

DEC 18 AAC comments

October 19, 2020

As Alaska's Dall sheep biologist from 1971-1997, I've been involved in the management of domestic animal diseases in wild sheep for a long time. Since retiring from ADF&G in 1997, I have continued monitoring the pneumonia problem in bighorn sheep associated with domestic sheep, as a Board member for FNAWS and WSF plus Alaska FNAWS and WSF, and a member of the Northern Wild Sheep and Goat Council. I am speaking for myself.

To date, Alaska's Dall sheep have not apparently suffered the sorts of pneumonia die offs common to bighorn sheep where domestic sheep and goats are involved. Historically explanations for bighorn pneumonia die offs have ranged from lungworm parasites through bacterial pneumonia. Presently, assigning bighorn pneumonia disasters to a primitive, difficult to study, bacterium, *Mycoplasma ovipneumoniae* (*M. ovi.*), is in vogue. Eventually, *M. ovi.* may take its place on the list of explanations that didn't quite explain everything. However, we don't want Alaska's Dall sheep to end up controlled by disease, whatever its cause.

Consequently, I support the revised regulations to 18 AAC 36 with one exception:

The "younger than two month exemption" for domestic lambs and kids under AAC 18.36.125 begs reconsideration.

I've read what there is about this issue, and all I can find is a passing reference to a May 2019 revision of a testing protocol for *M. ovi.* circulated by Washington State University in collaboration with the Washington State Department of Fish and Game. On the third (last page) of that document, **TESTING SHEEP AND GOATS FOR *Mycoplasma ovipneumoniae* (Movi)** available at

(https://www.wildsheepfoundation.org/cache/DOC47_2019-05-13UpdatedVetMovisamplingprotocol.pdf?20190514031711) there are a series of “bullet points.” These points deal with attempts to eradicate *M. ovi.* from infected domestic herds. The recommendations begin with:

If a herd is currently Movi-infected, the owner can be advised about methods to eliminate this bacterium. These methods are under development, so may require modification...

The second bullet point says:

- Lambs and kids typically remain uninfected with Movi for a considerable time after birth. Data show this is typically about 2 months, although in some herds can be 6-months or longer. Segregation at weaning can be an effective means of producing Movi-free kids and lambs if done prior to the age of Movi infection. . . .

This is all I can find that might be relevant to the “two-month exemption” to testing for *M. ovi.* prior to import to Alaska.

Inquiries with Washington State University revealed that this recommendation for domestic lambs and kids was preliminary. Since that time it has been learned that lambs and kids under two months of age can and do test positive for *M. ovi.* (Inquire of Dr. Tom Besser at WSU, the leading authority regarding *M. ovi.* for verification).

If, as Dr. Besser informed us, the May 2019 recommendations for hoping to rid a domestic herd of *M. ovi.*, were not supported by further research, it would be a mistake to continue with the “two-

month exemption” from testing for kids and lambs for import to Alaska as proposed for revision of 18 AAC 36.125

I suggest reconsideration of the “two-month exemption” from testing for kids and lambs as a condition of import into Alaska. I recommend mandatory testing for all domestic sheep and goats prior to import to Alaska.

I realize this has not been a simple challenge for regulators, and that there has been pressure from both the wild sheep and domestic sheep and goat sides. Still, separation of Dall sheep from domestic sheep and goats is the only sure way to protect Dall sheep from disease transmission. Nobody wants it, and our best hope is to hearken to the best biology we have today. Based on my experience, I think this calls for eliminating the “two-month exemption” from testing.

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