

October 30, 2020

Commissioner Jason Brune
Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

Dear Commissioner Brune:

I wish to express my opposition to the proposed changes to 18 AAC 36.125 and 18 AAC 36.135 requiring testing of *Mycoplasma ovipneumoniae* (*M. ovi*) when importing domestic sheep and goats into Alaska.

I am a domestic sheep owner and producer on the Kenai Peninsula. I own a flock of sheep of various breeds, ranging from 35-65 head, for both meat and fiber. One of the biggest barriers to increasing the size of my flock, and improving its genetics, is the cost of importing new stock into Alaska. These proposed regulations, requiring mandatory testing, will increase my costs, and in turn, increase the cost of lamb and woolen products for my customers. I constantly hear that leaders in Alaska support the mission of Alaska-grown and sustainability, but these regulations imply just the opposite.

I am saddened that the department has promulgated testing regulations for sheep and goats that are not rooted in sound science. One cannot ignore the outside influence the Wild Sheep Foundation has had on this process, concluding with these ill-conceived regulations before us.

To go back to when this all started, when this burdensome testing requirement idea raised its ugly head nearly 5 years ago, Proposition 90 was offered by the Wild Sheep Foundation to the Alaska Board of Game. With this proposal came a swift discord between stakeholders and there was much misinformation spread about resulting in no action taken by the Board. The issue festered on and the topic of testing was subsequently tussled about later in the legislature. As with so many controversial issues that come before lawmakers, the two groups, the Wild Sheep Foundation and the Alaska sheep and goat producers, were urged to meet with each other and come up with a resolution suitable to both parties. The meetings were held over the course of a few years; and alas, at the last minute, after multiple solutions offered, the foundation walked away from a reasonable compromise.

And what happens? Now we have regulations drawn up and offered by the department. The battle continues and you ask the small, few and regulation-weary domestic sheep and goat owners to defend their livelihoods once again against unfounded and persistent arguments which are not based upon sound science.

Some basic facts in review:

- *M. ovi* is a pathogen that currently exists in several species of Alaska's wildlife, including those in remote areas where there is no interaction with livestock.

- Testing sheep and goats before importation will have no impact on current wild animal populations.
- Science and data do not support required testing of *M.ovi* as a solution to pneumonia outbreaks
- *M. ovi* positive does not mean diseased; some *M. ovi* positive big horn herds have had pneumonia outbreaks while others are thriving.
- *M. ovi* is not limited to sheep, goats and muskox as assumed; testing in Alaska has found *M. ovi* in deer, caribou, and moose.
- **Alaska has had no wild sheep die-offs associated with *M. ovi*.**
- Testing showed similar prevalence of *M. ovi* positive wildlife as domestic animals, around 4-5%.
- *M. ovi* is not new to Alaska; wildlife test samples dating back to 2004 have tested positive for *M. ovi*.

Adding this regulation to an already costly process to import an animal into Alaska, whether by land or air or sea, will have a chilling effect on “growing our own” and achieving sustainability in Alaska agriculture.

This push for *M. ovi* testing for sheep and goats needs to be reconsidered. The risk this pathogen supposedly poses is far outweighed by the negative impacts it will have on this industry. This pathogen is endemic in North American small ruminants and more research is needed to clearly understand it.

Alaska should be focusing on cost-effective and reasonable strategies that ensures physical separation between domestic sheep and goat herds and wildlife, not imposing costly regulations upon a small and tenuous industry. There is no chance that my sheep will ever come anywhere close to a wild sheep here in the southern part of the Kenai Peninsula, and I suggest that finding fencing solutions is a more reasonable strategy in areas where the animals may come into contact with each other.

The demand is strong for Alaska-grown lamb; let’s not price ourselves out of a growing market that is a part of the vision for sustainable agriculture in Alaska.

Respectfully,

Jane Conway
37075 Nicholas View Lane
Soldotna, Alaska 99669

cc: Shannon Miller, DEC Program Coordinator