



THE WILDLIFE SOCIETY ALASKA CHAPTER

2627 Ingra Street
Anchorage, AK 99508

The Alaska Chapter of The Wildlife Society is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

28 March 2013

Mr. Tim Towarak, Chairman
Federal Subsistence Board
1011 E. Tudor Road
Anchorage, AK 99503

Dear Mr. Towarak:

The Alaska Chapter of The Wildlife Society is submitting a wildlife regulatory proposal for consideration by the Federal Subsistence Board. Our proposed regulation would prohibit the use of domestic sheep or goats as pack animals for subsistence hunting of Dall's sheep, mountain goats, or muskox.

Diseases transmitted by domestic sheep and goats are a major cause of mortality and reduced reproduction in wild sheep populations in western North America, and have caused the extirpation of some bighorn sheep populations. Respiratory disease (pneumonia), in particular, is a serious problem that has often caused widespread die-offs of bighorn sheep following contact with domestic sheep. There is a great deal of published research that describes how transmission of pathogens from domestic livestock may adversely affect wild sheep populations. Fewer die-offs and disease problems have been documented in mountain goats than in bighorn sheep. However, mountain goats are susceptible to many of the same diseases as wild sheep. Muskox may likewise be susceptible to diseases transmitted by domestic livestock.

Alaska's wild sheep, goat, and muskox populations have thus far been minimally exposed to pathogens carried by domestic livestock. The potential negative consequences of contact with domestic sheep and goats in Alaska are greater than in the other western states because our wild sheep and goats are free of and likely lack resistance to most livestock diseases. Furthermore, any diseases that are introduced could be spread widely throughout the large, contiguous ranges of Dall's sheep and mountain goats in Alaska. Thus, a proactive and precautionary approach should be taken to avoid the introduction and establishment of many serious livestock diseases in Dall's sheep and mountain goat populations.

We believe it appropriate for the Federal Subsistence Board to consider this proposal. It will have no effect on traditional use of pack horses, mules, or dogs, which are authorized under ANILCA and which do not pose a threat to wild sheep and goats. Domestic sheep or goats are rarely, if ever used as pack animals for subsistence harvest in Alaska, nor have they been used traditionally. However, the use of domestic goats in particular as pack animals appears to be increasing elsewhere in North America, and could occur with greater frequency in Alaska. Introduction of livestock pathogens to Dall's sheep or mountain goats could occur from even a small number of such pack animals. We believe that this risk is unacceptable given the consequences for Alaska's wild sheep and goats, and for the people who rely on those populations for sport and subsistence harvest.

Please note that the Alaska Board of Game recently adopted a similar regulation restricting the use of domestic goats and sheep as pack animals during sport harvest of Dall's sheep, mountain goats, and muskox. Adopting this proposal will bring federal subsistence regulations into alignment with state regulations.

Our proposed regulation is attached. I have also attached a position statement that our organization has adopted that addresses the disease risk that domestic livestock pose to wild sheep and goats. That will provide additional background regarding the scientific basis for our proposal.

We appreciate your consideration of this issue and hope you and others on the Board will adopt our proposed regulation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jerry Hupp', written in a cursive style.

Jerry Hupp, Ph.D.
President, Alaska State Chapter of The Wildlife Society