

Keith Douglas

Ms. Miller, my name is Keith Douglas and I have been a resident of Alaska for 40 years and in 38 of those hunting, guiding and viewing sheep have been my vocation. I have even built a cabin at Sheep Mountain on the Glenn Highway from which I view sheep throughout the year. I have a degree in Biology have worked with the Alaska Department of Fish and Game and have stayed in contact with sheep biologists in Alaska, Arizona and Nevada.

I have long ago concluded that *Mycoplasma ovipneumoniae* (Movi) has been and is a disease that can be cataclysmic to wild sheep populations. As you know, it has recently been found in game animal populations in Alaska. More studies are needed to identify the strains existing within Alaska but I firmly believe Alaska DEC should take actions that will mitigate the potential for future infections brought into and already existing within the state of Alaska.

These proposed changes to Title 18 are a good start to effective Movi protection to wild Caprinae populations and I fully support them. Hopefully you and your coworkers within DEC will monitor the studies from scientists throughout Alaska and the entire North American west. Yukon's Control Order 201-001 which took effect 1 January 2020 is a comprehensive, proactive measure to address and minimize the effect of Movi on their Caprinae species. You should monitor the progress that is being made there.

Summation: It has been proven that Movi has been lethal to many wild sheep populations in North America since before 1900.

Subspecies of North American wild sheep share similar genetic make-up. Ramey from Cornell University concluded in a 1993 study that the division of sheep into distinct subspecies is "largely illusory". The status of taxonomic differences between Dall sheep and Bighorns is also questionable; hybridization has occurred in their recent evolutionary history.

Since I feel that Movi is such a risk to our wild populations I must support the Alaska Wild Sheep Foundation's stance that we should test all domestic sheep and goats of ALL AGES prior to importation. All testing should be done through AAVLD diagnostic laboratories and that Movi be added to the reportable disease list.

I will tell you, and I'm not speaking for the Wild Sheep Foundation here, that they are firm in their belief that these changes are needed and will be beneficial in protecting our wildlife. I do not think they will stop funding many of the things they are pushing for either. This funding should allay some of the fiscal concerns that the state and private stock owners have. The time to act is now. And in these actions you will be fulfilling your purpose as stated in 18 AAC 36 "to prevent the introduction of animal disease that could infect the state's domestic and wildlife populations... (and) prevent the spread of infectious, contagious, communicable and dangerous diseases affecting domestic animals within the state". Seems pretty clear cut to me. Thank you for your consideration.

Keith A. Douglas
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