

## 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” (Burris 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,

Kim Titus, Ph.D  
Conservation Affairs Committee  
Alaska Chapter of The Wildlife Society

#### **References cited:**

Alaska Chapter of the Wildlife Society. 2013. [https://wildlife.org/wp-content/uploads/2015/12/Position-Statement-red\\_disease\\_risk\\_statement.pdf](https://wildlife.org/wp-content/uploads/2015/12/Position-Statement-red_disease_risk_statement.pdf)

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**From:** [Michael Spindler](#)  
**To:** [Senate Resources](#); [House Resources](#)  
**Cc:** [Rep. Ashley Carrick](#); [Sen. Click Bishop](#); [Sen. Scott Kawasaki](#); [Rep. Maxine Dibert](#); [Sen. Cathy Giessel](#)  
**Subject:** Executive Order 124  
**Date:** Thursday, February 8, 2024 9:00:05 PM

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Dear Senators and Representatives:

I am opposed to Executive Order 124. As a long-time hunter and fisherman living in Fairbanks, and having retired from a 41-year career in wildlife management in Alaska, I well know the danger of improperly researched introductions and importations of flora and fauna. Without proper research there is the risk that a newly introduced species could threaten our valuable native game mammals and fisheries with disease or parasites. The current process involves the Board of Game and a three-year cycle which allows sufficient time for detailed research and deliberations before permitting the importation and introduction of a species that is not native to Alaska. EO 124 seeks to shorten this process by transferring authority to the Commissioner of Fish and Game. Please take legislative action to vote against EO 124, so that the process remains open, transparent and well-researched. We cannot risk any of our valuable game and fish populations by fast-tracking permits to import or introduce flora and fauna.

Thank you for your consideration of this issue.

--  
Mike Spindler  
Certified Wildlife Biologist - The Wildlife Society  
Conservationist  
FAA Certified Flight Instructor - Commercial Instrument Single Engine Land and Sea

Dear Senate Resources Committee Member:

**I am opposed to Executive Order 124 and hope you and other legislators will vote it down.**

As a lifelong Alaskan and an avid hunter, I respect and appreciate the extensive public process created and used for decades to develop Alaska's wildlife regulations. This time-tested process, which involves professional biologists with the Alaska Department of Fish and Game, seven members of the Governor-appointed Alaska Board of Game, and the public, is considered the envy of most states and has served Alaska well for decades in conserving the state's wildlife and avoiding the introduction of deleterious diseases and parasites. Parting from this proven process for the sake of "efficiency" seems illogical and ill-advised. Alaska's wildlife is far too valuable and important to cut corners under such a guise.

This proposed EO is unnecessarily broad given that the Board of Game can already 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 through EO 124 represents an expedited process for the importation of exotic species that is unrestricted as to new species currently not approved under 5 AAC 92.0295. Exotic species introductions will pose increased risk of disease or parasite transmission to native wildlife or domestic livestock, or to public safety. This change would unnecessarily exclude the public from the long-established and effective deliberative process for wildlife regulations.

The Board of Game lists those species that can be possessed without a permit in 5 AAC 92.029. This is known as the clean list and over decades the Board has carefully deliberated many public proposals seeking to allow exotics into Alaska. After thorough consideration and deliberation, nearly all have been turned down, citing the risks to Alaska's native wildlife being too great. Indeed, the Alaska hunting community has consistently opposed the introduction of exotics into Alaska, with the associated risks to their food sources.

As a former ADF&G biologist and administrator, I had the pleasure of interacting with many wildlife professionals from other states. I learned from these interactions 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.

I respectfully urge you to oppose EO 124, with the needless risks it poses to Alaska's valuable wildlife.

Sincerely,

Doug Larsen  
Juneau, AK 99801

**From:** [Tom Paragi](#)  
**To:** [Senate Resources](#); [House Resources](#); [Rep. Cathy Tilton](#); [Sen. Gary Stevens](#)  
**Subject:** please oppose Executive Orders 124, 126, and 134  
**Date:** Friday, February 9, 2024 8:45:06 PM

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Hon. Members of the Alaska Legislature:

I viewed the video of the Senate Resources committee meeting on 5 February and urge you to oppose Executive Orders 124, 126, and 134 recently issued by Governor Dunleavy.

EO 124 -- Importation of exotic species (not native to Alaska) poses serious risk of transmitting disease or parasites to Alaska wildlife and domestic livestock. Alaskans seeking to improve local food supply can already import livestock and game species on a “clean list” approved by the Board of Game. Species not on the clean list that are proposed for importation should continue to undergo a thorough vetting by the 7-member Alaska Board of Game, the hunting public, and the scientific community through the existing fish and game regulatory process.

Simplifying the current review procedure to an expedited process and a single person is an unnecessary risk for new exotic species proposed for importation. The Board of Game already has the ability to delegate transfer and importation authority for select circumstances to the Commissioner of Fish and Game (AS 16.05.270) when judged prudent.

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EO 126 -- Wood Tikchik State Park was set up with an advisory council in 1978 as the largest national park in the U.S. During the hearing the State Parks director could cite no problems with administrative functioning of the existing council.

EO 134 -- The Recreation Rivers advisory board addresses about 416 miles of free flowing rivers in the Susitna basin adjacent to the largest urban area in Alaska (400,000 people including Anchorage). The Palmer-Wasilla area was one of the fastest growing municipalities in the U.S. a decade ago. There have been various access routes and land designations proposed in recent years for resource development west of the Parks Highway. These factors attest to the wisdom of an open communication forum to help mitigate potential conflict between public recreation and development in the Susitna Basin.

At the Senate Resources hearing, a DNR official noted the Recreational Rivers advisory board has had some challenges getting all 11 members representing diverse public interests and 2 local government seats to some meetings. Rather than dissolving the board, DNR might appoint alternates to each seat on such a large board to have a better chance of achieving a quorum when specific dates present conflicts for some members to attend a meeting

The purpose of advisory boards, composed of appointed volunteers who are local resource users, is to bring multiple perspectives on management issues to the agency administrators. The administrators have decision authority but benefit from the eyes, ears, and boots on the ground by local citizens most directly affected by decisions.

I served on the state parks advisory board for northern Alaska in the mid-late 2000s. The late Rep. Mike Kelly was an avid outdoorsman and regularly attended our annual legislative

briefings. He always thanked us for our service and pointed out that we were in the best position to hear public concerns and try to help users work out conflicts before they got serious enough to trigger legislative intervention (where in his words, “the fix could be worse than the problem”).

Governor Dunleavy’s proposals to abolish these citizen advisory boards are disrespectful of voluntary public service that has been sought by prior administrations over the last 4 decades.

Thank you for the opportunity to comment. Respectfully,

Tom Paragi

[REDACTED]  
Fairbanks, AK 99712

**From:** [Christi Heun](#)  
**To:** [Senate Resources](#); [House Resources](#); [Rep. Cathy Tilton](#); [Sen. Gary Stevens](#)  
**Subject:** EO 124  
**Date:** Friday, February 9, 2024 2:27:21 PM

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Good Afternoon Senators and Representatives,

I would like to draw attention to EO124 which reads: **The commissioner of Fish and Game has the authority to prohibit by regulation the live capture, possession, transport, or release of native or exotic game or their eggs.**

As a hunter, wildlife enthusiast, and generally educated human being who lives in Alaska, I encourage you to unilaterally **oppose** this measure. The commissioner is not a biologist, even if he was, the next governor may not have a good working knowledge of what repercussions can come of releasing non native species across alaska at his/her whim. Disease, displacement, (parasites like moose tick disease or Chronic wasting disease) are extremely real concerns that would have devastating effects to our animals. Animal introductions should never be a decision left to one person, and requires thoughtful consideration. As such, please, consider our Alaskan legacy and the people who depend on them for subsistence everyday and **OPPOSE** EO124.

Thank you kindly for your time,  
Christi

**From:** [Isabel Grant](#)  
**To:** [Sen. Cathy Giessel](#); [Senate Resources](#); [House Resources](#); [Representative.Geran.Tarr@akleg.gov](#); [Rep. Andy Josephson](#); [Rep. Cathy Tilton](#); [Sen. Gary Stevens](#)  
**Subject:** Executive Order 124  
**Date:** Monday, February 12, 2024 5:00:37 AM  
**Attachments:** [Outlook-5dpaku1x.png](#)

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Dear Senators and Representatives,

I am writing on behalf of the non-profit organization Defender of Wildlife, based out of our Anchorage office. Established in 1947, Defenders of Wildlife is a national nonprofit conservation organization dedicated to the protection of flora and fauna in its native habitat, with over 6000 members in Alaska.

**Executive Order 124 would give the commissioner of fish and game authority to release exotic game, bypassing the board of game and important regulatory procedures.**

We strongly encourage you to OPPOSE EO 124. In short, importing non-native species carries unknown and potentially irreparable damage to Alaskan wildlife. Risk of disease (like Brucellosis in ungulates, chronic wasting disease in deer, or M. ovi in sheep) or parasite transmission (like moose winter ticks) to native game and domestic livestock in Alaska is an extremely serious concern. While we appreciate the governor's concern for expediting certain process, this is not one that should be on the list, and should not bypass the process of the board.

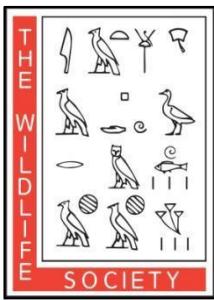
Thank you for your consideration, and for your thoughtfulness on this issue.

Sincerely,  
Isabel Grant



**Isabel Grant** (she/hers)  
Alaska Representative  
[DEFENDERS OF WILDLIFE](#)  
441 West 5<sup>th</sup> Avenue, Suite 302  
Anchorage, AK 99501  
TEL: 907-276-9410 [Defenders Alaska Facebook](#)  
[Facebook](#) | [Twitter](#) | [Instagram](#) | [Medium](#)

Visit <https://defenders.org>!  
I live and work on traditional [Dena'ina](#) lands



## ALASKA CHAPTER OF THE WILDLIFE SOCIETY



February 8, 2024

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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,

Kim Titus, Ph.D  
Conservation Affairs Committee  
Alaska Chapter of The Wildlife Society

#### **References cited:**

Alaska Chapter of the Wildlife Society. 2013. [https://wildlife.org/wp-content/uploads/2015/12/Position-Statement-red\\_disease\\_risk\\_statement.pdf](https://wildlife.org/wp-content/uploads/2015/12/Position-Statement-red_disease_risk_statement.pdf)

Burris, O. E., and D. E. McKnight. 1973.  
[https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research\\_pdfs/burris\\_and\\_mcknight\\_1973\\_adfg\\_tech\\_bull\\_4\\_game\\_transplants\\_in\\_alaska.pdf](https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/burris_and_mcknight_1973_adfg_tech_bull_4_game_transplants_in_alaska.pdf)

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[https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research\\_pdfs/game\\_transplants\\_alaska.pdf](https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/game_transplants_alaska.pdf)

**From:** [Kim Titus](#)  
**To:** [Senate Resources](#)  
**Subject:** Executive Order 124  
**Date:** Monday, February 12, 2024 4:14:56 AM

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**I am opposed to Executive Order 124. Please vote it down in a Joint Session.**

This Executive Order would 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 to the commissioner of the Department of Fish and Game (ADFG) for administrative efficiency. Among the hundreds of fish and game regulations that are within the powers of the Alaska Board of Fisheries and the Alaska Board of Game, it is unclear why this was singled out to be moved to the sole authority of the ADFG commissioner. If there was a real desire for additional administrative efficiency in decision-making of Alaska's fish and game, then why not move more regulations and have the ADFG commissioner be appointed the czar of these important public resources.

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 is unrestricted as to new species currently not approved under 5 AAC 92.0295. Exotic species introduction will pose increased risk of disease or parasite transmission to native wildlife or domestic livestock, or to public safety. This change, that needs to be voted down, would unnecessarily exclude the public from the long-established deliberative process for wildlife regulations.

The Board of Game lists those species that can be possessed without a permit in 5 AAC 92.029. This is known as the clean list and over decades the Board of Game carefully deliberated many public proposals to allow exotics into Alaska. Nearly all are turned down. That's why Texas has zebras and Alaska does not. The Board of Game has not wanted to risk the threats of exotics to native game. Alaska hunters/subsistence users have consistently NOT wanted exotics threatening their native game/food. I was the deputy director – Division of Wildlife Conservation ADFG for 8 years and I attended every Board of Game meeting. I provided information to the Board as they considered the clean list and transplant proposals. This regulatory process works well. The hunting community has consistently opposed the introduction of exotics into Alaska and the risk to their food. I am a long-time deer, moose and caribou hunter and I see no need to transfer this authority and eliminate the Fish and Game advisory committee system from the process.

I have had many professional interactions with leadership of other state fish and game agencies. Alaska is the envy of many other state agencies for having largely intact big game populations and ecosystems compared to states where these states spend millions trying to combat the negative effects of exotics.

Sincerely,  
Kim Titus, Ph.D.  
Wildlife Professional

River Road, Juneau



**From:** [Michael C. T. Smith](#)  
**To:** [Senate Resources](#)  
**Subject:** Executive Order 124  
**Date:** Saturday, February 10, 2024 9:31:19 AM

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Senate Resources Committee:

I am writing to express my strong opposition to Executive Order 124 that gives the commissioner of the Alaska Department of Fish & Game unfettered authority to introduce non-native species without a process to ensure full vetting and public input.

I have significant personal experience with the tragic results of such exotic introductions in New Zealand where ecosystems have been radically modified and very substantial funds are spent annually to control these non-native species and the diseases they carry.

Introductions are not necessarily inherently bad, but there must be a reasonable public review and comment process before making such a determination. We have a Board of Game with decades of experience and as an absolute minimum the board's concurrence in any decision should be required.

Thank you for consideration of this comment.

Dr. Michael C.T. Smith, Ph.D.

**From:** [Susannah Woodruff](#)  
**To:** [Senate Resources](#)  
**Subject:** Executive Order 124  
**Date:** Monday, February 12, 2024 9:11:34 AM

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Hello,  
I am writing to urge you 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.

I understand the 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.

Respectfully,  
Susannah Woodruff  
[REDACTED]  
Anchorage, AK 99507

**From:** [Sen. Cathy Giessel](#)  
**To:** [Julia OConnor](#)  
**Subject:** FW: Executive Order 124  
**Date:** Monday, February 12, 2024 9:26:30 AM

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**From:** Kim Titus <ktitus54@gmail.com>  
**Sent:** Friday, February 9, 2024 4:48 AM  
**To:** Sen. Cathy Giessel <Sen.Cathy.Giessel@akleg.gov>; House Resources <House.Resources@akleg.gov>; Jesse Kiehl <Jesse.Kiehl@akleg.gov>  
**Subject:** Executive Order 124

**I am opposed to Executive Order 124. Please vote it down in a Joint Session.**

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Sincerely,  
Kim Titus, Ph.D.

Wildlife Professional

River Road, Juneau

[REDACTED]

**From:** [Ragen Davey](#)  
**To:** [Sen. Cathy Giessel](#); [Senate Resources](#); [House Resources](#); [Representative.Geran.Tarr@akleg.gov](#); [Rep. Andy Josephson](#); [Rep. Cathy Tilton](#); [Sen. Gary Stevens](#)  
**Subject:** OPPOSE EO 124  
**Date:** Monday, February 12, 2024 8:16:00 AM

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Dear Senators and Representatives,

I am writing on behalf of the non-profit organization Defender of Wildlife, based out of our Anchorage office. Established in 1947, Defenders of Wildlife is a national nonprofit conservation organization dedicated to the protection of flora and fauna in its native habitat with over 6000 members in Alaska.

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Thank you for your consideration, and for your thoughtfulness on this issue.

Sincerely,

Ragen