are confined on my property and never leave. They have their own enclosure & I have electric fencing on the perimeter of my property. I have a better chance of winning the lottery than my goats have coming in contact with the wild population. While my goats are just pets, they ARE a part of my family. Many people depend on them for food, milk or fiber. Prop 64 would take away many Alaskans ability to provide food for their families.

I BEG you to vote "NO" on Prop 64!

Sincerely,

Leisl Shagen

Submitted By
Nina Shaw
Submitted On
10/26/2017 10:55:46 PM
Affiliation

Take no action on prop 64!

Submitted By
April Shepherd
Submitted On
10/27/2017 8:24:54 AM
Affiliation

Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art. The people of Alaska depend on being able to sustain the lifestyle that was enjoyed by our original founders. There are no free roaming herds near the wildlife being used to take away the rights of a free society.

Submitted By
Elizabeth Siegel
Submitted On
10/26/2017 8:40:36 PM
Affiliation

I am writing to voice my opposition to the Board of Game's Proposal 64, previously known as Proposal 90. At this time, the State has shown no evidence that domestic sheep and goats are a substantial risk to wild sheep, or that they should be removed from the "clean list." Furthermore, the State has no immediate and compelling interest in implementing additional regulations for sheep and goat owners whose livelihoods are at stake. Studies show that the vast majority of domestic sheep and goats will never have contact with wild sheep, given in large measure to the mountainous habitat of the latter. Moreover, less than 2% of domestic sheep and goats tested positive for the M ovi virus that is at issue. Domestic sheep and goats have been in Alaska in large numbers for more than 50 years, with no provable impact on the Dall sheep population. Finally, as near as I can tell from the information on the ADF&G website, one of the primary presentations relied upon by the Dall sheep working group was done by the Nevada Department of Wildlife, based on studies done in the Lower 48. I believe it's always suspect when we use Outside data and apply it to Alaskan reality. With the implementation of Proposal 64, what the State actually puts at risk is the livelihoods of many Alaska farmers. It's no secret that the economy of Alaska is growing ever more tenuous, with declining oil revenues and talk of income taxes – dipping into savings just to pay the bills. We have a great need to diversify our economy, and it seems to me that the government has its most compelling interest in encouraging and supporting small businesses, not in regulating them into bankruptcy. My friends own a farm within the radius (15 air miles from Dall sheep habitat) for which the proposed regulations would require fencing and permitting and other cost-prohibitive actions. In addition to raising pigs and chickens, they have ducks, turkeys, and goats – and are looking into obtaining other animals in the near future as they pursue their dream of having a working farm. They make goat cheese and goat milk soap as part of their farming enterprise. They're just getting their farm off the ground, and after 2 years of hard work raising animals and building a demand for their products, are finally looking at being able to turn a profit. Adding more costs to their enterprise – if not prohibiting them from owning goats at all – would devastate their business. Again, there is no compelling interest for the State to regulate those who keep domestic sheep and goats. This is a solution looking for a problem, and the very definition of government over-reach.

Submitted By
Maia Siegel
Submitted On
10/27/2017 11:39:53 PM
Affiliation
4-H, FFA, Farmer

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4960 E Pine St
Wasilla, Alaska 99654

I am EXTREMELY opposed to Prop 64. This proposal would make it illegal (and thus impossible) to raise sheep or goats in Alaska. Goats and sheep are vital to the agriculture industry, without them our already practically nonexistent food-security would be crippled. We are constantly at the edge of starvation and disaster in Alaska. The agricultural industry and local foods movements are FINALLY seeing growth and interest, and support, from the local community in the last few years. Feeding the residents of this state is a difficult enough task, to do so without small ruminants (domestic sheep and goats) would be extremely difficult, if not impossible. Contrary to what proponents of this Proposition have said, it is NOT possible to warrant permits to animals that are not on the "clean-list," making the possesion of a domestic sheep or goat an illegal activity. THUS, we would be forced to rely on cattle, swine, and poulty for the production af any animal-based products. But for many Alaskan agriculturalists and backyard hobby farmers, cattle are simply too large and too expensive to raise and house in most cases. Swine can be destructive and difficult to manage, and rely almost exclusively on grain-based diets and supplements. Poultry can be, and are, raised by many Alaskans, but poultry cannot be milked, and do not provide the same versatality of products that livestock offer (leather, lard, etc.) Goats and sheep offer the ideal combination of traits for many people. First, their smaller size and generally more tractable nature makes them excellent choices for anyone wanting to just start out with the raising of livestock. Second, they are very adaptable in feeding and management styles, and can be found well cared for on any sized or style of farm. Third, they require less feed and less infrastructure than either swine or cattle, making them a more economical animal to raise. Fourth, due in large part to the aforementioned benefits, goats and sheep are often the first livestock project a 4-H member tries their hand at. If Prop 64 were to pass, the 4-H program statewide would take a severe hit. Imagine, if you will, the Alaska State Fair and Tanana Valley Fair. Imagine the livestock barns and show arenas- completely empty and void. The smiling youth telling wide-eyed fairgoers about their precious project animals would simply cease to exist. We cry, as a nation, about the youth- millenials and teens and kids that are irresponsible, that do not care, that do not understand the world... but we turn around and attempt to take away opportunities like 4-H and FFA projects. Opportunities that help kids develop work ethics, public speaking skills, people skills, soft skills, responsibilty, financial skills, long-term and short-term planning, goal setting, accountability, and so much more. The skills learned from raising animals in 4-H and FFA are traits that cannot be learned elsewhere, and to learn them at young age is a blessing that pays dividends throughout their lives. I know firsthand the value of 4-H, I've raised goats for many years as a 4-H and FFA project in middle and high school. My experiences in 4-H changed, and saved, my life. Before I joined 4-H, I could not make a phone call, could not answer the front door, I did not leave the house, I barely spoke, did not care about my appearance, or about how others perceived me, and had no clear goals or vision for my future whatsoever. I was severely depressed, had extreme anxiety, and was self-harming. I joined 4-H in middle school, essentially against my will. Somehow, despite everything else in my life, I had a soft spot for animals. And when Dad agreed that I could get "a goat or two," I took it upon myself to read every single book I could find about them. I memorized pages and diagrams; everything from nutrient contents of pastures, to assisting with the birth of kids (baby goats), ideal ventilation in barns, lactation curves of the 7 most popular dairy goat breeds, mineral requirements of goats by age, stage of production, and season, the carcass yields of different breeds and ages of goats, breed standards, milking parlour plans, etc. etc. etc. If goats were even mentioned, I read it and memorized it. Eventually, Dad and Mom agreed that I had studied enough, and we set out to build a barn and purchase our first goats. We settled upon 3 Nigerian Dwarves (a breed of dairy goat that stays smaller than most dogs). I absolutely fell in love with those goats. My 3 sisters and I would take the goats on walks and jogs around the neighborhood as if they were just dogs. (Those goats walked on a leash better than most dogs, I might add.) Of course, my life didn't turn around completely. I was still drowning in depression, and usually completely out of touch with other people. But I would still wake up and walk my goats several times a week. We were only supposed to have 3 goats, and they were to be just pets, per Dad's orders. But my 14th birthday found us adding 2 more goats to the herd. And a few months later someone gifted us a pair of pygmy goats. We took all 7 goats to the Alaska State Fair, where we learned how to show goats by the seat of our pants. That year, at 14, I met about 20 other 4-H members. However, I did not consider a single one of them a friend at the time: I was just there to show goats, and be as unnoticed as possible. Over the course of the next year, I bought a few more goats, and we had the first goat kids born on our farm that spring. I was still extremely depressed, and I wouldn't look someone in the eyes, ever. However, I had taken to talking to people, as long as it was about goats and nothing else. By the following fair year (at 15) I had 9 or so goats that we brought to show as a family (at this point 5 of us 6 kids were in 4-H; the youngest was still too young). I found, by the end of the shows, that I actually had a lot in common with the other 4-H'ers. They liked their goats and sheep a lot, they were smart, they were nice, and they didn't seem to care that I was hiding myself and extremely quiet. I wanted to get to know them, and wanted to have friends for the first time in a long while. I joined FFA, the Livestock Judging Team, and the 4-H Teen Club: rapidly getting as involved in 4-H as I could. I started braiding my hair, dressing nicer, and talked to people about subjects other than goats, every once in awhile. My high school years rapidly exploded. I won the Job Interview competition at the Alaska State FFA Convention, going on to compete in the national competition at the National FFA Convention that fall (at the age of 16). Our livestock judging team took top honors 2 years running; competing in events such as prepared and extemp speaking, a judging event, a quiz bowl event, and a written test (complete with breed identification, a team problem, a math problem, and written livestock scenarios) I'd

also begun my first official job; working at the vet clinic, in order to pay for feed and equipment I needed for the growing goat flock At the end of my Junior year, I was elected as a state officer of the Alaska FFA Association- a position that meant my teammates and I would be writing workshops and speeches which we would then deliver to schools and FFA chapters across the state. We flew to Oregon and Washington DC for training, and then back to the National FFA Convention to represent Alaska as delegates. I graduated high school with a 3.96, received the UA Honors Scholarship, as well as the Alaska Performance Scholarship. I was re-elected to state FFA office, and spent the year balancing travel across the state and country with a full course load through UAF, a part-time job, and a flock of goats that were kidding and needing milked quite regularly. Fast forward another 18 months, and I've completely turned my life around from middle school. I've gone several months without self-harming or being overwhelmed with anxiety. Depression is much more manageable. And, I'm halfway through my third college semester; earning good grades, and working 2 part-time jobs. I'm in a stable relationship with a guy I met because of 4-H (back when I was 14) (he raised lambs in 4-H, and served as an FFA state officer as well; he's currently in Marine Basic Training in San Diego). And I'm still raising goats today! If I hadn't gotten involved with 4-H and raising goats 6 years ago, I cannot confidently say that I would be who I am today, let alone that I would still be here.

All of that background is to say this: Prop 64 is not just a threat to the legality of domestic sheep and goats, it brings a much larger impact to the entire state. Prop 64 not only challenges the livelihood of farmers and livestock producers state-wide, it threatens our very way of life. It kills opportunities for youth to learn important life skills. It threatens the food security of the entire state. It creates fear and conflict for anyone involved in agriculture or livestock in any way. And who knows how many other people could have stories like mine? Beyond just the lacking facts, questionable examples, and overall overreach "shoot first ask questions later" attitude of this proposition, there are actual people whose entire lives will be changed for the worse because of this proposition. I urge you to VOTE NO ON PROP 64.

I'm more than happy to chat about my experiences with 4H and FFA, explain my opinion further, and share what I've learned from raising goats. If you have any questions at all, feel free to get ahold of me.

Submitted By
Debra Smith
Submitted On
10/22/2017 10:22:38 AM
Affiliation

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907 244-1706
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Anch, Alaska 99507

Please do not make it impossible for those of us who choose to keep goats and sheep.

Submitted By
Michelle Smith
Submitted On
10/8/2017 1:47:52 PM
Affiliation

As an advocate for ALL forms of local food, any proposition restricting the effort to produce food locally is not in the best interest for the State of Alaska. Growing our food industry is VITAL for the sustainability of our Great State. In the last year alone, the market has grown by leaps and bounds. You can now find more locally grown food in our grocery stores than ever before.

With the growth in domestic livestock production, we lessen the pressure on wildlife as a food source and build our economy from the ground up.

Lets not overreact to a change in a wildlife population we have no control over. It would be ignorant to restrict local industry without a concrete, local evidence of a threat to our wild population of sheep and goats.

Submitted By
Somer Snider
Submitted On
10/8/2017 12:48:28 PM
Affiliation

I oppose the proposition to restrict domestic livestock production

Submitted By
Darren Snyder
Submitted On
10/26/2017 5:07:12 PM
Affiliation

I oppose Propostiion 64 and recommend having the State Vet assess the actual risk before implementing the action steps indicated in Prop 64.

Submitted By
Jerry Soplanda
Submitted On
10/26/2017 4:54:12 PM
Affiliation
Former Farmer / AK resident

I am commenting on Proposition 64, banning domestic sheep and goats in AK. I ask that you do not ban resident's ability to keep domesticated sheep or goats. There is no tangible evidence that there is any harm being done to the animals or to humans. All this, while other lives are being enhanced by the experience of raising animals and feeding their families and friends.

1. I can understand keeping wild species from becoming herd animals for preservation of lifestyles, environment, and future generation's enjoyment; but I cannot understand why you are concerned with keeping common herd (domesticated) animals from the residents of AK. As far as I can tell, they cause no harm to wild populations, do not interbreed with undomesticated similar species, nor do they cause disease to spread amongst humans or animals.

2. As a child and young adult, I was raised and worked on a farm with herd animals and I can tell you that offering a child that kind of start has more benefits than you may realize. An appreciation for other beings, instilling a sense of stewardship, and in the end - acknowledging the cycle of life.

3. If someone is offended by the presence of a small group of goats/sheep/or other herd animal, perhaps those folks should check their sensitivities and eat their bacon cheese burgers with a better understanding of how the real world works.

4. I have not read anything in the papers / online, or seen anything on TV (although I rarely watch) where there has been an outbreak of pestilence or any other similar matter.

5. If you want to apply some common sense to the management of animals in AK - please start by addressing the illogic of allowing folks to hunt female moose...

Thank you for your time and considerations

Jerry Soplanda

Submitted By
Awbrey Sottosanti
Submitted On
10/27/2017 5:32:11 AM
Affiliation

Please allow the goats to remain

Submitted By
Prissy stephens
Submitted On
10/8/2017 1:03:46 PM
Affiliation

Phone
907-376-4496
Email
Prissystephens841@hotmail.com
Address
2100 north spruce drive
Wasilla , Alaska 99654

"I oppose the proposition to restrict domestic livestock production"

No on prop 64

Submitted By
Kristin Steward
Submitted On
10/26/2017 11:26:53 PM
Affiliation

I oppose Prop 64!

It is irrational, unnecessary, and will negatively affect my family and hundreds of families throughout the Mat-Su Valley who used goats and sheep to provide for our families. The wild goat and sheep population is not affected by domestic sheep and goats.

I oppose Prop 64!

Submitted By
LS
Submitted On
10/26/2017 11:53:40 PM
Affiliation

Please take no action on Prop 64. This prop would negatively impact many in Alaska.

Submitted By
Andrea Stott
Submitted On
10/26/2017 9:37:12 PM
Affiliation

Please take no action on Prop 64. I know many responsible sheep/goat owners in the Matsu Valley, believe there is no concern for the wildlife population in connection with these basically domestic animals. Please don't lump is in with issues of the lower 48 states. Your consideration is appreciated.

Submitted By
Glori Strickler
Submitted On
10/26/2017 9:33:00 PM
Affiliation
None

Take no action prop 64

Submitted By
Michelle Sturgeon
Submitted On
10/26/2017 11:36:54 PM
Affiliation

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189 E Nelson ave PMB201
WASILLA, Alaska 99654

Please vote NO! on Prop 64 as an agricultural supporter and a fellow goat owner the effect of this proposition is unquantifiable. Without a case or scientific proof that this virus or bacteria has ever been present in Alaska, this seems like an overreach that does not need to happen.

Submitted By
Mike sunderland
Submitted On
10/27/2017 6:13:07 AM
Affiliation
Resident

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P.o. box 3325
Palmer, Alaska 99645

Voting against proposition 64, live on a farm and enjoy owning goats, sheep, and pics

Submitted By
Mary Diane Suter
Submitted On
10/26/2017 4:12:03 PM
Affiliation

Phone
9076883106
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suterm@gci.net
Address
PO Box 670144
Chugiak, Alaska 99567

Please vote no on prop 64.

Submitted By
Mandy sutton
Submitted On
10/27/2017 12:36:00 AM
Affiliation

The action of prop 64 to Alaska is not only The sky is falling move but harmful to the many folks that rely on goats for their many benefits ie milk for the kids that can't have cows milk this prop is absurd in Alaska

Submitted By
Michelle Swan
Submitted On
10/27/2017 3:08:02 PM
Affiliation

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m_shelly123@hotmail.com
Address
1070 N. Helen Ln
Wasilla, Alaska 99654

I oppose proposition 64, this is unnecessary. People survive off of their animals!

Submitted By
Kim Swisher
Submitted On
10/27/2017 8:47:08 PM
Affiliation

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907-322-6589
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Fairbanks, Alaska 99709

I oppose proposition 64

Submitted By
Carol Symonds
Submitted On
10/27/2017 5:55:52 PM
Affiliation

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ewetopia@gci.net
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PO Box 2254
Palmer, Alaska 99645

I opposeProp 64. Sheep and goats are extremely unlikely to mingle with wild sheep. Sheep in Alaska are always fenced or they would quickly become a meal for predators. Please do not take farms livelihood away by not allowing them to keep sheep.

Submitted By
Todd Talladay
Submitted On
10/26/2017 2:03:02 PM
Affiliation

If Fish & Game is trying to protect wild Sheep and goats this is not the way to go about it. We live in Alaska because we enjoy the freedom from the over-governed areas in the lower 48. Trying to outlaw livestock that hundreds of people use as their livelihood goes against everything we stand for in Alaska. Fish & Game needs to work with the people of the state not against them and their livelihood. Disease comes in many ways to include the wind and birds that migrate every year. If this kind of law was allowed to pass next thing they would outlaw cows, horse, dogs and cats. I am VERY disappointed in our Fish & Game representatives that they would even consider such legislation. They need to be replaced by personnel who are in tune with Alaska and what the people want.

Submitted By
Dianna Taplin
Submitted On
10/26/2017 11:23:18 AM
Affiliation

Phone
907 252-2249
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dtaplin@alaska.net
Address
Box 1567
Soldotna, Alaska 99669

I oppose vehemently Prop 64. There is very little contact between wild and domestic sheep and goatd, thus miniscule chance of infection. The bigger objection is taking domestic and traditional livestock off the clean list. Farming for food, children learning to care for livestock, develop respect and work ethic, preservation of a lifestyle, and any other reason people have traditionally kept animals should not be restrictedfor such a commervially driven special interest group. In addition, the government seems to be on ine hand telling us to buy local, dupport local food production, but that would be impossible if the government then restrictec a large segment of livestock This is a country of the people, by the people and for the people i,as one of the prople, implore the board to reject Prop 64. As a secondary consequence, businesses will lose when goat and sheep farmers no longer need geed or supplies. I support people who farm, businesses, people who enrich their lives with ruminant snimals i stronglr reject Prop 64.

Submitted By
Brittany Templeton
Submitted On
10/27/2017 10:35:05 AM
Affiliation

There is no evidence supporting that the proposed regulation will assist with disease prevention in dall sheep habitat. If preventative measures are to be taken against the spread of disease, evidence should be available that supports that this issue is actually a problem in Alaska and that the regulation will address the problem. Until such time that there is scientific evidence that supports the permitting system, this regulation is unnecessary.

Submitted By
Terri Terreault
Submitted On
10/27/2017 6:39:22 AM
Affiliation

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Take no action on Proposition 64.

Submitted By
Jessica Throckmorton
Submitted On
10/27/2017 9:24:20 PM
Affiliation

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Address
830 E. Schwald Rd.
Wasilla , Alaska 99654

As an owner of goats that subsist off of the benefits of milking and raising caprine. We would be devastated greatly if this would be forced to end. These are our domestic pets used for dual purpose. I highly opposed proposition 90 as it would be grievous to our family. THANKS

Submitted By
Ingrid Tierese
Submitted On
10/26/2017 11:18:30 PM
Affiliation

I'm asking you TAKE NO ACTION on Prop 64.

Submitted By
Ian Tompkins
Submitted On
10/17/2017 4:25:47 PM
Affiliation

Phone
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Address
1661 N Charlene St
Wasilla, Alaska 99623

I would ask that the Board carefully consider the ramifications of Proposal 64. Removing domesticated sheep and goats from the state's clean list would personally impact a significant portion of my livelihood. At the very least I would ask that the board withhold judgment until the alleged threat that domestic sheep and goats pose to wild Dall Sheep has been thoroughly studied.

Submitted By
Chauntel Troyer
Submitted On
10/26/2017 9:17:04 PM
Affiliation

I strongly feel that our state needs to be as self reliant as possible. With no know cases of disease transferring to wild animal populations, there seems to be very little risk to our native animals. Let Alaskans keep their livestock and livelihood.

Submitted By
Donna Truett
Submitted On
10/27/2017 1:19:11 PM
Affiliation

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907-795-0796
Email
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Address
PO box 877352
Wasilla, Alaska 99687

I oppose prop 64.

Submitted By
DesArae Turco
Submitted On
10/27/2017 12:54:56 PM
Affiliation

TAKE NO ACTION on Prop. 64. Goats and sheep are a huge part of Alaska's agriculture.

Submitted By
Charisha Uhrmacher
Submitted On
10/17/2017 6:00:26 PM
Affiliation
Private goat owner

The local Chapter of the Wild Sheep Foundation has proposed once again to the Alaska Board of Game to remove domestic sheep and goats from the clean list – along with other ridiculous proposed regulations to the ownership of domestic sheep and goats in the State of Alaska. The only thing the BOG has the authority to do is remove domestics from the clean list. Regulation of domestic sheep & goats would fall under the office of the State Veterinarian, ADEC. If the BOG should pass Prop 64 domestic goats and sheep would be illegal to own in the State of Alaska. No permits are issued for animals not on the clean list. No importation of new bloodlines or export of family pets are allowed on delisted animals. No more 4H sheep & goats at the Fair. Animals not on the clean list cannot be processed at the USDA meat plant. If a particular mammal, bird, or reptile species does not appear on the "clean list", it may not be imported into Alaska or possessed as a pet or livestock in Alaska, and the Department of Fish and Game cannot issue a permit allowing its importation or possession. Domestic sheep and goats would basically be illegal to own in the State of Alaska.

The foundation for Prop 64 by the WSF is to prevent the possible transfer of a bacterium, Mycoplasma ovipneumoniae (M.ovi), to the wild Dall sheep population. M.ovi has been associated with pneumonia outbreaks in Big Horn sheep in the lower 48. There have been no Dall sheep deaths due to M.ovi in the state of Alaska cause by domestics. All of the current information and studies have been on Big Horn sheep in the lower 48. No studies have been completed on Thin Horn sheep, (Dall sheep) susceptibility to the bacterium in the State of Alaska.

To date – NOT ONE Dall sheep has died from this bacterium being spread to wild Dalls from domestics that have been in Alaska in great numbers since the 1960's. But in fact, every year Dall sheep hunters harvest anywhere from 500 to 1000 Dall sheep. Last year 788 Dall sheep were listed as harvested on the ADFG website. Jeff and I are hunters, we are not opposed to hunting, but what we are opposed to is a special interest hunting group who wants to kill trophy animals trying to infringe on our lifestyle without true due cause of risk to the Dall sheep population as exhibited by history in our State.

Alaska is very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in state, meaning all animals are to be fenced on your property at all times. Alaska has many natural barriers (rivers, mountains, predators and highways) to help prevent wild Dall sheep & domestics from coming into contact. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. All the current information, and forced captive studies, has been done with Big Horn Sheep in the lower 48. The Alaska Department of Fish & Game has not done mapping of Dall sheep habitat to define areas of true concern. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment (to date only 6 domestics out of 334 have tested positive for M.ovi bacteria) and determine a risk versus regulation protocol, the current Proposal 64 should be shelved. The Wild Sheep Foundation is trying to restrict my personal rights, without due cause, to own domestic small ruminants on my own personal property. If you love seeing domestic goats and sheep at the Fair, if you enjoy a dairy herd share for raw milk, if you purchase local lamb or goat meat, if you spin fiber for art or warmth- please take the time to respectfully state your opinion and recommend that the Board of Game takes no action on Prop 64.

Please protect our right to enjoy our pets that provides love, enjoyment and nurturment to my family

Submitted By
Rachyl Van Horn
Submitted On
10/27/2017 6:22:59 AM
Affiliation

No on Prop 64.

Submitted By
Amber VanBuskirk
Submitted On
10/27/2017 10:38:30 AM
Affiliation

Phone
9078418878
Email
amberj@mtaonline.net
Address
PO Box 520131
Big Lake, Alaska 99652-0131

My name is Amber. I am a mother of four children, a wife, a teacher for the public school system, a small-scale family farmer and a life-long Alaskan. I am also adamently against Propositioin 64.

I was born and raised in Alaska with the idea that Alaska is the "Last Fronier". I have alsways taken that to meen that we Alaskas had the ability to do what we needed to do for ourselves and our families, within the law. I never thought that the law would try to take those abilities away.

The members in my family, myself included, have a series of severe food alergies. We have spent the past 5 years building up the ability to provide for ourselves foods that will not cause issues for us. This includes goats' milk.

Not only do we rely on our goats for milk as part of our diet, but we also cherish our small herd of four. The thought that our Great State of Alaska is trying to take them away from us not only freightens me, but it upsets me on a level beyond comprehension, especially with no clear forsight on what this proposition would actually meen for us. Alaska does not allow permits for animals not on the "clean" list. Does that meen that you will force us to slaughter our cherished pets/family members? Shame on you if that what this will leed to!

Submitted By
Jason Vink
Submitted On
10/3/2017 9:20:59 PM
Affiliation

I oppose prop 64. My family would not survive with out sheep and goats for meat. The chance of any sheep making good it through the wolves coyotes lynx and bears to get even remotely close to a fall sheep is slim to none. If this proposition is allowed to pass it would put my family in financial and physical harm.

Submitted By
Julie Volkheimer
Submitted On
10/27/2017 7:23:19 PM
Affiliation

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Po box 1189-349
Kotzebue, Alaska 99752

Take no action on Prop 64. This is wrong and will hurt a lot of small hobby farms who are providing a much needed niche in the Matsu Valley.

Thank you

Submitted By
Amber Vukich
Submitted On
10/9/2017 6:33:48 AM
Affiliation

This is concerning Prop 64 which would prohibit the farming of sheep and goats. In the proposal it is stated that it's BOG's constitutional responsibility to protect the wild sheep populations. My question to you is have you looked at the constitutional rights of property owners?

07 NOV PRIVATE PROPERTY RIGHTS DEFINED

Posted at 15:27h in Latest Articles, Property Rights by Tom DeWeese

As the battle to stop Sustainable Development grows, it is important that activists have clear definitions of their points as they deal with elected officials and planners who are making policy in their community. Below is a start in defining private property rights.

In a "Fifth Amendment" treatise by Washington State Supreme Court Justice Richard B. Sanders (12/10/97), he writes: Our state, and most other states, define property in an extremely broad sense." That definition is as follows:

"Property in a thing consists not merely in its ownership an possession, but in the unrestricte right of use, enjoyment, an isposal. Anything which estroys any of the elements of property, to that extent, estroys the property itself. The substantial value of property lies in its use. If the right of use be enie , the value of the property is annihilate an ownership is ren ere a barren right."

As a Founding Father, John Adams said:

"The moment the i ea is a mitte into society that property is not as sacre as the lawof Go , an that there is not a force of lawan public justice to protect it, anarchy an tyranny commence."

President Calvin Coolidge said:

"Ultimately, property rights an personal rights are the same thing."

Rancher and Property Rights Activist Wayne Hage said:

"If you on't have the right to own an control property then you are property."

PRIVATE PROPERTY RIGHTS MEAN:

1. The owner's exclusive authority to determine how private property is used;

2. The owner's peaceful possession, control, and enjoyment of his/her legally purchased, deeded private property;

3. The owner's ability to make contracts to sell, rent, or give away all or part of the legally purchased/deeded private property;

4. That local, city, county, state, and federal governments are prohibited from exercising eminent domain for the sole purpose of acquiring legally purchased/deeded private property so as to resell to a private interest or generate revenues;

5. That no local, city, county, state, or federal government has the authority to impose directives, ordinances, fees, or fines regarding aesthetic landscaping, color selections, tree and plant preservation, or open spaces on legally purchased/deeded private property;

6. That no local, city, county, state or federal government shall implement a land use plan that requires any part of legally purchased/ deeded private property be set aside for public use or for a Natural Resource Protection Area directing that no construction or disturbance may occur;

7. That no local, city, county, state, or federal government shall implement a law or ordinance restricting the number of dwellings

that may be placed on legally purchased/ deeded private property;

8. That no local, city, county, state, or federal government shall alter or impose zoning restrictions or regulations that will devalue or limit the ability to sell legally purchased/deeded private property;

9. That no local, city, county, state, or federal government shall limit profitable or productive agriculture activities by mandating and controlling what crops and livestock are grown on legally purchased/deeded private property;

10. That no local, city, county, state, or federal government representatives or their assigned agents may enter private property without the

written permission of the property owner or is in possession of a lawful warrant from a legitimate court of law. This includes invasion of property rights and privacy by government use of unmanned drone flights.

The exercise of police power over wildlife may not, of course, be done in such a manner as to infringe upon the Fedral rights of U.S. citizens.

Section 1 of the fourteenth amendment: **Section 1.** All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

The Fourteenth Amendment to the Constitution of the United States of America, Section 1 states:

"All persons born or naturalize in the Unite States, an subject to the juris iction thereof, are citizens of the Unite States an of the State wherein they resi e. ***No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law****; nor eny to any person within its juris iction the equal protection of the laws."*

Whereas the right to food protects the right of all human beings to be free from hunger, food insecurity and malnutrition, which is recognized in the Universal Declaration of Human Rights as part of the right to an adequate standard of living, article 25.

Whereas all domesticated animals (domitae naturae) are recognized as personal property with ownership rights and liabilities retained by the one(s) with a rightful claim to ownership, even when the animals have strayed from the owner's property. William Blackstone (1765-1769)

Therefore, any law or ordinance made or enforced by any State or Local Government which abridges the ability of any citizen of the United States to provide for themselves an adequate standard of living, or attempts to deprive any citizen of the United States of security in their food source, or of personal property where no Constitutional Law has been broken should be deemed Unconstitutional.

Thank you for your time,

Amber Vukich

Submitted By
Jessi W
Submitted On
10/8/2017 4:37:00 PM
Affiliation

I oppose the proposition to restrict domestic livestock production.

27 October 2017

Dear Board of Game members:

When prop 90 (now prop 64) came out the agriculture community argued the drastic measures were unnecessary due to the low risk of contact, based on the facts that we have low numbers of domestic sheep and goats, we're a fence in state and Alaska has no grazing leases for sheep or goats on public lands. Now that we are getting results back from the voluntary testing program, and getting more Alaska specific information, there is more evidence that such extreme measures are unwarranted:

- Alaska's domestic sheep and goat populations have gone from 27,000 sheep in the late 1960's to roughly 1400 sheep and goats in 2015 (National Ag Statistics)
- There have been no cases of population-limiting respiratory disease outbreaks in thinhorn sheep, goats or Musk ox in North America.
- There have been no confirmed cases of thinhorn populations in the wild testing positive for Movi
- Very little is known about the impact of Movi on thinhorn or Eurasian sheep - neither of which have experienced population-limiting respiratory disease outbreaks.
- Preliminary results from the current study in Alaska: 334 animals tested on 22 farms, only 2% (6) of those animals have tested positive for Movi

Given these Alaska based facts, rushing into costly and burdensome regulation is needless. Just the double fencing requirement would put several producers out of business either due to cost of the fencing or the "buffer" zone eating up all their land. The threat of removal from the "clean list" is unfounded; there is not enough evidence to support a drastic move such as this.

Alaska producers have demonstrated that they are taking this issue seriously and will continue to work towards maintaining healthy wild and domestic sheep and goats. The Board of Game should fail prop 64, allow time for the current study to finish, do a fact-based risk assessment then a plan can be put into place based on Alaska based facts and science. Since the Office of the State Veterinarian has authority over livestock, the discussion of management should be taking place with that office, not Department of Fish and Game.

Respectfully,

Vel Wager
P.O. Box 1312
Delta Junction, AK 99737
907-895-4348
4-H Leader of the D.J. Stumpjumpers

Submitted By
Charity Walker
Submitted On
10/27/2017 3:18:45 PM
Affiliation

I am commenting regarding proposition 64, the purpose of which is to remove domestic sheep and goats from Alaska's clean list. This is a poorly thought out and detrimental proposition. I OPPOSE proposition 64. There is no factual, verified, or scientific evidence that Alaska's domestic sheep and goats pose a threat Alaskan wild dall sheep populations. The main reason is the extremely small risk of contact between wild and domestic populations. Very few domestics live in verified dall sheep habitat. I do support regulations and monitoring for those who may actually live on the side of a mountain, but these cases are extremely rare. In addition, full testing of domestics has yet to be conducted to determine the extent of M . ovipneumoniae in Alaska. Preliminary testing has shown only 2% to be positive or inconclusive. This proposition will negatively impact many farmers, producers, and consumers in the Alaskan agricultural community. Please do the right thing and nix proposition 64. Thank you.

Submitted By
Luke Walker
Submitted On
10/27/2017 7:00:12 PM
Affiliation

I oppose proposition 64

Submitted By
Joseph Andrew Want
Submitted On
10/26/2017 5:38:01 PM
Affiliation

Phone
9077502813
Email
Joe_a_want@yahoo.com
Address
4506 Melan Drive South
Fairbanks, Alaska 99712

Considering the fact that there are no documented cases of Dall sheep contracting a disease or parasite from domestic sheep and goats, I fail to see the logic for proposing the banning of these livestock species in this State. Considering that there is a greater possibility of wolves and coyotes coming in contact with dogs than Dall sheep with domestic sheep and goats, the proposal is ridiculous and lacks merit. Why not ban reindeer? They can pass disease, parasites and genetic material to caribou. A lot of people depend on goats for milk and other dairy products. A good number of people also like to spin wool from their sheep. While it is true that neither of these species are indigenous to Alaska, neither are non-Alaskan Natives, dogs, cats and horses.

Submitted By
Jacalyn Watson
Submitted On
10/23/2017 10:37:43 PM
Affiliation

Phone
907-440-5848
Email
jacalyn@mtaonline.net
Address
18949 Elnora Lane
Eagle River, Alaska 99577

I am opposed to Proposition 64. Our goat's milk has been a staple in our family for years. We use it fresh as the only source of milk for children and adults who have allergies to cow's milk and we make kefir which is well-known as a superior probiotic unmatched by any other food product. We and many other families rely on the nutrition this milk provides. First our children and now our grandchildren benefit from the milk as well as the lessons learned by visiting the farm and the goats at the State fair. Losing this health-giving resource would be a tragedy. The rationale for the burdensome regulations of Proposition 64 is extremely weak and one-sided and would effectively end the ability of farmers to continue to provide access to goats and their milk. Alaskan goats are not and have never been a threat to the sheep. Please do not allow a few well-funded people to strip away this wholesome and health-giving product and lifestyle. Jacalyn Watson

Submitted By
Kathleen Wattum
Submitted On
10/9/2017 12:06:43 PM
Affiliation
Owner - Coyote Trail Fiber Mill

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katewattum@yahoo.com
Address
po box 84561
fairbanks, Alaska 99708

Thank you for the opportunity to comment on Proposal 64 - Permit for possessing live game.

First as a owner of a small sheep herd 12 - 20 depending on the season)I need specifics: costs, implementation, what this means to me in my community.

I'm not finding the fencing specifics anywhere. I'm seeing things like fencing to prevent nose to nose contact all the way to 10' fencing with post 50' apart that would prevent a polar bear access.

There needs to be room for realistic compromise on the issues. Registering all sheep would require owner cooperation. And who would do something to bring focus to their farm for regulators. Who would regulate it? Spot testing and research on numbers of animals and size herds needs to continue. Face to face farm visits to work on how to build the appropriate structural needs would be great. Financial support to make adjustments without threatening the existance of a small industry is important.

I do agree that comprimise in the testing, realistic and affordable fenced areas and no free ranging of domestics is important. I think an avenue to direct resources and education to small farmers is needed as well.

Doesn't the Cooperative Extension Service have agricultural agents already in communities? Might the state us them to developed connections with local farmers? Put money and energy there. Focus and identify the areas of biggest concern. Find a way to educate not to threaten.

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Submitted By
Darlene Webster
Submitted On
10/27/2017 2:06:47 PM
Affiliation

Let the people keep their animals! I do not support 64. People will go hungry and broke. If weed can be sold all over, let the animals stay!

Submitted By
Julie Wendt
Submitted On
10/19/2017 6:58:19 PM
Affiliation

Phone
9972523980
Email
karlukacres@yahoo.com
Address
50765 Karluk Ave
Kenai, Alaska 99611

I am writing to the Board of Game regarding Bill 64. I am writing to ask the BOG to ignore Prop 64. This proposition is from a special interest group trying to ram their agenda into AK. We have had no problems with our wild sheep and goats dying due to diseases from domestic goats. This is a non-issue in AK. Many in our great state, live a subsistence lifestyle or raise their own food. I raise goats for income, milk and meat to feed my family healthy food. This bill proposes to make it so I cannot feed my family as I wish, to address an issue that is non-existent. Alaskans need to be able to support themselves by being able to raise their own meat and milk when many are in isolated areas and food security and high prices are a concern. Please protect our rights. Thank you for your time.

Submitted By
Christine Wilcox
Submitted On
10/27/2017 9:04:49 AM
Affiliation
Spruce Tip Farm and Nursery

Phone
908-632-1496
Email
Clwilcox@acsalaska.net
Address
10001 Hampton Circle
Anchorage, Alaska 99507

Dear Members of the Board of Game,

I am opposed to Proposition 64. 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 64 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 costly testing.

These requirements would place a severe economic burden onexisting owners of sheep and goats, the businesses that provide feed and care products for them, and the State of Alaska. The State is currently faced with an almost $4 BILLION budget shortfall, and does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and based on 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 thinhorn sheep in the wild, including both Dall sheep and Stone sheep. In light of the fact that the population of domestic sheep in Alaska has dropped from a high of 20,000 in the 60’s & 70’s to the current low of approximately 1000, the risk is obviously decreasing rather than increasing, and removing sheep and goats from the Clean List will do nothing to benefit wild populations.

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 64 due to the severe impact it will have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal 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.

Please follow the advice of the ADF&G, the DEC and State Vet’s Office, the Division of Ag, and the Dept. of Law and “Take No Action” on Proposal 64.

Submitted By
Julie Wilkerson
Submitted On
10/26/2017 3:54:11 PM
Affiliation

My husband and I have lived in Alaska since 1976. We got a remote parcel in 1982. Since then we converted our land to a homestead, raised our children and had sled dogs, goat, sheep, cows, chickens, ducks and geese. I cannot think of any reason why any farm animal would not be allowed in Alaska, especially goats. They are intelligent, produce delicious milk and meat. We are against any law the proh

Submitted By
Donna Wilmot
Submitted On
10/26/2017 8:19:05 PM
Affiliation

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9072521402
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Daughn.sterling@gmail.com
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Pobox1011
Soldotna, Alaska 99669

To the game board. I am requesting you take no action on prop64. I personally do not have any goats, but I believe that this loss of the goats in my neighborhood would be devastating..there is an elderly couple that consider there goats like some consider there children. My own grandchildren love to play with them..The other goats in the neighborhood belong to a family with children and I know it would also devastate that family also.. Please consider the sadness this would create ..pleas take no action on this. Thank you for your consideration on this matter. Donna Wilmot

Submitted By
Chandra Wilson-Sutton
Submitted On
10/26/2017 9:17:14 PM
Affiliation

Phone
9075210579
Email
C.wilsonsutton@gmail.com
Address
7099 Wasilla Fishhook rd
Wasilla, Alaska 99654

I oppose Prop 64. My child is a member of 4-H and we are trying to set up a subsistance driven home. You are stifiling her education and our survival. What you are trying to ban will only create further issues in the recession of the State of Alaska.

Submitted By
Sherri Winfree
Submitted On
10/27/2017 11:12:34 AM
Affiliation
Alaska Resident

Phone
907-748-8291
Email
sandr2694@gmail.com
Address
2694 W Stable Cir
Wasilla, Alaska 99623

To whom it may concern,

I am writing you today to address my oppostion to Proposition 64.

I am a longtime resident of Alaska, a wife, mother and caretaker of many animals, of which many are domestic goats. Our animals bring our family immense pleasure, not only are they family pets, but they are a staple of nutrition, education and a steady contribution source to our finances. They are an ongoing joy and quality source of life lessons.

I take the responsibility of the care of our animals very seriously. In our beautiful state we are required to provide a contained area for our animals to be kept. We do that and as good stewards provide nutrition and health care to keep them safe from harm and illness.

The private ownership of animals impacts our lives in may ways. From our personal experiences on our own farm, to our our friends, families and associates that have bound together to make the Alaska farming communities, to the local companies that processes our meat, to our involvement in the 4H Programs that supports child involvement and enjoyment in the Alaska State Fair. Proposition 64, if considered, would make a huge imact on not just our lives but on the community and state as well.

This Proposition, in my opinion, will only benefit a special interest group which looks to stifle the everyday lives of so very many Alaskans in the claim of protecting our wildlife, specifically our Dall Sheep population. As we are a hunting family as well, we consider the welfare and conservation of our wildlife to be of the highest importance. However, as you well know, there have been no known cases where the Dall Sheep in Alaska has been negatively affected, or infected, by the keeping of domestice animals in many decades. Also, the numbers of Dall Sheep harvested continue to grow yearly showing there is no decline in population of animals.

In closing, I adimately oppose Proposition 64 and hope that you will take in consideration of the many like myself that have written to you in opposition of this unfair and unjust Proposition.

Sherri Winfree

Submitted By
Jordan Wolf
Submitted On
10/26/2017 10:34:54 PM
Affiliation

Dear Board of Game

I am writing you to oppose Proposal 64 and ask that you take NO ACTION!!

Goats are a big part of my family. They provide fresh milk for my children. Clean meat that is raised how I want it and properly, humanely loved and cared for every day until it's purpose. Taking goats and sheep off the clean list will cause my family that depends on the milk for their child. The large picture is Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or herd shares for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do to my family and others, but that trickle down of the harm that will be done to our economy in agriculture in Alaska.

Alaska IS very unlike the lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property.

There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. NONE!

At this present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep only 6 (2%) have tested positive for the bacterium. It's a screaming low risk factor in opposition to the "sky is falling" stance the Wild Sheep Foundation has been painting.

If domestic goats and sheep are removed from the clean list owners are left in purgatory. Per the Alaska Dept. of Fish and Game website, animals not on the "clean list" cannot be permitted. That makes them illegal to own. The Alaska Dept. of Fish and Game needs to map the critical habitat areas of the most concern for contact with domestics.

Most importantly M.ovi needs a host, it does not live in the environment and can ONLY be spread through close contact of Dall sheep and domestics. Alaska has many natural barriers to block that "close" contact; rivers, mountains, lakes, highways, subdivisions and predators. Our property has fencing that keeps our herd on MY property. There has never been nor will there EVER be a Dall Sheep in my backyard. They simply are not in my area, let alone get past my fencing. My Livestock Dog also makes sure any animals that aren't ours simply don't come near our property. She does her job extremely well.

I ask the Board of Game to take NO ACTION on Proposal 64.

Thank You,

Jordan Wolf

Submitted By
Kailyn Wolf
Submitted On
10/16/2017 5:51:46 PM
Affiliation

This is my comment for Proposal 64- Remove domestic sheep & goats from Clean List in State of Alaska.

This proposal if adopted will harm my families lifestyle and heart. Anyone who knows me knows that my goats are a huge part of my life, soul and heart. They bring me happiness, fulfillment and nourishment daily, not only to myself but to my entire family as well. My children have learned more about life, responsibility and love more than I ever could've imagined. The local Chapter of the Wild Sheep Foundation has proposed once again to remove domestic sheep and goats from the clean list – along with other ridiculous proposed regulations to the ownership of domestic sheep and goats in the State of Alaska. If the BOG should pass Prop 64 domestic goats and sheep would be illegal to own in the State of Alaska. No permits are issued for animals not on the clean list. No importation of new bloodlines or export of family pets are allowed on delisted animals. No more 4-H sheep & goats at the Fair. This one particularly hits us hard at home as one of my daughters is in 4-H. Animals not on the clean list cannot be processed at the USDA meat plant. If a particular mammal, bird, or reptile species does not appear on the "clean list", it may not be imported into Alaska or possessed as a pet or livestock in Alaska, this will prohibit me from bringing in new bloodlines to my herd. The foundation for Prop 64 by the WSF is to prevent the possible transfer of a bacterium, Mycoplasma ovipneumoniae (M.ovi), to the wild Dall sheep population. M.ovi has been associated with pneumonia outbreaks in Big Horn sheep in the lower 48. There have been NO Dall sheep deaths due to M.ovi in the state of Alaska caused by domestics. All of the current information and studies have been on Big Horn sheep in the lower 48. No studies have been completed on Thin Horn sheep, (Dall sheep) susceptibility to the bacterium in the State of Alaska. To date – NOT ONE Dall sheep has died from this bacterium being spread to wild Dalls from domestics that have been in Alaska in great numbers since the 1960's. But in fact, every year Dall sheep hunters harvest anywhere from 500 to 1000 Dall sheep. Last year 788 Dall sheep were listed as harvested on the ADFG website.

Alaska is unlike anywhere else in the Lower 48. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in state, meaning all animals are to be fenced on your property at all times. Alaska has many natural barriers (rivers, mountains, predators and highways) to help prevent wild Dall sheep & domestics from coming into contact. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi!!! All the current information, and forced captive studies, has been done with Big Horn Sheep in the lower 48. The Alaska Department of Fish & Game has not done mapping of Dall sheep habitat to define areas of true concern. At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist. Until the office of the State Veterinarian, Dr Gerlach, is able to complete the risk assessment (to date only 6 domestics out of 334 have tested positive for M.ovi bacteria) and determine a risk versus regulation protocol, the current Proposal 64 should be shelved. The Wild Sheep Foundation is trying to restrict MY personal rights without due cause to own domestic small ruminants on MY PERSONAL PROPERTY. Anyone who loves seeing domestic goats and sheep at the Fair, enjoys a dairy herd share for raw milk, purchases local lamb or goat meat, spins fiber for art or warmth will no longer be able to do so. My kids will not only lose their fresh, homegrown milk and meat but also lose their best friends. Goats that have taught them how to love. Goats that have taught them how new life is brought into this world, watched them be born and grow into future milkers or become food to feed our family. Any one of us can be having the worst day and go into our barn, walk up to any of our goats and be instantly greeted with love and affection. No matter what we're going through our goats are there and comfort us. The bond my children have developed is unlike anything else. Could you look your own children in the eyes and take away something that matters most to them in the world? To tell them that they will no longer have one of their life teachers and as my daughter calls them- Family. Tell them that they will be illegal and destroyed all because a group of hunters are concerned about their trophy animals that have NEVER been affected here in Alaska? I can't even begin to fathom telling them and literally breaking their hearts and how to find comfort from this. It is our property, our rights and how we choose to live. No one should have a say in that.

Submitted By
Emily Wood
Submitted On
10/27/2017 2:50:59 PM
Affiliation

Please do not persue proposition 64, it would be devistating to agriculture in Alaska.

Submitted By
Jennifer Wood
Submitted On
10/26/2017 7:33:56 AM
Affiliation
Private land owner - MatSu valley

Phone
(907) 232-2559
Email
jenwood71@hotmail.com
Address
4601 S. Canter Cir.
Wasilla, Alaska 99654

Our family strongly opposes Prop 64! As long time MatSu bourough residents and experienced outdoorsmen/ hunters, this proposition seems to us like a blatant over-reach and over-reaction of a government entity. Our small, family hobby farm would be very negatively affected by this proposal and seems that it would have long term, damaging effects on the entire farming community of Alaska.

Please use caution and prudence as you proceed in this decision as it affects a great number of farming families - And please remember.....NO FARMS, NO FOOD. Thank you.

Submitted By
Paula Wright-Savok
Submitted On
10/26/2017 10:08:14 PM
Affiliation

Dear Board of Game,

I am writing you to oppose Proposal 64 and ask that you take NO ACTION. We have a small hobby farm that helps support your small family. I am disabled and raising our own goats and sheep for food, milk and fiber plus as beloved members as our families helps us to subsist and support ourselves. Alaska is already so far removed from a lot of resources and it is of the outmost importance that we have sustainable agriculture here and sheep and goats help Alaskans to do just that. By removing them from the clean list you are not just hurting individual Alaskan families and farms you are hurting Alaska's economy as a whole. Our domesticated, fenced in sheep and goats pose ZERO real world lethal threat to Dall sheep, but removing domesticated sheep and goats from the clean list does pose a REAL threat to Me, my family, Alaskan families, Alaskan farms and Alaska as a whole. Please take NO ACTION on Proposal 64.

Thank you,

Paula Wright-Savok

Submitted By
Wendy M Yannayon
Submitted On
10/27/2017 3:39:27 PM
Affiliation

Phone
8015897653
Email
Ammochick13@yahoo.com
Address
2050 N Broadway DR
Palmer, Alaska 99645

These people need their goats.

Submitted By
Alyson
Submitted On
10/27/2017 1:51:55 PM
Affiliation

I strongly oppose proposition 64 based on the lack of evidence that domestic goats and/or sheep are of any danger to the wild dall sheep population in Alaska. Until further proof has been documented, I see no reason in this proposition passing. This is an attack on many Alaskans who use these animals as food and/or income.

Submitted By
Angela
Submitted On
10/27/2017 12:43:01 PM
Affiliation

I do not agree with Prop: 64. All the people I know that own goats maintain clean herds. This is not a necessary change and in the end will cost the State of Alaska more money by increasing the paperwork that has be to processed to get the licenses, people to be over that work and needing people to enforce the licenses.

Submitted By
Christy
Submitted On
10/27/2017 6:38:26 AM
Affiliation

Phone
9077075378
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Davidnchristy1@gmail.com
Address
PO box 226
Sutton , Alaska 99674

Dear Board of Game I am writing you to oppose Proposal 64 and ask that you take NO ACTION. I own two clean tested beautiful Alpine goats. They give me about 2 gallons of milk a day. They are essential for the health of my family of 12 children. We are responsible goat owner's. We buy local hay which helps support agriculture in Alaska. Alaska needs sustainable agriculture. Goats and sheep are a large part of agriculture around the state. From animals being processed for meat, or for milk, or wool fiber art, to all the hay and grain that is purchased from local farmers or feed stores. It's not just the harm taking goats and sheep off the clean list will do to the families that own them, it's the trickle down of the harm that will be done to our economy in agriculture in Alaska. Alaska does not have open grazing of commercial herds where wild sheep and domestic sheep/goats would comingle. Alaska is a fenced in State, meaning all animals must be fenced on your property. There have been NO cases of Dall sheep dying in Alaska or Canada due to M.ovi. None! At the present time the office of the State Veterinarian is working on a risk assessment based on M.ovi testing of local domestic sheep and goats in conjunction with Dr. Maggie Highland - USDA Animal Disease Research Scientist, and the Washington Disease Diagnostic Laboratory. To date, out of 334 goats and sheep only 6 (2%) have tested positive for the bacterium. I ask the Board of Game to take NO ACTION on Proposal 64. Thank you for your time. Sincerely, Christy

Submitted By
Danielle
Submitted On
10/27/2017 8:28:59 PM
Affiliation

Phone
9074862870
Email
zigmommy@gmail.com
Address
PO Box 5553
Chiniak, Alaska 99615

I strongly oppose the proposed Prop 64 regulations removing domestic sheep and goats from the clean list. As an Alaskan and a goat-keeper, I'm shocked the state has allowed this measure to proceed as far as it has! Keeping goats provides my family with fresh milk and meat year-round, and allows me the opportunity to maintain an active, thriving, and lucrative small business as a goat milk soapmaker. As a member of the Made in Alaska and Made in Kodiak programs, I'm extremely concerned about the effect these wholly unnecessary proposed regulations will have on the future of my business, as well as my family's own food security. Take no action on Prop 64!

Submitted By
Denise
Submitted On
10/27/2017 11:03:34 AM
Affiliation

I find it maddening that an outside organization is once again unduly influencing game management issues in a state they simply don't understand. The Wild Sheep group is clearly making an issue (and money) for themselves for their own gains and has no concern for the economy and needs of real Alaskans. Please do not allow this absolute travesty of Prop 64 to go through.

Submitted By
Jesse
Submitted On
10/27/2017 8:29:36 PM
Affiliation

I just bought my house a couple months ago to raise animals too feed my family since the stores are poisen. Goat milk is what kept my sister alive. Ypur prop 64 is ludicrous.

Submitted By
Kim
Submitted On
10/26/2017 10:05:41 PM
Affiliation

Phone
9077077155
Email
Whitetigerbudz@gmail.com
Address
11744 west Easy St.
Wasilla, Alaska 99623

I am submitting this comment because I am concerned that a ban on domestic goats and sheep is premature and will harm Alaska's already fragile agriculture industry. Before such drastic measures are taken, we should determine the prevalence of this disease by testing a statistically significant portion of the populations, and also by analyzing the probability of disease transference from domestic to wild populations. I appreciate your consideration of this matter and hope that you hit pause on this regulation.

Submitted By
Krista
Submitted On
10/26/2017 9:44:02 AM
Affiliation

I do not personally own goats, but I know many people who Do! They use the goats for their milk and even just as pets! I think it is our rights as Americans to own and kind of livestock as long as we keep them maintained and care for them appropriately. This should be thrown out completely!

Submitted By
Laurel
Submitted On
10/26/2017 2:04:36 PM
Affiliation

RE: Prop 64:

I oppose this proposition in its entirety. Making it illegal to own domestic goats would be devastating to those I know who own these animals. And others would face financial ruin and emotional trauma over losing them. There are studies done here in Alaska showing that the risk of domestic goats and sheep coming into contact with wild Dall sheep is in fact low. And the percentage of domestics tested in this State came in at 2% testing positive for the M. ovi virus they are concerned about. Domestic goats and sheep have been in the state of Alaska in large numbers since the 1960s and there have been no die offs from Dall sheep in that time. The risk is not great enough to remove the ability for small farmers to have these animals in their lives.
The health benefits of having access to raw milk sources cannot be ignored or overwritten, either. Reduced allergies, improved skin health, and the healing from probiotics in homemade kefir and yogurts are just a few of the great things raw dairy provides, and its all free of any added sugars or manufactured ingredients.
Please, let's keep Alaska the last frontier where we live free.

Submitted By
Pam
Submitted On
10/27/2017 1:56:47 PM
Affiliation

I am for the proposition to make it unlawful to keep goats & sheep on someone's property. When I went through the Veterinary Assistant course at the Matsu College, Dr. Susan Dent took our class out to a home that had goats & sheep in Wasilla. She had us go there to trim the goat/sheep hooves because the family had too many goats & sheep & didn't care for them well. It was really really sad. I don't remember how many goats this family had--too many for them to care for properly. It looked out of hand. Many of the goats had very long hooves. Goats and sheep are a farm animal & the average "mini farm" owner is not equipped & financially stable enough to care for them. There are just 2 livestock vets in the valley (Dr. Dent, & Dr. Holland). My Aunt has goats that she uses for milk. One was giving birth recently & ran in to complications. She called a vet, but they were busy, so she asked her son (a trained EMT), if he would be prepared to do C Section! Thank goodness, they were able to flip the kid in the goat's uterus & it all eneded well. But in my opinion, the hobby farming has gone out of hand & animal welfare is at stake. Another thought: who decides how humanely these animals are slaughtered? Who knows how they are killed & what sort of suffering they endure at the end. The local slaughter house has regulations, people's hobby farms do not. What about the milk? Hobby farm owners rarely test their milk for harmful bacteria. Also, many hobby farm owners do not dispose of the feces properly & the drainage system on their property is inadequate. I hope that you take these thoughts in consideration today as you vote. Thank you for your time.

Submitted By
Samantha
Submitted On
10/26/2017 10:38:44 PM
Affiliation

Please vote no on Prop 64. In Alaska, there are already laws regarding fencing and livestock that help prevent issues. We are also a proud group of people who are self sufficient. Goats and sheep are incredibly hardy, and easy to maintain in comparison with other larger livestock such as cows. Removing goats and sheep removes a lot of people's self sufficiency as well. This is a bad law that hurts the people of Alaska and does NOT help our wildlife.

Submitted By
Sif
Submitted On
10/27/2017 2:33:51 PM
Affiliation

Dear Board of Game,I'm writing you to oppose Prop 64 and ask that you take NO ACTION. Prop 64 would force us to become outlaws. Considering the stats and numbers that I'm sure you've already seen from others comments(like the Farm Bureau) ,that especially in AK there is NO THREAT to wild sheep from domestic sheep and goats for M.Ovi. This is nothing more than catering to special interest groups. Prop 64,if enacted,will harm this entire state. Alaska already ships in 98% of its food. What's next? Cows? Horses? Chickens? This will hurt a lot of small farmers here in AK and a vast network associated with it ,including me and my family of 9. Our AK economy is already suffering,this will do nothing more than add more pain. Again,I urge you to take NO ACTION on Prop 64. Thank you

Submitted By
Tara
Submitted On
10/27/2017 12:44:40 PM
Affiliation

I own a small flock of sheep on Lazy mountain. I have dreams of bringing fresh genetics up from outside Alaska to better my sheep. My sheep are never in contact with wildlife, they do not free graze outside their fencing, and I have never seen a wild sheep or goat anywhere on Lazy. What I have seen, is my niece and nephew learning valuable lessons about life and animal husbandry, responsibility and compassion. Farm life is becoming a thing of the past some places. Let's not let that happen here. Let's not make it so difficult and expensive for the farmer that we all have to give up our goals of sustainability and grass roots life.

Submitted By
Wendy
Submitted On
10/27/2017 6:24:27 AM
Affiliation

Phone
9072273776
Email
Wendymvanorman@gmail.com
Address
PO Box 92606
Anchorage, Alaska 99509

Please take no action on Prop 64. There is no documented need for a removal of domesticate goats and sheep from the Clean List.

Submitted By
Jennifer
Submitted On
10/27/2017 10:31:17 AM
Affiliation

Phone
19078549970
Email
Ak_mommy_83@yahoo.com
Address
Parksville
Chugiak, Alaska 99567

I do not support prop64. It will hurt Alaskan farmers and people who depend on the meat.

Submitted By
Ruthann Alberts
Submitted On
10/3/2017 10:02:57 AM
Affiliation
Mrs.

Phone
7157693291
Email
buzzie73@hotmail.com
Address
PO Box 244
Butternut, Wisconsin 54514

We need to stop this unnecissary killing of wildlife especially bears this is harssh and cruel.....we are invading there space they didnt invasde ours....and this way of killing is just inhumane and cruel... Please stop and stop passing these ingodly rules and regulations they are simply not in the right thinking~! Bears have a right to live just like we do we are not god to take any living breathing thing from this earth.....

Submitted By
Margie Atkins
Submitted On
8/18/2017 5:25:48 PM
Affiliation

Phone
999 999-9999
Email
Margie_atkins@hotmail.com
Address
4212 Whitsett Ave #202
Studio City, California 91604

My father was a marksman in the Army.

We ate what he hunted and fished.

Sport killing is a travesty on humanity.

Killing babies is a black mark on all

our souls.

Submitted By
Michelle Barowski
Submitted On
8/14/2017 7:26:37 PM
Affiliation

Phone
2106027274
Email
barowski11@aol.com
Address
4128 GreenValley Rd
Cibolo , Texas 78108

Please stop this attack on our wildlife! What are people that insist on killing all these precious creatures scared of? God made this world for all living beings, not just humans!

Submitted By
Daniel M Barr
Submitted On
8/15/2017 6:57:08 PM
Affiliation

Phone
7175129279
Email
dan_barr@aol.com
Address
566 Brentwater Rd
Camp Hill, Pennsylvania 17011

Stop the attack on our lands and the animals within.

Submitted By
Alyssa barrientez
Submitted On
8/9/2017 9:14:42 PM
Affiliation

Phone
5209074561
Email
Cassie_tai@yahoo.com
Address
6000 s avenida talca
Tucson , Arizona 85706

Please stop the killing bears. There is no need for this senseless violence.

Submitted By
Mary Baures
Submitted On
8/28/2017 4:58:07 AM
Affiliation
978 927-4901

Phone
9789274901
Email
marybaures@comcast.net
Address
123 Water St
#52
Beverly, Massachusetts 01915

Ending the Cult of Superiority by Cultivating Awareness

To step back into nature requires deprogramming our cult of human superiority. What we did to a disabled bear in New Jersey is an example of how we play God when we are not competent to be God.

Pedals had one amputated arm and the other maimed, but he learned to walk upright. Mistaken for a man in a bear suit, he became a social media darling in 2014. Many recorded his distinctive gait, posting the sightings on Pedals the Injured Bipedal Bear Facebook page. Unable to defend himself, he was not dangerous. Teachers used him as an example of resilience, but his handicap made survival difficult. Frequently, he collapsed in a road and had to elbow his way off.

Fig. 2 Orangutan and baby in Borneo before the forest was torched.

Sabrina Walsh Pugsley's heart shattered when Pedals wandered into her parent's backyard in Oak Ridge. Thin, with a dull coat, Pedals breathed heavily and was often so exhausted he lay down for ten minutes before making his way back to the forest.

She began a GoFundMe page which raised $22,000 to rescue Pedals. The Orphaned Wildlife Center agreed to build a home for him with a door out to a pond where, along with fourteen other bears, he'd have a natural setting, medical attention, food, and protection from winter. A petition to wildlife officials to send Pedals to the sanctuary collected 315,000 signatures but they refused.

When bear massacres began in New Jersey, Pedals fans feared he would get killed. Again, their pleas were denied. On October 14, 2016, Lisa Rose-Rublack, who been advocating for Pedals, wrote, "PEDALS IS DEAD. The hunter who has wanted him dead for nearly 3 years had the satisfaction of putting an arrow through him."

In death, all dignity was gone. Strung upside down by his feet in the back of a truck, sticky fluids matted his muzzle. Just as his life was a struggle to live, he must have gurgled to breathe through horrific pain as his life ended. His head rested beside a pile of plastic bottles, a green cooler, a yellow target, a blue wheelbarrow, and a bag of apples. Poor Pedals was lured to his death by an apple.

That the state of New Jersey sponsored the massacre speaks to the sickness and gratuitous violence of our culture. In 2005, Dr. Ed Tavss did a study of hunting black bears and found conclusively that hunting them did not decrease complaints about them. A nonviolent approach using trash containments, not bear hunts, decreased complaints about bears. There is no scientifically valid argument a harvest of bears reduces human-bear conflicts in suburbs. Experts say bears lured out of the forest by human food are the problem.

Why did New Jersey promote a bear massacre when scientists say trash containment is the solution to bear conflicts? A hunting group, New Jersey Outdoor Alliance sponsored a $15,000 fundraiser for governor Chris Christie and one of the leaders, Anthony Mauro was appointed to Christie's environmental protection team. According to Doris Lin, a lawyer for the Animal Protection League of New Jersey and the Bear Education and Resource Group, and Stu Chaifetz, a spokesman for the group Showing Animals Respect and Kindness, the bear hunt was "payback for campaign help" and a "fix" from the beginning.

According to Senator Raymond Lesniak, non-lethal solutions were preferred by 74% of New Jersey voters and only .07% of the population wanted a bear hunt. Although 64% of people poled by the Humane Society oppose trophy hunting, politicians in power sanctioned them. What about a government for and by the people? (Editor's note: you can learn about NJ Smart Bear Legislation here at http://savenjbears.com/take-action.php).

Our world is broken, and we cannot rely on our leaders to stop unfathomable acts of cruelty or to find new values, priorities, and paths to the future. As former President Jimmy Carter explained, "America is no longer a democracy and has become an oligarchy." Paybacks to rich contributors by leaders "has caused the worst damage to our basic moral and ethical standards."

Submitted By
Barb Beronski
Submitted On
8/16/2017 5:09:51 AM
Affiliation

Phone
773-732-2246
Email
Babeandbarb@yahoo.com
Address
3346 N. Hamlin Ave.
Chicago, Illinois 60618

Leave the bears live. They were not put on this earth to be trophy hunted. Leave the good Lords animals be.

Submitted By
Vanessa black
Submitted On
8/14/2017 2:56:20 PM
Affiliation

Phone
6189430387
Email
bla6v@aol.com
Address
12799 pinkstaff ln
Lawrenceville , Illinois 62439

Save these bears..enough killing of our wildlife already..this must stop..our wildlife deserves to live as we do..no more inhumane cruelty..no more slaughtering.

Submitted By
Jody Canet
Submitted On
10/27/2017 6:18:42 PM
Affiliation

Phone
9073515434
Email
Jodycanet@gmail.com
Address
17500 E Maud Rd
Palmer, Alaska 99645

I believe the negative impacts of passing this regulation outweigh the positive and encourage you not to pass it

Submitted By
Melinda cetto
Submitted On
10/21/2017 5:24:47 PM
Affiliation

Phone
8163829570
Email
Mcetto@sbcglobal.net
Address
303 Johnston dr
303 Johnston dr
Raymore, Missouri 64083

Please do not allow this to happen. Be good humans. The earth belongs to the animals,too.

Submitted By
Kees den Boeft
Submitted On
10/20/2017 5:23:37 AM
Affiliation

Dear Sir,

Let us pretend those beautifull family is next of kin.

So lets treat them that way!!!

Submitted By
Lea Derence
Submitted On
10/20/2017 3:31:44 PM
Affiliation

Decent, moral people live by the GOLDEN RULE. If you don't want someone hunting you and/or your family down - don't do it to others!! It is so deranged that people get so upset over mass shootings but there are hunters that do THE EXACT SAME THINGS TO INNOCENT NON-HUMANE ANIMALS and people think it should be legal WHEN IT SHOULD NEVER BE LEGAL TO KILL OTHERS!!!

One day humans will become the decent, moral, loving, caring, merciful beings that God intended us to be. One day HUMANS WILL BE VEGAN!!!

Submitted By
Grace estrada
Submitted On
8/28/2017 3:34:50 AM
Affiliation

Please save the bears they are important for the ecology balance and for future generations

Submitted By
Yazel Garcia
Submitted On
9/13/2017 12:32:00 PM
Affiliation

Please stop the hunting of all bears.

Submitted By
SHEILA Graham
Submitted On
10/26/2017 9:54:21 AM
Affiliation
Alaskan citizen

Phone
907-953-1968
Email
Scampersmom14@gmail.com
Address
PO Box 3507
45705 Kenai Spur Hwy
KENAI, Alaska 99611

This is a vefy effective program.Please support.

Submitted By
Michael Hawk
Submitted On
8/14/2017 4:04:39 PM
Affiliation
Mr.

Phone
9546840682
Email
cub4ufl@aol.com
Address
4565 NW 10th way
Ft lauderdale, Florida 33309

We need to protect our wildlife. The fact that there are still trophy hunting allowed is repulsive. We as humans are growing in numbers and Norma's Lake wall art Wildlife is dwindling. This has to change.

Submitted By
Laurie Henkel
Submitted On
9/8/2017 10:58:55 AM
Affiliation
Ms.

Phone
9704842684
Email
wolfwatch4pack@hotmail.com
Address
2451 S. Timberline Road, Apt. 3-108
Fort Collins, Colorado 80525

Attn. Board of Game:

I would propose you consider as top priority to stop the barbaric cruel and severly and excruciating painful use of trapping. Have you yourself seen the trapping and the pain inflicted.????Did you know animals feel pain and have emotions such as humans. This has been going on for decades and you have not been educated since then to assess that this is barbaric and extremely excruciating painful, to have a animals limb stuck in a trap, and you allow hunters to do this????And to give a dam that a animal is suffering. Please be remined this is the year 2017, have you not advanced your thought processes???This is not cave man days, nor Hunter and Gatherer days, and you continue to allow this. How non-empathetic your Dept. is. How about putting one of yourselves in a trap, and or trap one of your board members, so perhaps they would then understand,oh wow this does hurt, let me remind you.....The ANIMALS FEEL PAIN AND OR IN SEVERE TORMENT BEING TRAPPED.

Also you should let nature resolve on its own. I also propose you stop the allowing of the biologist to shoot Wolves and or other animals, you say its to control, they are paid too mcuh just to study and kill. Taking the lives of inncocent animals and inflicting pain and trauma on their packs and animals.

I also propose the ceasing of dynamiting dens, who in Gods' green earth thought of this and your allowing this. This is as inhuman as it gets. Whay is wrong with your dept. You are not human. To inflict this obscene act, is being done definitely by Psychopaths who get off on killing and take out their frustration on the innocent. Psychopaths you can't talk to or influence due to their brain is abnormally wired, so you need to take greater means to stop. How about dynamite their home and family, then they just might?????get a hint of the enormous pain and trauma they are inflicting. Is this how far you have come???Which is not far at all, that your dept. says you are managing wildlife, theyd be fine to manage themselves. You are just concerned about money coming into the state of Alaska so the animals are hunted and slaughter by idiots who get off on killing. PS Your Dept of Board and Game is responsible for inflicting this sickness.

The proposals as noted above.

1) Stop all Trapping

2) Stop shooting, aerial killing, dynamite/bombing of dens.

3) Find another way of bringing money in you all want so bad, help people, provide resuces for animals, let me spell it out. Quit barbaric killing. Leave these wildlife families of all kinds alone. People can come to Alaska to tour and observe animals in their natural elements then you can make money off tours. But seriously, after decades your dept. still allows barbaric killing. UNBELIEVEABLE. The ones on your board/Dept. have a serious lack of compassion and greed and the incapacity to know pain. Therefore have the members get trapped and or aerial shot with family near by, then maybe????their brains would kick in to realize pain. Trapping and hunting is known as killing. Hoping someone wakes up and realizes this, the only way seems the members and dept. need themselves and their families killed, stuck in a barbaric trap, and beaten alive while stuck in a trap to maybe understand what you are allowing to be done to these innocent animals, otherwise it is apparent your are not getting it.....!!!!!!!!

Submitted By
Wendy hopkins
Submitted On
8/13/2017 2:29:25 AM
Affiliation

Please STOP this cruel practice. We need to protect all wildlife or this planet will die taking us with it. Killing any animals is cruel and barbaric and senseless act, all animals have a right to life!! We do not have the right to take it from them! THE WHOLE WORLD IS WATCHIN, IN THIS TIME OF GROWING AWARENESS AND PROTECTION OF ANIMALS! ITS TO LEAD BY EXAMPLE! DO THE RIGHT THING. STOP KILLING BEARS!

Submitted By
Jody Jansen
Submitted On
10/3/2017 12:08:50 PM
Affiliation

Stop the killing!

Submitted By
Vera Kebsch-Müller
Submitted On
10/21/2017 1:02:44 PM
Affiliation

Phone
0049-7031-234934
Email
reinhard.vera@gmx.de
Address
Ahornweg 4
Böblingen, Other 71034

Dear Ladies and Gentlemen,

"the greatness of a nation can be judged by the way it's animals are treated" - Mahatma Ghandi.

Whenever there is an emergency case somewhere - Women and children are rescued first. Well, doesn't this apply to bears? Who is so cold blooded to go and murder hibernating moms and their cubbies who are hibernating peacefully in their dens? Not even to think about such a cruelty! It is inhumane and unethical. I kindly ask you to overthink these devastating plans. Every normal feeling person is outraged and devastated! For the case that moms and cubbies will get murdered in their peaceful dens, I will spread the word here all over Germany, newspapers etc. and will make people to avoid traveling to Canada. Have friends abroad too (England, Finland etc) All my friends are very fond to see bears and to shoot them - with the CAMERA!

So please overthink these horror plans!

Yours sincerely,

Vera Kebsch-müller

Submitted By
Humera Khan
Submitted On
8/14/2017 10:41:00 PM
Affiliation
Homes

Protect them

Submitted By
Tracy Kirouac
Submitted On
8/28/2017 5:58:30 AM
Affiliation
2care

Phone
828-342-7645
Email
tracy.kirouac@icloud.com
Address
76 Ruthwells Rd
Otto, North Carolina 28763

People come from all over the world to see alaskas wild life,last of the wild frontier please don't destroy our beautiful Alaskas wild life Bears, wolfs ect. It will take away tourist,mess with the Eco system,and is just not right. It cruel and unfair,leave nature alone!

Submitted By
Susan Lamastra
Submitted On
10/20/2017 6:54:56 PM
Affiliation
Mrs.

Cruelty is a behavior that is not acceptable to most people. You have no right to murder other species as you see fit. This is very irresponsible; your job calls for responsible decision makers.....if cruelty is part of your organization's code, then you can't respect life, which clearly is irresponsible and harms all....animals, present people and future generations, all negatively affected. Please rethink. Be responsible. No killing.

Submitted By
Spencer Lennard
Submitted On
8/10/2017 11:13:03 PM
Affiliation
Mr.

Phone
5418461352
Email
spencerlennard@gmail.com
Address
POB 489
Williams, Oregon 97544

Dear Alaska Department of Fish and Game,

As a US citizen, a lover of wildlife and a frequent visitor to the great state of Alaska I implore you to do everything in your power to end all predator control in your district (related to black and grizzly bears, cougars, wolves, bobcats, coyotes and other apeax predators). Apex predators are natice to Alaska's ecosystems, they regulate prey species and have a very beneficial cascade effect to aqualti species and ecosystems....and are absolutely self regulated. lethal control on all apex damages ecosystems by harming the very delicate predator/prey balances, costing taxpayers vast sums of money to restore damaged ecosystems....and display a worldview where accepting degraded ecosystems is considered acceptable and preferable.

Please, end all lethal control for all apex predators in your management sphere.

Submitted By
Judy Lenoir
Submitted On
8/10/2017 4:39:16 AM
Affiliation

Phone
8508650485
Email
Msbandit12@gmail.com
Address
356 Fanny Ann Way
Freeport, Florida 32439

Please save the bears at all costs!

Submitted By
Jacquelyn Lewis
Submitted On
8/10/2017 6:05:25 AM
Affiliation
Mrs.

Phone
3863378649
Email
JACQUELYN.LEWIS@ATT.NET
Address
100 Fallen Timber Trl
Deland, Florida 32724

Thank you for allowing me to use my voice in benefit of the bears.

There is no way back from extinction. We must utilize the sciene at hand and provide better stewardship of our natural resources to protect all species.

Please, consider alternatives to the horrendous slaughter of this species.

Submitted By
Jayne Matthews
Submitted On
8/15/2017 12:00:51 PM
Affiliation

Leave the bears to live their lives. Nobody has the right to murder them.

Submitted By
irene mccalloster
Submitted On
8/19/2017 3:14:44 AM
Affiliation

Phone
863 424 8432
Email
reniehvfl@yahoo.com
Address
514 high Vista dr
davenport, Florida 33837

Bears are an essemtial part of Alasaka environment. Wildlife and wilderness areas must be perserved.

Man shoul limit its popuaton and not encrach on wildlif's homes.

Submitted By
Jackie Mills
Submitted On
8/19/2017 8:20:33 AM
Affiliation

Phone
4073504607
Email
jmls9779@gmail.com
Address
2266 viehman trail
Kissimmee , Florida 34746

Please stop killing the bears. There is no need for it. We already have enough animals becoming extinct, why make more? Is it really necessary? You can't think of a better idea than to kill them? That doesn't say to much about your thought process and what you want to teach our future generation about compassion and morals.

Submitted By
Patricia Molen van Ee
Submitted On
8/10/2017 6:07:08 AM
Affiliation

Phone
410-997-7790
Email
pmvanee1@gmail.com
Address
5620 Thunder Hill Road
Columbia , Maryland 21045

Please stop the bear hunt.

Submitted By
Patricia Molen van Ee
Submitted On
8/18/2017 4:06:13 PM
Affiliation

Do not allow bear hunting.

Submitted By
Prairie Moser
Submitted On
8/28/2017 12:51:33 PM
Affiliation

Phone
5415510070
Email
prairiemoser@gmail.com
Address
800 w. 10th st.
Bandon, Oregon 97411

Please don't kill any bears. Create sanctuaries where there are no people to be a problem. Animals deserve better than they get from humans.

Submitted By
Terri Nedzvekas
Submitted On
8/17/2017 1:27:04 PM
Affiliation
Ms.

Phone
3125044770
Email
terrianed@netzero.com
Address
3341 W 59th Street
Chicago, Illinois 60629-3619

Ban trophy hunting

Submitted By
Gerald Newton
Submitted On
10/4/2017 10:54:54 AM
Affiliation
Mr.

Phone
9079780160
Email
gnewton@acsalaska.net
Address
2815 Beulah Ct.
North Pole, Alaska 99705

Please adopt regulations to limit the taking of game for air boats to be the same as for airplanes.

Please adopt the following regulations.

Same day airboat: - It is against the law to hunt or help someone else take big game until 3:00 a.m. the day following the day you have operated an air boat. You may hunt deer the same day as air boat is operated (provided you are 300 feet from the airboat). - In Units 7, 9, 11-13, 14A, 14B, 15-21, and 23-25, black bears may be taken at permitted bait stations the same day you have operated an air boat, provided you are at least 300 feet from the air boat. In Units 7, 11, 12, 13, 14B, 15, 16, 20A, 20B, 20C, 20E, 21D, 24C, 24D, and 25D, brown bears may be taken at permitted bait stations the same day you have operated an air boat, provided you are at least 300 feet from the air boat. Same day air boat operaton take is not allowed on National Park Service lands

Submitted By
helena orges
Submitted On
8/14/2017 5:19:23 PM
Affiliation

nomore killing or abuse let them live

Submitted By
Judith Perna
Submitted On
8/17/2017 8:03:29 PM
Affiliation

Phone
561-275-4849
Email
Jinglejudi@gmail.com
Address
3557 Little Pine Lane
Lake Worth, Florida 33467

Save beats in Alaska.

Submitted By
Bonnie Raine
Submitted On
8/19/2017 7:22:05 AM
Affiliation

God is watching

Submitted By
Jeremy M Reed
Submitted On
10/26/2017 2:28:04 PM
Affiliation

This is absolutely ridiculous. I oppose this.

Submitted By
Debra Robinson
Submitted On
10/27/2017 12:33:30 PM
Affiliation

Phone
907-746-0891
Email
debrawynn@yahoo.com
Address
12000 Woodstock Drive
Palmer, Alaska 99645

This law should never be allowed in Alaska

Submitted By
Jessie Russell
Submitted On
10/27/2017 4:35:30 PM
Affiliation

I oppose

Submitted By
Dawne Santopietro
Submitted On
8/14/2017 3:58:26 PM
Affiliation

It is past time to end trophy hunting. It is unnecessary, horribly cruel, and only benefits hunters willing to put out the blood money it takes to commit these atrocities. Let me be frank, if there wasn't big money to be had in this disgusting business, no one would be taking people to kill animals that often are held captive, only for the pleasure of those who would murder them for fun. This as an industry must stop. We hunted centuries ago to feed and clothe ourselves and our families. This is 2017, totally unnecessary, and will no longer be tolerated by the people on this planet. Thank you.

Submitted By
Alexandra Sophia Seeley
Submitted On
8/20/2017 1:10:14 AM
Affiliation
Change.org

Please illegalize the hunting of bears. It is cruel and totally unecessary to survival. Bears are beautiful, intelligent beings who deserve respect; they have the right to live as much as we do. I also fear that hunting them might contribute to thier extinction. Killing them for fun is low and cowardly. We DON'T need their meat or fur to survive; ILLEGALIZE the killing of bears for any reason other than self-defese!

Submitted By
Margaret Shalit
Submitted On
10/25/2017 12:46:26 PM
Affiliation

Phone
9079404006
Email
Margishalit@outlook.com
Address
PO BOX 7672
Nikiski, Alaska 99635

What kind of government overreach is this!? Stop trying to create pointless laws which will only harm the people around them! Anyone who tried to pass this should lose their job. I'm sick of these bogus claims by people just trying to make a name for themselves. It's part of why so many people resent the government and are voting for a full dismissal of many programs! How is this not obvious?!

Submitted By
John S. Sonin
Submitted On
10/24/2017 3:36:51 PM
Affiliation
Civil Humanity

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Douglas, Alaska 99824

Every loiving organism is crucial to our current Quality of Life!

Submitted By
Patti Stock
Submitted On
8/19/2017 2:37:48 PM
Affiliation

I hope this comes to pass. The last thing we need is for all predators to be killed. Sport hunting should not be allowed. To love the act of killing an animal tells me there is something missing in your psyche

Submitted By
Christine suarez
Submitted On
8/14/2017 3:42:55 PM
Affiliation

Please please stop killing these bears! Its disgusting! Stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop stop !!!!!!!!!!!

Submitted By
Linda Sy
Submitted On
10/20/2017 12:56:40 PM
Affiliation

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32 Wadsworth ave
Si, New York 10305

Please end the hunting and killing of bears! This is despicable!

Submitted By
Donna Thompson
Submitted On
10/27/2017 11:05:02 AM
Affiliation

Board members, you know this proposition is being driven by those who are not affected by it's passing. You KNOW THIS! Do what is right by Alaskans. Please. Do Not Pass.

Submitted By
Susan Toennies
Submitted On
8/10/2017 6:16:16 AM
Affiliation

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Please STOP the killing of bears. It is unnecessary and cruel.

Submitted By
Frank Verito
Submitted On
8/22/2017 12:49:04 PM
Affiliation

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Please save the bears across Alaska, and stop the destruction of old growth forests. Man and nature need someplace on this earth to roam in peace.

Submitted By
Theresa Watt
Submitted On
9/11/2017 11:39:41 AM
Affiliation

Dear Hunting Regulation Decision Makers,

When my husband was on his first caribou hunt last year, he had an opportunity to shoot a mother caribou with a young calf. His partner pressured him to take the opportunity, while my husband (a father), couldn't in good conscience take the shot. He passed up the opportunity and got a different caribou the next day. After hearing this story I read that when the mother is shot, the calf will die within 3 days from dehydration. As a mother thinking about abandoning a defensless child/calf left to die, is about the worst thing imaginable. I looked through the regulations and see that you can not take a mother moose with a calf but did not see the same regulation for bear, bison, caribou, goat, sheep, wolf, or wolverine. My husband is a hunter and a good person, like many Alaskans so he was able to make an honest and wise choice. I wish I could say the same about all hunters but we know this is not the case. Please consider making this a mandatory change as it is uneccesary, wasteful, unsustainable, and cruel to take a mother and leave the calf to die.

Thank you, Theresa Watt

Submitted By
Rochelle
Submitted On
10/24/2017 2:40:57 PM
Affiliation

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San Francisco, California 94114

Look, this is just some evil stuff on the part of ANYONE behind this including our crazy 45!!!

PLEASE HAVE A HEART AND CONSCIOUS AND DO THE RIGHT THING FOR THE ANIMALS instaed of the greedy evil inhuman humans!!! Thank you, Rochelle Willox

Submitted By
Sylvia zimmer
Submitted On
10/20/2017 9:27:43 PM
Affiliation

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Please stop the game hunt. It's insanity. It's for no cause or reason except in the name of a "hobby". Murdering helpless/defensless animals.

Thank you as always

Submitted By
Dave
Submitted On
10/27/2017 10:53:32 AM
Affiliation

Making changes like this will have a negative effect on thousands of people's lifes and how they sustain. Alaska is a fence state not free range. Studies done outside of our state are not relivent to our circumstances. Take all of this in consideration before ruling and making this a ballot to vote on and waste more taxpayer dollars.

Submitted By
Debra
Submitted On
8/16/2017 6:29:51 AM
Affiliation

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Please leave our bears alone. We love our wildlife. There arw really no good reason to kill anjy of these animals. It is up to people like you to figure out a way to to coexsit with them. Murdering them isn't the way to go.

Submitted By
Hunter
Submitted On
10/16/2017 3:11:19 PM
Affiliation

Hi, I would like to make a suggestion to the ADFG. As you know, a nonresident can only hunt Goat, Sheep, Brown/Griz with a licensed guide or with second degree kindred. Unfortunately for people like myself not having kindred, even if I could afford a guided hunt, I don't think I could justify $7,000 for one animal like a goat with my wife. Here is what I am hoping you would consider, Its kind of like a "Earn your hunt".

A person could hunt goat, sheep or Brown/Griz without a licensed guide or second degree kindred if all the following were met:
1. Personally have harvested a Black Bear in the state of Alaska
2. Personally have harvested a Caribou in the state of Alaska
3. Personally have harvested a Moose in the state of Alaska
4. Personally have harvested a Deer in the state of Alaska
5. One of the previous four must have used small aircraft for insertion and extraction of the hunt.

Other options would be to include other species like Wolf, Wolverine, Muskox, Elk or Bison. This would allow someone to set a goal for themselves to achieve with the reward of being able to hunt a species never available to them before. By doing something like this, it would show that they have spent the time learning, preparing and successfully accomplishing at least four hunts to prove they aren't just someone thinking they can handle what they aren't capable of doing.

This would prove financially beneficial to the state as well. People like myself would hunt more species in Alaska if it meant it would open up other hunts for myself. If you look at the four species I listed above (Bear, Caribou, Moose and deer). It would give the state $2200 in tag revenue, even more if it took a couple years to fill a tag. Not to mention, the state would get $160 each time the person came up in license fees.

I don't believe this would affect outfitters much because you will still have all those people who have the money and would rather just spend the money than to work for the chance to hunt a super species.

Please take this into consideration, I would love to be able to plan a hunt where I can say it was a do it yourself hunt that I earned by successfully completing the "Earn your hunt" Program.

Thanks,
Hunter Bouma

Submitted By
Martha
Submitted On
8/14/2017 4:03:02 PM
Affiliation

Please do something to end this, it is so sad and unfair.

Submitted By
Pattie
Submitted On
10/21/2017 7:26:48 AM
Affiliation

Please let them be, we are in their world hunting them,so wrong!!

Submitted By
Sophia
Submitted On
8/14/2017 7:26:37 PM
Affiliation

Please protect our wild life from trophy and game hunters. We have already decimated much of our wildlife habitat and population. I ask that you please consider and find nonviolent ways to allow for humans and wildlife life to coexist. Future generations will thank you.