



## ALASKA CHAPTER OF THE WILDLIFE SOCIETY



February 8, 2024

### RE: Alaska Chapter of The Wildlife Society Comments on the Executive Order 124 by Governor Michael Dunleavy

Dear Honorable Members of the Alaska Legislature:

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 science-based 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.

The Alaska Chapter of The Wildlife Society (TWS) has reviewed Executive Order 124 by Governor Michael Dunleavy (1/15/2024) that proposes to transfer authority to prohibit by regulation the live capture, possession, transport, or release of native or exotic game or their eggs from the Alaska Board of Game (board) to the commissioner of the Department of Fish and Game (department) for administrative efficiency.

**The Alaska Chapter TWS respectfully asks the Alaska Legislature to oppose Executive Order 124.** This proposed Executive Order is unnecessarily broad because the board can delegate authorities for specific actions to the commissioner under AS 16.05.270 as prudent and necessary in the best interest of the public. The proposed transfer of authority represents an expedited process for importation of exotic species that (1) is unrestricted as to new species currently not approved under 5 AAC 92.029 that could pose increased risk of disease or parasite transmission to native wildlife or domestic livestock, or to public safety, and (2) unnecessarily excludes the public from the long-established deliberative process for wildlife regulations.

Background: The earliest policy on game transplants in the state of Alaska (1959) recognized the risk of a free-ranging species introduction having adverse effects on “the numbers, health, or utilization of resident species” (Burriss and McKnight 1973:2). In 1995 the game transplant policy was broadened to include evaluation criteria for benefits and risks and formal review of proposals, and it prohibited introduction of nonindigenous (exotic) species to free-ranging situations in Alaska (Paul 2009:3-4).

Captive rearing of exotic (nonindigenous; non-native) species is sometimes done for yield of meat, antlers, hides, and other products. This requires diligence on the part of private owners to prevent escape of a confined species that could spread infectious disease or parasites or pose a public safety risk. Transport of exotic species already in Alaska as livestock (e.g., elk, plains bison, and reindeer) is under the purview of the office of the state veterinarian for disease testing and other safety conditions.

The board lists those species that can be possessed without a permit in AK in 5 AAC 92.029. This is known as the clean list and over decades the board has carefully deliberated many public proposals to allow exotics into Alaska. Board discussions have focused on risk of disease to native game and impacts to native flora and fauna. It is useful to note that Alaska is the envy of many other fish and game agencies for having largely intact big game populations and ecosystems compared to states where agencies spend millions trying to combat the negative effects of exotics.

The risk involved with transmission of disease from livestock to wild game is highlighted in a technical review and position statement by our organization (Alaska Chapter of the Wildlife Society 2013). Animals in possession under the conditions of a permit issued by the department are in captive animal facilities, not as pets or free ranging.

Proposed action: EO 124 is a fundamental shift of regulatory authorities from the board to the commissioner with substantial effect on public process. The board reviews 5 AAC 92.029 once every 3 years unless urgency warrants an agenda change request (allows review out of cycle). The board process includes a call for proposals, department analysis and recommendation, public written comments, public verbal comments, and board deliberations on the proposed regulations. In contrast, the department process includes drafting regulations, posting them on an online system with an automated notice sent out to a list of recipients, and allowing 30 days for public comment on the proposed regulations.

Considerations: The Alaska Chapter TWS understands that Governor Dunleavy may wish to streamline permitting for more responsive action on requests to import exotic species as potential food sources, particularly in remote communities. However, importing species not listed in 5 AAC 92.029 carries unknown but potentially substantial risk of disease or parasite transmission to native game and domestic livestock in Alaska and should not bypass the more deliberative and open process of the board. For species already considered through the board process (listed in 5 AAC 92.029) that have potential as a human food resource, the board may choose to delegate regulation of the live capture, possession, transport, or release of native or exotic game or their eggs to the commissioner to streamline individual permits (case by case basis) where disease risk and mitigation measures are clearly understood. Other species (e.g., carnivores) should remain in the board process, particularly those posing a risk to public safety.

On behalf of the membership of the Alaska Chapter of The Wildlife Society,

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Conservation Affairs Committee  
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