

October 19, 2020

Shannon Miller  
555 Cordova Street  
Anchorage, AK 99501.

RE: Comments on The Proposed Animal Health Regulation Changes

Dear Ms. Miller:

I oppose the two proposed additions as 18 AAC 36.125.a.5 and 18 AAC 36.125.a.6. Both exempt testing for *Mycoplasma ovipneumoniae* (Movi) in sheep and goats two months of age or younger.

But first some context: DEC's statutory mandate states that "It is the policy of the state to conserve, improve, and protect its natural resources and environment..." That protection includes our wildlife resources. Therefore, it is critical for DEC to create regulations to prevent any transmission of disease from domestic animals to wildlife. The ONLY sure way is to employ spatial and temporal separation between domestics and wild sheep. No contact, no disease transmission. It's that simple. These proposed DEC regulations fall far short of the level of safety necessary to protect Dall sheep and mountain goats, perhaps other species, especially in the light of what is needed – separation – and what is being employed – a stop-gap measure of testing SOME domestic sheep and goat imports, not even all of them.

All federal land management agencies, Western states' wildlife departments, the national Wild Sheep Foundation, the American Association of Wildlife Veterinarians, the Wildlife Society, and the Western Association of Fish and Wildlife Agencies' Wild Sheep Working Group all hold formal management policies that separation is the best mitigation for disease transmission.

All the testing in the world will never afford the protections from disease transmission that spatial and temporal separation affords. Testing is only an optimistically hopeful barrier and can never assure zero transmission. Alaska should be pursuing separation as a primary means to prevent disease transmission. I consider testing only a first step. But for this exercise regarding the proposed regulations, the health and safety of not only domestic sheep and goats, but also other wildlife potentially susceptible to Movi could be at great risk unless these exemptions in 18 AAC 36.125.a.5 and 18 AAC 36.125.a.6 are removed. Here is why:

To get to the truth of the question whether or not lambs and kids two months old and younger should be exempt from testing for import, I called THE expert on Movi, Dr. Tom Besser, retired professor and previous holder of the Rocky Crate/Wild Sheep Foundation Endowed Chair at the School of Veterinary Medicine at Washington State University.

Dr. Besser essentially said he was worried that should these exemptions be included, the state could easily see transmission of Movi to wild animals. Indeed, he said there is NO SAFETY in not testing ALL domestic sheep and goats because even the ones two months and younger have been

shown very capable of carrying Movi and therefore transmitting it to other animals. It should never be assumed that they can't.

In addition, after asking Dr. Helen Schwantje, the Provincial Wildlife Veterinarian for British Columbia, about this issue, one thing she recommended was a 30-day isolation before importation into Alaska. Perhaps a final test to confirm the continued negative status would help ensure no importation of "hidden" Movi into Alaska.

So, based on the expertise of Dr. Besser and Dr. Schwantje plus what we know about the easy transmissibility of Movi, I ask that 18 AAC 36.125.a.5 and 18 AAC 36.125.a.6 be deleted from the passage of these proposed regulations.

Sincerely,

Karen Gordon  
Fairbanks, AK  
978-9053