

ALASKA PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

John "Thor" Stacey

(907) 723 1494

thorstacey@gmail.com

MEMORANDUM

To: Alaska Department of Environmental Conservation Commissioner Jason Brune
Director Christina Carpenter

From: Sam Rohrer- President
Thor Stacey- Director of Government Affairs

Date: 10/29/2020

Re: Support for Proposed Changes to 18 AAC 36

Introduction:

The Alaska Professional Hunters Association (APHA) represents Alaska's hunting guides and their small, family run businesses. First formed in 1969, APHA's mission is: *to support conservation of Alaska's big game while promoting professionalism and ethical conduct in the hunting guide community.* Approximately 60% of Alaska's contracting registered guides (business owners) are APHA members.

Food Security and Economic Impacts Attributed to Hunting Guides:

APHA collaborated with the McDowell Group first in 2014 and subsequently in 2016 to describe some of the economic and social benefits brought to the state by hunting guides. McDowell's 2014 report was based on hunt numbers and survey information from 2012, the 2016 report summarized updated data from 2015. When considering the economic impacts attributed to hunting guides, it's important to keep in mind that the average guide business is a small, family run, Alaskan owned business that serves less than seven visiting hunters annually.

Key economic highlights from these reports are captured in the following table:

- 87 million dollars total economic output (2016)
- 1,550 people directly employed (2016)
- 29.7 million dollars in direct spending with Alaskan businesses (2012)
- 52.5 million new dollars to Alaska's economy (2016)
- 22.5 million dollars paid in direct wages
- Approx. 50% of economic benefits realized by rural Alaska (2012)

- 89% of guide businesses Alaskan owned
- 570 indirect jobs supported by guides

Food Security

Selected quotes from the 2016 McDowell report-

“The moose meat literally feeds a village”

“Often we share meat with elders in the village we fly in and out of who can no longer hunt. They are tremendously appreciative”

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| • 230,000 lbs total shared game meat (2015) | • 13,000 lbs shared wild sheep meat (2015) |
| • 1.1 million dollars estimated value of all meat shared (2015) | • \$760,000 replacement value of meat shared in rural Alaska (2015) |

Hunting guides represent a valuable industry in Alaska, especially in economically depressed rural areas. Game meat, including wild sheep meat, is an important component of food security in rural Alaska. Hunting guides rely on healthy populations of big game for their livelihoods, a disease outbreak in wild sheep would devastate wildlife populations, guide businesses and reduce food availability for all Alaskans.

Significance of Wild Sheep and Goats to Hunting Guide Businesses:

Alaska’s legislature continued territorial policies, supporting a requirement that non-resident hunters travelling to Alaska must hire a licensed hunting guide if they hunt: wild sheep, goats or brown/grizzly bears. Guide requirements were put in place to keep visiting hunters from injuring themselves in the mountains or being mauled by grizzly bears. Hunting guides in Alaska offer a valuable service to the public by providing safe and responsible utilization of big game for the benefit of Alaskans and visiting hunters alike. Wild sheep in particular are important to guide businesses, often providing the financial foundation for their viability. Each year approximately 400 non-residents purchased guided sheep hunts in Alaska. McDowell assigns an average economic impact of \$27,000 (2012) to each guided trip in the State. This is a conservative number for current and future sheep hunts given inflation, but even using this conservative number, sheep hunts bring at minimum, 10.8 million dollars in economic activity alone to Alaska each year. Approximately 160 guided goat hunts occur annually bringing another 4.5 million dollars in economic activity to the State. Combined, guided hunts for wild sheep and goats conservatively contribute over 15 million dollars annually to Alaska’s economy.

Proposed Disease Mitigation Policies for Wild Sheep and Goats are Consistent with Policies Protecting Salmon:

If *Movi* affected wild salmon and was transmitted by goldfish, Alaska would have long ago banned the importation of goldfish or required testing of all goldfish in-state and upon importation. In fact, Alaska has taken proactive steps to mitigate disease mitigation to wild salmon by pre-emptively banning all fish farming in Alaska for fears that an unknown disease could be transmitted to salmon. Banning fish farming is a precautionary approach because if disease was ever transmitted to wild salmon, we would not be able to contain it in the wild populations. Our wild salmon are valuable economically and as a source of food; the risk of loss is culturally abhorrent and not worth short-term upsides of salmon farming. Taking pre-emptive measures to protect valuable fish and game in Alaska, even where no specific disease has been identified or tested for, is a mitigation strategy currently in place to address the theoretical risk of a salmon slaying disease even as salmon farms have the potential to bring billions of dollars of economic activity to Alaska. Requiring imported domestic sheep and goats to be tested for *Movi* is a disease prevention strategy well worth the time and financial commitment, compared to blanket bans on agricultural activity such as what is in place to protect wild salmon.

Alternatives to Testing and DEC's Role:

Sportsmen are hopeful wise policies will be implemented to prevent a catastrophic disease outbreak thus avoiding a messy contest over liability for damage to public resources. Wildlife in Alaska is a public trust resource described in Alaska's constitution (*Article VIII*). Alaska's Department of Fish and Game's Division of Wildlife is mostly funded by user fees with the lion share (73%) being paid by non-resident sportsmen. Around 90% of the clients served by Alaskan guides are visiting hunters. Domestic stock owners do not pay fees to support the Division or Wildlife nor is there a mechanism in place that would hold them accountable for damage to wildlife. Damage to wildlife originating from domestic stock owners should be paid for by the negligent domestic stock owner, just as the person who starts a forest fires is liable for damage and costs incurred to the public from a wildfire. Should guide business owners be compensated if stock owners are irresponsible and negligently cause the destruction of wildlife their small business rely on? DEC is entrusted with protecting animal health and given the express authority to require testing and screening of domestics upon importation. Implementing the proposed changes, with minor modifications discussed below, to *18 AAC 36* is a cost effective and common-sense approach to protecting the public and its resources from *Movi*.

Absent DEC to implement effective screening at the border for *Movi* we would encourage consideration of the following measures immediately:

- Creation of a fund to finance cost of containment/mitigation of disease outbreaks (modeled after the oil spill and containment fund)

- Statutory reform to clarify liability of stock owner for costs incurred to the public to contain disease outbreaks (similar to liability for costs to contain wildfires)
- Bonding requirements for domestic owners for risk associated with disease transmission to wildlife

Untested imported sheep and goats are a liability to Alaska stock owners and a risk to wildlife. Alaskans importing sheep and goats should be afforded the guarantee and peace of mind that imported animals are safe and clear of any harmful disease.

Effective Screening and Consistent Data Gathering:

APHA is concerned that the proposed regulation as written provides for a loophole that will further fragment the already challenging testing and scientific landscape *Movi* occupies. Our concern could be alleviated if multiple sources confirm that sheep and goats less than 2 months old cannot become infected with *Movi*. Assuming this is not the case, as there are already readily available published accounts of young domestic sheep being infected, allowing animals to avoid screening if they are less than 2 months in age effectively nullifies requirements to test upon importation. Further, this exclusion would worsen the situation by creating a market incentive to import young animals. This will not only potentially allow infected animals to enter the State, it will also create a troubling data gap as the State seeks to gather more and more information on *Movi* prevalence and strain typing. If, after some years, animals of some age class are shown to always test negative for *Movi*, the regulation could be adjusted, but only after a robust data-set shows such results.

Testing methodology is an important aspect of gathering useful data moving forward. APHA is aware of a simmering debate in the scientific world as to the best testing methodology and protocols. We are concerned that academic conflict and deliberation is undercutting the goal of developing a real world, standardized and useful *Movi* testing protocol. While we support continued research and the ensuing scientific debate that is necessary to advance our understanding of *Movi*, we want Alaska to take a standardized approach to importation screening. APHA supports modifying the proposed regulation to stipulate that importation testing be done through an AAVLD-accredited laboratory.

Summary:

APHA and our members are part of a larger hunting community with relationships in the western states and Canadian provinces. For years we have been aware of die offs of wild sheep attributed to pneumonia and linked to *Movi*. Our members have donated hunts to conservation organizations with the hope of funding more research to increase our understanding of *Movi*, its various strains and hopefully how to contain or cure it. Until 2017, we viewed *Movi* as a problem to pay attention to and help with but one that we didn't have to worry about in Alaska. The news that *Movi* is present in our wild animals came as a shock to us and has put us on high alert. We understand there is only one strain of *Movi* documented in wild animals, we hope it is innocuous as it appears to be. We recently learned there are multiple strains that have been identified in domestic sheep and goats in

Alaska. This has driven home to us the need to begin screening on importation to keep new potentially deadly strains from entering the State.

Hunting guides run small businesses, so we understand how frustrating government mandates are and the impact they have on our bottom line. As small business owners, we are sympathetic to domestic sheep and goat owners' concerns over being mandated to test for a disease whose transmission to wild animals requires a perfect storm or alignment of the stars. All we can ask is that the domestic owners look at our situation and understand that our businesses and livelihoods won't survive a disease outbreak and that the loss to the public if there is a large die off event would be a tragedy on the level of a huge chemical spill that could sterilize the Kenai river or other large salmon watershed. We understand *Movi* tests cost between \$50 and \$100 dollars, but we are also aware of financial support being offered to help offset these costs. Given the long-term benefits of testing all domestic sheep and goats for *Movi* upon importation and the incredible value of Alaska's wildlife, we respectfully support requiring testing for *Movi* for sheep and goats of all ages before they can imported to Alaska.