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# ALASKA FARM BUREAU, INC.



PC01  
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December 28, 2018

Alaska Board of Game  
PO Box 115526  
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Dear Members of the Board of Game:

At your January 10<sup>th</sup> meeting in Petersburg one of the items on your agenda is discussion about the M. ovi issue.

It may seem to some that it is taking a long time to find a solution, but as the science is showing this is a complex issue and shouldn't be rushed. Mycoplasma Ovipneumoniae has been found in Caprinae and non-Caprinae wildlife species around the state (Dall sheep, mountain goats, moose and caribou); apart from one caribou, these positive animals appear healthy.

Given how widespread M.ovi is in the wild populations it is unlikely this is a recent occurrence and may not be the result of contact with domestic sheep or goats. With all this new information and the complexity of the issue it's important to look at the whole picture – population health, stress load, etc. – and not have a singular focus on one pathogen.

We believe ADF&G and DEC have been doing a great job of collecting data necessary for making management decisions to maintain healthy wildlife and domestic populations. With the current information, drastic measures would not appear necessary.

Domestic owners continue to work on education and maintaining separation. Maintaining separation with wildlife is generally a keep point for livestock owners to keep out pathogens and parasites that wildlife carry.

We urge you while discussing this issue to consult and listen to Dr. Robert Gerlach, Alaska State Veterinarian and Dr. Kimberlee Beckmen, ADF&G Wildlife Veterinarian.

Respectfully,

Scott Murgage, President  
Alaska Farm Bureau, Inc.



Submitted By  
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12/28/2018 1:56:34 PM  
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Alaska Outdoor Council

Comments to Board of Game members for the 2019 January Work Session, agenda item #6.

RE: Board Findings for Allocating Nelchina Caribou Hunting Permits.

The Alaska Outdoor Council represents 48 Alaska Clubs and individual members, numbering around 10,000 Alaskan, who hunt, trap, fish, and recreate on public lands. AOC has opposed the Alaska Board of Games Findings #2006-170-BOG dividing state subsistence users into two groups since its conception in 2006. A decade later and nobody still likes it.

The board will be addressing their "findings" (I'm assuming that means their past findings on subsistence use management of Nelchina caribou) regarding allocation permits for Nelchina caribou hunts at the January 10, 2019 BOG Work Session. It's best that board members be reminded that the only way the BOG got sanctified to divide subsistence hunters up into either community or individual users by the Alaska US Supreme court is the fact that;

"participation in a community harvest was open to all Alaska residents". (AFWCF v. SOA and Ahtna, 2015)

Findings based on giving a preference to users of Nelchina caribou based on criteria of residency, culture or ethnic backgrounds is against AOC Policy 2-83:Subsistence Priority and Common Use Management. And hopefully the Alaska Supreme Court justices also.

The 2006 BOG findings on Nelchina caribou (and moose subsistence uses) in GMU 13 does need re-addressed. But not in Petersburg. The board's decision to take this issue up in Petersburg tarnishes the public process regulating hunting in Alaska.

The whole notion that the BOG's long-term goal for allocating Nelchina caribou back in the 2006 board findings is "to design a system to accommodate subsistence-dependent users in such a manner that permits can be virtually guaranteed from year to year" needs re-addressed. If that is still the board's goal for Nelchina caribou hunting permits ten years after I'm unaware of it.

There is no reason why the board couldn't just vote to repeal the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area for moose and caribou. 5 AAC 92.074(d). It's creation was only based on getting around the Tier II regulations.

The division of subsistence users into two patterns by the BOG in 2006 findings, community or individual, hasn't achieved any of the hunters expectations. I have been unable to find out how much the whole Copper Basin CSH has cost the state. And just as importantly who is paying for it? Is any of it coming out of the Fish & Game Fund, AS 16.05.100? Are PR funds used? How much funding from OSM, if any? Surely implementing Tier II hunts during times of shortage by the board couldn't cost the state as much as the ill conceived Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area.

Adopt a rotational Nelchina caribou harvest permit based on the numbers of Alaskan residents who apply. Stop trying to find ways of discriminating among Alaskans who choose to gather a wildfood harvest during times of reasonable harvestable surplus.

Thanks your consideration,



Submitted By  
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12/28/2018 2:56:40 PM  
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Chairman Spraker, and members of the Board of Game:

I would like to comment regarding agenda item #8, regarding the M. ovi discussion.

There are a number of domestic sheep and goat owners who have been deeply engaged for the past three years in working on this issue. Our goals include educating producers across the state about the importance of maintaining separation between wildlife and domestic livestock, identifying the presence of M. ovi through testing, taking steps to mitigate the pathogen, and establishing protocols for biosecurity.

With the recent improvements and standardization of testing protocols for M. ovi, ADF&G has identified M. ovi in both wild sheep and goats, as well as moose and caribou, some of them in areas where no domestic livestock herds or flocks exist. The factors in the transmission of the pathogen are unclear, but what is eminently clear is that it is to everyone's best interest to maintain the separation that already exists between livestock and wildlife.

Biosecurity measures that we ourselves have adopted include limiting visitors to certain areas of the property, having several livestock guardian dogs whose job includes deterring wildlife (as well as human intruders) from approaching fencelines, and keeping any new animals isolated in a quarantine area until test results demonstrate that they are free of disease and pathogens. This is in addition to our routine annual whole-herd testing, and participation in the state vet's M. ovi study.

Although we as domestic owners cannot control the behavior of wildlife, we are utilizing all of the resources at our disposal, as mentioned above, to prevent contact between our livestock and wild animals on our own property.

Respectfully submitted,

Suzy Crosby



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12/28/2018 3:04:46 PM  
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Dear Alaska BOG members,

Concerning Item 8 on the agenda:

8. Invasive Disease and Parasites Discussion Including M.Ovi and Moose Winter Tick

Please consider this subject in light of facts and considering risks vs. costs and not be influenced by money, popular opinion, or other pressures that would dilute wise decisions.

I keep a domestic dairy goat herd securely fenced in on my own property, keep my animal's healthy and well nourished, test regularly for CAE, CL, & Johne's, have a vigorous parasite management protocol, and have tested for M.Ovi. My herd is not at risk of interacting with wild goats or sheep. I would like to maintain the freedom to supply myself and my family with food that my animals produce. In light of the recent earthquakes in my area, I feel it is very important to protect and support local food sources.

Thank you for your careful considerations of this matter.

Kelly Dellar



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This is in regard to Item 8 for your workgroup on Jan 10. Having a sizeable fullblood Boer meat goat herd with ennobled genetics causes my concern about the efforts by some to hamper or delete this viable agricultural enterprise on Eielson Farm Road out of North Pole. This stock will never be in contact with Dall sheep given our geographic location so the risk of M.ovi passage is impossible. The majority of my market stock is for terminal use as meat product. Any animals sold for breeding stock become the responsibility of the new owner. No one wants to hurt the Dall sheep. But if the risk of Movi transmission is not reasonably stratified by location (whether stationary farm or transient packing use) and mitigation measure is not applied only where risk is possible, then it's fake news and wasted effort. In other words, leave my herd alone because you cannot put every goat owner in the same risk pot at stir, especially putting Alaskan folks in the lower 48 risk pot! This doesn't have to be that hard or that big! The over reaching shock statements and proposed measures by Kevin Kehoe and WSF are fraudish and outlandish. It's hard to believe that this issue got this far through our well meaning official channels, you guys should be able to see through this stuff. I mean, take all goats off clean list and making them basically untenable to own? Really? In the land of homesteaders? If it wasn't so serious, it would be funny! What I really resent is the fact that hunters and farmers are being divided and pitted against each other, both great groups of Alaskans, over an issue that history will point back at as a non-issue!



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Hello-  
My name is Debra Lucero. I would like to add comment for the upcoming BOG Work session on 1/10/19 in regard to #8. I am an owner of domestic goats. I am concerned with attempts to control the domestic sheep and goat population. I am relatively new to goat production, but have had excellent mentors in the goat community from the Kenai Peninsula to the Mat-Su borough. Based on recommendations from my mentors, veterinarian and preliminary report by state veterinarian, I have implemented strategies to keep my herd safe. I attempt to keep wild animals from interacting with my goats by using a 5' fence to surround the area where my goats live/graze. I have a relationship with a local veterinarian and my herd has been tested for CL, CAE and Johnes disease. One of my 3 goats has been tested for M. ovi. I plan on adding M. ovi to my annual testing in fall 2019. I am currently working on a biosecurity plan that will be finalized in spring 2019. I am vested in the health of my animals and would be interested in reasonable measures to insure the health of the wild population.  
Thank you,  
Debra Lucero



**From:** Michelle Myers  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments Jan 10th Meeting  
**Date:** Sunday, December 02, 2018 10:31:11 AM

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#8

Realizing M-Ovi and Ticks are scary. Elected officials and some appointed and F&G employees are hearing and reading a lot of, well fear mongering. Others who take the time to get informed on these issue understand overreaction impacts basic civil liberties and the Alaskan way of life.

M-Ovi is a sensitive issue. More research is coming in every day. Do dogs carry an M-Ovi variant? Everyone understands we need some common sense rules. We need to know where the current wild herds are actually roaming. Yes we need a buffer zone established. We know stress is a factor in herds getting sick. Movement in their home zones causes stress, add that movement at fall/winter has a harder impact.

Helping farms starts with NOT allowing illegal agreements. If someone came to you and said sign this binding legal document; You may NOT disclose; You will NOT know the terms till AFTER you sign; You MUST abide by what we want. And use fear mongering that farmers are NOT working with them? This is just WRONG.

Helping farms in 1/2 hiking mile?, from within last 2 years established location, help these farms receive funds to move. 1 hiking miles? should receive move or double fencing funds.

Yes everyone wants to wild herds to grow. First we need good solid research that documents potential corridors for growth. Then funds need to be made available to farms in that area.

TICKS! Yuck. Okay here is the best suggestion I have. Pattern this on the local volunteer fire departments. Establish a set of rules for hunters, locals, etc. Take this online class, learn about ticks. If you see a moose with ticks do (insert here). I would lean towards, kill and apply a tick kit?, and send documentation to F&G.

On board anyone who lives in identified tick areas to help with this! Admit as a dog owner I didn't want my dog near a tick pile, reality is dogs can help find these piles so we can provide early treatment. Pattern this on a bounty program.

Thanks for reading  
Michelle



**unapologetically FOR ALASKAN RESIDENTS**

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December 27, 2018

## Comments to Alaska Board of Game

### Work Session – Petersburg

January 10, 2018

Dear Board of Game members,

Regarding setting a policy or Finding on allocation of Nelchina caribou draw permits, we believe the board should wait until the next Region II meeting this March in Anchorage to further discuss this and allow the public to send in comments.

During the last board teleconference it was mentioned that the board would like to set a policy that determines which Nelchina caribou hunts have priority, and it was further mentioned that the priority would likely look like this:

- #1 priority – Tier 1 and CSH hunts
- #2 priority – Youth Hunts
- #3 priority – DC 485 permit hunt

We don't yet know how many permits for 2019 will be available for the DC 485 hunt, but what we do know is that the 5,000 permits formerly available will be reduced to 500 or less.

In 2017 the board created a new youth hunt for Nelchina caribou and advised the Department to offer up to 200 permits. We certainly support youth hunts, but have concerns that the "up to 200" permits for the youth hunt may be too high given loss of opportunity for the DC 485 hunt that so many Alaskans depend upon.

We also have concerns that there have been numerous proposals seeking to rescind the CSH hunt, and putting that hunt as a priority in policy could affect future proposals in that regard.

The board is aware how controversial these issues are, and the recent loss of opportunity for 4,500 Alaskans to hunt Nelchina caribou under the DC 485 permit makes it even more so.

We don't believe these issues should be set as a policy or Finding at this work session.

Sincerely,

Mark Richards  
Executive Director Resident Hunters of Alaska (RHAK)



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12/28/2018 4:17:05 PM  
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Dear Alaska Board of Game,

Thank you for the opportunity to comment on a work session item on your January 10th agenda. Item number 8 (Invasive Disease and Parasites Discussion Including M. ovi and Moose Winter Tick) is of particular concern and interest to me as a domestic goat owner and dairy producer.

A lot has happened in the goat/sheep community since I gave testimony at the BoG meeting in November of last year. Much has also happened in the testing of the wild population of Moose, Dall sheep, Caribou, Muskox and Mountain goats. I personally had not tested my herd of dairy goats as of the BoG meeting in November 2017. After the meeting I decided to test my herd for many reasons, but the number one reason for me personally testing my herd of dairy goats for *Mycoplasma ovipneumoniae* (M.ovi) was to do no harm to others. "Others" may be my friends and clients in the domestic community that I sell goats to, based on the uncertainty of a Proposition by the Alaska Wild Sheep Foundation. Or "others" might be Dall sheep, given the very minimal risk based on our situation compared to the lower 48 of disease transmission. Either way – I tested my herd, as did many, many others in the domestic goat/sheep community. The Alaska Department of Fish and Game also tested approximately 1,500? wilds as of October 2018. We are still waiting for the press release on all of those results. But, in summer 2018 a dead caribou was discovered and the ADF&G press release said this animal was in poor condition, but ultimately died from *Mycoplasma ovipneumoniae*. There were other press releases by ADF&G detailing M.ovi being found in other species beyond Caprinae. A research paper for the CDC Emerging Infectious Diseases was written and published by Margaret A. Highland, David R. Herndon, Scott C. Bender, Lisa Hansen, Robert F. Gerlach, and Kimberlee B. Beckmen December 2018 based on *Mycoplasma ovipneumonia* in other species. And the Alaska Wild Sheep Foundation took every opportunity to comment in every press release in local newspapers that "their" worst fear had happened and M.ovi was spread to the wild population by domestic sheep and goats. So, let us now fast forward to the first working group meeting between domestic producers, AK WSF, hunter/conservation groups where Kevin Kehoe President of the local Chapter of WSF denounced the science of M.ovi being found in the wild population in Alaska, even though it was confirmed by 2 laboratories, and highly esteemed veterinary scientists. It was a WTF moment for the participants from the domestic community on the working group.

We in the domestic community are very vested in the health of our animals and we are willing and interested in reasonable measures to insure the health and safety of the wild population. It's truly a win win situation to keep domestics and wilds separate from each other. There are many ideas and programs that would benefit both domestic producers and Alaska's wild animals. We need to work together as a team on the same playing field without some of the over the top game playing by the AKWSF. I hope the BoG can continue to see the benefit of us working together and not against each other. Jeff and I are looking forward to the next working group meetings January 5th & 6th.

Sincerely, Tina Starr Judd



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12/28/2018 3:25:22 PM  
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My comment is regarding item 8 on your agenda regarding M.ovi in domestic shee and goats and possible threat to wildlife.

I implore you to hold off taking any action until the prevalence study being conducted through the Alaska State Veterinaian's office is completed. Too much is not known about M.ovi, and any action taken now would be premature.

My goat herd was part of the prevalence study, and I feel strongly that the process be completed with the publication of the paper and peer review. I am concerned that the Board of Game is receiving undue pressure to take an action to "protect" wild populations before we know if that is even possible. Given that tests show that M.ovi is present in wild sheep and goat populations as well as in caribou populations, I think it's impossible to meet a goal of having a "M.ovi-free state." Instead, let us all wait for the scientific process to be completed regarding the prevalence study.

Again, I urge members of the Board of Game to act not in haste, but only after receiving all the factual information that is available. Thank you.



Submitted By  
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12/28/2018 1:51:26 PM  
Affiliation

I am writing today in regards to the final subject on your list of discussions. As you approach your discussion on disease and parasites, I think it is important for me as a domestic goat owner to give some insight on my own personal management practices taken to protect my animals and I hope other domestic owners will do the same, as I know the majority of producers in this state are proactive in disease management. I personally keep my very small herd of dairy goats on a fenced half acre portion of our property. We chose a style of fencing that deters moose from ever entering the goat's area. We also have 4 livestock tending dogs. We keep a closed herd which means we do not take our goats off the property and other goats do not come to our property. I draw blood on my entire herd annually to test for CAE, CL and Johnnes disease, with negative results every year since I got my first goat. This year I even sent in a liver sample on a butchered goat to have a mineral screen performed to get a general idea on the health of my herd overall, with good results. I worm my herd quarterly and treat preventatively for lice at least twice a year. I have never had a lice outbreak on my farm as of yet. I was on the list to have my herd tested for Movi this year, but as many of you know our local veterinarian on the Peninsula is not of good health and it has left a void in our community. I am more than willing to have my herd tested for Movi. The health of my herd is my top priority in raising quality animals and practicing proper biosecurity is of utmost importance to keep my herd healthy. Thank you for your time