

Submitted By
Jacob Klapak
Submitted On
2/26/2016 7:07:13 PM
Affiliation

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Dear Board of Game,

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

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

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

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

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

I strongly oppose Proposal 90. I am an avid hunter and family farmer so I see both sides but do not feel that this would be a wise decision. Our kids are planning on doing 4-H and this would hinder their hopes of doing this. I would appreciate you taking adequate time to look into this and have a longer more public comment period.

Thank you, Jacob Klapak

Submitted By
James Armitstead
Submitted On
3/3/2016 10:41:00 PM
Affiliation
Mr.

I am very opposed the Prop 90. Now, more than ever, we need Alaskan farmers raising all kinds of food. Recently, many Alaskan grocery store shelves were empty, especially meat shelves, when a Tote ship was having mechanical problems and couldn't deliver food to our state for a few weeks. I'm a crane operator at the Port of Anchorage and have worked at the dock for 40 years. I see the ships come and go. The Port of Anch is in terrible condition and the cranes are ancient. We should NOT depend as much as we do on shipping. Self sufficiency and food security should be our highest priorities in this state. Let's make farming EASIER, not harder!

Testing sheep/goats and stricter fencing requirements will make it too expensive to raise these animals. These domestic animals provide meat, milk, fiber, and ingredients for soap makers. I know this to be a fact, because I buy lambs and goats from local farms for meat. My wife spins yarn from the fleece of both species, AND she makes all of our family's soap. Sheep fat makes wonderful soap!

Fewer domestic sheep/goats will impact the hay and barley farmers in decreased sales. People with food sensitivities (there are MANY!) are going to have no choice but to move elsewhere. Yarn, and fiber shops that have been trying to increase the amount of AK grown products available to consumers, may have to close their doors.

There has been no known cross contamination of disease from domestic animals to wild sheep herds. Prop 90 will do more harm than good. Please do not support the proposition.

Submitted By
james Folan
Submitted On
2/27/2016 11:47:29 AM
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I do not agree that domestic livestock poses a risk to wild animals in Alaska and I oppose any law or reg that would restrict domestic livestock in Alaska.



Submitted By
James O'Connor
Submitted On
2/25/2016 10:49:21 PM
Affiliation

Proposal 90 has been brought before the Alaska Board of Game by the Alaska Wild Sheep Foundation (the local chapter of a well-funded outside national organization), whose primary mission is the “conservation” of wild Dall sheep for purposes of recreational viewing, hunting, etc. They are requesting that the Board of Game eliminate domestic sheep and goats from Alaska’s “Clean List”. Their proposal would require that all owners of domesticated sheep and goats obtain permits from the Alaska Department of Fish and Game (ADF&G) to own their livestock, complete expensive testing for unspecified diseases (testing which is not yet available), and that “all domestic sheep and goats within 15 air miles of Dall sheep habitat must be contained within a ADF&G approved facility (double fence, etc.)”

Based on studies from the Rocky Mountain West in areas where free-range grazing on public lands is permitted and disease transmission is allegedly, but not scientifically proven, linked to overlapping ranges and direct contact between wild and domestic herds, the Wild Sheep Foundation is asking the Board of Game to take what they refer to as “proactive” and “preventive” measures here in Alaska.

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

Even if you don’t live in Alaska, this proposal should be both concerning and objectionable to you. At no other time or place in the history of this country has a group of conservationists led by hunting interests attempted to coerce a government agency to put small livestock owners out of business by enacting regulatory action with costly inspection and enforcement ON PRIVATE LAND. If this proposal is successful in Alaska, the Wild Sheep Foundation and other related “conservation” organizations will likely put other species of livestock in Alaska as well as other states in their cross-hairs. Farming and hunting are both time-honored traditions, and neither group should be unreasonably disenfranchised to serve the other.

It’s not just about our animals, it’s about our freedom as taxpaying landowners to use our own land to grow our own food. Please join us in OPPOSING Prop 90.

Submitted By
Jared Palmer
Submitted On
3/4/2016 3:19:30 PM
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Im writing in opposition to prop 90 because it is absoltley uncalled for and there is no real backing behind the causes. The only thing that this prop will do it ruin thousands of farms and families that constant rely on the product an income produced by these animals.

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
By fax: (907) 465-6094
By On Line Comment Submittal

Dear Alaska Department of Fish and Game, Boards Support Section,

Please accept the comments below in opposition to Proposal 90 being considered by the Board of Game at the upcoming Board of Game meeting in March.

Proposal 90 seeks to limit, restrict, and regulate the ownership of domestic sheep and goats in the State of Alaska by removing them from the State's "Clean List"; to require 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".

This proposal is not well conceived and has not been adequately vetted through a broad based public process. The Wild Sheep Foundation has rushed this proposal through the Board of Game process without sufficient involvement by all stakeholders that would be affected. Apparently it was included in ADF&G Advisory Group meetings recently, yet Advisory Group meetings are not generally attended by non-hunting interests, and no appropriate notice was given to parties that generally don't look to see what's on the ADF&G Advisory Group meeting agenda. Only recently has the Alaska Department of Law, Alaska Department of Fish & Game (ADF&G), Alaska Department of Environmental Conservation (ADEC), and State Veterinarian's Office been engaged in a conversation involving legal jurisdiction, regulatory authority, effects of the Proposal if passed. Virtually no engagement of the Department of Agriculture, the Farm Bureau, or broad based discussion with private domestic sheep and goat owners has taken place. The Wild Sheep Foundation unabashedly understates the significant devastating effects that this Proposal would have on the livestock community in Alaska, and on those State agencies that would be required to implement and oversee regulatory compliance. **To date, this Proposal is tantamount to a special interest group's extreme prejudice at the expense of all other interests involved in this issue.** The Proposal would impose costly oversight by the State, and severe economic burden to Alaskans who already do, or those that would like to, own goat and sheep in the future.

Is the rationale for concern for the protection of the State's wild Dall Sheep? Yes. Is Proposal 90 an appropriate response? Absolutely not. Proposal 90 is simply an extreme overreach of

government regulatory requirements which are not necessary in the State of Alaska. Are there more reasonable and appropriate measures that can be implemented to ensure the protection of wild Dall Sheep in Alaska? Yes. **Yet, those reasonable and appropriate measures need to be fully vetted through a comprehensive, collaborative, and respectful process with ALL of the Public agencies and Private parties that would be affected.**

If Proposal 90 were to be approved by the Board of Game, the ADF&G will be required to implement regulations, issue permits, review testing results (for as of yet unspecified, and perhaps even unavailable, tests), and inspect and approve fencing requirements throughout the State of Alaska, all of which will add untold expense to the ADF&G at a time when the State of Alaska is already grappling with an annual budget deficit of over \$3.5 Billion. The Alaska State Troopers Wildlife Division has affirmed via correspondence to the ADF&G that they have no resources to enforce this proposal in light of the State's budgetary crisis. Adding a new costly State regulatory oversight program is simply ludicrous, and unnecessary.

The Department of Law has recently provided an opinion that the Board of Game and the ADF&G don't have legal authority to regulate domestic livestock, yet, the Wild Sheep Foundation is asking that the Board of Game, which sets policy followed by the ADF&G, to essentially do so by removing them from the Clean List. Removing them from the Clean List is simply a back door approach to attempt to regulate domestic livestock. Candidly, it would seem more appropriate that the "Clean List" is managed by the Alaska Department of Environmental Conservation, not the Board of Game.

There is no precedent for taking domestic livestock off the "Clean List" in the State of Alaska. The Department of Agriculture and the Farm Bureau opposes this action. The thousands of owners of domestic sheep and goats in the State of Alaska oppose this action. According to the State, chimpanzees were the last animal taken off the list many years ago. The "Clean List" was created to provide a means of restricting exotic animals of concern from entering our state, not intended to restrict the possession of common domestic livestock.

Removing domestic sheep and goats off the State's "Clean List" would potentially result in the inability, or extreme difficulty, to import or export genetic diversity of domestic sheep and goats into or out of the State. Removing domestic sheep and goats, and other common livestock, from the "Clean List" should be a "non-starter". Other more reasonable solutions could be agreed upon and employed to provide the protection to the Wild Dall sheep population.

Dall sheep "habitat" areas have yet to be delineated for this purpose of this Proposal, but presumably as proposed, a 15 mile radius from areas of wild sheep habitat would encompass all

of Anchorage, the core area of the virtually the entire Mat-Su Valley, most of the Kenai Peninsula, and untold other areas around the State. Dall sheep do not come out of the Chugach or Talkeetna Mountains into the Anchorage bowl or Mat-Su core area, and domestic sheep and goats are not going into those Dall Sheep habitat areas. 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, and natural predators.

The Wild Sheep Foundation is applying the unique experience of Lower 48 States where there are very different circumstances than those that exist in the State of Alaska – Livestock grazing on public lands does not exist in Alaska like it does “outside”. There has not been a single case of proven virus transmission in the State of Alaska between domestic livestock and wild sheep populations. Even outside the State where there have been incidences of wild sheep die off due to disease, it has not been conclusively proven that the virus was due to transmission from domestic livestock. Wild sheep naturally carry the bacterium that causes the virus and it is equally possible that natural environmental stress conditions trigger the disease that is detrimental to wild sheep.

Requiring the actions proposed by the Wild Sheep Foundation would effectively result in extremely expensive and unnecessary burden on domestic goat and sheep owner enthusiasts, 4-H participants, and small farm operations which are providing valuable, locally raised meat, milk, fiber (wool), and related products to Alaskans. It would impact the ability to own domestic sheep and goats, and have a negative state-wide economic impact.

I respectfully request that you decline Proposal 90 and direct the Wild Sheep Foundation to rethink and restart their proposal in a more collaborative, constructive, and inclusive manner with the Department of Agriculture, ADEC/State Veterinarian’s Office, Alaska Department of Fish and Game, the Alaska State Trooper’s Wildlife Enforcement Division, the Farm Bureau, and a broad based effort to engage and seek input and buy-in of the state’s private owners of domestic sheep and goats.

Sincerely,



Jeff Judd
Wasilla, Alaska

Submitted By
Jenn Holde
Submitted On
2/26/2016 12:18:58 PM
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Regarding prop 90.

Domestic sheep and livestock are no threat to wild populations. The bigger threat is to our food source if there is a stoppage of any kind in getting grocery stores resupplied. Many folks here grow our own food. Without our livestock to back up the food supplies the wildlife here would have to be used for food even more than it is now. If there are food shortages, there will not only be hunting there will be large scale poaching. This proposal puts undue financial hardship on livestock owners, requires unneeded permitting which add to the work load of those who would oversee the permitting and enforcement of the new rules and regulations. Plus they would cause all types of issues without by not allowing the import of new genetics into the food line, Thus the interbreeding would cause inferior quality in the remaining animals. In some cases the families rely on the milk, wool, and meat. Some people are allergic to cow's milk and have to rely on goat milk. These requirements and regulations are unnecessary burdens and would be a doorway to stopping other animals and farming leaving us dependent on the lower 48 if they have not been shut down for farming as well.



Submitted By
Jennifer
Submitted On
3/4/2016 11:33:21 AM
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We are domestic goat owners and also hunt. We LOVE the freedom that we have in the United states and state of Alaska to live our lives as we see fit. Raising our own food is a big part of my families lives. Proposition 90 is a misinformed attempt to limit the freedoms we have as livestock owners. Passing proposition 90 will not have any effect on the survivability of Alaska's Dall Sheep populations but will effectively cause undue damage to the livestock industry in Alaska through unnecessary and misguided regulation. As owners of domestic farm animals we have found that nutrition is a vital part of keeping our animals healthy. Survivability of a goat kid is based mainly on the nutritional health of its mother throughout pregnancy and its ability to receive nutrition from its mother early in life. Additionally, pregnancy rates and successful kidding rates are a direct result of nutritional levels. If we apply the same principals of nutrition to Dall Sheep we can see that there is good reason they are struggling to maintain sustainable population levels. Given the recent years of warm, dry summers and mild, icy winters, the Dall sheep population is having a difficult time maintaining appropriate levels of nutrition. We see the effects good and poor nutrition has in our goat herd and can imagine the frustration hunters and guides must feel knowing that they cannot affect the nutrition of Dall Sheep to encourage their populations.

The idea that domestic animals are causing disease in Dall Sheep populations and therefore causing their decline is simply not true. Not one report I have read concerning the mortality rates of Dall sheep in Alaska suggested transferable diseases from domestic animals caused any sheep deaths.

Please do not restrict my freedom to raise farm animals based on the erroneous, misguided theory presented in proposition 90. Please vote no on proposition 90



Submitted By
Jennifer Wallis
Submitted On
3/4/2016 11:42:32 AM
Affiliation

Proposition 90, concerning domestic sheep and goats is poorly written as well as an unnecessary precaution for Alaska. The removal of goats and sheep from the clean lists will be disastrous for Alaska in many ways. The ramifications for our 4H kids, and the inability to bring up new bloodlines being two of the worst effects. I sincerely hope that the board of game will consider Alaskan's needs when looking at this proposition, rather than the wants of outside interests. As many of you may know, our domestic sheep and goats do not free range up here like they do in other states, so the opprrtunity for wild infection is just not present here. Not to mention the fact that the diseases of concern are not an issue among our domestic animals anyway. Considering that fact, the precautions listed in Prop 90 are excessive and unneeded. Thank you for the opprrtunity to express my concern.

Submitted By
Jerod Cook
Submitted On
2/27/2016 7:09:05 PM
Affiliation
Resident

I do not support Proposal 90 in any form. With things the way they are in the State right now we should be supporting farming of any kind through out the state. No special intrest group should be put before another. The wild sheep in question do not live in the same areas that farming is taking place. I find it hard to believe that this is a big problem in Alaska. Don't make it a big problem by passing another law for a special interest group. A farmer should be able to have any demestic animal he feels he needs on his farm here in Alaska with out having to worry about government coming around and telling him what to do with them. NO on Proposal 90.

Submitted By
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Submitted On
3/4/2016 2:35:19 PM
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I am writing in opposition to prop 90 because for years goats have been providing hundreds of families with ways around new age allergies. If goats are taken off the clean list hundreds of family's will loose their heathly source of organic foods, and it will most likely hurt the economy here about 50% if not more people here strives off of their livestock. You would be wiping out hundreds of farms and families just the same.

Submitted By
Jessica Bush
Submitted On
2/29/2016 4:43:14 PM
Affiliation
Private owner

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I am against Proposal 90 that is being brought to the board of fish and game by the Alaska Wild Sheep Foundation (the local chapter of a well-funded outside national organization). Myself I am a born and raised Alaskan woman. I grew up in Alaskan farming in Houston Alaska along my grandpa's side whom had been up in Alaska since 1944. Years before Alaska became a state. He owned 172 acres we used for farming. Never once did we see any Dall sheep in our area and we were surrounded by mountains. The only place we ever seen Dall sheep was way out away from any time of civilization or homesteaders. We had to fly hours to reach them. So the worry of Dall sheep ever being in our property was never an issue. We seen moose much more often then Dall sheep.

I have one little dawf sheep I saved from being killed. She is the most spoiled and loving little sheep you could ever meet. She has a little jacket she wears if it is to cold out. She gets fed a good diet of lamb chow and hay, she gets fresh bedding daily. She loves to play soccer out in the yard and chase the dogs around. She loves to be petted and wags her tail with happiness. She is part of my family. We have a fenced in yard, and our neighbors all around us have fenced in yards. I don't let her roam in the yard without supervision, matter of fact she rather play in her nice room we made for her. We get her check ups with the local veterinarian's that specialized in farm animals. We even have her micro chipped. We shear her wool in the spring and use it to make some extra income. The main part is she is part of our family.

The thought that I would have to lose my well cared sheep because of some ridiculously poorly thoughtout proposal as Proposal 90, makes me sick. The thought of local farmers, pet owners of domestic sheep and goats that have invested money, time and love into their little family members and them losing their incomes, way of life or beloved pet due to some scummish proposal. We need to keep the clean list and find differnt and better solutions instead of hurting the Alaskan people and future generations. This state is already in the middle of a recession and people have already been moving out, this would just give another reason for people to invest in another state instead of Alaska. The more rights we have taken away, the more people will not stay. Alaska people are differnt the people in the states, we need to be able to self sustainable. The fact that Alaska is mostly covered in mountains is ridicouls to have an air space of 15 miles to have domestic sheep and goats. Have you seen the farming area's? Do you really see how much this would harm the economy and Alaskans that depend on it. It's also ridiculously to picture Dall sheep roaming around in a civilization city, such as Anchorage. Perhaps on top of a mountain range sure. I could see them roaming around up there.

This proposal would cost the state itself money to even start this. To change property zoning rights after people already spent hundreds of thousand of dollars into investing into them for having sheep and goats, i am sure would cause some lawsuits from money and income lost to farmers and other business and homeowners whom bought the land just for the zoning right to have sheep or goats.

This proposal is truly unnecessary and Alaska finacally can't afford to have. I truly hope you don't accept Proposal 90. I truly hope the future generations can enjoy having domestic sheep and goats. Also for the Alaskans that already invested tons of money, time and love to their sheep and goats to be able to keep what they already have.

Thank you for your time and consideration.

Jessica bush



Submitted By
Jessica DeVeaux
Submitted On
3/4/2016 1:42:52 PM
Affiliation

This is a classic example of outside interest groups throwing regulations at State of Alaska resources without a clear understanding of our differences with other states. Alaska demographic and topography do not lend themselves to a 15 mile regulated agricultural zone vs wildlife zone. Much of Alaska shares these spaces. There haven't been any documented cases of diseased sheep from domesticated sheep and goats. The proposal is broad and doesn't show the regulations implicated or how they will be imposed by State of Alaska fish and game or wildlife conservation. I am opposed to this proposal as it is too broad and doesn't represent the best interests of Alaskan wildlife or domestic husbandry, many of us depend on our animals for sustainability.



Submitted By
Jessica Dickinson
Submitted On
2/26/2016 1:43:33 PM
Affiliation
No on Prop 90

Submitted By
Jessica Salyer
Submitted On
3/4/2016 3:19:02 PM
Affiliation

This comment is in response to goats possibly being added to the dirty list in the state of Alaska. I am asking personally that the board does not move to do this because many families in Alaska use goats milk and by-products to feed and provide for their families. Making it impossible for Alaskan families to have goats would directly affect their capability to be self-sufficient and earth friendly. Another thing to note here is that goats milk is often used for children and adults who have allergies. Removing goats from the clean list would burden Alaskans who provide for themselves and live a certain life style. Thank you for your consideration.



Submitted By
Jessica Sheneman
Submitted On
3/4/2016 3:12:22 PM
Affiliation

I am opposed to people coming in and taking away all of the livestock. This is a lot of people's lifestyle.

Submitted By
Jim O'Connor
Submitted On
1/27/2016 9:24:49 PM
Affiliation

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I am very strongly opposed to taking goats and sheep off of the clean list. Goats and sheep are a significant part of the local food economy. Hampering the keeping, transfer in and out of state and utilization of goats and sheep would have very negative effects for the substantial number of people who keep goats and sheep and those who indirectly benefit from them.

I value the native wildlife of Alaska, both for their beauty and their utilization for meat and sport. However, I see no trade off here to be made. I see no compromise.

Leave people's goats and sheep alone.

Submitted By
Jim Wolford
Submitted On
3/4/2016 1:08:09 PM
Affiliation

I am opposed to the adoption of Prop 90 at this time. I don't think there is enough evidence currently to warrant this. It would place unwarranted regulations on owners of goats and sheep in the Mat Su area, most of which would have virtually no chance of having their animals interact with Dall Sheep.

Also I understand that some of the board members are also members of the group submitting the proposal. In addition I feel that the game board is too heavily weighted with hunting interests, without proper representation to non consumptive users. This to me smacks of "conflict of interest".

I am a hunter and have been for a long time.

Submitted By
Joanne Daniels
Submitted On
1/13/2016 10:50:14 PM
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I feel hindered by not being able to get to Fairbanks to make my voice heard. I hope someone will present my letter to the decision-making body. Our family came to Alaska from NY in 2010. People often ask why we moved. The answer is easy...freedom. In New York we had to have a permit to carry a concealed handgun, a permit that I could no longer get if the judge deemed it unnecessary. Therefore, I could not touch/use my husband's handguns even in defense of our children and property or I would be the one going to prison. I was not allowed to touch any handguns at sporting good stores. We could not remodel any part of our home without a government permit. We could not live in a new house until all the government inspections were completed. We were not allowed to have an outhouse. We were not allowed to use burn barrels. Outdoor furnaces were on their way to being banned. We were allowed to homeschool, but only if we turned in all the appropriate paperwork in a timely fashion. A family one county from ours had all 10 of their children removed from their home just before we moved because they failed to turn in all of the required information, even when it was proven that the children were very well educated and working at grade level. We were not allowed to drive our 4 wheeler off of our property without government permission. These many constrictions didn't happen overnight. They happened little by little as the government "deemed" things necessary for the "protection" of its citizens. In short, we felt like we were suffocating. Alaska's freedom beckoned.

So I feel it is my duty as a newcomer who came from outside to warn you that this small harmless requirement of permits may seem little, but it is not harmless. You seem to be reacting (as opposed to acting sensibly) to information and experiences with which the lower 48 are dealing. The vast majority of Alaskan goat and sheep owners have zero interactions with wild herds. Yet you seem eager to establish wholesale regulations on the Alaskan domestic herd of which a VERY small percentage MIGHT be involved in this problem that you MIGHT have! Just because they are having to eradicate bighorn sheep herds in the lower 48 where domestic animals often share grazing with wild herds does not mean that we will have that same problem here. Alaska has a totally different set of variables! You must take that into account! Furthermore, you must understand, in our country today, the informed citizenry is extremely alert to government intrusion, especially when it is unnecessary. Our freedoms are being taken just one little permit at a time at the whim of government and non-constitutional governing bodies and we are to the point that we cannot afford to ignore even the "little" things anymore! Furthermore, in Alaska we are making great strides to become as food independent as we can be. This is neither easy nor cheap. Mandating permits on these animals is just one more thing we have to think about...more unnecessary work that makes what we do harder. And who is to say that it will stop with sheep, goats, and cows? In NY they were requiring us to pay a fee and register our dogs! Farmers were being charged a tax for the methane their cows were producing that was supposedly damaging the earth! Where does this end? Who will stand up for the responsible citizens?

(On a side note, who can even remember what freedom looks and feels like anymore? I'm not sure I'd recognize it. Sometimes I daydream about it. What I see is beautifully wild. The responsibility of it turns boys into men. It forces creativity. It demands accountability. Courage, honor, and justice dwell with it. It makes me weep because neither I nor my children will ever experience it fully.)

I WILL say that I am a bigger and bigger advocate of herd testing. I am finding that very few people are testing their animals. Many are declaring their animals to be "clean" and are spreading disease to other kind-hearted well-intentioned homesteaders...people who want to think the best of others and take a man at his word. That is NOT to say, however, that I am an advocate of vaccinations. Please, do not think I said THAT! God forbid that I should put such an idea in your heads! Responsible animal ownership does not equal regulation, vaccinations and permits, it equals regular testing, clean herd management practices, and disease eradication. So, if you want to care for the wild herd without chipping away at our priceless freedom, let's try a little more thoughtful action and a lot less reaction. Do you really have a CURRENT problem with diseased wild herds IN Alaska? Why not deal with it more locally where the problem exists rather than intruding into homesteads that have no affect on the issue whatsoever? We do not at all wish to be careless with our wildlife. On the contrary, we value it as a very important food source for our family. But we equally value our privacy and freedom. Please do not force us to give up one for the other. Let's encourage people to test and to only deal with others that do and to practice responsible farming/homesteading. We are counting on you to place as high a value on our freedom as we do and to make your decision based on fact, not the fear of "what if". We didn't move across two countries just to live in another New York!

Sincerely,
Goat lover and owner,
Joanne Daniels



Ninilchik, AK

P.S. I have wanted goats since I was a young teen. I am 40 this year and have finally gotten my first two! Their names are Goodness and Mercy, and they seem to have no intention of following me anywhere anytime, let alone, all the days of my life ;)

Submitted By
John Broussard
Submitted On
3/4/2016 11:04:21 PM
Affiliation

We urge you to not regulate by requiring fencing or registering goats, sheep or livestock in Alaska. This sounds like a plan's underway to not so gradually deny or restrict individuals from raising their own livestock.

Sincerely, John Broussard

Submitted By
John Thomas
Submitted On
3/4/2016 4:43:46 PM
Affiliation

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

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

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

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

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

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

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

Submitted By
Joseph O'Neil
Submitted On
3/3/2016 6:03:48 AM
Affiliation
Private citizen

Phone
9072226354

Email
akjoelee@yahoo.com

Address
8601 E 11th Ct
Anchorage, Alaska 99504

Prop 90 lacks scientific evidence to move forward. It's backers have dubious arguments that threaten subsistence for hundreds of small farm families. Support for this proposition is nothing more than a giveaway to hunters who want nothing more than to put a trophy over their mantle. I hope you see it for what it truly is and rule accordingly.

Submitted By
Josh Thomas
Submitted On
3/4/2016 4:46:04 PM
Affiliation

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

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

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

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

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

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

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

Submitted By
June Strothenke
Submitted On
1/29/2016 9:40:13 AM
Affiliation
Farmer

Phone
9077507979
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strothenkejj@gmail.com
Address
1958 Porcupine Lane
Fairbanks, Alaska 99712

In reviewing Proposition 90, submitted by The Alaska Wild Sheep Foundation referring to Domestic Sheep and Goats being removed from the "clean list" regulation. I have many points against such a proposal.

I've been researching online and what I've found is that:

1. The Alaska Wild Sheep Foundation lost its charter with the Wild Sheep Foundation for non-compliance with National Wild Sheep Foundation.
2. All of the reports on interactions and "spreading of disease" between domestic herds to wild herds took place where grazing lands were shared through lease and agreement in the Rocky Mountains, with the sickness involved being pneumonia and I could only find documentation of one death related.
3. Everything I have read about Alaskan Dall Sheep indicate that they prefer the higher, precipitous climes, where there are no habitations by people or their herds.
4. With Agriculture of private herds on the rise within the state, it seems that life, liberty and the pursuit of happiness is being exercised and should not be considered for infringement.

Thank you.

Submitted Respectfully,

June C. Strothenke, taxpayer and resident

From: Juniper Lanmon
Sent: Monday, February 29, 2016 11:57 AM
To: Ely, Kayla L (DFG)
Subject: Other

Juniper Lanmon has sent you the following inquiry from our website:

PROPOSAL 90

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

Submitted By
Kanika Koruna
Submitted On
3/3/2016 11:32:52 PM
Affiliation

Phone
892-2912
Email
kanika7@hotmail.com

Address
4532 North Three Bees Road
Wasilla, Alaska 99623

Dear Board of Game,

I am opposed to Proposal 90. If passed, the Proposal would remove domestic goats and sheep from the so-called "Clean List" of domestic animals, effectively devastating the ability of individual goat and sheep enthusiasts, goat and sheep 4-H programs, and small farm owners to own goats or sheep. Proposal 90 would require domestic sheep and goat owners to obtain permits from the Department of Fish and Game to own sheep or goats, comply with very expensive double fencing, and complete testing using protocols which are as yet undeveloped and unproven. I have a small subsistence farm and have tested my goats for common communicable goat diseases. We started raising goats due to children allergies. My children had cow milk allergies but could drink goat milk. They also have allergies to beef, chicken, turkey, but not goat. I am not independently wealthy so our farm has provided a stable means of providing quality allergen free food to my family. This Proposal would undermine the food security of my children.

The requirements will cause severe economic burden to my family personally, and will also have significant cost impacts to the State of Alaska. With the current Alaska financial condition, the State simply does not have the program staff or financial resources to implement or manage a new regulatory compliance program, especially one that is unnecessary and fraught with flawed logic.

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. My goats are confined to pens and barns and not allowed to free range and as mentioned earlier, are disease free. My farm is in the Meadow Lakes area yet could be considered within 15 air miles of a mountain range and fall under the proposed regulations even though there are no wild sheep herds nearby.

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

My family personally benefits in numerous ways from the ownership and husbandry of domestic sheep and goats. We raise goats for milk and meat. We have raised sheep but currently do not have any. I ask you to not pass Proposal 90 due to the severe impact it will have on my and other small farm operations. The Proposal has not been well vetted, has not been through adequate public process, and is fundamentally flawed in its underlying assumptions and proposed requirements. Why should we be punished for doing no wrong and causing no harm.

Proposal 90 is unreasonable in that it puts 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 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 90.

Thank you,

Kanika Koruna

Submitted By
Kari Butler
Submitted On
2/29/2016 6:59:29 PM
Affiliation
Alaskan Resident

Phone
9077764091
Email
kariannb@yahoo.com
Address
49075 Dogbane Drive
Kenai, Alaska 99611

In regards to Proposal 90

My name is Kari Butler. My husband and I own the Butler's Crazy Farm. We are a small farm with the purpose to teach our children how to live off the land and be sustainable. We also foster children and these children also get a taste of the responsibility and the love of animals and the animals help them heal and learn values they may never have had a chance to learn.

Prop 90 would kill our farm. Why? Because if you remove goats off the clean list according to 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." Our goats, who give us milk, meat, cheese, yogurt, and love would have to be put down.

The reason "hobby farming is growing rapidly"(as stated in Proposition 90) in Alaska is due to the need and the desire to have clean food, become self-sustainable, and not rely on the stores where barges can be delayed and shipments of food be contaminated or spoiled. To raise our animals with food we desire, to avert our children from allergens, to provide meat, milk, cheese, and yogurt without antibiotics unless the antibiotics are necessary, and to be able to have raw milk that is digestible for the children and adults who are lactose intolerant.

From all the research I have done, and all the questions I have asked I have yet to find one person say, in Alaska there has been an encounter of nose to nose contact between wild and domestic goat and sheep. In fact, as it was explained to me, domestic cats are more of a threat to the Dall sheep habitat than domesticated sheep or goats, because of their feces. And unless there is nose to nose contact the listed disease transmissions cannot happen. In the lower 48, you have a set of unfortunate circumstances, herds of domesticated sheep and goats are everywhere and have been allowed to herd around wild sheep and goats. In Alaska this is not the case. Our goats are not in "free" herds nor herded in the areas where Dall sheep would inhabit, i.e. a mountain. For many reasons, the main one being the terrain is inhabitable and the predators are too numerous to be profitable.

I agree we, Alaskans, have a constitutional mandate to protect and maintain our wildlife populations. I do not agree this proposition in anyway will protect or maintain our wildlife populations as there is no science which states this is an issue. Our Dall sheep population is not being devastated, nor is it in any danger of being devastated, as our issues in Alaska are different from the lower 48.

I feel this proposition harms Alaskans, and does not protect our habitats. I feel this is not based on science, but on fear. You are mandated by the legislature to provide sound judgement using: "biological and socioeconomic information provided by the Alaska Department of Fish and Game, public comment received from people inside and outside of the state, and guidance from the Alaska Department of Public Safety and Alaska Department of Law when creating regulations that are sound and enforceable."(The Board of Game's authority to adopt regulations as described in AS 16.05.255) What part of this proposition is sound in science? And what part of this enforceable? Fear is not science and the state has no money to enforce this proposition, and it is not the maximum benefit of the people of Alaska.

Submitted By
Kat Gambill
Submitted On
2/28/2016 11:29:36 AM
Affiliation

I am writing this in opposition to Preposition 90. I am a sheep owner living in the Municipality of Anchorage. Presently I have 9 sheep, which are contained by fencing and are protected by a Livestock Guardian Dog. I do not agree with the proposed preposition, as i found that after extensive research it seems that the reasoning to add sheep and goats on the unclean list in Alaska is modeled after similar proposals in the lower 48. We need to have reasonable look why this can not be applicable to Alaska.

1. We do not have any herds of sheep or goats grazing on state or federal lands. All animals are contained on personal property.
2. There is no "open range" grazing in Alaska, which would allow for "commingling" of wild and domestic sheep/ goats.
3. The topography as well as urbanization and extensive use of Livestock Guardian Dogs as predator deterrent with domestic stock, is deterring wild sheep from roaming into areas containing domesticated sheep and goats.
4. Studies done in the lower 48 have proven, that extensive comingling is required for desease transmission. This is not occuring in Alaska due to the above mentioned reasons.

It is important for our comparatively small agracultural community to be able to keep and maintain personal livestock. Sheep and goats are an affordable source of meat and milk for personal consumption. The keeping of larger livestock is not cost effective with the high costs for feed.

Sheep and goat owners purchase large amounts of locally grown hay and grains, therefore greatly contributing to the local economy.

Most local breeders of sheep and goats test their herds annually for the most common diseases and are maintaining clean herds. Most people only maintain a couple of animals for personal uses. We do not have any herds consisting of thousands of animals, as the lower 48.

In conclusion, I do not believe that the situations of what has occured with the big horn population in the lower 48 and the our local Dall sheep population can be treated the same. The situations are completely different, open range vs contained on personal property, large herds vs small herds of domestic sheep or goats, topographical division by waterways, bogs and urbanized areas in Alaska to large agracultural areas with mostly dry, traversable topography.

I would like to ask you to reject preposition 90 on these grounds.

Sincerely,

Kat Gambill

Submitted By
Kelli Krause
Submitted On
3/3/2016 3:50:25 PM
Affiliation

Phone
8911063

Email
Kellikrause07@gmail.com

Address
2521 e mountain village drive
St b pmb 827
Wasilla, Alaska 99654

I am writing to express my outrage at Prop 90. We just moved to the valley on a small amount of acreage and got goats. We did this for several reasons. 1) we want to teach our kids real life skills; Hard work, the value of animals, how to work together and use the land. 2) we want our kids to leave the screen alone and get outside! The goats are helping us do that. 3) We want to know where our food comes from. Kids, and society in general, have such a disconnect between food and table. We are trying to bring about change in this area. Prop 90 will eliminate ALL of these things from our family. We can't afford the proposals requirement and would be forced to give up our beloved animals. The WSF has one thing in mind, and that is the money made on bringing big game hunters into Alaska. There is no science behind their claims that domestics goats and sheep spread diseases to wild herds, and domestic goats certainly do not come nose to nose with wild herds in 99% of the state. We are not sharing grazing grounds. Please do not let an outside group dictate how life and livestock are handled in Alaska. Please do not act on this proposal. Please keep goats and sheep on the clean list and support farming and livestock in Alaska.

Submitted By
Ken ivie
Submitted On
2/27/2016 4:00:41 PM
Affiliation

Phone
907-255-3115
Email
kkivie@gmail.com

Address
po box 3131
Valdez, Alaska 99686

Pertaining to Prop 90. The proposition to remove farm goats and sheep from the clean list is based on bad and or incomplete science. It appears to be driven by sheep hunter guide companies in a misguided effort to protect their income, not by any real threat to Dall sheep.

Those in Alaska who raise goats or sheep, whom I am acquainted with, do not free range or even let their animals out of their yard. Bio security is very important to them.

Small farmers in Alaska contribute to the Alaskan economy constantly in buying Delta oats and hay, Kenny lake hay, feed from Alaska mill and feed, alfalfa from local people who import and sell it. We contribute to the food security of Alaska. This proposition would place an unfair burden on us.

Perhaps we should ban dogs who carry kennel cough because they might contaminate wolves and coyotes, which are vital to a healthy ecosystem, or cats because they may have toxiplasma which can kill bears, the list goes on and it is nonsense.

Submitted By
Ken Michels
Submitted On
2/1/2016 12:18:21 PM
Affiliation

Phone
907 398 1195

Email
kenmichels51@hotmail.com

Address
PO Box 1281
Kenai, Alaska 99611

Please do not require more unnecessary permits, fees, costs for people who want to raise sheep or goats, I find it hard to believe that domestic sheep or goats are affecting our wild sheep or goat population. If there is any scientific data that this proposal is necessary it should be made public and widely available.

Submitted By
Kendra Johnson
Submitted On
3/3/2016 10:11:22 PM
Affiliation

I am against Prop-90.

As a Hunter and a member of a community that enjoys our freedom to owning livestock, I do not see any benefits to this proposition.

What this does is take people's liberty to live and enjoy their livestock- hindering some from self-sustaining. This would greatly impact many in our community from farmers to kids learning through local 4-H programs. Financial impacts of this would be farmers not being able to grow livestock for meat or wool- local business and community markets would lose customers and possibly fold due to economic failure. Individuals should have the choice to raise and harvest our own food (and resources) without all of these regulations. We should be able to choose what we eat without the government telling us where our food should come from. Knowing what is in the feed we give the animals, knowing it is organic, healthy without all the added hormones should be our choice.

Please do not allow this Prop-90 to pass.

Submitted By
Kevin mckinney
Submitted On
3/4/2016 4:10:37 PM
Affiliation

Phone
907-360-2117
Email
Kmoffroad@gmail.com

Address
3421 w 69th ave
Anchorage, Alaska 99502

I oppose proposition 90

I would like to start by saying I have family members that depend on goats in more than one way for the health of their children. They do not raise goats simply for the fun of it they started it because of the fact their children can consume it and have no reactions to it like store-bought meats and milk, and trust me they have tried. They can also eat wild game, moose caribou and others. We try our best to hunt wild game every year and in fact this year was even more important, and we applied for several different hunts between five different household family members and none of us received one permit this year which leaves us to a harvest ticket that we may or may not fill. This means having the goats is far more important now than they were other years past. The sad part with this whole proposition is that it will not affect the majority of the people, they won't even pay any attention to this proposition because it doesn't affect them in anyway it's only affecting the people that have goats or sheep to depend on. I'm sure if one or more of the board members had to depend on a private goat or sheep farm for the health of their family this would never have been brought up. So far we haven't seen enough evidence to even prove this proposition, as explained in other comments. This situation needs to be better explained so the entire public can truly understand the situation, especially those that it does not affect but still care about our rights to provide healthy food for a family.

Thank you for your time, Kevin mckinney

Submitted By
Kimberlie Ivie
Submitted On
2/24/2016 7:36:43 AM
Affiliation

Phone
9072551720
Email
kkivie@cvinternet.net

Address
PO Box 3131
7085 Richardson Highway
Valdez, Alaska 99686

I reside in Valdez, Alaska. My goats cannot range into sheep territory. If I ranged my goats at all, they would be lost to predation, as bears and coyotes are right out my back door. Most of us in Alaska with goats and sheep have dry lot farms. We have areas covered, often heated, large enough to house our animals with small fenced areas for day use. In the summer my goats are behind general fencing with my entire barnyard strung with electric. This is to keep my goats in and other animals out. There is no need for laws requiring I double fence or laws requiring my goats are tested. My animals will never have contact with wild sheep.

There is no reason to fix something that is not broken. Our wild sheep population is not sick. Our small farming community in Alaska is not a threat to the wild sheep. The idea that this pneumonia is in our farming community has no base. Testing for this is going to add cost to farming and cost of keep - is already an issue for small farming operations.

I am confused as to why this is even a topic of discussion. If it is the worry that in the future something other predation and hunting will cause a decline in wild sheep numbers, small Alaskan farmers will be the last to be the cause.

Please do not allow this law to pass.

Kimberlie Ivie

Submitted By
Kimberly Fasser
Submitted On
3/3/2016 9:17:01 AM
Affiliation

Phone
9079039784

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fasserk@msn.com

Address
6450 N. Britchenstrap Dr.
Palmer, Alaska 99645

I strongly object to any proposed government interference w my owning goats! If this proposal passes, it infringes on my right to raise goats for myself & my family, and places unnecessary financial hardship on us. I do not believe I should have to obtain a permit to own my goats, not do I need any extra fencing for them!



Submitted By
Kirsten Boatright
Submitted On
1/26/2016 7:34:21 PM
Affiliation

Hello! I just wanted to say thank you for your stance on Proposition 90, in keeping with scientific information supporting the keeping of livestock in this state. From what I understand, you guys don't see domesticated sheep and/or goats as posing a threat to the wild sheep in our state, and you seem to support sustainable agriculture. As a homesteader keeping livestock on our farm, I appreciate your efforts to allow those of us who provide meat/milk/fiber to continue without undue regulation. If ever our farming/ranching were to pose a threat to the wild animals of our state, please let us know what we can do to fix the situation before it gets out of hand!

Thank again,

Kirsten Boatright of Ebenezer Acres

Submitted By
Kyle Summerlin
Submitted On
2/25/2016 3:42:14 PM
Affiliation

In regards to Proposition 90 concerning domestic sheep and goats being removed from the clean list. Simply put, this proposal is outrageous. It is outrageous that a local chapter of an OUTSIDE organization propose any restrictions to Alaskan residents. It is outrageous to even consider removing a person's ability to provide for themselves and household when disease transmission between wild and domestic herds has not been scientifically proven in Alaska or anywhere else. And since a testing protocol hasn't been developed or proven, it's outrageous to think that these measures are beneficial or proactive toward preventing the transmission of disease. Given that there are no commercial sheep or goat operations in Alaska, and that all herds are owned by private citizens, and that such herds are typically small in relation to commercial operations, the threat of disease transmission between domestic and wild populations is incredibly small. However, the impact to Alaskan residents who own sheep and/or goat herds for provisional or recreational reasons will get great, and grievous. The average herd owner will not be able to comply with the proposed regulations, resulting in the eradication of their herd. This will be detrimental to the Alaskan way of life. This proposal is thoroughly unprecedented, presumptuous, and above all, outrageous.



Submitted By
Kyle VanTassel
Submitted On
3/3/2016 10:25:28 PM
Affiliation

Please do not add regulations for domestic goat owners. Domestic goats are very territorial and the risk of transmitting diseases to the wild sheep of Alaska seems extremely unlikely.

Submitted By
Leisl Shagen
Submitted On
2/29/2016 9:48:21 AM
Affiliation

Phone
907-715-2437
Email
akmuttmom@gmail.com
Address
2548 N Dana CT
Wasilla, Alaska 99623

To Whom it may concern,

I urge you to please take no action on Proposition 90!!! Many of my fellow Alaskans against this proposition will state the scientific data and legality against this proposal. So I will leave that to them, many of Alaskan sheep & goat owners use these animals for meat, milk, wool & they provide them (and others) with these fresh products, as well as supplementing their income. But, there are many people like myself that own these animals just for pets. My goats are part of my family, just like my dogs & cats. I don't have children & my pets mean as much to me as I'm sure your children do to you. I do everything possible to make sure my goats are happy & healthy, I have my vet out several times a year to ensure that they stay that way. If this proposition should pass, due to the small acreage I live on, I would probably not be able to comply with the fencing requirements stated in the proposal. I would more than likely have to move in order to keep my goats, which is not an option for me. I'm outraged at the mere fact that this is even being discussed. I as well as others in our community want to ensure the health of Alaska's wildlife, however I believe this proposal would do nothing to protect Dall sheep, it would only destroy agurcultural life in Alaska. I feel there is a solution to protecting our wild sheep, while allowing livestock owners the freedom to own & raise these animals. Proposition 90 is not the solution! Please take no action on proposition 90!!!!

Sincerely,

Leisl & Del Shagen



Submitted By
Libby Mohr
Submitted On
2/28/2016 11:49:02 AM
Affiliation

Please do not remove domestic sheep and goats from the clean list. My young family's food security would be immediately effected.

Submitted By
Linda Price-Albers
Submitted On
2/29/2016 2:15:41 PM
Affiliation

Phone
907-398-8321

Email
dandelion_acres@yahoo.com

Address
4412 N. Dogwood
Kenai, Alaska 99611

Unless the goats or other livestock included in this proposal, are within a reasonable radius of the Dahl Sheep Habitat or area/animal of concern, I absolutely do not feel this proposal should apply. Our animals are kept confined within a 40 acre parcel surrounded by 8 foot fence. They do not leave the area. Please do not apply this unnecessary burdon on Alaskans with a few animals. Thank you.

Submitted By
Lona Dermer-Kinney
Submitted On
2/29/2016 1:59:01 PM
Affiliation

Phone
907-232-4135
Email
lona.dermer@totemocean.com
Address
POB 874051
Wasilla, Alaska 99687

I am a proponent of responsible farming which I believe can be accomplished in Alaska without any harm to the wildlife population. Placing unnecessary restrictions on farming is an impediment that need not be created. As the Matanuska dairy farmers proved, commercial operations are unlikely to be successful in Alaska. I am most interested in preserving the individual right to sustaining one's self. Personal ownership of such livestock as goats, sheep, chickens, cows, etc is an excellent way for a consciencious individual to ensure a reliable food supply. Self-reliance should be encouraged by every possible means, and having domesticated livestock is merely evidence of indepenence and a person's basic survival instinct. Important to note is that livestock has existed for centuries in harmony with their wild relatives without any negative impact in many parts of the world, take for instance the Alps or Himalayas. Please do not deny Alaskans the basic right to survive.

Submitted By
Loria Swanner
Submitted On
3/4/2016 4:39:24 PM
Affiliation

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

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

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

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

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

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

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

Submitted By
Lynn Burnett
Submitted On
2/28/2016 1:39:47 PM
Affiliation
Alaskan resident

Due to the lack of evidence that pneumonia carried by domestic sheep and goats actually has a significant impact on wild sheep and goats, the vague description of rules and regulations pertaining to the new regulation proposal, and the overreach of (and lack of ability to enforce) the regulation itself, I do not support this proposed change. I feel it would cause undue burden on small farmers and rural families that house these animals for sustenance and income, and that the sheer generality of the rules surrounding this regulation would be a gateway for broad and unfair interpretation against the common populous in Alaska.

In short, I do not see any good reason that this proposed regulation should come into effect nor does there appear to be adequate proof that these measures would prevent the spread of pneumonia among wild sheep and, as such, it does not have my support.

Submitted By
Maia Siegel
Submitted On
3/3/2016 12:18:15 PM
Affiliation

Phone
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maia.a.siegel@gmail.com
Address
4960 E Pine St
Wasilla , Alaska 99654

To all the Alaska Department of Fish & Game,

As a lifelong Alaskan, hunter, fisherwoman, goat keeper, and shepherd, I completely oppose the adoption of Proposal 90.

Proposal 90 aims to prevent the contact of domestic sheep/goats with wild sheep. However, their reasons for preventing contact (domestic sheep/goats are “proven” to transmit pneumonia to their wild counterparts) and their means of preventing contact (permitting, double-fence, required testing, removal from clean list) do not balance. For one, domestic sheep/goats DO naturally carry pneumonia-causing bacteria naturally, however, wild sheep DO as well. For two, the correlation between herd die-offs and exposure to domestic herds is not fully understood, and not one single case has EVER been witnessed in Alaska. Thirdly, there is more behind population die-offs than simply the exposure to a certain type of bacteria; for an animal to get pneumonia they need to be exposed to the bacteria, undergo stress, and have a compromised immune system, it’s not as simple as catching a cold so to speak. Additionally, because no studies have been done to date, we don’t know with certainty that pneumonia IS the cause for population changes in Alaska; other factors include the winter weather, lack of vegetation, mineral deficiencies (especially Selenium), excessive predation, excessive hunting, infertility in ewes and rams, etc. As a livestock owner here in Alaska, I have had to battle mineral deficiencies, poor-quality forage, rough winters, outbreaks of illness, infertility, and predation in my own flocks, and know that it is a frustrating burden to overcome. I truly believe that the population changes in our wild sheep is a multi-faceted issue, and would love to help study the issue more fully. While it benefits us Alaskans to have more wildlife in the state, it also benefits us greatly to have a healthy population of domestic livestock. Thus, I believe it would be in the best interest of all involved to seek more workable solutions, while also researching more closely just why the wild sheep are experiencing population changes.

Were Proposal 90 to pass, the effect on would be far-reaching and devastating. Proposal 90 will add more costs and more hoops to jump through for anyone raising goats and sheep, and would discourage people from starting to raise goats and sheep. Disease testing is already a very high cost to flock owners, which most of us participate in already, and voluntarily at that. (The only testing requirements currently are for goats and sheep being imported into Alaska, however a majority of flock owners will only purchase tested-negative animals, and will only allow tested-negative animals on their property) With Proposal 90, we would be required to participate in extra tests, which would cost us additional money, and would greatly increase the cost of owning a herd. Were goats and sheep to be removed from the clean list (as proposed), all import and export of goats and sheep would be halted- which is the only way for us to provide genetic diversity in our flocks in this isolated state. Add in the requirement of “Department approved facilities,” and it becomes evident that the cost to raise and own livestock will skyrocket, as will the headache and heartache. The costs to the state of Alaska (which is currently facing a HUGE deficit, and is looking at cutting vital services just to stay afloat) will also skyrocket. The cost of sending personnel to each and every farm to inspect, as well as the cost to follow up or test for diseases, as well as the cost to permit each and every flock owner, as well as the cost just to set up the entire system; will be HUGE, and is simply a cost that we CANNOT afford.

As said above, I understand the frustration of population declines and die-offs. I have experienced first-hand the conundrum that is mineral deficiencies, poor-quality forage, illness, and harsh winters with my own flock. With that experience behind me, I know that we need to be looking at the big picture of our wildlife populations, and need to begin more all-encompassing research. We should be looking at mineral levels in our forage and in our wild sheep populations. We should look at how we can help wild sheep cope with winter more effectively. We should be looking at the impact that external and internal parasites have on our wild sheep. We should be looking at which ranges and herds are doing well, and see why they are compared to the other herds. All in all, I feel that if we work together to complete more comprehensive, Alaska-specific research, we can find exactly what it is that the wild sheep need, and create a plan based upon those needs specifically.

With all that in mind, please do NOT adopt Proposal 90.

Thank you for your time,

-Maia Siegel

Siegel Farm

Alaska FFA Association

Mat-Su 4-H

Submitted By
Marchell Lillard
Submitted On
2/27/2016 10:36:03 PM
Affiliation

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I ask respectfully that you would highly consider tossing Prop.90 into the trash can. There is no reason for this to even be a consideration at this time. Not only is there no scientific data to back up putting sheep or goats on the unclean list but the proposition itself goes against our freedoms to be able to use our property to grow and raise our own food. My animals are very important to me and my family.

Also, at this time,our state has enough financial problems and this would definitely be a burden that is totally unnecessary.

Thank you,

Marchell Lillard

Submitted By
Margie Buchwalter
Submitted On
2/28/2016 9:38:15 AM
Affiliation

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My husband and I spent many years in Alaska and followed in the footsteps of Matt and Rhonda Shaul when they left the State and opened the second commercial goat dairy in the State of Alaska. We would still be there operating that business had my husband not become seriously ill that mandated we move to get more advanced medical treatment for him.

We have been following the developments of Proposal 90 which would remove domestic sheep and goats from the "clean list" requiring a permit to own these animals.

This proposal is a gross overstepping of government controls of private property. It also tampers with the freedoms guaranteed in the Constitution for all citizens of the United States.

The Constitution guarantees Life, Liberty and the pursuit of happiness. This proposal would eliminate the ability of many to raise their own food, providing healthy food for their families that is vital for life. More and more people are finding that devastating/confining illnesses they have are contributed to the store bought processed foods they are eating. Their saving grace is to raise their own food and to hunt and fish for survival, literally. Proposal 90 would not only rob people of their freedoms, but it would be the death sentence of many.

This proposal would also severely limit our liberties to farm on our own private land. Many people cannot raise large livestock because of physical, financial or land limitations. This proposal would essentially eliminate the opportunity for families on small acreages to become more sustainable in food production, forcing higher reliance on game and jeopardizing the sustainability of the wild food. With the wild food source being in jeopardy, then the State would put stronger limits and no hunt zone into play to try to save the population and/or build it back up. You, the State of Alaska, would be setting yourself up for more poaching and illegal limits.

This is the time in Alaska's history to be supporting local production of food not hamstringing the efforts by burdensome regulations for a problem that has not even been established to exist and at this point I'm not reading anything anywhere that shows it has been proven to have happened in the Lower 48.

Alaska farmers are deeply concerned for the health of the wild game. Many are hunters and rely on the wild game as a supplement to their farm raised food. When we lived in Alaska, we certainly did supplement our food sources with hunting and fishing. Alaskans welcome protection of the wild resources as much as they welcome the protection of their rights to farm and raise their own food. Alaskans of all people are deeply committed to a life of self-sufficiency and liberty; it is our heritage and is what has drawn many of us to this State. However we do not welcome proposals from commercial hunting interests based on poor science done in the "Lower 48" (which may not even apply in Alaska) that threaten our most basic of freedoms guaranteed in the Constitution.

Lastly this proposal threatens the right of all Americans to the pursuit of happiness. For many Alaskan farmers, is a deep tradition that is generations old. The satisfaction gained from being able to produce healthy food for your family and community is an important right that must be and is protected by the Constitution.

Please do not support Proposal 90!

Submitted By
Marian Thomas
Submitted On
3/4/2016 4:43:27 PM
Affiliation

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

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

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

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

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

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

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

Submitted By
Maribeth Rogers
Submitted On
3/2/2016 10:32:17 AM
Affiliation

Proposition 90 - Strongly Opposed

I am a displaced Alaskan, currently in the process of returning to my state when I was made aware of proposition 90. Reading it in great detail, it deeply disturbed me and if past will alter the path of my future and those of my young children. I hope you take the time to read my comments, even if my current address doesn't reflect my home state.

This proposition is ludicrous at best. Alaska has for generations now been able to farm livestock and have wild game living in the same state without or with negligible negative impact and if anything has changed, it is that domestic stock is healthier and we have better fencing and preventative measures in place. This proposal is not based in science but in an a personally funded agenda by an outside special interest group, siting a non-existent issue with the burden of defense falling on farmers in an already high expense and strained environment.

Particular points to me that are especially concerning:

Disease testing of unspecified diseases. With such a loose term, at any time this allows for changing of the rules and what is to be tested. Tests already run \$15-20 each, multiple tests on multiple animals...the expense adds up quickly and most much be done annually. What diseases that are to be tested must be specified and reasonable for the species and for farmers to afford. In addition this is mostly nonsense as most farmers already test for a wide range of diseases. In case WSF isn't aware, pneumonia kills domestic livestock too and farmers look to avoid it and treat it as much as possible. Disease is expensive and genetically devastating to small farmers which is why most go to great lengths to keep their herds healthy.

Removal from the clean list. So this would require a permit to import new and much needed bloodlines from an agency whose history is shows an unwillingness to issues *any* of such permits as well as the added expense of acquiring such permits, provided they become obtainable at all. Alaska struggles already with a limited gene pool in domestic stock imports. It is also extremely expensive and farmers go to great lengths to ensure healthy, productive stock is obtained or they lose time, money and the next generation. What would be a better alternative is veterinarian approved REASONABLE quarantine or requiring specified diseases be tested for before entry (age dependent by species and disease). The state of HI has such, requiring 72 hrs of observation before leaving with the new owner into the state. So instead of cutting off bloodlines to a much needed agricultural industry in a violation of rights, provide an obtainable path to import bloodlines that most farmers can afford.

Double fencing for sheep ranges. Most farmers do not want wildlife to have contact with their herds, ironically to prevent disease and parasite spread. Who draws the lines of the sheep ranges and do they change? While a reasonable fence is necessary and wise, double fencing is overkill and expensive. A minimum height or suggested fencing material would be better. Wild sheep generally want nothing to do with human establishments and despite what seems to be the WSF's belief, most farmers do NOT want their sheep and goats running the wild steep hillsides where they can fall or be eaten. Most farms are well developed land, busy barnyards and of little interest to timid wild sheep. Most farmers of small livestock in Alaska also keep large, loud guard dogs, though used for deterring predators, should also deter normal wild sheep. Sheep entering these areas are of a concern to the farmer. Why is it not behaving like a normal wild animal? Is it diseased? Starving? Has it been illegally tamed?

Permits to keep sheep and goats. This is probably the most enraging part of this proposal. No other state has done such a thing. It is a violation of core rights of Alaskans, to require them to get permits at personal expense to keep a normal domesticated animal, found worldwide, on their own personal property. No one requires permits for cats, yet cats do more damage to the environment and wildlife than any other domestic animal. Every Alaskan and American has the right to raise livestock on their own farms without needing permission from any government agency. It is an insult to the senses that the freest state in the union would consider such a restrictive and intrusive action on a domestic animal, especially those used for private food sources and income. Simply despicable and embarrassing, this portion of the proposal should not even be entertained.

Alaska has a farming problem. Despite a rich history, farms are struggling and Alaska is losing its ability to produce its own food at a disturbingly rapid rate. This is not a good for biosecurity or the environment or the economy. Instead of allowing blatant attacks on this industry, Alaska would be wise to encourage them. Goats have one of the lowest carbon footprints of any domestic stock and with our environmental changes, Alaska would do well to encourage their production in the state, especially over animals like cattle. Sheep are a similar story.

This proposal appears like the government is aware of issues with the wild sheep populations but instead of trying to fix it, they want to find a fallguy, either for financial gain or personal satisfaction. The science behind wild sheep studies have shown wild sheep naturally have strains of pneumonia, many are healthy and natural carriers of this disease. No known contractions of disease from domestic animals to wild sheep populations have been documented in Alaska. States allowing open range grazing are at a much greater risk for such. If disease is a concern to their numbers, consider vaccinations. This is done frequently in the lower 48 to control rabies spread. It is difficult but not impossible and would protect current populations instead of twiddling thumbs and whining about it possibly, might be the fault some random farmer and the 2 goats in his backyard 100 miles away. Personally I would be more concerned about the low birth rates. This is not natural and to my knowledge, we don't know the cause. Have these animals been evaluated for deficiencies? Parasites? Genetic



mutations? New trauma? Changes of environment? The other issue that is concerning to most farmers is the lack of interest in poaching, over hunting and harassment of wildlife by this agency and F&G. Lack of prosecution and interactive prevention gives the appearance of laziness and complacency. Most farmers in Alaska are also hunters and deeply concerned for their environment and the animals in it. This is the way of life and a heritage to them. This proposal attacks them personally, fails to provide action to actually protect the wild sheep population and forces farmers to choose to either side with their main livelihoods or an enjoyable tradition. All based on special interest funded research not conducted in the state of Alaska and not offering any solid proof for the reasons behind their unrealistic suggestions.

Farmers are willing to work to protect our precious wildlife but it must be within reason, it must be affordable and it must NOT infringe on personal property and livelihood rights. With Alaska's current financial crisis and lack of growth in most any industry, it is foolish to squash one of our few remaining in state resources. Please consider reasonable alternatives that actually protect our wild sheep instead of destruction of our heritage.

Submitted By
Marilynn Methven
Submitted On
2/27/2016 8:05:40 PM
Affiliation

My family and I are long time Alaskans. We have fiber sheep that we use for creating products that sell at craft shows and farmers markets. The lambs sell to other families beginning their adventure into spinning wool into yarn and some go for food. I have elderly neighbors who have kept goats for their milk for years that would be devastated without their companionship.

We have been following the developments of Proposition 90 which would remove domestic sheep and goats from the "clean list" requiring a permit to own these animals.

This proposal is a flagrant overstepping of government controls of private property. It also repudiates the freedoms guaranteed in the Constitution for all citizens of the United States.

The Constitution guarantees Life, Liberty and the pursuit of happiness. This proposition would eliminate the ability of many to raise their own food, providing healthy food for their families that is vital for life.

This proposition would also severely limit our liberties to farm on our own private land. Many people cannot raise large livestock because of physical, financial or land limitations. This proposal would essentially eliminate the opportunity for families on small acreages to become more sustainable in food production, forcing higher reliance on game and the tenuous food infrastructure of Alaska. This is the time in Alaska's history to be supporting local production of food not hamstringing the efforts by burdensome regulations for a problem that has not even been established to exist.

We as Alaska's farmers are deeply concerned for the health of our wild game. Many of us are hunters ourselves and rely on the wild game as a supplement to our farm raised food. We welcome protection of our wild resources as much as we welcome the protection of our rights to farm and raise our own food. Alaskans of all people are deeply committed to a life of self sufficiency and liberty, it is our heritage and is what has drawn many of us to this State. However we do not welcome proposals from commercial hunting interests based on poor science done in the "Lower 48" (which may not even apply in Alaska) that threaten our most basic of freedoms guaranteed in the Constitution.

Lastly this proposal threatens the right of all Americans to the pursuit of happiness. For many of us farming is a deep tradition that is generations old. Farming is in our natures (something indicated by recent epigenetic research that has shown that our ancestors experience's are part of our own DNA literally). The satisfaction gained from being able to produce healthy food for your family and community is an important right that must be and is protected by the Constitution.

Please do not support proposition 90!

Submitted By
Martha Lojewski
Submitted On
2/26/2016 9:31:46 PM
Affiliation

Re: Prop 90 Farmers and hunters are both trying to put food on their tables. One method is not better than the other. They have to respect each persons right and ability to put food on their tables. Board of game is partly responsible for maintaining that respect and balance between the groups. I am writing today as a farmer. I understand the worry behind backyard livestock potentially introducing disease into wild sheep populations. Until there is scientific evidence to back up this claim, forcing livestock owners to change fencing and requiring testing for diseases will ultimately cripple the farmer. If the board of game is going to require such incredible new demands with such a high financial cost to the farmer, the reasons need to be proven beyond a shadow of a doubt to be true, not a suspected fear. This proposed change is overstepping the bounds of government. I side with the Department of Law and Fish and Game. Let us continue to have our backyard livestock.

March 3, 2016

To:

Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526

Attention: Comments Regarding Proposal 90

I encourage the Board of Game to OPPOSE Proposal 90. Proposal 90 aims to require permitting for all domestic goats and sheep within the state of Alaska. The concern is that domestic goats and sheep carry diseases, which have the potential to cause serious illnesses within wild sheep populations. Scientific evidence is primarily associated with anecdotal evidence linking domestic sheep to bighorn sheep die-offs in the lower 48 and Canada. Here, I am primarily going to address the Proposal 90 from a domestic goat standpoint. The number of documented (i.e. associative contact) cases of disease transfer from domestic goats to bighorn sheep is very small (two). The only documented controlled test consisted of seven bighorn sheep confined with domestic goats. Two of the seven experienced respiratory related illness. This shows incomplete disease transfer. In nearly all cases of presumed disease transfer between domestic goats and bighorn sheep, extended periods of contact were required. The science has not yet determined the exact disease strains which actually cause disease outbreaks. Several strains of Pasturella based pneumonia have been implicated. In summary, the science has yet to established unequivocal documentation of disease strains and transfer mechanisms. This is particularly true for Dall Sheep (*Ovis dalli*). How would domestic animals be "certified disease free" when there is incomplete knowledge disease strains? They can't be! Permitting cannot guarantee reduced transmission of disease to wild populations.

Proposal 90 is meant to be a "start" to prevent disease spread to wild sheep population. It would serve as a precedent with the end goal of eliminating all domestic sheep and goats from any wild sheep habitat. Alaska represents an attractive place for interests groups to push forth a proposal of this type as the agricultural community is small with little commercial support. The permitting process is not a sustainable approach and adds increased demands on small scale agriculture in Alaska as well as increased demands on the state of Alaska both from budgetary and enforcement standpoints. Proposal 90 dictates constraints that must be met, likely resulting in the financial infeasibility of raising livestock in Alaska. Local, sustainable, healthy food production should be encouraged. Wild game cannot sustain all meat demands to the state of Alaska. It is a right of an Alaskan citizen to raise their own food.

The proponents' claim the hobby farming is rapidly growing in Alaska. I have been involved in the goat community in Alaska for 30 years as an owner and breeder. My direct observation show that domestic goats are not showing a direct increase in numbers. There were far more goats in the 1980's and 1990's than in the past 15 years. Goats have been present in Alaska before the 1980's as part of homesteader activities. No disease transfer has ever been reported or documented. The reality is that small scale agricultural in Alaska is unlikely to increase as the cost of raising livestock in Alaska is two to three times higher than in the lower 48. This is a significant impediment to growth of domestic goat populations (and sheep). It is highly

unlikely that any commercial operation would ever be established in Alaska. It is important for the proponents' to back up these claims. Trends in the lower 48 do not necessarily relate to trends in Alaska.

There are other measures that can be taken to limit contact between domestic goats and sheep. Wild sheep interests groups can use their resources to fund scientific research and provide of educational resources. Owners of domestic goats and sheep value Alaskan wild animal resources. Educate! There is far more than can be accomplished with cooperation, with a much greater benefit and effectiveness, than can be accomplished through Proposal 90. I encourage the Board of Game to OPPOSE Proposal 90 in its entirety.

Sincerely,

Matt Bray

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North Pole, Alaska 99705

bray@mosquionet.com, 907-488-0872

Submitted By
Matt Shaul
Submitted On
2/26/2016 1:26:35 PM
Affiliation

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Hello,

My family and I are long time Alaskans, though curenly out of state, we are selling our farm here in NY and moving back to Alaska as soon as it sells.

My wife and I started Cranberry Ridge Farm, the first commercial goat dairy, in the State of Alaska.

We have been following the developments of Proposition 90 which would remove domestic sheep and goats from the "clean list" requiring a permit to own these animals.

This proposal is a flagerant overstepping of government controls of private property. It also repudiates the freedoms guaranteed in the Constitution for all citizens of the United States.

The Constitution guarantees Life, Liberty and the pursuit of happieness. This proposition would eliminate the ability of many to raise thier own food, providing healthy food for thier families that is vital for life. I speak from personal experience. I have a very restricted diet and am sensitive to almost all store bought foods. I maintain my health on a diet of primarily goat and sheep milk and meat (by my doctors orders) I have to be very careful in the selection of my food. Raising my own meat or hunting is very critical to my health and well being. There are many others that are in a very similar situation.

This proposition would also severely limit our liberties to farm on our own private land. Many people cannot raise large livestock because of physical, financial or land limitations. This proposal would essentially elimintate the opportunity for families on small acerages to become more sustainable in food production, forcing higher reliance on game and the tenous food infrastructure of Alaska. This is the time in Alaskas history to be supporting local production of food not hamstringing the efforts by burdensome regulations for a problem that has not even been established to exist.

We as Alaska's farmers are deeply concerned for the the health of our wild game. Many of us are hunters ourselves and rely on the wild game as a supliment to our farm raised food. We welcome protection of our wild resources as much as we welcome the protection of our rights to farm and raise our own food. Alaskans of all people are deeply committed to a life of self sufficiency and liberty, it is our heritage and is what has drawn many of us to this State. However we do not welcome proposals from commercial hunting interests based on poor science done in the "Lower 48" (which may not even apply in Alaska) that threaten our most basic of freedoms guaranteed in the Costitution.

Lastly this proposal threatens the right of all Americans to the pursuit of happiness. For many of us farming is a deep tradition that is generatons old. Farming is in our natures (something indicated by recent epigenetic research that has shown that our ancestors experience's are part of our own DNA literally). The satisfaction gained from being able to produce healthy food for your family and community is an important right that must be and is protected by the Constiutuion.

Please do not support proposition 90!

**Board of Game****Proposal 90 & 91**

The health of the Alaska's Dall Sheep and all native wildlife species of Alaska is important. That is part of the reason I have herd guardian dogs for my livestock, an action that is considered a predator friendly choice. Having lived in remote as well as rural areas of AK, I appreciate and value our wildlife and have learned the importance of learning to live cooperatively on the land.

Proposal 90 is an extreme approach to deal with something that has not become an issue in Alaska. Alaska is not a free grazing state. Between fencing and natural barriers there is a low likelihood of close contact between wild sheep and domestic sheep/goats.

There is time to approach this issue in a logical manner and to form a plan that fits the uniqueness of Alaska, without harming the livestock industry. There is no documentation of Dall Sheep deaths due to contact with livestock in Alaska.

We must oppose any form of permitting for simply owning livestock. Realistically, this discussion should be limited to activities in Dall Sheep habitat or near enough that there's a high probability of close contact.

A reasonable solution should begin with a livestock-wildlife working group formed to collaboratively work on issues such as this one.

I oppose Proposal 90 and 91. Let us work together to find the right action for Alaska that respects the needs of both our wildlife and our livestock.

**M.E. Lee Coray-Ludden – P.O. Box 254 – Clam Gulch, AK 99568 – 907-394-6146 -
leeeq7175@gmail.com – Pres. ANFBA (Alaska Natural Fiber Business Association)**



Submitted By
Megan Green
Submitted On
3/1/2016 4:24:53 PM
Affiliation

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Dear Board of Game,

My family and I urge you to reject Proposal 90 at the upcoming Board of Game meeting. We ask the Board of Game to refuse to impose unnecessary and prohibitive restrictions on the livestock owners of Alaska, to recognize that there is not a preponderance of scientific evidence that domestic sheep and goats are a threat to the wild sheep of Alaska, and to consider the significant impact of indirectly forcing us to give up our agricultural lifestyle based on the WSF's unsubstantiated claim that there "could" be contact between Dall sheep and our livestock that "could" result in disease transmission.

We care deeply for all Alaskan animals, wild and domestic. Our motives in opposing Proposal 90 are to protect our right to maintain the Alaskan agricultural lifestyle; our right to raise food for our families; our ability to lessen our dependence on commercial food sources and hunting of wild game; and our ability to teach our children to work hard, live sustainably, and become responsible stewards of the land and animals with which we are entrusted.

The Science – No Preponderance of Evidence:

- **Scientists Do Not Fully Understand the Cause of the Pneumonia Outbreaks in Bighorn Sheep:** Over the decades that pneumonia outbreaks in bighorn sheep in the lower 48 have occurred, researchers have not been able to establish a precise causal agent. A number of bacteria have been implicated in the pneumonia outbreaks; however, even now, the exact cause (etiology) of these outbreaks remains unknown. Scientists have attempted to narrow down the bacteria and some believe that *M. haemolytica* (in the Pasteurellas family) is the primary agent of pneumonia outbreaks. However, other scientists believe that the "the most likely primary bacterial agent" is *Mycoplasma ovipneumoniae*. The reality is that "the cause(s) of this disease have been subject to decades of debate and controversy" (Besser et al. 2013).
- **Correlation Not Causation:** While some pneumonia outbreaks and die-offs of Bighorn sheep in the Lower 48 have "spatial and temporal" links to contact between domestic sheep, pneumonia outbreaks and die-offs have also occurred in the absence of contact with domestic sheep or goats (Aune K. et al. 1998; WAFWA 2010). Thus, not all Bighorn sheep die-off events can be connected with domestic sheep contact. In the case of many of the die-offs that are supposedly linked to domestic sheep/goats, the contact between the domestic livestock is not well documented and much of it is anecdotal (suspected contact). Although, there is some correlation between contact with domestic sheep/goats and wild sheep pneumonia, a causal relationship has not been definitively established. Correlation does not necessarily equal causation, and should not form the basis for sweeping legislation.
- **Endemic Agents - Wild Sheep Carry These Pathogens Naturally & Can Be Healthy Carriers:** The WSF claims in Prop 90 that "domestic sheep and goats carry strains of pneumonia proven to be deadly to bighorn sheep populations in the lower 48." However, the reality is that both wild and domestic sheep naturally carry strains of Pasteurellas bacteria (including *M. haemolytica*) in their nasopharynx. Additionally, "the existence of Pasteurella in an individual is not always manifested in disease. Most wild sheep carry small amounts of the bacteria..." (Miller et al. 2011). Likewise, *M. ovipneumoniae* is also found in both healthy domestic and wild sheep populations, according to Margaret Highland, DVM, with the USDA's Animal Disease Research Unit and Dept. of Veterinary Microbiology and Pathology at WSU. Dr. Highland proclaims, "The oddity of this all is the fact that *Mycoplasma ovipneumoniae* is an endemic agent in North American small ruminants...yet there is a desire to make wild small ruminants completely free and naïve of exposure to this bacterium. It has become policy in some cases to kill (shoot) survivors of herds that experience outbreaks of pneumonia—I know of a case in which just over 200 surviving animals were killed— then bring in new bighorns to repopulate the area, without really understanding all of the factors that caused the first outbreak.' She said rather than attempt to maintain bighorn herds that are mycoplasma free, the agencies should be trying to find ways to help bighorn live with the presence of this bacterium. 'I think the key to the problem lies in understanding why the survivors survive,' she said. She listed possible efforts such as reducing human imposed stress, focusing on nutrition, and controlling population size" (Johnson 2016). In other words, the presence of these endemic agents means the bacteria "is a constant that's not likely to go away, regardless of what wildlife managers do" (Johnson 2016). Note that according to ADF&G reports, pneumonia has been found in Dall sheep populations in AK, and that is without any documented contact with domestic livestock.
- **"An Impossible Disease Concept":** Dr. Mark Thurmond, Professor Emeritus of Veterinary Epidemiology at the University of California, Davis, School of Veterinary Medicine has argued that, "transmission of pneumonia between domestic and wild sheep is 'an impossible disease concept.' 'When it comes to infectious diseases, there's a mistake you cannot make: confounding disease transmission with disease agent transmission.'...Pneumonia is a complex disease and is due to a complex series of events and exposures...That includes exposure to disease agents such as bacteria, but it also includes stressors such as extreme weather, predation, overpopulation, or nutritional changes. That stress releases stress hormones in the animal, which weakens the immune

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

- **Stress is Likely a Factor in Wild Sheep Susceptibility to Pneumonia:** According to one Bighorn sheep researcher, die-offs among Bighorn Sheep “are common and have been reported since the 1800s... The exact etiology of die-offs is still poorly understood, but seems to originate from stress, which is not always nutritional...” (Shackleton et al. 1999). Furthermore, “bighorn sheep are most susceptible to the harmful effects of *Pasteurella* under stressful conditions including periods of low forage quality and quantity, high predation or harassment, or harsh weather (Frank et al. 2006). Under these conditions, the immune system becomes suppressed, and individuals infected with *Pasteurella* are often more susceptible to fatal pneumonia (Festa-Bianchet 1988)” (Malberg 2008). Other studies indicate that wild sheep are more susceptible to pneumonia outbreaks when they experience stress (i.e. elevated cortisol levels) (Kraabel and Miller 1997; Miller et al. 2012).
- **Experimental Studies Suspect:** Many of the studies cited to establish that domestic sheep transmit disease to wild sheep were done under “experimental conditions” (i.e. captivity and forced comingling), which add stress, a likely factor in wild sheep contracting fatal pneumonia (Miller et al. 2011). Experiments intended to “prove” that *M. haemolytica* and other bacteria kill wild sheep have required very high doses of inoculations in wild sheep, “resulting in death within days (not like the subacute/chronic disease actually seen)” in wild sheep, according to Dr. Highland. Again, much of the evidence beyond these forced co-mingling studies is based on anecdotal field reports. Although we cannot entirely discount them, these reports do not demonstrate true causation, merely correlation.
- **Lack of Scientific Integrity:** Dr. Mark Thurmond, Professor Emeritus of Veterinary Epidemiology at the University of California, Davis, School of Veterinary Medicine has highlighted a number of faults found in government risk assessments that have been performed related to wild sheep and domestic livestock separation (Thurmond 2015). Dr. Thurmond notes that, ‘Review of [the risk assessments] reveals an absence of key steps, ‘best available science,’ and ethics required in [risk assessments] and modeling, and in science in general’ (Johnson 2016). He points to “false testimonies” and provides “examples of some of the ‘more egregious issues.’ For example, USFS’ Snow Mesa risk assessment makes several statements claiming domestic sheep transmit disease to bighorn, citing ‘Besser et al. 2012, Cassirer et al. 2013’ as research references. The problem is, neither of those bodies of research actually supports that assertion...’ Such significant misrepresentation of published results is a serious scientific offense and violation of trust” (Johnson 2016). Dr. Thurmond argues that “government agencies would be less likely to continue to operate on faulty science if they were to follow guidelines laid out by the National Academy of Sciences (NAS) for scientific integrity. ‘If the industry groups would rally together and demand that the agencies follow the Redbook guidelines—on every decision— we could avoid much of the damage that results from government policies that lack scientific integrity” (Johnson 2016).
- **Die-Offs and Population Fluctuations Happen:** Wildlife populations ebb and flow. We see “die-offs” in numerous wildlife populations (like the current die-off of murres in the Prince William Sound). In one bighorn sheep study, the researchers note that, “Our analysis revealed that 88% of pneumonia-induced dieoffs occurred at or within 3 years of peak population numbers, which implies that density-dependent forces such as food shortage or stress contribute to bighorns’ susceptibility to pneumonia... Both malnutrition and stress are known to affect animal immunity... Our results also suggest that native herds are less likely to experience pneumonia-related disease problems.” (Monello et al. 2001). Researchers have not ruled out natural population fluctuation in the die-off events in Bighorn sheep populations.
- **Livestock and Wild Sheep Can Live Together Without Disease:** As Miller observes, “interspecies interactions do not invariably result in disease” (Miller et al. 2012). There are states in which domestic sheep range and native bighorn sheep continue to thrive, like Montana. Furthermore, Arizona and New Mexico have thousands of small sheep producers along with a healthy bighorn sheep population.
- **We Need to Know More:** Clearly, we do not understand the actual cause of pneumonia related die-offs in Bighorn sheep, nor do we understand all the factors that contribute to the increased susceptibility of wild sheep to pneumonia. Why then, the hurry to impose prohibitive regulations on domestic livestock owners when we do not fully understand the problem?

Actual Threats to Wild Sheep in Alaska:

- **The Dall Sheep Population Status:** According to the 2014 ADF&G Wildlife Management Report, Dall sheep population trends appear to be stable or decreasing throughout Alaska, with some areas increasing. Furthermore, the report notes that “high variability in population trends is normal and expected to continue.” Decreases that have been observed (in the Brooks Range, for instance) are believed to be due to harsh winters (ADF&G 2014). As of 2015, Dall sheep are not classified as a “species of concern” or an “at-risk species” in Alaska (ADF&G 2015).
- **Low Pregnancy Rates are Main Concern, Not Disease:** Tom Lohuis, ADF&G Dall sheep biologist, has “found some indication of viruses that have been associated with sheep in the Lower 48, but he found them at very low levels.” And he notes that, ‘it’s not uncommon for wild sheep to have been exposed to these viruses. Whether they have a pathogenic effect or not is dependent on a lot of different things.’ He also states, ‘It may not be a problem...Just because we have it doesn’t mean it’s a bad thing. The low pregnancy rate is biggest deal for me’ (Woodford, Riley 2009). “The causes of sheep mortality vary from area to area. Predation, avalanches, and starvation appear to be leading causes of Alaska Dall sheep population declines” (ADF&G).
- **Pneumonia Already Present Among Dall Sheep in Alaska:** According to a 2010 ADF&G report by Tom Lohuis, ADF&G has tested samples from Dall sheep to “ascertain if these animals carried bacteria associated with respiratory disease and pneumonia in other wild sheep populations.” They found that 51% of the samples “tested positive for bacteria of the genus *Pasteurella*,” and more than 24% tested positive for “bacteria of the species *Mannheimia hemolytica*” (Lohuis, Tom 2010). Alaskan wild sheep are

already exposed to these bacteria, despite not having contact with domestic sheep and goats.

- **No Transmission of Disease Between Livestock and Wild Sheep in Alaska:** According to the ADF&G, there is currently no evidence that domestic sheep and goats are transmitting diseases to the wild Dall sheep of Alaska. There is not a single record of this in the decades that Alaskans have had domestic livestock. To date, ADF&G has not conducted any research that indicates that domestic sheep and goats are a threat to the wild sheep in Alaska, let alone a primary threat, as claimed by the WSF.
- **Mineral Deficiency Is a Real Threat to Alaskan Wildlife:**
 - **Alaska Is Mineral Deficient:** As those of us who dedicate ourselves to animal husbandry know, our livestock often require vitamin and mineral supplementation in order to maintain optimum health. Alaskan soil is mineral deficient. According to the UAF, “most Alaskan soils and all forages grown in these soils are deficient in selenium... selenium is an essential micronutrient in animal diets, and it should be considered a critical ingredient when feeding only Alaska-based forages” (Jahns and Shipka 2004). Furthermore, “Adequate levels of Se are necessary for ... immune function, reproductive success, and recruitment” (Flueck et al. 2012). Selenium supplementation (especially coupled with vitamin E) is known to improve the immunity of sheep and other livestock (Hall et al. 2013; Ziaei 2015).
 - **Wild Sheep Are Often Deficient:** Studies have shown that wild sheep are mineral deficient (Mincher et al. 2007), particularly selenium deficient (Cox 2006; Rosen et al. 2009). In fact, in a study on the effect of selenium supplementation in Bighorn sheep, researchers state, “Bighorns are highly susceptible to pneumonia, and in some cases this susceptibility may be exacerbated by trace mineral deficiencies” (Rosen et al. 2009).
 - **Mineral Deficiency Seen in Other Alaskan Wildlife:** Alaska is known to be deficient in selenium and other minerals, creating likely mineral deficiencies among Alaskan wildlife. Alaskan moose have been found to be deficient in copper and other minerals, which has been correlated with population decline (Flynn et al. 1977; O’Hara et al. 2001). It is likely that mineral deficiency, including selenium deficiency, is a primary threat to the wild sheep of Alaska. While most domestic sheep and goats of Alaska are given selenium and other mineral supplements (which is one of the reasons our domestic animals have better immunity to diseases like pneumonia), the wild sheep do not have the luxury of receiving these extra minerals. Thus, if our wild sheep are not able to handle naturally occurring pneumonia strains due to depressed immune systems resulting from mineral deficiencies, we could see population declines in the future.
- **Unethical Hunting Practices Are a Threat:** Research has shown that stress is a key factor in determining whether wild sheep will succumb to naturally occurring strains of pneumonia (Kraabel and Miller 1997; Malberg 2008). There are many factors that can contribute to the stress of our wild sheep, including weather, forage loss, predation, etc. However, unethical hunting practices by the commercial guides can also lead to stress in our wild sheep populations. Appendix A of the 2014 ADF&G report, “Trends in Alaska Sheep Populations, Hunting, and Harvests,” includes a letter to “Registered Big Game Guides-Outfitters” from an investigator of the Alaska Department of Commerce, Division of Corporations, Business and Professional Licensing looking into unethical conduct among sheep hunting guides, claiming that there have been “numerous complaints regarding interfering and obstructing hunts, violating buffer zones, using aircraft to herd animals, failing to respect the gear and equipment of others and numerous other acts that would constitute Unlawful Acts.” (ADF&G 2014). These unethical practices, including violating buffer zones and herding sheep with an aircraft increase the stress on our wild sheep, potentially resulting in death of the same sheep these big game hunters claim they wish to protect.
- **Domestic Livestock Not a Threat:**
- **No Contact Between Wild Sheep & Domestic Livestock:** As part of Prop 90, the WSF claims that, “An expansion of human settlement (and consequently, livestock) could lead to increased contact between Dall sheep and disease-carrying livestock.” The use of the word “increased” implies that there is some amount of contact now, when in actuality there are no documented cases of contact in the State of Alaska. The WSF asserts that “transmission between domestic sheep, goats, and wild sheep is often nose-to-nose.” The reality is that any domestic sheep or goats that wander away from their farms in Alaska will be eliminated by predators long before they are able to come into “nose-to-nose” contact with a wild sheep or “co-mingle” with them. The same is true for any wild sheep that should wander toward civilization (defying all instincts of self-preservation) – so many natural barriers exist in the form of rivers, highways, and towns that it is ludicrous to imagine that the two could actually meet.
- **Alaskan Livestock Are No More “Disease-Carrying” than Wild Sheep:** There is an underlying assumption by the WSF that domestic sheep and goats are “disease-carrying livestock” and that they are unhealthy, teeming with bacteria, and inevitably pose a health risk to the wildlife of Alaska. Likewise, it is assumed that wild sheep are naturally healthier than domestic sheep and goats, and that they would not be stricken with diseases or be as susceptible to bacteria if they were not in contact with “disease-ridden” domestic sheep and goats. These are clearly false assumptions. All animals (and humans) carry disease. What is important is how well the immune system defends the body from disease. Domestic sheep and goats are significantly healthier than the wild sheep because owners spend a great deal of time and money ensuring that they are well fed, protected from predators, sheltered from extreme weather, regularly dewormed, and given adequate mineral and vitamin supplements. Wild sheep populations that have had no contact with domestic goats and sheep still struggle with a multitude of diseases, including pneumonia (even in Alaska, as noted above).

Other Options for Protecting Our Wild Sheep:

- **Increase Awareness & Establish Notification Systems:** Rather than impose unnecessary burdens on livestock owners, it would be far more effective for ADF&G to work cooperatively with livestock owners to increase awareness of this issue and encourage owners to report Dall sheep sightings near their farms. No other state in the US has imposed regulations on domestic livestock owners on private land. While grazing rights on public land have been revoked in certain areas, there is absolutely no precedent for imposing such prohibitive regulations on private landowners. Most states that have a published wild sheep management plan call specifically for education and “cooperative” efforts with domestic livestock owners (e.g., South Dakota, Nebraska, and Nevada).
- **Determine Real Stress Factors:** Instead of wasting our tax dollars regulating livestock owners, ADF&G could invest their time and expertise in researching what actual stresses exist in the Dall sheep population and develop a management plan that will have a



positive and long-lasting impact on these herds.

- **Improve Wild Sheep Mineral Supplies:** It would be far more prudent for the ADF&G and the Dall Sheep Working Group to focus their money and attention on improving the mineral supplies for the wild sheep, perhaps depositing mineral licks (such as other wildlife departments have done) or kelp meal (kelp is high in selenium and other nutrients, readily available in Alaska, and a favorite supplement among livestock owners) in areas frequented by Dall sheep.
- **Collaborate to Develop Useful Management Plans:** Instead of seeking to eliminate and/or work against the domestic livestock community, it would be far more effective to collaborate with livestock owners to develop a useful management plan for improving the health of the wild sheep. After all, we are the people who care for sheep and goats in Alaska day in and day out, working to balance the mineral needs that arise from living in AK, increasing forage diversity, and improving the immunity of our animals.
- **Increase Dall Sheep Preserves:** If ADF&G or the Board of Game is concerned about the health of our Dall sheep populations, one of the most significant things they can do is increase the number of preserves throughout Dall sheep habitat. This will protect our sheep from hunting pressures and provide them with a sanctuary in which to replenish their numbers.

Conclusion: Need for Further Study & Clarification:

- **We Need More Data & We Have Time:** In the words of ADF&G: "It is essential that we understand the demographics of species [that] we have concerns about, and are able to identify the cause of poor reproductive success, or high adult mortality, before effective conservation actions can be taken. Rudimentary information on numbers, trend, and distribution is lacking for many species in Alaska, and acquiring that information is, in itself, a conservation action. The program has operated in this information-gathering phase for most of the last 10 years, and it will likely be a high priority need in the next 10 years as well. Alaska's relatively pristine nature, unlike most states, affords us that time" (ADF&G 2015).
- **Request for Clarification and Further Study:** We request that, prior to implementing any change to 5 AAC 92.029 or imposing new regulations on livestock owners, the Board of Game and ADF&G:
 - **Provide a Risk Assessment that strictly adheres to the National Academy of Science's published guidelines for the science of risk assessment (the NAS "Redbook").**
 - Create more Dall sheep preserves, to protect our sheep from hunting pressure and stress.
 - Present maps of presumed Dall sheep "risk" areas.
 - Determine levels of acceptable risk for the management of Dall Sheep in Alaska.
 - Invite extensive public discussion of how these areas and levels were identified, which pose the greatest threat, and the options to eliminate the risk.
 - Perform a thorough health impact assessment of Proposal 90 on the Alaskan community.
 - Perform a thorough social impact assessment of Proposal 90 on the Alaskan community.
 - Perform a thorough economic impact assessment of Proposal 90 on the Alaskan community.
 - Provide, in reference to *M. haemolytica* and *M. ovipneumoniae*, a "scientifically defensible analysis, specifically on the probability of sufficient contact for pathogen transmission and, if there is transmission, the probability of disease and spread of the disease to the herd in the wild."
 - Provide written documentation from other states imposing such regulations as Proposal 90 on private or commercial landowners and include the rate of success achieved in the wild sheep population by such implementation.
 - Provide a risk assessment of ADF&G officials interacting with Dall sheep during research and unintentional disease transmission to Dall sheep from their interactions with other wildlife.
 - Provide records of instances (date and location) wherein domestic sheep and/or goats and wild sheep co-mingle and have "nose-to-nose contact" in Alaska.
 - Identify the precise locations of Dall sheep habitat in Alaska, define the exact location of every border that is "within 15 air miles of Dall sheep habitat," specify how these borders are defined and determined (state criteria and parameters) and by whom, specify how often these borders will change (e.g. seasonally, yearly, etc.), and detail how each livestock owner will know if their land or a portion of their land is within the nebulous "15 mile air miles" designation.
 - Provide a detailed plan for implementing the permitting system required by Proposal 90, including a cost analysis for the State of Alaska and private and commercial livestock owners.
 - Provide specifications for the "Department approved facilities" that the proposal will force upon livestock owners, including a cost analysis of these facilities for private livestock owners, commercial livestock owners, and a cost analysis for the State of Alaska to enforce these requirements.
 - Provide a plan that details exactly what it means for animals to be "certified disease free," who will perform this testing, how testing will be enforced, what specific diseases these tests must cover, how often tests must to be administered, and the cost of these tests for commercial and private livestock owners.
 - Provide a plan for enforcing the requirements of Proposal 90, including exactly how ADF&G will assess the facilities of each goat and sheep owner throughout the vast geographical terrain of Alaska and the details of what that assessment will entail.
 - Present a documented plan for how ADF&G will ensure bio-security for each farm that ADF&G personnel visit so that they can guarantee their personnel are not responsible for farm-to-farm or wildlife-to-farm disease transmission (e.g. disposable protective clothing and footwear for each farm, personnel sanitation procedures, equipment and transportation sanitation, etc.).
 - Define the ramifications for ADF&G and the compensation to Alaskan livestock owners if it is determined that ADF&G personnel are responsible for disease transmission to private or commercial livestock.
 - Clearly define the parameters that would warrant the destruction of private or commercially owned Alaskan livestock.
 - Determine how ADF&G will oversee disposal of livestock if owners are not able to afford "to obtain a permit to continue owning their livestock," to purchase and construct "approved facilities" for their animals, or procure "certified" disease testing that Proposal 90 would impose.
 - Invest the funds that ADF&G currently receives from the WSF into a program to develop vaccines and other health promoting

protocol for the wild sheep of Alaska.

- Perform research to determine if mineral deficiencies in Dall sheep increases their risk of succumbing to naturally occurring strains of pneumonia, and provide a risk assessment, considering the documented mineral deficiencies in Alaska (copper, selenium, etc.).
- Provide a public report that can definitively rule out natural population fluctuations in wild sheep.

Summary - We Request:

- **Collaboration:** We would like to work with ADF&G and other Alaskan agencies to develop effective methods to improve the health of all Alaskan animals, wild and domestic.
- **Representation:** We ask for equal representation and a fair hearing within the forums that are discussing this issue (Board of Game Meetings, Dall Sheep Working Group, etc.).
- **Scientific Integrity:** We ask that both sides of the scientific debate be presented and reviewed and that ADF&G creates a thorough risk assessment that adheres to the National Academy of Science's Redbook guidelines.
- **Alaskan Strategies:** We request that ADF&G work with us to create strategies that are tailored to address the reality of Alaska's unique habitat.

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and Goats (*Capra hircus*) in Montana. *Vet. Med. Int. Vet. Med. Int.* 2011, 2011:e162520.

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Submitted By
Megan Hamlin
Submitted On
2/26/2016 1:09:23 AM
Affiliation

Hello, I'm writing out of concern for an important issue facing Alaska livestock owners, ranging from large producers, to backyard hobby farmers, to the 4H kids that represent our futures.

This proposition will have a hugely negative impact on domestic sheep and goat owners across the state.

-Importation of new breeding stock is the foundation of maintaining quality animals in Alaska. Artificial insemination of goats is not uncommon, but is costly, whereas artificial insemination of sheep is highly skilled, with low probability of conception. To the best of my knowledge, there are only 2 veterinarians in the state that are trained in sheep insemination, and only 1 documented case of success (a single lamb born last month in Matsu).

-Disease testing as required by Proposition 90 doesn't exist, and will likely be extremely expensive to conduct if and when testing becomes available.

-Double fencing as required by Proposition 90 is extremely expensive. The distance required between double fences would be 30', and many animal owners doesn't have the novelty of extra acreage to provide the buffer zone between the double fences

-Livestock and pets that don't meet the requirements will be destroyed. What a horrific solution to put on people, children and their pets, companions, and livelihood for a non-existent, unproven "problem".

There is no evidence that domestic sheep and goats in Alaska are carriers or transmitting pneumonia that is believed (but not proven) to be causing die-offs of Big Horn Sheep in the Lower 48. Alaska State Veterinarian Robert Gerlach stated mineral deficiency and hunting, and ADFG stated "predation, avalanches, and starvation are believed to be the leading causes of Dall Sheep mortality in Alaska."

Proposing a law like Proposition 90, with no regard for how the consequences will fall down the ladder, is a blatant show of government overreach at its finest.

The agriculture and livestock industry is growing as to meet demands for locally grown and sustainable farms. More and more citizens are choosing to raise their own animals. Please stand up for the people and animal owners of Alaska. Farming in Alaska presents enough challenges and expenses without the fear of unsubstantiated governmental overreach.

I stand for education and practicality. I believe in the freedoms enjoyed by many Alaskans choosing to provide for their families and others by raising livestock. Domestic sheep and goats are arguably among the best suited livestock for raising in Alaska, providing fiber, meat, and milk.

Submitted By
Michelle LaVigueur
Submitted On
3/4/2016 8:58:18 PM
Affiliation

Please do not pass prop. 90. I live in Nikiski, many miles from the nearest wild sheep/goat populations. Passing proposition 90, the way it reads now, would greatly increase the burden on farmers as well as the state to enforce the new proposition. Again, please do not make unnecessary regulations on sheep/goat farmer's whos animals are not a direct threat to wild populations.

Submitted By
Michelle Myers
Submitted On
1/28/2016 4:53:11 AM
Affiliation

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

Goats and sheep.

NO.

I understand opening and discussing that goats and sheep can carry disease. 15 Air miles is huge and includes lots of space that contact is like umm the words I want to use are not nice.

When transporting equines into Alaska they receive a permit # and are checked by the federal vet. Is this appropriate for goats, sheep and pigs? Yes.

Submitted By
Mike Pendergrast
Submitted On
3/4/2016 4:07:36 PM
Affiliation

Phone
907-715-4799
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I am writing to voice my opposition to Proposition #90

This issue impacts the health and economic well being of my family.

I have been an Alaskan since 1958. I am an outdoorsman and hunter. I am a domestic goat owner for over 15 years. I have goats for the main purpose of providing the fresh milk and meat that I can not purchase in any grocery store in the State of Alaska.

I understand that there is a health and survival issue with wild sheep and goats. We all have seen the reports from the other states, but to date, not one of these studies can point to domestic/wild contact as the sole reason for the issues in the wild. According to the AKF&G, they know of no domestic/wild contact in the state.

The lack of scientific study by the State of Alaska, that there are no state or federal grazing lands, the manmade and natural barriers that exist between domestic and wild populations and the absence of farm and livestock involvement in the BOG Dall Sheep Working Group tells me that there needs to be more research and discussion before such a drastic move be advanced.

Maintaining a healthy and productive dairy goat is not a cheap undertaking. To have a quality milking goat, I invest anywhere from five to seven hundred dollars to acquire a six week old animal, plus the health testing and transportation costs to get the kid to Alaska. Yearly, I invest over one thousand dollars in feed and care in each of the animals I raise. I have spend the money necessary to construct and maintain shelters and fencing to protect my herd from the elements and predators (both two and four legged). I am enrolled in a monthly milk test program, have blood testing done semi-annually, and routine vet visits to ensure I have a healthy product for my table.

Thank you for your time.

Mike Pendergrast

Submitted By
Nathan
Submitted On
3/2/2016 8:44:39 PM
Affiliation

Sir/Ma'am,

I am a domestic goat owner as well as a hunter. I enjoy the freedom that we have in the US and state of Alaska to live our lives as we see appropriate. Raising our own food as well as hunting for food is an important part of our lives. Proposition 90 is a misinformed attempt to limit the freedoms we have as livestock owners. Passing proposition 90 will not have any effect on the survivability of the Dall Sheep populations but will effectively cause undue damage to the livestock industry in Alaska through unnecessary and misguided regulation.

As owners of domestic farm animals we have found that nutrition is a vital part of keeping our animals healthy. Survivability of a goat kid is based mainly on the nutritional health of its mother throughout pregnancy and its ability to receive nutrition from its mother early in life. Additionally, pregnancy rates and successful kidding rates are a direct result of nutritional levels. If we apply the same principals of nutrition to Dall Sheep we can see that there is good reason they are struggling to maintain sustainable population levels. Given the recent years of warm, dry summers and mild, icy winters, the Dall sheep population is having a difficult time maintaining appropriate levels of nutrition. We see the effects good and poor nutrition has in our goat herd and can imagine the frustration hunters and guides must feel knowing that they cannot affect the nutrition of Dall Sheep to encourage their populations.

The idea that domestic animals are causing disease in the Dall Sheep populations and therefore causing their decline is simply not true. Not one report I have read concerning the mortality rates of Dall sheep in Alaska suggested transferable diseases from domestic animals caused any sheep deaths.

I understand the frustration hunters and hunting guides must feel in this Sheep population crisis. Let's work at determining another way to keep our wild animals healthy and prolific. Please do not restrict my freedom to raise farm animals based on the erroneous, misguided theory presented in proposition 90. Please vote no on proposition 90.

Respectfully,

Nathan Schauermann

Boreal Glen Farm

Palmer, AK

Submitted By
Nicole
Submitted On
2/19/2016 8:16:52 PM
Affiliation

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Tok, Alaska 99780

To whom it may concern, I am leaving a comment regarding prop. 90, the proposal to move sheep and goats to the unclean list, to force people to get permits for these animals and wanting to force owners within "15 air miles of dall sheep habitat" to get approved fencing and health checks.

I completely DISAGREE with every part of prop 90. This should not be passed. There are so many arguements against it. To name a few, for most people who own goats and sheep it is a matter of hobby farming or for those with little income to be a little more self-reliant. It's not like they have sheep and goats roaming around unchecked. Due to Alaska's harsh climate and the abundance of predators most goat and sheep owners already keep their animals in a safe and secure environment. Adding additional costs to owning these animals; like permits, required vet checks and standard double fencing would prove to be too costly for a lot of the people. This would make it more difficult for homesteaders and Alaska's food self-reliance. It is unrealistic for most people to own cows for milk or meat as they are so large and consume so much food. Goats and sheep are the perfect solutions for livestock owners in Alaska, and allowing this to go through would alienate many of these possibilities and realities. This proposal is a blatant infringement on our rights.

There are way too many rules being made, regulating we the people more and more, taking away our rights bit by bit. Every one needs to realize that.

The proposal wants state resources, troopers, and fish and game officials to regulate livestock in Alaska. That's not exactly a wise use of state funds. I'm not really sure it is their place either.

There was quite the article written titled "Safeguarding the treasure, Disease Risk to alaskas dall sheep." I was quite horrified about how many "mights" and "coulds" there were in this article trying to justify the proposal. I believe this proposal will lead to the decline of small scale farming in Alaska just as it has done in the lower 48. Obviously not a good thing. Many people believe there is plenty of room in this large state for livestock and wildlife to co-exist.

To sum it all up, This is not just about "saving the dall sheep" This is about our basic rights as Americans. This is about our right to raise our own food, to be more self-reliant, about Alaska's food security. Thank you for reading this, I realize it's important to protect our wildlife but I know this is not the answer. at the very least hold off on making more rules until there are more thorough studies done, with not so many maybe's and could be's and "pre-ponderings.

Submitted By
Patricia Miller
Submitted On
3/4/2016 10:33:08 AM
Affiliation
none

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9073786151

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millerstead@hotmail.com

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3036 Ester Dome Rd
Fairbanks, Alaska 99709

Proposal 90, which potentially aims to mandate registration of every last domestic sheep and goat in this state as well as require "department-approved facilit(ies)" should not be accepted. This proposal aims to protect wild populations from diseases that are not even present in Alaska and will cause UNREASONABLE BURDENS on livestock owners. Agriculture is critical to this state and is difficult enough already. It is not the job of the board of game to place unnecessary hampering restrictions on farmers, particularly when there is no current threat to wild populations of dall's sheep from domestic sheep and goats. This proposal is vague in defining what exactly is "dall's sheep habitat". A 15 mile boundary is excessive for preventing disease transmission. This proposal is poorly thought out and will cost our already cash-strapped state too much money that could be better spent elsewhere. I strongly encourage that this proposal is NOT PASSED.

Submitted By
Pierce Thomas
Submitted On
3/4/2016 4:48:25 PM
Affiliation

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

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

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

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

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

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

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

Dear F&W:

2-29-16

PC264
1 of 1

My family and I are against Proposal 90. We grow vegetables and our co-farmer has goats. We eat domestic goat and use sheep for wool. We believe the proposal to be completely foolish and detrimental to Alaskan agriculture.



Sincerely,

Rachel Babitt
of Alaskan Homegrown
in Kaslof

Babitt
po box 25

Submitted By
Rebekka Morse
Submitted On
3/4/2016 3:43:52 PM
Affiliation

Phone
907-317-0518

Email
Rebekka_ak@yahoo.com

Address
3705 Arctic Blvd
Anchorage , Alaska 99503

Good Evening, I have many friends and family whose lives and children's lives depend on goat milk products. I've done a lot of research before stating my opinion here. Nothing I've found has had concrete evidence showing potential harm to wild sheep. So much today is scare tactics and unfortunately people fall for them without thoroughly researching unbiased evidence. Please, before you fall for the scare tactics of profit based entities from out of the state think about the horrendous jeopardy you are placing on the children with severe bovine allergies. Thank you for your time.

Submitted By
Rep. Dan Saddler
Submitted On
3/4/2016 4:36:30 PM
Affiliation

I would like to register my concerns with Proposal 90, due to be presented to the Alaska Board of Game at its March 2016 meeting in Fairbanks, relating to domestic sheep and goats.

I have recently been contacted by a number of Alaskans with fears that this proposal would have significant, perhaps devastating, impact on their personal and commercial activities relating to livestock management. I am sympathetic to their concerns.

Resident Alaskans have long enjoyed the excitement and rewards of hunting sheep and goats in Alaska's mountainous areas. Non-residents who share a passion for hunting sheep have likewise provided commercial opportunities for other Alaskans to serve as master or assistant guides.

However, lowland cultivation of sheep and goats also brings real benefits to many resident Alaskans who have no involvement in hunting. It provides sources of meat and dairy products to a variety of consumers, including many Alaskans allergic to cow milk, and for whom sheep or goat milk is a highly desirable alternative. It also represents an important cottage commercial industry, which is important as Alaskans seek to generate more domestic sources of food.

I would note that the Alaska Department of Fish and Game has recommended the Board not approve this proposal, in part on grounds that regulation of domestic livestock, including requiring testing for disease or double-fencing, is outside the authority of the Board of Game.

While the Board does have the authority to remove animals from the "clean list," it does not appear that sufficient evidence of intermingling of domestic and wild sheep and goats in Alaska has been presented to justify the additional impediments on domestic sheep and goat herders. Additional efforts by the department to develop evidence to justify any such separation via other regulatory means might be a fruitful avenue of research.

Absent such evidence at this time, and for the other reasons mentioned above, I would encourage the Board of Game to take no action on Proposal 90.

Yours respectfully,

Representative Dan Saddler

Submitted By
ROBERT MENNIS
Submitted On
3/4/2016 1:06:56 PM
Affiliation

Phone
907-602-5830
Email
ICEFISHER138@HOTMAIL.COM
Address
6700 HOLLY LANE
ANCHORAGE, Alaska 99502

I send this comment to show my opposition of Proposition 90

I oppose prop 90 for many reasons, but first and foremost because it threatens the health of my children. Like many people, my children have been diagnosed with many food allergies. Goats and sheep have been a saving grace to allow us to accommodate their needs. All three of my children are allergic to all of the following: cow's milk, wheat, oats, soy, beef, commercially available chicken, pork, and eggs. Each child has other specific allergies including: corn, apples, oranges, yeast etc. In addition to this, products produced in a facility that processes these items cause reactions, as well as products from animals that have eaten corn, soy, wheat etc. This severely limits what we can feed our children; in fact it eliminates nearly all processed foods that are available for purchase. We raise, hunt, and fish for all the meat and animal products in our home. Because hunting can be expensive and unreliable, we raise goats for meat and milk. They make up a large part of our children's diet.

Removal of goats and sheep from the clean list, and following the provided regulations in prop 90 would be the end of sheep and goats in Alaska. Therefore the end of the small backyard farm as well. The following is copied from prop 90, followed by a portion taken from the ADFG web page regarding the clean list: **“Any person in possession of domestic sheep (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 90 has no business being implemented in its current state. It is poorly written and mainly contains misguided information that is at best untruthful. As someone who hunts and raises animals I believe that domestic goats and sheep are a much needed resource for our state. At the very least they are a way to reduce our dependency on food being shipped to Alaska, and at best they are a lifesaving source of nourishment for those who need it most.

Thanks for your time,
Robert Mennis

Submitted By
Dr Sabrieta Holland
Submitted On
2/25/2016 8:23:22 PM
Affiliation

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907-232-7477
Email
Alaskacowdoc@hotmail.com
Address
2299 S Falk Lane
Palmer, Alaska 99645

Hello,

As a follow up to my public comment at the ADFG MatSu Advisory Board Meeting, I would like ADFG to consider better utilization of MatSu Borough Animal Control and Regulation and Title 24 of MSB Code. This would address the concern, at least in the Mat Su Borough, of loose goats and sheep that are apparently an issue discussed in ADFG Proposal 90 as well as loose cattle discussed in ADFG Proposal 91.

I have spoken to MSBACR Chief Matt Hardwig as well as dispatchers. They are more than happy to investigate and act on any loose domestic animals reported by ADFG. They do have to be reported. There is no way for the left hand of government to know that the right hand of government has an issue to deal with unless they call them and file a report in writing. Notable is the fact that Chief Hardwig has never received a complaint of any kind from anyone in reference to the Baldy Mountain Highland Cattle that are described in particular by Proposal 91 as such a nuisance and risk.

Certainly in these fiscally concerning times it makes sense especially to make use of resources and infrastructure and laws that are already in place.

Certainly this would allow those law-abiding livestock owners with well-restrained animals to continue to enjoy their freedoms of having livestock.

Should these proposals actually be taken seriously, I would like to suggest they be amended to read "Except in Boroughs with existing Animal Control Facilities and Codes that already address these issues."

I am happy to facilitate a meeting with ADFG and MSBACR to verify and delineate a more productive relation here.

This so far appears to be a reasonable resolution to all parties. Animal Control, Alaska Wild Sheep Foundation, ADFG, Alaskan farmers. If the two agencies are able to cooperate and follow through, this would allow the vast majority of MSB residents to not be harnessed with undue federal regulation due to the non-compliance of a few. Follow through will require political support to MSBACR in what may be an unpopular process to begin with. Some local groups of animals have been loose for decades. Perhaps if the alternative consequences of Borough disregard for the loose livestock are explained to the general public (federal permits required to own livestock, livestock being shot on sight by ADFG, etc. as well as the concern of disease transmission to our wildlife populations), then the general public would be more supportive.

Proposals List:

http://www.adfg.alaska.gov/static-f/regulations/regprocess/gameboard/pdfs/2015-2016/prop_book/2016_prop_book.pdf

MatSu Borough Code, Title 24 Animal Care and Regulation:

<http://www.codepublishing.com/AK/MatanuskaSusitnaBorough/mobile/?pg=MatanuskaSusitnaBorough24/MatanuskaSusitnaBorough24.html>

Dr Sabrieta Holland

Submitted By
Samantha Brose
Submitted On
3/4/2016 2:25:16 PM
Affiliation

I am against prop 90 it is not okay for other people to decide if I have livestock or not on my own property, And it will hurt the local farmers in Alaska and local business. There is no known record of domestic livestock getting wild livestock sick or transporting any disease in the state of Alaska. I'm very disappointed in the state for even considering this. Alaska is a wonderful state and supports locals this will not be beneficial to the farmers or the hunters for that matter. I appose prop 90

Submitted By
Sara Russell
Submitted On
3/4/2016 9:39:41 AM
Affiliation
Mrs.

Please oppose prop 90, as it will cripple Alaskan farmers and our ability to raise healthy food for ourselves and our communities based on faulty studies from the lower 48 States and being pushed by out of state special interests.

Submitted By
Sarah Donchi
Submitted On
1/25/2016 4:52:36 PM
Affiliation

Phone
9072521929
Email
sdonchi@yahoo.com
Address
35850 Jay Ave
Soldotna, Alaska 99669

~~Regarding Proposal 90, permit for possessing live game, I have several questions:

My understanding is that the biggest risk is of spreading pneumonia from domestic to wild populations. What is the prevalence of pneumonia in domestic sheep/goats in Alaska?

What is the prevalence of pneumonia in wild sheep/goats in Alaska?

How many proven instances are there of domestic sheep/goats infecting a wild animal in Alaska?

How and where are the boundaries of Dall sheep habitat defined?

The proposal states that "hobby farming is growing rapidly in Alaska including areas that would be considered Dall sheep habitat". What exactly does this mean? Approximately how many more sheep/goats have been introduced into Dall sheep habitat? Has there been a study identifying when and where this happened and how many, if any, infections resulted?

The wording of this proposal seems very vague and unsubstantiated. My concern is that passage of this proposal will unnecessarily discourage the growing interest in farming, food security, and sustainable agriculture in Alaska. As well, there is very little information available on what the habitat boundaries are and what qualifies as a "department approved facility".

As both a farmer and hunter I support efforts to manage wild populations for sustained yield, but this proposal does not appear to be thoroughly researched.

Thank you,
Sarah Donchi

Submitted By
Sarah Smith
Submitted On
1/29/2016 10:47:36 AM
Affiliation

To Whom it may concern,

In regard to Prop 90 from the perspective of a small scale farmer. I believe that this proposition would be harmful to small scale farmers and homesteaders throughout the state of Alaska. As many of our herds are located in remote areas testing is not always available and when it is the cost of transporting a viable blood sample is extremely high. This would put a huge strain on a small scale operation. This would also limit the importing of new stock into Alaska causing farmers to resort to inbreeding and raising the cost of stock to the point of severely limiting small scale operations. We pride ourselves on being predator friendly in our practices and are working closely with the USDA NRCS (Natural Resources Conservation Agency) office. Still due to our location sending blood samples for testing to an out of state lab is unrealistic and we have to rely on maintaining a closed herd with selective breeding of unrelated stock. So while I am a large supporter of conservation efforts and biodynamic farming practices I believe that this proposition would be harmful to farmers in the state of Alaska. The costs to small scale farmers would far outweigh the benefit to the wild sheep populations.

Submitted By
Scott Oviatt
Submitted On
3/3/2016 8:50:16 PM
Affiliation

Phone
907-745-2204
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soviatt@mtaonline.net
Address
4149 S. Trellis
Palmer, Alaska 99645

In regard to Prop 90; What are we doing? Why are we even having a discussion about this? As I know it, there is not now, never has been, and is not anticipated to be a problem in Alaska with domestic and wild sheep/goats transferring any kind of disease between these species. It seems to me that this is nothing more than an extremely provocative move by certain individuals with a personal and selfish agenda and it is agitating the entire farming community in this state.

I have been a resident of the Palmer area for the past 30+ years. Never, in all this time has there been a siting of a wild sheep or goat on the valley floor, nor a domestic animal in wild animal ranges. This entire proposition has no merit in science nor in common sense, What I've seen are foxes, bears, smaller vermin, owls, eagles and hawks that come onto my property and destroy my fowl. What should we do about that?

Perhaps we should list dogs as unclean. After all, they have actual physical contact with the foxes and the bears and small vermin.

What about declaring cats as unclean? I'm sure that the owls that swoop out of the night sky and grab our little kitty cats are subject to disease from that contact.

How about humans? We allow humans into close proximity to wild sheep in order to kill them with bullets and arrows. Human contact with wild animals will always be more deadly than non-contact with farm animals.

Come on folks, use your heads.

Yes, I waxed a bit snarky here, but I aim to prove the point that this proposition is nothing more than complete ignorance and self-serving on the part of the authors with absolutely no regard for the damage it will cause to the public. Many, many farms, farmers and lifestyles would be completely ruined if proposition 90 is taken up. It is completely unnecessary and if this proposition is allowed to pass, it will create (as it has already) and "us vs. them" situation. This would be a case of classic government overreach not by consent of the people, and not by anyone the public has elected to maintain oversight of our resources.

Submitted By
Shawna Wolk
Submitted On
3/2/2016 3:41:52 PM
Affiliation

Phone
907-252-1220
Email
Swolk2001@yahoo.com
Address
Po box 338
Kasilof , Alaska 99610

. I am an Alaskan that is very alarmed by proposition 90 Presented to the Board of Game by the Wild Sheep Foundation. Our family is comprised of a long lineage of farmers and ranchers and 3 generations of our family practice self reliance, sustainability and what we feel are best practices on our 10 acre farm. We have a small herd of Nigerian dwarf goats for meat, milk and companionship. Our herd is contained on 7/10ths of acre in the center of our acreage within a very stout fence built of 4x6 treated posts, 5 ft cattle panels and 2x6 top and bottom rails at a cost of \$6,600.00. Our primary concern is containment and protection from predators. My tiny goats would never make it out of our neighborhood alive much less the 15 air miles to the Wild Sheep and Wild Goat habitat in the Tustumena bench lands. This proposal points to problems that have affected the lower 48 states, and transposes them on Alaska, trying to solve a problem here that hasn't existed. This proposal doesn't take into consideration the sheer size of Alaska and the many miles and natural barriers that exist(rivers, inlets, mountain ranges, roads, bridges, cities) between domestic goat and sheep domiciles and Wild Sheep and Goat habitats. If approved as written proposal 90 puts all Alaskans' private property rights at risk, limiting what i can grow and eat on my property is a violation of my rights..especially when it is suggested by an out of state, elitist group such as WSF to an Alaskan Governor appointed board.

I direct the reader to the Declaration of Independence and the 6th Amendment to the US constitution.

Proposition 90 asks the Board of Game to remove Domestic sheep and goats from the "clean list" there is no precedent for removing domestic livestock from the list. According to state records, the last animals removed from the list were chimpanzees. The Department of Agriculture and the Alaska farm bureau opposes any action be taken by the BOG in regard to this proposal. In its haste to ask the BOG to remove livestock from the clean list, WSF did not allow for sufficient public process to include the stakeholders (livestock owners/producers) involvement or thorough legal review by the Department of Law and the Alaska Department of Fish and Game. Board of Game should reject this proposal on the grounds that they have NO jurisdiction over domesticated animals. Board of Game should not remove ANY livestock from the clean list. In my opinion, the Board of Game should not recommend or advise the legal governing agency with jurisdiction in the matter of proposition 90 per conflict of interest.

I Thank you for the opportunity to send the Board of Game my comments.

Shawna Wolk, Happy Homestead Nigerians

Submitted By
Sheri Walker
Submitted on
2/27/2016 7:56:02 PM
Affiliation

Dear Board of Game Members:

I am opposing Proposition 90 for these reasons:

- It infringes on the inherent rights of Americans to produce their own food on their own property.
- Many people (including myself) raise their own food due to severe allergies/intolerances. If this proposition is passed, it will put undue financial burden on us who already pay premium for food that we can safely eat.
- 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, mountain ranges.
- To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition (eg mineral deficiency). Unethical hunting practices can also lead to stress in our wild sheep populations.
- 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.
- The State of AK cannot afford to implement and enforce this proposal. It is in an economic crisis and such regulations will only drain it further.
- Prop 90 would place severe financial limitations on Alaska’s ability to maintain sources of clean, healthy food raised in-state. Limiting our food independence weakens our State. It could potentially place a higher reliance on wild game as a healthy food source, increasing the hunting pressure (disease causing stress) on local wildlife.
- The members of the Wild Sheep Foundation are primarily hunters (their mission: “...promoting the interests of the hunter”), and many of the Foundation’s financial supporters are commercial hunting guides and outfitters. The WSF’s motives behind Prop 90 are not purely altruistic; they are not merely concerned about protecting the wellbeing of Alaska’s wild sheep, for the sake of the wild sheep. They are interested in protecting the wild sheep in order to hunt the sheep for sport and profit. The commercial hunting guides and outfitters who support the WSF and Proposal 90 profit enormously from the wild sheep of Alaska (a guided sheep hunt can cost \$18,000 - \$30,000 per hunter).
- An elite group of hunters should not be allowed to impose its agenda on farmers' rights to have livestock on their private property.

I am not opposed to hunting in Alaska, as our family supplements our food source with wildlife. Protecting the Dall Sheep is an honorable desire. However, I firmly believe that there are ways of protecting them without destroying the ability of farmers to maintain their operations.

I strongly urge the Board of Game to work with farmers and the Department of Agriculture to explore viable ways of preserving the farming initiative while protecting Dall Sheep.

Sincerely,

Sheri Walker

Submitted By
Sherri
Submitted On
3/4/2016 6:03:16 PM
Affiliation
Winfree

Phone
9077488291
Email
sandr2694@gmail.com
Address
2694 W Stable Cir
Wasilla, Alaska 99623

To whom it may concern,

The concerns and allegations of proposition 90 are unfounded and unsupported by proper investigation and field studies. Before such a proposition should even be considered, the question I would ask is why are we letting an outside lobbyist group interject and propose changes to laws that effect Alaskans. Dall sheep populations are found on every mountain range throughout Alaska, and there are private ranches and farms in just about every valley in between. So the idea of a fifteen mile buffer zone between farmed and wild sheep populations is absoluteley absurd. To allow propostion 90 to become law will create significant hardships upon those families that raise domestic sheep and goats for subsistance and commercial prosperity. To do so, on the unsubstantiated whim of an outside organization without factually cited studies showing Alaskans the merit behind such a proposition would be criminal and unconstitutional. Those of us who live in this great state, do so for for the opportunity to live a specic lifestyle that is garenteed to us under both the Alaska and US constitutions and we will not rollover for any outside special interest group at any cost.

Thankyou,

Sherri & Rob Winfree

Submitted By
Rob Winfree
Submitted On
3/4/2016 6:05:56 PM
Affiliation
Phone
907-244-8406
Email
rands2694@gmail.com
Address
2694 West Stable Circle
Wasilla, Alaska 99623

To whom it may concern,

The concerns and allegations of proposition 90 are unfounded and unsupported by proper investigation and field studies. Before such a proposition should even be considered, the question I would ask is why are we letting an outside lobbyist group interject and propose changes to laws that effect Alaskans. Dall sheep populations are found on every mountain range throughout Alaska, and there are private ranches and farms in just about every valley in between. So the idea of a fifteen mile buffer zone between farmed and wild sheep populations is absoluteley absurd. To allow propostion 90 to become law will create significant hardships upon those families that raise domestic sheep and goats for subsistance and commercial prosperity. To do so, on the unsubstantiated whim of an outside organization without factually cited studies showing Alaskans the merit behind such a proposition would be criminal and unconstitutional. Those of us who live in this great state, do so for for the opportunity to live a specic lifestyle that is garenteed to us under both the Alaska and US constitutions and we will not rollover for any outside special interest group at any cost.

Thankyou,

Sherri & Rob Winfree



Submitted By
Shirley Speer
Submitted On
3/4/2016 6:25:15 PM
Affiliation

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907 371-3563

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speeralaska@yahoo.com

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HC 1 Box 2980
Healy, Alaska 99743

This is something that someone in the lower 48 has started and doesn't know anything about what's going on up here. How many cases has the wild sheep or goats been reported in Alaska? How many cases has been reported in the lower 48? We don't have the money for the programs we already have that need attention without starting something that don't apply to us. They are pushing laws on us we don't need. We regulate our own herds there's no outbreak or ever has been in Alaska. We Alaskans should make laws that we need and we know what that is and when its time.



Submitted By
Stephanie
Submitted On
3/4/2016 4:19:05 PM
Affiliation

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9185107275

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Mizd05@yahoo.com

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510 W Tudor Rd Ste 1
Anchorage, Alaska 99503

I oppose opposition 90

Submitted By
Stephen Bequette
Submitted On
3/3/2016 10:59:52 PM
Affiliation

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825 West Lookout Drive
Wasilla, Alaska 99654

Dear Board,

I am strongly opposed to the proposal 90. Nowhere in the information presented is there any proof that the diseases listed even exists in domestic sheep or goats within the State of Alaska and as evidence of transmission in a controlled experiment the conditions were unrealistic and deliberate in quarantieing exposure. Many of the conditions cited were problems with reintroduction and relocation of wild populations which is not done in Alaska. Then there is the onerous aspects of all of the proposed mitigation measures in the proposal, all of which are viewed as intrusions to all sheep and goat owners.

I am disappointed in finding out about this proposal, which will affect a lot of people on such short notice. I am also noting that this type of regualtion could be applied to many other domestic species and therefore is more important that it be reviewed more carefully before any action. So I am asking for at least a delay be inacted so more information and dialouge can be exchanged instead of a set of regulations being rammed down the throat of some people who did not see it coming without being able to respond or even submit other proposals.

Submitted By
Steven Thomas
Submitted On
3/4/2016 4:54:20 PM
Affiliation

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

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

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

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

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

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

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



Submitted By
Susan Judd
Submitted On
3/4/2016 1:17:42 PM
Affiliation

Please reconsider Prop 90. I have family that earn a significant income in the farming of goats and it in not way affects the Alaska Dall Sheep population. It's all fine and good to save Alaska's Dall Sheep, but let's identify what the "real" problem and threat to wild sheep is before harming countless other Alaskans in the process. There has never been a case of disease transmission between wild and domestic sheep and goats in Alaska! Taking sheep and goats off the "clean list" is like putting out a campfire with Niagara Falls. Government overreach at its finest!

Submitted By
Suzanne
Submitted On
2/29/2016 1:18:20 PM
Affiliation

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48940 Wendy Lane
Soldotna , Alaska 99669

~~proposal 90 and 91

Alaska's Dall Sheep population is important, but proposal 90 is an extreme approach to deal with something that has not become an issue in Alaska. I can not begin to tell you how it will harm and negatively impact the personal use/small farm livestock industry not to mention the large farm livestock industry and 4-H JML children. We oppose any form of permitting for simply owning livestock

Alaska is not a free grazing state. Between fencing and natural barriers there is a low likelihood of close contact between wild sheep and domestic sheep/goats. There is no documentation of Dall Sheep deaths due to contact with livestock.

I am not a biologist, however due to the low opportunity for domestic and wild sheep to integrate seems a minute opportunity for the bacteria of concern (*M. ovipneumoniae* and *M. haemolytica*) to be introduced. As it is endemic in wild and domestic populations, disease develops when immune systems become depressed to be introduced.

Reductions in Dall Sheep numbers due to disease should factor in multiple stressors: weather, predation, avalanches, lambing, parasite load, age and nutrition.

Respectfully,

Suzanne

Submitted By
Suzy Swanner
Submitted On
3/4/2016 4:36:34 PM
Affiliation

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

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

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

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

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

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

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



Submitted By
Tabitha Nardini
Submitted On
3/2/2016 6:28:07 PM
Affiliation

Oppose prop 90 There is no know research or know problems that proves a need for restrictions on goats and sheep. Before imposing rules and regulations on State of Alaska residents. Please understand the effects this will have on the people living in this wounderful state of Alaska. Do not pass prop 90! Thank you, Tabitha Nardini

Submitted By
Tabitha Nelson
Submitted On
2/23/2016 3:07:47 PM
Affiliation

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USA, Alaska 99833

I am both a hunter and domestic livestock owner. Proposition 90 will hurt so many farms and families in Alaska. I believe the bighorn sheep population needs to be protected but taking sheep and goat off the clean list is not the way to do it. Try decreasing hunting, or no out of state hunters, subsistence only. If food security in Alaska is important, proposition 90 will surely make it more impossible. This is nothing more than big money having their way, which always hurts small independant farmers. It is unconstitutional to mandate such an imposition without statistical data proving there is a legitimate threat or connection to domestic animals.

Submitted By
Tammy Briggs
Submitted On
3/2/2016 10:09:31 PM
Affiliation

I am writing to address the proposal to remove goats and sheep off Alaskas Clean List. I am a born and raised Alaskan resident, hunter and small scale farmer. I do not agree with this proposal. The cost alone to impliment this proposal would be a large undertaking and the state simply doesn't have the money with recent cut backs already to Alaska State Troopers. Removing goats and sheep off of the clean list WILL NOT alleviate the risks to the wild sheep population. The diseases of concern are not just carried by domesticated goats and sheep but by cats, dogs, cows, horses, and even people. I do not believe these outside hunting agencies should have any say in the legality of owning domesticated sheep and goats in Alaska. The rapid decline in the wild goat/sheep population in the lower 48 was due to neglagence on the part of the government agencies involved and farmers who allowed mass domesticated sheep/goats to roam in natural habitat of the wild sheep/goat area. This has never been an issue in Alaska and there simply is just not enough domesticated sheep and goats in Alaska to ever pose a threat. The simple fact is, a domestic sheep or goat would never make it in Alaskas vast forested areas with a multitude of predators at every corner to take care of them. If Alaska wants to take a stance in this then simply don't allow domesticated sheep and goats to be farmed into the areas where wild sheep and goat habitat. If the Board Of Game goes foward to pass this proposal the fight will not be over. The Sheep federation does not own this state, We the people that live here every day for generations own this state. We will not quietly back down from this. Alaska needs to make a stance on this. Today it is the sheep and goats, tomorrow it will be horses and cows, then dogs and cats. In laymans terms, this is an asinine proposal and should have no further consideration.

Other key points to consider in regards to this proposal is the impact this decision would have on our farming community, our 4-H programs, and the personal right to raise our own livestock and farm our own lands. Alaska is already cut off from the lower 48 and most of us Alaskans like it that way. Do not take away our right to make our own decisions in what we choose to raise to feed our families. The sheep federation and hunters are more of a threat to the wild sheep and goat herds in Alaska then any of the domesticated sheep and goats are. Look at the numbers. How many wild goats and sheep in Alaska have been killed by domesticated goats and sheep...how many have been killed by hunters?

Please really stop and think before you even begin considering supporting this proposal. Please make a stand against lower 48 stupidity coming into Alaska.

Thank you for allowing me to give my opinion on this matter.

Tammy

Submitted By
TAMRA ROSENDAHL
Submitted On
2/9/2016 12:02:54 PM
Affiliation

Phone
9073150069

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2sixrozez@gmail.com

Address
2561 E HIAWATHA DR
WASILLA, Alaska 99654-2839

As of this year I have started raising goats. They will help us physically as I have a cow milk allergy & goats milk doesn't affect me. They are a joy to watch on our minifarm. Please don't take this privilege away. There are many who raise goats for that same reason. They are a great benefit to all. Thank you for not passing these proposals and allowing us to comment.

Submitted By
Tara Pollock
Submitted On
3/4/2016 11:55:19 AM
Affiliation

Phone
355-3909

Email
lillywolfsbane@gmail.com

Address
Po box 643
Palmer, Alaska 99645

The prop 90 is a terrible idea. The only thing it will do is hurt local Alaskans, small farmers and hobbyists who love their sheep and goats like family. Removing these animals from the clean list will not help wild sheep. I am not the most articulate of my bunch, so please listen to the arguments of my friends.

Submitted By
Tari
Submitted On
2/28/2016 3:40:28 PM
Affiliation

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970-409-0224
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Address
8242 west wesley drive
Wasilla, Alaska 99623

Dear Board of Game,

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

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

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

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

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



Submitted By
Taylor Ness
Submitted On
3/4/2016 3:11:13 PM
Affiliation

I'm opposed to the state trying to go through everyone's yards and taking their livestock away from us because it'll hurt the economy... Don't take them !!!

Submitted By
Terry Jones
Submitted On
2/25/2016 11:28:18 AM
Affiliation

As a small goat farmer on the Kenai Peninsula, I am very concerned about Prop 90. Wondering how or what is being done to protect the food producers in our area? How will this affect those of us that are within the proposed 20 mile boundary? We have lived in Alaska and farmed here our entire lives. Our stock is contained to our property at all times. My family has also been involved in the big game guiding industry so I am very aware of the hunting/guiding culture in our area. Have never heard of a case of the domestic animals mingling with the wild in the the state of Alaska. So I am totally against this going into law.

A very concerned farmer,

Terry Jones



Submitted By
Copper Center, AK 99573
Thad Henry
Submitted On
3/4/2016 11:10:46 AM
Affiliation

To The Alaska Board Of Game,

My name is Thad Henry and I farm in Kenny Lake Alaska. I am a lifelong Alaskan who loves, hunting, fishing and trapping. As a rural Alaskan I love the independent lifestyle of ALL that this great state offers. I am an avid hunter and outdoorsman who has harvested moose, caribou, sheep and goat for many, many years. I am also a farmer. Our family farm is nestled in one of the most beautiful places in this entire state, the Copper River Valley. My family hand picked Kenny Lake as the place to settle in this state, due to it's productive brome hay fields, agricultural rich lands and farming heritage. The state of Alaska has promoted farming, agriculture and the rearing of livestock and farm animals in the Copper River Valley since early statehood. These efforts are very active today with efforts through the Department of Agriculture, state cooperative extensions and local farm bureaus. Our farm produces quality milking goats and sheep that we rely upon and make a livelihood. My children are growing up in an environment where they are taught to clean pens, build fences, feed and water animals daily. My children are growing up with a strong work ethic and understand the importance of animal husbandry as well as a keen sense of responsibility and stewardship to both livestock and the land. The state of Alaska promoted agriculture enhancement in this region in early statehood and many still rely on the brome hay as a cash crop for their income. Residents of the Copper Valley rely upon livestock as an income and food source, many of which are domesticated sheep and goats. The Department of Agriculture still continues to promote farming in our region as it is an agriculturally rich area. We will be haying over 60 acres this year, much of which will be fed to our own animals as well as sold to other livestock owners in the local area and throughout South Central Alaska.

Proposition 90 is an extreme proposition. It is asinine to suggest that sheep and goat owners erect double fencing on their property. Obviously those proposing this have never lifted a finger at fence construction or maintained fencing for domesticated animals. Every fence that is built across this great state was put in with much pain staking work, time and money. Only a non-farmer would have the ignorance to suggest that domesticated sheep and goats wander off to socialize in the mountains with wild stock when in reality they feel safe and secure within the protected confines of their pens and barn. If the unlikely possibility exists that wild sheep could range across my property during breeding times heading for another mountain range, why should the burden be passed on to the farmer to prevent this rare incident from being a possibility? This should be the state's responsibility to restrict live stock from entering my farm lands.

Proposition 90 is an extreme proposition, which will have no effect on Dall Sheep numbers within Alaska. It is in the best interests of the WSF to propagate actions outside of reduction of harvest since they are funded by out of state Hunters and big game guides. Why is there still much of the state that is open to general harvest hunts for full curl rams if the population numbers are desperately low? Why hasn't the board of game placed further restrictions on harvest numbers taken by non-resident hunters, big game guides and resident hunters? The WSF has no interests in making such a proposition to the Board of Game since such a proposal would restrict those that fund their organization.

The idea of taking domesticated sheep and goats off of the "clean list" is crazy and not even rational. Domesticated livestock such as sheep and goats have been a mainstay of farmers throughout Alaska and the lower 48 states since colonial occupation and westward expansion from the beginning founding of our nation and our state. The board of game would be acting outside of their legal authority to think they can outlaw common farm animals such as domesticated sheep and goats within Alaska. To remove common domesticated farm animals without consideration of opposing views from the state veterinarian, department of agriculture, state cooperative extension and farm bureaus would show a tremendous lack of judgement. To remove sheep and goat from the clean list would send a very clear message that the board of game is only interested in representing the outside interests of trophy hunters and big game guides.

Proposition 90 is an extreme proposition with no consideration at all to the Alaska Residents who depend upon farming and agriculture within this great state. Proposition 90 takes away the rights of independent Alaskans and if supported by the Board of Game would be a perfect example of governmental overreach which threatens the rights of private property owners, Alaskans, and citizens of the United States. Let me remind the board of game that their role is to make allocative and regulatory decisions for Alaska's wildlife resources not domesticated farm animals. The Alaska Department of Fish and Game has recommended "no action" because it is NOT the right of the Alaska Board of Game to regulate livestock on private lands within Alaska. Federal and State departments have spent 57 years trying to promote agriculture and the farming industry within this state. I am hopeful that there are true Alaska's serving on the board of game that will support the hardworking farming families who are scattered across this state and take a stand against proposition 90. Please take "no action" on Proposition 90.

Sincerely,
Thad Henry
Dairy Goat & Sheep Farmer
Hay Producer
Kenny Lake AK
HC-60 Box 300K
Copper Center, AK 99573

Submitted By
Theresa Armitstead
Submitted On
3/3/2016 10:31:48 PM
Affiliation
Mrs.

- I am very opposed the Prop 90. Now, more than ever, we need Alaskan farmers raising all kinds of food. Recently, many Alaskan grocery store shelves were empty, especially meat shelves, when a Tote ship was having mechanical problems and couldn't deliver food to our state for a few weeks. We should NOT depend as much as we do on shipping. Self sufficiency should be one of our highest priorities. Let's make farming EASIER, not harder!

Testing sheep/goats and stricter fencing requirements will make it too expensive to raise these animals. These animals provide meat, milk, fiber, and ingredients for soap makers. I know this to be a fact, because I buy lambs and goats from local farms for meat. I spin yarn from the fleece of both species. I also make all of our family's soap (have done so for twenty years!). Sheep fat makes wonderful soap.

Fewer domestic sheep/goats will impact the hay and barley farmers directly in less sales. People with food sensitivities (there are MANY!) are going to have no choice but to move elsewhere. Yarn, and fiber shops that have been trying to increase the amount of AK grown products available to consumers, may have to close their doors.

There has been no known cross contamination of disease to wild herds. Prop 90 will do more harm than good. Please do not support the proposition.

Submitted By
Thomas Olsen
Submitted On
3/3/2016 9:40:25 PM
Affiliation

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Palmer, Alaska 99645

- The Wild Sheep Foundation's proposal is an extreme overreach of regulatory requirements which are not necessary in the State of Alaska.
- They are applying the unique experience of Lower 48 States where there are very different circumstances than those that exist in the State of Alaska – Livestock grazing on public lands does not exist in Alaska.
- There has not been a single case of disease transmission in the State of Alaska between domestic livestock and wild sheep populations.
- Even outside the State where there have been incidences of wild sheep die off due to disease, it has not been conclusively proven that the disease was due to transmission from domestic livestock. Wild sheep naturally carry the bacterium that causes the disease and it is equally possible that natural environmental stress conditions trigger the disease that is detrimental to wild sheep.
- The state already disallows use of domestic sheep and goats for purposes of packing into the back country in Dall Sheep habitat areas for hunting or transport purposes.
- The Proposal would take domestic sheep and goats off the state's "Clean List", resulting in the inability to import or export genetic diversity of domestic sheep and goats within the state. Domestic goat and sheep owners would be required to obtain a permit from the State to own domestic goats and sheep, and if within 15 miles of wild sheep habitat be required to construct expensive double fencing approved by ADF&G, and complete expensive and unreliable testing of their livestock. The areas of Dall sheep habitat for this purpose have yet to be defined, but as proposed a 15 mile radius from areas of wild sheep habitat to areas outside of wild sheep habitat would encompass all of Anchorage, the Mat-Su Valley, and untold other areas around the state. Dall sheep do not come out of the Chugach Mountains or the Talkeetna Mountain into the Anchorage bowl or Mat-Su core area, and domestic sheep are not going into those Dall Sheep habitat areas. 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.
- There is no precedent for taking domestic livestock off the so called clean list in the State of Alaska. The Department of Agriculture and the Farm Bureau opposes this action. According to the State, chimpanzees were the last animal taken off the list many years ago. The clean list was created to provide a means of restricting exotic animals of concern from entering our state, not intended to restrict the possession of common domestic livestock.
- Requiring the actions proposed by the Wild Sheep Foundation would effectively result in expensive and unnecessary burden on domestic goat and sheep owner enthusiasts, 4-H participants, and small farm operations which are providing valuable, locally raised meat, milk, fiber (wool), and related products to Alaskans. It would impact the ability to own domestic sheep and goats, and have a negative state-wide economic impact.
- The Department of Law has already provided an opinion that the Board of Game and the ADF&G don't have legal authority to regulate domestic livestock, yet, the Wild Sheep Foundation is asking that the Board of Game, which sets policy followed by the ADF&G, to essentially do so by removing them from the Clean List. Removing them from the Clean List is simply a back door approach to regulate domestic livestock.
- If passed, the ADF&G will be required to implement regulations, issue permits, review testing results, and inspect and approve fencing requirements, all of which will add untold expense to the ADF&G at a time when the State of Alaska is already trying to figure out how to cut the budget by \$3.5 Billion. Adding a new costly State program is simply ludicrous, and unnecessary.
- The Wild Sheep Foundation has rushed this proposal through the Board of Game process without sufficient public process, involvement by all stakeholders, or even through sufficient legal review by the Department of Law and the ADF&G. To date, this proposal is simply a special interest group's extreme prejudice at the expense of all other interests in this issue. The proposal is not well vetted, and would impose costly oversight by the state, and severe economic burden to Alaskans who already do, or those that would like to own goat and sheep in the future.
- The Wild Sheep Foundation, funded in large part by outside hunting interests, have not attempted to work with the DEC which oversees the State's Veterinarian, the Department of Agriculture, the Farm Bureau or the State's livestock owners. They have simply filed a Proposal with the Board of Game which will have devastating consequences to the interests of domestic sheep and goat owners in the state. And they understate the real ramifications of their proposal to the domestic livestock industry.
- If the Wild Sheep Foundation is interested in reasonable approaches and solutions then the affected parties are willing to try and reach those. Proposal 90 does not do that. Taking domestic sheep and goats off the clean list, requiring that a 15 mile buffer zone is established requiring permits for ownership, testing, and double fencing is simply unreasonable and unnecessary, detrimental to a host of private interests, and ultimately extremely costly to both private owners and the State of Alaska.

Submitted By
Tiani Heider
Submitted On
1/29/2016 2:13:21 PM
Affiliation

Regarding Proposition 90, under the "Miscellaneous Permits" section:

I am adamantly opposed to the adopting of any, or part, of this proposal. Leaving aside the fact that the Bighorn sheep, domestic sheep and goats, and pneumonia, are somehow extant here in Alaska (which they are not) my primary concerns are the following:

1. Removing the domestic sheep and goats from the "clean list" will make the importation of new genetics into Alaska's isolated domestic herds impossible. This will essentially spell the ruin of those two species in this state, where they play a crucial role in homesteading, subsistence, and farming. They provide meat, milk, fiber, and companionship to 1000's of Alaskan residents.
2. Many small businesses and even cottage industry, rely upon the breeders and importers of sheep and goats to provide for their business needs. Restricting this would be catastrophic to them.
3. The owners of the domestic sheep and goat would be shouldering the entire cost of permitting and inspecting...and would also be forced to double fence their property. This is an onerous burden on any segment of our population. The penalties are unknown, the cost to administer are unknown, and the long range economic impact is unknown.
4. Attempting to initiate a permitting process is going to be lengthy and expensive for the state to undertake, in an era of budget shortfalls.
5. The State cannot afford to inspect each and every homestead, back yard, farm, ranch, and cabin that currently has domestic sheep and goat. They are literally all over the state, and many of those are off grid, and off the road system entirely.
6. The notion that "habitat" will not effect most people, is in error. The "15 air mile" limit, for example, includes the entire Municipality of Anchorage, including Girdwood, Eagle River, Chugiak, Thunderbird Falls and Eklutna. That is over half the population of the state, with many thousands more in the Mat Su....from Palmer all the way beyond the glacier at Mile 100 on the Glenn Highway-and that is if *only* distance from treeline is used-not actual habitat.

In short, the proposal contains no solid scientific data, is a tremendous burden upon the resident owners of domestic sheep and goats, infringes upon their liberties, and reaches into the pockets of everyone who caretakes these domestic animals.

Thank you.

T Heider

Wasilla

Submitted By
Tina Starr Judd
Submitted On
2/25/2016 10:04:57 PM
Affiliation

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Address
2051 S Carr St
Wasilla, Alaska 99654

Dear Alaska Board of Game,

Alaskans need a sustainable agricultural industry where our food diversity, reliability, and healthy alternative is supported and allowed to prosper, not diminished by drastic government regulation which is unnecessary, costly, and divisive. Proposition 90 which is being promoted primarily by an outside special interest hunting conservation group (the Wild Sheep Foundation), requests the state remove domestic sheep and goats from the so-called "Clean List", and while perhaps well intended, the requests places extreme regulatory burden on private land owners with domestic sheep and goats. The result would be cost prohibitive regulatory requirements imposed on domestic livestock owners to double fence their property, complete as of yet unidentified and undeveloped testing protocols, and apply for permits from the State of Alaska to own such domestic livestock. Alaska residents that own domestic sheep or goats as beloved family animals, 4-H projects, or small farm operations are up against a well-funded outside interest group who has stated they will continue their fight through the State legal system. They purport links between domestic sheep and goats to bacteria within the wild sheep population in the lower 48. This allegation has yet to be actually scientifically proven, and in fact the science indicates that the wild sheep population may inherently carry the bacteria which weakens the immune system after being triggered by natural environmental stress events. In any event there has not been a single proven case of bacteria or virus transmission between domestic sheep and goats and the wild sheep population in the State of Alaska. Additionally, unlike lower 48 states, Alaska has no open grazing practice on public lands further reducing any likely exposure to domestic livestock, and in the event that a domestic sheep or goat escapes from its owner's property, Alaska's wild predators (wolves and bears) will likely dispatch the domestic animal in short order – in fact, our domestic livestock are often killed right on the private owner's property by Alaska's wild predators. Alaska is in the midst of a financial crisis with a projected annual budget shortfall of \$4 BILLION dollars! It is cutting basic services to state residents, considering passing state income taxes and sales taxes, and reducing or eliminating the Permanent Fund Dividend program. The fact is, the State has no funding for new costly State programs – especially those that are unnecessary, virtually impossible to enforce, and lack any scientific basis in our State.

Sincerely, Tina Starr Judd

Submitted By
Tina Thomas
Submitted On
3/4/2016 4:39:01 PM
Affiliation

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

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

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

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

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

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

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

Submitted By
Trudy Davis
Submitted On
2/24/2016 10:26:11 AM
Affiliation

I OPPOSE Proposal 90 which would require every sheep and goat owner to need permits (aka permission), and double fence, and special testing because of being removed from Clean List. This will eventually spill over to cows, hogs, and other livestock, and possibly horses, and include pet ownership of any of these animals as well as farm, 4-H and other entities. The economic effects will move on to other businesses such as feed and farm supply stores.

This really is an infringement on the rights of farmers. It has no warranted proof that it is at all necessary. Stop the invasion of our rights.

Submitted By
Valerie Kinney
Submitted On
3/4/2016 8:30:06 AM
Affiliation

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Skiffgirl@gmail.com
Address
33566 Perkins Rd.
Homer, Alaska 99603

Sir/ma'am,

I am a domestic goat and sheep farm supporter as well as a hunter. I enjoy the freedom that we have in the US and state of Alaska to live our lives as we see appropriate. Raising our own food as well as hunting for food is an important and traditional part of our lives. Proposition 90 is a misinformed attempt to limit the freedoms we have as livestock owners or supporters. Passing proposition 90 will not have any effect on the survivability of Alaska's Dall Sheep populations but will effectively cause undue damage to the livestock industry in Alaska through unnecessary and misguided regulation.

As a supporter of domestic farm animals I know that nutrition is a vital part of keeping our animals healthy. Survivability of a goat kid or lamb is based mainly on the nutritional health of its mother throughout pregnancy and its ability to receive nutrition from its mother early in life. Additionally, pregnancy rates and successful kidding or lambing rates are a direct result of nutritional levels. If we apply the same principals of nutrition to Dall Sheep we can see that there is good reason they are struggling to maintain sustainable population levels. Given the recent years of warm, dry summers and mild, icy winters, the Dall sheep population is having a difficult time maintaining appropriate levels of nutrition. We see the effects good and poor nutrition has on a goat or sheep herd and can imagine the frustration hunters and guides must feel knowing that they cannot affect the nutrition of Dall Sheep to encourage their populations.

The idea that domestic animals are causing disease in Dall Sheep populations and therefore causing their decline is simply not true. Not one report I have read concerning the mortality rates of Dall sheep in Alaska suggested transferable diseases from domestic animals caused any sheep deaths.

I understand the frustration hunters and hunting guides must feel in this Sheep population crisis. Let's work at determining another way to keep our wild animals healthy and prolific. Please do not restrict my freedom to raise or support farm animals based on the erroneous, misguided theory presented in proposition 90. Please vote no on proposition 90.

Respectfully,

Valerie Kinney
Homer, AK

Submitted By
Wanda Wilson
Submitted On
3/4/2016 12:22:05 AM
Affiliation

These proposals have serious ramifications for the domestic sheep and goat populations here in Alaska. The far reaching potential to harm not only the farmers, but all of the industry that support them, definitely needs to be taken under further consideration. Surely there can be a better way found to address all of the concerns of the different groups than just slapping down some more restrictions. I am against these proposals. Thank you.