

RC10?

Rebuttal to Proposal 90 comments

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Thank you for including in BOG packets.

465-6094

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Dear Board of Game Members:

First I would like to say thank you for the opportunity to testify in person last weekend on an intensely personal topic (opposing Prop 90). It's the first time I've ever attended or testified at a BOG meeting, and I went in subconsciously envisioning facing a Nazi firing squad. However after listening to your responses to me and other commenters, I came away with the sense of having interacted with some really fine individuals who are deeply committed to doing the best they can to give fair consideration to everyone's viewpoints. You folks have taken on the enormous and unenviable task of trying to make the right judgment calls in a lot of complex situations. I thank you for your dedication, time and energy, and I wish you wisdom and guidance in the days ahead.

On Saturday afternoon (the 19th) I had the opportunity to sit down for a lengthy chat with the backers of Prop 90, a representative of the Alaska Farm Bureau, and a couple of other sheep and goat breeders. During the discussion, the "15-mile buffer zone" between Dall sheep habitat and domestic livestock was verbally clarified to state that any impassable barrier, whether natural or man-made, would be the boundary of that zone regardless of distance. (For example, the Turnagain Arm tideline would be the boundary of the McHugh Creek habitat (even though it's only a mile or two across the water to Hope), and roadways, rivers, and housing developments would clearly provide ample barriers to prevent Dall sheep from traversing other areas. As the discussion progressed, we unanimously agreed that there are only a handful of locations where domestic livestock are being raised in settings where there are no obstacles to prevent potential contact, and that those should be the areas of focus rather than sweeping, tsunami-style, across all livestock owners statewide. This clarification was not formalized in writing.

Following further dialogue, sheep and goat owners were asked if we thought we could have a safety plan in place with implementation underway within two years. We agreed that was a reasonable goal within that time frame, but no mention was made by either side regarding amending the proposal. The conversation ended cordially, the round-table discussion seemed to have been productive, and I left with the guarded hope that the two opposing groups might in fact be able to work cooperatively along with other state agencies to address the issue. During Sunday's testimonies I was momentarily cheered by a suggestion from the submitter of Proposal 90 that the Board table the proposal for two years, but instantly dumbstruck at the follow-up suggestion to "remove sheep and goats from the Clean List but without enforcement for two years". A second Prop 90 supporter elaborated on the latter request, stating that sheep and goat owners must be "forced to be at the table" because of the probability that we would fail to take action if left to work on it ourselves. This attitude completely undermines the spirit of collaboration that I thought might have been in germination stage during the prior day's discussion.

The WSF and DSWG have had the concept of Proposal 90 on their tables for a very long time, yet not a single effort was made to reach out to any livestock owners. It is only fair and reasonable to allow owners time to formulate a response and a game plan. Although the amended proposal (removal from the Clean List) might appear to offer a guiltless compromise, in reality nothing could be further from the truth. Passage under those terms would essentially put our necks under the guillotine blade with the Wild Sheep Foundation holding the release cord. Cooperation isn't realistically possible when one of the parties feels that their beheading may be imminent. We are already thoroughly aware that this problem is not going to go away, and it is highly unlikely to be ignored or forgotten. Prejudicial assumptions to the contrary are not evidence-based, since we have not yet been given the opportunity to act.

I would respectfully submit to the Board of Game that livestock owners should be given the benefit of the doubt and allowed time to enter into some cooperative efforts toward a solution, without the prematurely punitive action of having our animals removed from the Clean List. Such a decision would offer no tangible benefit to the health and well-being of Dall sheep; however, it would leave the statewide livestock community in a turmoil-filled limbo for years to come. We've already experienced personal fallout from the mere threat of removal from the Clean List—two pending sales to a 4-H family were canceled due to their anxiety over Prop 90, and not wanting their children to own potentially illegal animals. So instead of selling a pair of registered kids for the \$500 they were worth they went for \$75 to someone who butchered them the same day. Three other longtime sheep and goat owners have already sold their herds for meat—in the midst of other hardships, they viewed the looming specter of Prop 90 as the death blow. The effects of **actually** taking domestic sheep and goats off of the Clean List, even with a promise of delayed enforcement, would cause the entire industry to suffer irreparable harm. It's much more difficult to take a ruling off the books than it is to act thoughtfully and deliberately before taking drastic action in the first place.

If Proposal 90 is ever to be given serious consideration, its myriad vague terms and nebulous references need to be clearly defined. What exactly defines "habitat"? Where are its boundaries? Testing when it becomes available?? Testing for what, at whose expense? What exactly is a "department-approved facility"? What department would approve it? Who would put up the double fencing? How far between the fences? If a land owner cannot comply with fencing requirements due to space issues or finances, will enforcement agencies attempt to come in and kill their animals? Who would issue permits, or would de-listed animals simply be illegal? What state agency's budget would cover costs of inspection and enforcement? These are just some of the questions that must be asked and answered in any discussion regarding this proposal. Official statements from several departments have indicated that it is not within the Board of Game's purview to regulate livestock, and I hope you would carefully consider the ramifications on all sides if you should undertake to do so. I would ask you again (as mentioned in PC 332) to act as advised by ADF&G, DOL, DEC and state vet, DNR, Division of Ag, and the AK Farm Bureau and Take No Action on Proposal 90.

If you do choose to take action on this matter, please consider Mr. Kehoe's first suggestion (a two-year moratorium) as the only realistic option, and reject the alternative (removal of domestic sheep and goats from the Clean List). The most detrimental and counter-productive effect of such a measure would be to divert the attention and energy of livestock owners toward fighting for survival in legal arenas, instead of working toward a common goal. Thoughts of Dall sheep welfare would be likely the last thing on their minds.

Board of Game members, the seven of you have the power to determine what course of action this matter will follow for the next two years. Will we come together to concentrate on the issue of minimizing contact between wild and domestic sheep, or will sheep and goat owners simply focus on going into battle to defend themselves in this war that has been waged against them in a Pearl Harbor-like strike? Negotiations toward a mutually agreeable settlement are conducted between peace-seeking peers during a cease-fire in a neutral zone, not in the trenches while staring down the muzzle of a loaded cannon. Please consider establishing a Livestock-Wildlife Working Group, with appropriate representation from the BOG, ADF&G, DEC, DNR, Division of Ag, and the Farm Bureau, to add balance to the concerns of livestock owners and the Wild Sheep Foundation. By creating a working group with an official standing, the Board and the Advisory Councils would have direct involvement in the discussions and solutions, and the Working Group would have access to Board resources as they strive to achieve positive results.

Respectfully submitted,



Suzy Crosby, Alaska Dairy Goat Association