

## Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management

1011 East Tudor Road M/S 121

Anchorage, Alaska 99503

RAC EI 20023.KW

**OCT 30 2020**

Jason W. Brune, Commissioner  
Office of the Commissioner  
Alaska Department of Environmental Conservation  
P.O. Box 111800  
Juneau, Alaska 99811

Subject: Comments on the Alaska Department of Environmental Conservation 2020 Proposed Regulation Changes to 18 AAC 36 Animal Health

Dear Commissioner Brune:

I am writing on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposed regulation changes to 18 AAC 36 Animal Health, specifically to 18 AAC 36.125 Goats (a)(5), 18 AAC 36.135 Sheep (a)(6), and 18 AAC 36.215 (b) through (f).

This Council is one of ten Regional Advisory Councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Eastern Interior Alaska Region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to federally qualified subsistence users whom the Council represents.

For the past several years, this Council has grown increasingly concerned about the potential impacts of *Mycoplasma ovipneumoniae* on the wild populations of Alaska's sheep, mountain goat, moose, and caribou populations, all of which are important subsistence resources in the Eastern Interior Alaska Region. In 2017, the Council learned about the potentially deadly *Mycoplasma ovipneumoniae* bacteria that domestic sheep can transmit to wild sheep through sneezing or nose-to-nose contact. In Alaska it is estimated that 2-5% of domestic sheep have this disease. In 2018, the Council heard that the State had started collecting tissue and mucous samples from *Mycoplasma ovipneumoniae* in caribou. In 2019, the Council also received detailed information from the Alaska Department of Fish and Game on the study of the *Mycoplasma ovipneumoniae* pathogen and its presence in the wildlife populations in Alaska.

On October 14 and 15, 2020, this Council held a public meeting via teleconference, where we were presented with and discussed the Department of Environmental Conservation 2020 draft amendments to 18 AAC 36 Animal Health.

In the course of this discussion, the Council made the following comments and unanimously voted to support the following:

The Department of Environmental Conservation proposed changes to 18 AAC 36.125 Goats (a)(5) and 18 AAC 36.135 Sheep (a)(6) that allows an exception to a person(s) who intends to import to Alaska a goat or a sheep, which is under 2 months of age at the time of the import, not to be tested for *Mycoplasma ovipneumoniae*. According to the published scientific research available to the Council, the animals under 2 months of age are just as susceptible to *Mycoplasma ovipneumoniae* as older animals and can carry the pathogen. The studies indicate that lambs can contract this pathogen at birth or shortly thereafter and it may impair their growth and productivity even in the absence of overt respiratory disease. The presence of any *Mycoplasma ovipneumoniae* in a domestic goat or sheep poses increased risk for nearby wildlife populations of ungulates, which can trigger deadly pneumonia outbreaks.<sup>1</sup>

Based on this knowledge, the Council supports the following amendments:

**18 AAC 36.125. Goats.** (a) In addition to meeting the requirements of 18 AAC 36.010 – 18 AAC 36.015, a person who intends to import a goat into the state shall ensure that the health certificate or certificate of veterinary inspection includes certification that each goat

...

**(5) has tested negative for *Mycoplasma ovipneumoniae* within 60 days of import. All age groups require mandatory testing.**

**18 AAC 36.135. Sheep.** (a) In addition to meeting the requirements of 18 AAC 36.010 - 18 AAC 36.015, a person who intends to import a sheep into the state shall ensure that the health certificate or certificate of veterinary inspection includes certification that each sheep

...

**(6) has tested negative for *Mycoplasma ovipneumoniae* within 60 days of import. All age groups require mandatory testing.**

The Council is concerned about keeping the Alaska Dall sheep population disease free and would like to stress the important value of this animal to subsistence and other users. Therefore, the Council believes that testing should be performed by an accredited diagnostic lab and that *Mycoplasma ovipneumoniae* should be added to the reportable disease list and be reported the same day it was discovered.

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<sup>1</sup> Besser TE, Levy J, Ackerman M, Nelson D, Manlove K, Potter KA, et al. (2019) A pilot study of the effects of *Mycoplasma ovipneumoniae* exposure on domestic lamb growth and performance. PLoS ONE 14(2): e0207420. <https://doi.org/10.1371/journal.pone.0207420>

If you have any questions regarding this correspondence, please contact Katerina “Katya” Wessels, Subsistence Council Coordinator, Office of Subsistence Management, at (800) 478-1456 or (907) 786-3885 or at katerina\_wessels@fws.gov.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Sue Entsminger". The signature is written in black ink and is positioned above the printed name.

Sue Entsminger  
Chair

cc: Eastern Interior Alaska Subsistence Regional Advisory Council  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Lisa Maas, Acting Policy Coordinator, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Tom Kron, Acting Council Coordination Supervisor, Office of Subsistence Management  
Katerina Wessels, Subsistence Council Coordinator, Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
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