



THE STATE  
*of* **ALASKA**  
GOVERNOR BILL WALKER

**Kenai/Soldotna Fish & Game  
Advisory Committee**

Mike Crawford, Chair  
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Board of Game

December 18, 2018

Dear Board of Game Members,

The Kenai Soldotna Fish & Game Advisory Committee (KSFGAC) would like to enter an emergency petition on the harvesting of Mule deer in the state of Alaska.

With the potential of Mule deer to increase capacity in Alaska, they bring with them other disease and parasites. Specifically, Mule deer carry winter tick which could devastate Alaska's moose and caribou populations.

By allowing the harvest of mule deer we could help any major expansion of migrating mule deer into Alaska. Along with any harvest data and possible sampling this would also allow for better management of Alaska's game populations.

Respectfully,

Mike Crawford  
KSFGAC Chair



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**Department of Fish and Game**

OFFICE OF THE COMMISSIONER  
Headquarters

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May 11, 2018

Mr. Mike Crawford  
Kenai/Soldotna Advisory Committee  
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[creditcardmike@yahoo.com](mailto:creditcardmike@yahoo.com)

Dear Chairman Crawford and Kenai Soldotna AC members:

Thank you very much for your petition to the Board of Game concerning mule deer and the potential for winter tick to become established in Alaska. The board delegated to the commissioner of the Alaska Department of Fish and Game under board policy 2015-208-BOG the authority to determine whether an emergency under 5 AAC 96.625(f) exists when petitions are submitted to the board outside of the regular schedule. This letter is to relay my decision that while we agree winter tick is a threat to cervid health in Alaska, we cannot find an emergency at this time. We do agree this matter should be brought to the board's attention, however, and therefore will send an Agenda Change Request to the board for consideration during the upcoming meeting cycle. If the ACR is accepted, the board will solicit comments to evaluate whether appropriate action could be taken.

Under 5 AAC 96.625(f), emergencies are held to a minimum and rarely found to exist. While we have not found an emergency, if two members of the board disagree, they can always call a special meeting. Note that any regulations made at an emergency meeting would be enacted for 120 days. A subsequent special board meeting would have to occur to make the regulations permanent.

Mule deer immigrating into Alaska could certainly bring winter tick with them, but since winter tick is not present on the animals from April to September, emergency harvest would not have an impact on the introduction of this parasite even if the regulations were effective September 1 through November.

In addition, there are multiple cervid (and bovid/ovid) hosts for winter tick already present in Alaska and the Yukon, not just mule deer. Yukon Environment has reported winter tick on whiter-tailed deer, moose, caribou, bison, mountain lions, and a coyote as well. Many of these animals routinely cross the border, especially caribou where 3 herds routinely winter in Yukon.

Finally, Yukon is apparently managing mule deer for growth of those species. Harvest is limited to 10 permits and they ask that hunters avoid taking white-tails.

Large portions of the border area in Alaska are lightly hunted at best. And mule deer may occupy these areas undetected.

For these reasons, it seems unlikely that harvesting mule deer on an emergency basis would prevent or slow any potential for winter tick to become established in Alaska.

In the interim between now and the next board meeting, we plan to continue monitoring and collecting information. We intend to further evaluate the feasibility of surveys for winter tick; we have already made preparations to capture, collect specimens, radio-collar or collect mule deer that are reported in an effort to evaluate the presence of parasites and pathogens; and continue discussions with our counterparts in Yukon to discuss the situation there and their experience and intentions with regard to winter tick.

We look forward to discussions with the board regarding winter tick and other pathogens and parasites during the coming year.

Thanks again for your vigilance.

Sincerely,



Sam Cotten  
Commissioner

cc: Alaska Board of Game members

# **Information on Pathogens and Parasites in Alaska's Wildlife**

Attention Hunters:

During the last few years, the Board of Game (board) has received several proposals dealing with pathogens and parasites that may threaten Alaska's wildlife. Hunters are expressing concern with reports of confirmed pathogens and increasing threats of new pathogens and parasites. At the same time, observations of non-native large mammals like mule deer in Interior Alaska, which can introduce some pathogens and parasites, have increased or are becoming more well-known, which prompted an emergency request to open a mule deer hunting season. The season request stemmed from the potential for winter tick to become established in Alaska.

Cervid health is very important to the Department of Fish and Game (ADF&G), and as a result, ADF&G submitted an Agenda Change Request, based on the above-mentioned emergency request, to discuss the issue with the board at the Southeast or Southcentral board meeting. ADF&G is currently monitoring and collecting information specific to pathogens and parasites that can be harmful to indigenous wildlife. In combination with this continued monitoring, ADF&G would like to work with the board, local fish and game advisory committees, and the public to determine the public's desires regarding management of wildlife that move into Alaska. Options range from managing these new species, such as mule deer and white-tailed deer, for growth (as Yukon Territory is doing) to seeking to minimize their density.

The public is encouraged to review ADF&G's Agenda Change Request and all materials on pathogens and disease at [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov) and provide comments to the board for whichever meeting the Agenda Change Request is scheduled, if accepted.



**ACR 2** – Mule deer, moose winter tick, and other parasites and pathogens.

**SUBMITTED BY:** Alaska Department of Fish and Game

**CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.**

5 AAC 85.XXX. Hunting seasons and bag limit for mule deer.

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.** Mule deer are occasionally seen in interior Alaska and are likely coming from places in Canada that have winter tick. Winter tick is a threat to cervid health in Alaska, especially for moose.

**WHAT SOLUTION DO YOU PREFER?** The department would like to discuss with the board how to best manage wildlife that moves into Alaska, and how to best handle pathogens and parasites they carry.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

- 1) **To correct an error in regulation.**
- 2) **To correct an effect of a regulation that was unforeseen when a regulation was adopted.**
- 3) **Does the request identify a biological concern for the population or a threat to meeting objectives for the population?** Winter ticks have not been documented in Alaska yet; however, the department would like to provide the board with information specific to pathogens and parasites that might be introduced to Alaska by mule deer, not just winter ticks. Winter ticks are prevalent in other places in North America and heavy infestations of winter tick on moose can result in severe anemia, skin irritation, hair loss, and ultimately death. This, combined with the increased sightings of mule deer in Alaska, have led to the department requesting this be discussed out of cycle.
- 4) **Does the request identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f)?**
- 5) **Does the request identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future?**

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** A request was received from a local Advisory Committee to allow the harvest of mule deer in Alaska as a way to prevent the spread of disease. Currently, mule deer have been documented in interior Alaska, specifically in the Interior/Northeast Arctic region, though pathogens and parasites are not region specific, nor are they specific to mule deer, and the department prefers this be addressed on a statewide issue. The next regularly scheduled statewide meeting to address this statewide is in winter/spring of 2020/2021.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** The department is requesting the board address the extending range of species not commonly occurring in Alaska. Some species have the potential to be carriers of diseases or parasites harmful to indigenous wildlife, and the department is currently undergoing monitoring and collecting of information specific to those pathogens and parasites.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** N/A

**STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.** Alaska Department of Fish and Game.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.** N/A