

Christina Carpenter, Director
Division of Environmental Health
Department of Environmental Conservation
State of Alaska

October 29, 2020

Dear Ms. Carpenter

I am encouraged by the Department's proposed regulation changes in Title 18, Chapter 36 of the Alaska Administrative Code, Animal Health. Specifically, the proposed regulation change requiring that domestic sheep and goats be tested for and clear of *Mycoplasma ovipneumoniae* (Movi) prior to import into Alaska. Without going into too much detail, my concerns focus on the potential detrimental impact to Alaska's populations of sheep and goats. More alarming is also the high potential of this respiratory bacterium affecting wild animals outside of Caprinae. To date, a strain of this potentially harmful bacteria has been reported in other species besides Caprinae to include, caribou, moose, mule deer, caribou, muskoxen, and white-tailed deer. In our Great State, an Alaskan study has already detected *M. ovipneumoniae* in 57% (4/7) of Alaskan domestic sheep premises and 7.6% (13/171) of domestic sheep. The important message to draw from these results is, at this time these results suggests that the prevalence of this bacteria may be lower than what is being experienced in the lower 48. It is critical that a regulatory regime is established to help prevent the spread of this respiratory bacteria.

As a retired biologist for both the State of Alaska and the USFWS, I do have knowledge and experience on how regulations are developed. The proposed regulatory changes are a good start, however additional measures need to be added and or clarified to include the testing of all domestic sheep and goats regardless of age prior to import into Alaska, that the Movi testing is conducted through an AAVLD accredited diagnostic laboratory, add Movi to the Reportable Disease List and require same-day reporting.

In conclusion, I would like to point you to a study conducted by the State of Alaska, Department of Fish and Game. In 2012, ADF&G contracted with ECONorthwest to quantify the economic importance of wildlife to our Great State. The study's results confirmed what most of us already know, Alaska's wildlife is important to Alaskans and visitors alike. It further demonstrated that wildlife contributes significantly to residents' quality of life and is one of the main reasons people visit Alaska. Because it is important to them, people spend money to hunt, view, and experience wildlife. In 2011, they spent over \$3.4 billion in Alaska to hunt and view wildlife here plus additional dollars out-of-state on gear and other goods supporting those activities. The importance of maintaining healthy and viable populations of not only wild sheep and goats but other Alaskan Bovidae cannot be overstated. Thank you for your time and efforts in the development of these important regulations.

Sincerely,

Peter J. Probasco
PO Box 2502
Palmer, Alaska 99645

Dear Fellow Wild Sheep Enthusiast

If we want to protect Alaska's wild sheep, goats, and muskoxen from further strains of Movi we have to act now before the [Friday](#) deadline. This is a unique opportunity to change the Alaska regulations to require screening of all domestic sheep and goats for Movi before they are imported. After we get that in place we will work to clean up the strains that already exist in Alaska domestics.

Mycoplasma ovipneumoniae or Movi is a foreign pathogen that destroys the cilia in the airways and facilitates pneumonia in wild Caprinae. Movi is most commonly carried by domestic sheep and goats. These domestics have developed immunity over the thousands of years that they have been exposed to it. Their wild cousins have no such immunity. One of the key components of our effort to protect Alaska's wild sheep, goats and muskoxen is the screening of all domestic sheep and goats for Movi prior to entry into Alaska.

We know we have at least a single strain of Movi in some Dall sheep and some caribou in Alaska. Caribou do not appear affected by Movi, but they can move the pathogen around the landscape. The strain we have is a unique strain and appears to be less lethal than some – although we are not certain at this point. The die-off that occurred this winter in the Alaska Range was primarily due to weather but may have been worsened by the Movi strain that's present in Dall sheep in that mountain range.

Just like the flu - there are multiple strains of Movi (more than 200). Just like the flu – because you had a mild case of the flu once doesn't mean that you can't be infected and killed by a more lethal strain later (that is why you are supposed to get a flu shot every year). Just like the flu – there are no good strains of Movi.

In Alaska, of the first eleven domestic sheep and goats tested and strain typed, there were ten different strains of Movi identified! So we may well have a ticking time bomb (more lethal strain) here in Alaska already but we certainly don't need more strains imported.

In response to our continued requests for a regulatory change, the Alaska's Department of Environmental Conservation (DEC) finally sent out notice of a proposed regulation change requiring that domestic sheep and goats be tested for and clear of *Mycoplasma ovipneumoniae* (Movi) prior to import. The public comment period closes on **October 30, 2020** at 11:59pm AKT.

The proposed regulation has some deliberate loopholes that have to be closed and still faces stiff opposition among the domestic owners fueled by disinformation. So we definitely need your support and ten minutes of your time to ensure this regulation gets fixed and put in place.

AK WSF would like you to join us in **SUPPORT** of this important regulation with the modifications below to help put this critical policy in place to protect iconic Alaskan sheep, goats and muskoxen.

The primary points to include in your message to DEC are the following:

- Let them know who you are and why wild sheep, goats and muskoxen are important to you
- You support Movi testing of **all** domestic sheep and goats regardless of age prior to import into Alaska
- You support Movi testing through **AAVLD accredited diagnostic laboratories**
- You support **adding Movi to the Reportable Disease List and requiring same-day reporting**

We would like you to send an email or online comment to DEC supporting the regulation change emphasizing the changes outlined above.

Your message to DEC need not be long or involved but should be in your own voice. You may email your support comments directly to shannon.miller@alaska.gov or submit them here <https://dec.alaska.gov/eh/vet/regulations/animal-health/> Please also include us in your response so we can better track the responses info@akwildsheep.org

Thank you in advance for your support – with your help we will achieve a major milestone in protecting Alaska's Dall sheep from this foreign pathogen!

If you have any questions or need any help in preparing a response then please feel free to contact me directly.

Kevin J Kehoe