



THE WILDLIFE SOCIETY ALASKA CHAPTER

The Alaska Chapter of the Wildlife Society strives 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.



March 7, 2025

Hon. Jake Fletcher
Chair, Alaska Board of Game

RE: Alaska Chapter of The Wildlife Society comments on proposal 147

Dear Alaska Board of Game members,

The Alaska Chapter of The Wildlife Society (TWS) 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 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 TWS has reviewed proposal 147 wherein the Department of Fish and Game (department) proposes to have the Board of Game (board) utilize statute AS 16.05.270 to delegate its authority to manage 5 AAC 92.029, commonly referred to as the clean list, to the Commissioner of Fish and Game. This regulation governs the authority to prohibit the live capture, possession, transport, or release of native or exotic game or their eggs.

In 2024, the Alaska Chapter of TWS opposed Executive Order 124ⁱ because a simplified process to consider 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 potentially to public safety (e.g., carnivorous or venomous species), and should not bypass the more deliberative and open public process of the board.

For the same reasons, the Alaska Chapter TWS respectfully opposes proposal 147. The reasons given to expedite the process putatively for food security, described below from 2024, are not compelling to modify the present board and public oversight process for risks to wildlife and agriculture. Given Alaska's relatively low incidence of animal diseases common elsewhere in the U.S, we endorse keeping the more deliberative board process to handle requests for review, public comment, and amendment of the clean list.

In testimony before the Senate Resources Committee in 2024, the Commissioner was asked what species requests prompted Executive Order 124ⁱⁱ. He replied it was importation of an emu, but he also related (recording time 1:11:34), "there may be some species that, ostrich, kangaroo...that a person may want to bring in for food [security] reasons, that don't pose a threat to wildlife of Alaska or ecosystems of Alaska that would have to go through this more onerous [3-year board] process. So this would speed that process up by potentially a year or two." The Commissioner did not mention in this instance whether his judgment of threats on species he mentioned was based on a review and recommendation from the department.

An example of risk with importing exotic species was discussed in the statewide board meeting in 2010, where proposal 19 requested addition of several species to the clean list, including walleroos from Australiaⁱⁱⁱ. Department comments for proposal 19, specifically for walleroos, noted “the potential to carry and transmit rabies and other viruses, diseases, bacterial pathogens, and parasites that may affect domestic livestock and wildlife. In addition, over 60% of all human diseases are zoonotic diseases and over 75% of emerging infectious human diseases originated from animals^{iv}.” Furthermore, the landmark publication (Daszak et al. 2000) on emerging infectious diseases (EIDs) that was quoted further states, “The transmission of infectious agents from reservoir animal populations (often domestic species) to sympatric wildlife, termed spill-over, underpins the emergence of a range of wildlife EIDs)”.

History is replete, on all human-occupied continents, with examples of small numbers of captive exotic species escaping into the wild, sometimes with widespread and long-lasting detrimental effects to agriculture and native ecosystems. The Commissioner had previously mentioned in his 2024 testimony that the board denied importation of Eurasian wild boars (*Sus scrofa*), a species desired by some hunters but that if escaped from confinement could damage Alaska ecosystems. This is a recent, relevant example from North America. Aside from disease risk transmission from feral swine to domestic livestock^v, the cost of protecting crops from feral swine in the Lower 48 states is presently \$40 billion^{vi}. Feral swine are rapidly expanding northward in Canada with similar concerns^{vii}. Even successful removal strategies are likely to be only temporary^{viii}.

The Alaska Chapter urges continued vigilance against attempts to shorten or simplify the scientific and public process for review of proposed importation of exotic species not on the clean list, however well-intentioned the arguments by proponents. We support efforts to enhance food security in Alaska and feel the current process for altering the clean list provides meaningful opportunities for food security while also serving to limit risks associated with importing exotic species.

If the board nonetheless approves proposal 147, the Alaska Chapter TWS respectfully asks the board to require the department to notify the public when the commissioner receives a request to add a species to the clean list. Given the serious risks inherent in exotic species, up front notification is warranted for adequate preparation by interested parties well in advance of the 30-day comment period on proposed regulatory changes under AS 44.62. This step is crucial for awareness to review scientific literature and engage in whatever process or plan the department may develop to handle requests for review, public comment, and amendment of the clean list.

Thank you for your consideration.

On behalf of the Executive Board and membership of the Alaska Chapter of The Wildlife Society,

Ryan Mollnow

President, Alaska Chapter of the Wildlife Society

References:

ⁱ https://wildlife.org/wp-content/uploads/2024/04/2024-TWS-Letter-EO-124_1.pdf

ⁱⁱ Alaska Senate Resources committee video, February 5, 2024 (time period 57:30-1:18:00)
https://www.akleg.gov/basis/Meeting/Detail?Meeting=SRES%202024-02-05%2015:30:00#tab2_4e

iii See “Proposals” at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-29-2010&meeting=anchorage>

iv See “Department Comments” at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-29-2010&meeting=anchorage>
The department risk analysis in 2010 for exotic species in proposals 15 and 19, per criteria in 5 AAC 92.029(g), is available upon request [*it might be online at the Board of Game meeting archive, but the ADF&G website is presently offline*].

v <https://www.bcpork.ca/wordpress/wp-content/uploads/2020/06/Section-9-WILD-FERAL-PIGS-IN-CANADA-v.-2020-06-01.pdf#:~:text=Wild%20pigs%20are%20the%20most%20prolific%2C%20highly%20invasive%2C,localized%20populations%20in%20British%20Columbia%2C%20Ontario%2C%20and%20Quebec> (accessed February 24, 2025)

vi <https://www.aphis.usda.gov/operational-wildlife-activities/feral-swine> (accessed February 24, 2025)

vii <https://canadiangeographic.ca/articles/mapping-the-rapid-spread-of-invasive-feral-pigs-across-canada/> (accessed February 24, 2025)

Daszak, P., A.A. Cunningham, A.D. Hyatt. 2000. Emerging infectious diseases of wildlife – threats to biodiversity and human health. *Science* 287(5452):443-449. https://www.researchgate.net/profile/Andrew-Cunningham-5/publication/12671093_Emerging_Infectious_Diseases_of_Wildlife--Threats_to_Biodiversity_and_Human_Health/links/0fcfd512f801dbc39d000000/Emerging-Infectious-Diseases-of-Wildlife--Threats-to-Biodiversity-and-Human-Health.pdf

viii Lewis A.A., B.L. Williams, M.D. Smith, S.S. Ditchkoff. 2022. Shifting to sounders: Whole sounder removal eliminates wild pigs. *Wildlife Society Bulletin* 46, 1, e1260. <https://bpb-us-e2.wpmucdn.com/wordpress.auburn.edu/dist/0/141/files/2022/08/2022-Willife-Society-Bulletin-Lewis-et-al.pdf> (accessed March 7, 2025)