



October 30, 2020

Alaska Department of Environmental Conservation
Attention: Shannon Miller
555 Cordova Street
Anchorage, AK 99501

RE: TRCP supports amending 18 AAC 36 to require *Movi* testing of all domestic sheep and goats prior to entering Alaska

Dear Ms. Miller,

On behalf of the Theodore Roosevelt Conservation Partnership (TRCP), we appreciate the opportunity to comment on the proposed regulation change concerning *Mycoplasma ovipneumoniae* (*Movi*) screening for domestic sheep and goats being imported to Alaska.

The TRCP is a national 501(c)(3) nonprofit organization that works with 61 partner groups and represents more than 110,000 members to guarantee all Americans quality places to hunt and fish. We applaud the Alaska Department of Environmental Conservation's willingness to mitigate the potentially devastating effects of *Movi* on Alaska's wild Dall sheep, mountain goats, and muskoxen populations. These iconic species are highly valued by sportsmen in Alaska and across the country, generating more than \$80 million in economic impact within Alaska each year.

Our understanding is that Alaska DEC is proposing an amendment to 18 AAC 36 that would require all domestic sheep and goats over two months of age to test negative for *Movi* within 60 days of import to Alaska.

While this is certainly an improvement over the current lack of required *Movi* screening, we respectfully request that the DEC amend 18 AAC 36 to require a negative *Movi* test of all domestic sheep and goats—regardless of age—prior to import into Alaska. This would be a more effective strategy for protecting Alaska's wild sheep, mountain goats, and muskoxen from new strains of *Movi* that have been detected in domestic sheep within the state.

We also encourage Alaska DEC to consider requiring *Movi* testing to be conducted through accredited diagnostic laboratories and adding *Movi* the Reportable Disease Lists, requiring same-day reporting.

Collectively, these actions would benefit the thousands of resident hunters, non-resident sportsmen, hunting guides, outfitters, subsistence harvesters, and tourism operators who rely on healthy populations of Alaska's wild sheep, mountain goats, and muskoxen.

Respectfully,

Edward B. Arnett, PhD., Chief Scientist
Jen Leahy, Alaska Field Representative

His Vision
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Our Mission

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