

From: kevinkehoe@alaskan.com
To: [Miller, Shannon D \(DEC\)](#)
Cc: info@akwildsheep.org
Subject: Comments On the Animal Health (18 AAC 36): Proposed Revisions
Date: Wednesday, October 21, 2020 12:29:37 PM

Dear Ms. Miller and Commissioner Brune,

I would like to commend the Department of Environmental Conservation for taking the long-overdue action of addressing *Mycoplasma ovipneumoniae* (Movi) in your Animal Health Regulations for the State of Alaska.

I am an Alaskan transplant, arriving here with my family a little over 25 years ago. I have always been an outdoor enthusiast and dedicated hunter. I also had the privilege of participating in 4H while growing up. After serving in the military for 26 years I became a small business owner here in Alaska. I support small businesses and the responsible development of natural resources.

Alaska's wild Caprinae; Dall sheep, Rocky Mountain goats, and Muskoxen, represent a public trust resource of incalculable value. Conservative estimates of their annual contribution to the State's economy are between \$20 and \$40 million based on the hunting and viewing of these iconic animals.

It is key then that we screen domestic sheep and goats prior to import to prevent other strains of Movi from entering the State. There are over 200 known strains of Movi, with some more lethal than others. Only one strain has been identified in Alaska's Wildlife currently and it appears to be a less lethal strain, although exact effects are unknown. At least ten different strains of Movi taken from the 11 domestic animals tested underscores the risk and strongly suggests that the multitude of strains are the result of imports.

There is plenty of room for both wild and domestic sheep and goats in Alaska. Since many of the diseases and pathogens that can be carried by domestics can be transmitted to their wild cousins it is imperative that domestic producers maintain the highest possible health standards to prevent the spread of diseases and pathogens to wild sheep and goats.

Although I fully support a regulatory change, I feel that there are some needed adjustments to what has been proposed.

First, the regulation should require the testing of **ALL** domestic sheep and goats regardless of age. Studies have shown that although young animals are less likely to carry Movi, they can and do carry the pathogen. Some farming techniques have proven successful in preventing this spread but there would be no way to guarantee that those practices were in place by every breeder supplying animals to Alaska producers.

Second, it is imperative that the **tests should be conducted by American Association of Veterinary Laboratory Diagnosticians (AAVLD) accredited diagnostic laboratories**. This will help guarantee consistency and quality control over the testing. There are several of these laboratories throughout the United States.

Third, the addition of Movi to the Reportable Disease List is a good step but **same day reporting** must be required to ensure that information is reported in a timely fashion to the Office of the State Veterinarian.

Thank you again for the opportunity to comment on the proposed regulatory change and your efforts to keep Alaska's wildlife safe.

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