



October 28, 2020

Shannon Miller
Alaska Department of Environmental Conservation (DEC)
555 Cordova Street
Anchorage, AK 99501

Dear Ms. Miller:

The Wild Sheep Foundation (WSF) appreciates the opportunity to comment on the proposed animal health regulation changes of the Alaska Department of Environmental Conservation (DEC). On behalf of our ~8,500 members worldwide, please accept this comment letter regarding Alaska DEC's proposed changes in Title 18, Chapter 36 of Alaska Administrative Code, for Animal Health. WSF strongly advocates for effective spatial and temporal separation between wild sheep and domestic sheep and goats. Combined with testing prior to importation, these strategies should reduce the potential for introducing novel strains of respiratory bacteria to Alaska and her wild Caprinae species.

Alaska is home to more than 70% of the wild sheep in the United States, more than 90% of the Rocky Mountain goats in the U.S., and 100% of the U.S. muskoxen population. Hunting, photography, and viewing combined, Dall's sheep are among Alaska's most economically-valuable big game animals. All 3 of these wild Caprinae species are irreplaceable ecological, cultural, and economical resources that benefit all Alaskans, and visitors (including hunters) from around the globe.

Acknowledging the importance of Alaska's Dall's sheep, it is imperative that actions be implemented to adequately test domestic sheep and goats prior to import into Alaska. *Mycoplasma ovipneumoniae* (*Movi*) is a respiratory bacterium commonly carried by domestic sheep and goats. If transmitted to Dall's sheep, mountain goats, and/or muskox, *Movi* could lead to significant loss of Alaska's wild Caprinae, by virtue of their connected habitats, across vast mountain ranges and major river systems.

In recognition of these potential risks, WSF recommends and supports:

- Mandatory *Movi* testing of all domestic sheep and goats, regardless of age, prior to import into Alaska
- *Movi* testing should be performed through accredited diagnostic laboratories
- Adding *Movi* to Alaska's "*Reportable Disease List*" requiring same-day reporting

Mandatory testing for *Movi* should include ALL domestic sheep and goats proposed for import to Alaska. WSF does NOT support an exemption for domestic lambs and/or kids less than 2 months of age, as *Movi* has been documented in young sheep and goats (per *Movi* expert Dr. Tom Besser, from Washington State University [retired]). While risk may be lower in young

animals (< 2 months of age), the proposed exemptions to AAH regulations continue the risk of introduction of *Movi* to Alaska, and could void the benefits of testing all other domestic sheep and goats. Every domestic sheep and goat, regardless of age, must be tested.

To date, Alaska has documented 10 *Movi* strains in a total of 11 domestic sheep and goats; it is critically important to prevent novel strains of *Movi* being introduced onto the Alaska landscape. Given adoption by the Yukon Territory of a pro-active and comprehensive domestic sheep and goat Control Order, Alaska needs to follow the Yukon's lead, including rigorous testing prior to import.

WSF also recommends conducting *Movi* testing within 30 days prior to importation, leading to a negative result from PCR analysis of nasal swab(s). Animals, after swabbing, must be isolated from nose-to-nose contact with non-tested animals. Upon arrival in Alaska, domestic sheep and goats should be quarantined for 30 days, followed by an *Movi* retest.

Our Alaska Chapter WSF (AK-WSF) has worked diligently for the past 5+ years to protect Alaska's wild Caprinae; WSF fully supports AK-WSF in these efforts. We realize these testing requirements are not convenient for Alaskans who wish to possess domestic sheep and/or goats; however, we believe this is a vital step to further protect Alaska's Dall's sheep, mountain goats, and muskox from such a deadly and consequential respiratory pathogen.

We look forward to hearing from Alaska DEC as this regulation moves through the process. Please contact us if we may provide additional justification for our recommendations.

Sincerely,



Gray N. Thornton
President & CEO



Kevin Hurley
Vice-President for Conservation

cc: WSF Board of Directors
Kevin Kehoe, President, Alaska WSF
WSF Professional Resource Advisory Board
WSF Conservation Staff