



# ALASKA FARM BUREAU, INC.

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October 29, 2020

Commissioner Jason Brune  
Department of Environmental Conservation  
555 Cordova Street  
Anchorage, AK 99501

Re: Opposition to Proposed Changes to Animal Health Regulations (18 AAC 36) to require testing for *Mycoplasma Ovipneumoniae* (M. ovi)

Dear Commissioner Brune:

The Alaska Farm Bureau is urging the Alaska Department of Environmental Conservation to reconsider enacting the proposed changes to 18 AAC 36 that would regulate *Mycoplasma ovipneumoniae*.

The Alaska Department of Environmental Conservation (ADEC) and Alaska Department of Fish and Game (ADF&G) had been working with stakeholders for several years to gather more data and better understand impacts and risk of M. ovi in Alaska and find an agreeable approach to maintaining healthy herds. Western states and Canada have been continuing research to better understand the relation between M. ovi, pneumonia outbreaks in bighorn sheep populations and contact with domestic sheep and goats. In recent years, these studies have produced results that contradict previous assumptions as well as raising awareness of extreme knowledge gaps in the understanding of M. ovi.

Since Alaska has not experienced M. ovi-associated die-offs in its wildlife, the fear around M. ovi is based on western states' bighorn sheep issues. Circumstances between bighorn sheep in the lower 48 and Alaska's Dall Sheep differ significantly. Bighorn sheep habitat has been drastically reduced through urban development. Long-term droughts and wildfires in the west are also severely reducing available forage for big horn sheep. These issues, along with other stressors (predation, overpopulation, harsh weather, handling, etc.) factor into the strength of an animal's immune system. The higher the stress load, as seen with bighorn sheep, the more susceptible animals are to disease.

Even among bighorn sheep populations the impact of M. ovi differs greatly. Some M. ovi positive herds have experienced population-limiting pneumonia outbreaks while others are thriving. Some M. ovi negative herds have experienced pneumonia

outbreaks while others thrive. Some of the bighorn sheep herds that experienced respiratory disease outbreaks had contact with domestic sheep/goats while others did not.

Alaska should be practicing science-based management over its wildlife resources. The current facts and science do not support taking any regulatory action over *M. ovi*, including mandatory testing of imported sheep and goats. Other wildlife and livestock authorities as well as subject matter experts are not recommending mandatory testing of *M. ovi* as part of a management plan; there are no official diagnostic test available and the science does not support such action.

There are still many knowledge gaps in understanding *M. ovi* and its impact on animals. There are still questions around which species are susceptible to disease and which are carriers of *M. ovi*. It is also unclear what the relationship is between strain types and development of disease as well as what role *M. ovi* vs other factors play in a disease outbreak.

In Alaska, *M. ovi* has been found in wildlife across the state, including areas where there are no livestock. There have been wildlife samples as far back as 2004 that tested positive for *M. ovi*. While the strain of *M. ovi* in wildlife and livestock appear to be different it is not known if the strain in our Dall Sheep is less virulent or Dall Sheep have adapted to the pathogen. With the areas of the state *M. ovi* is found in, and wildlife and livestock having different strains, it would seem that 1) our farmers and ranchers are doing a great job at maintaining separation, and 2) *M. ovi* comes from other sources than just domestic sheep and goats.

Given the knowledge gaps around *M. ovi* and respiratory disease, the lack of science to support mandatory *M. ovi* testing and the lack of official diagnostic testing, the Alaska Farm Bureau strongly recommends ADEC remove *Mycoplasma ovipneumoniae* from the proposed regulation changes to 18 AAC 36. We highly recommend ADEC and ADF&G collaborate with stakeholders on science-based management strategies as well as continuing research on *M. ovi*.

Working together we can have healthy wildlife and a robust agriculture industry. Thank you for your consideration on these comments.

Respectfully,



Scott Mugrage, President  
Alaska Farm Bureau

**From:** [Kevin J Kehoe](#)  
**To:** [Brune, Jason W \(DEC\)](#)  
**Cc:** [Miller, Shannon D \(DEC\)](#)  
**Subject:** Request for Public Comment Period Extension 18 AAC 36  
**Date:** Wednesday, September 16, 2020 1:58:50 PM

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To: Commissioner Jason Brune

RE: August 6th, 2020 Public Notice of Proposed Regulatory Changes to Title 18 Chapter 36 of the Alaska Administrative Code, Animal Health

Subject: Request for Public Comment Period Extension

Dear Commissioner Brune,

Alaska Wild Sheep Foundation (AK WSF) respectfully requests a 30 day extension to the public comment period on proposed changes to Title 18 Chapter 36 of the Alaska Administrative Code, Animal Health (18 AAC 36). Hunters are important stakeholders in matters concerning wildlife resources held in public trust. Because public notice on the proposed changes to 18 AAC 36 was issued during the fall hunting season we are asking for a 30 day extension to the public comment period to allow hunters adequate time to participate. AK WSF appreciates the proposed regulatory change and is hopeful that there will be ample time for the hunting community to weigh in.

AK WSF is dedicated to promoting the conservation of Alaska's wild species of Caprinae (Dall sheep, Rocky Mountain goats, and musk-oxen). AK WSF's membership is mostly composed of hunters and hunting guides who enjoy pursuing Alaskan sheep and goats. Hunting seasons for Dall sheep in Alaska begin with a youth hunt in the first week of August and finish up with archery hunts at the end of September. Other hunting seasons for mountain goats extend into the middle of October and even into November in certain units. In some cases our members who are guides have been in the field since public notice of proposed changes to 18 AAC 36 were first issued on August 6th and will remain in the field or under contract with their clients into the beginning of October. Our non-guide members often times are in the field for weeks at a time between August sheep season and during September when they hunt for subsistence animals like moose and caribou. In conversations with other conservation groups, our membership is not alone, August and September are the traditional hunting seasons for Alaskans. This use pattern is especially prevalent in the Alaska native community as fall time is the most important subsistence season in most regions.

We sincerely appreciate your consideration of this request.

Regards,

Kevin

Kevin J Kehoe  
President  
Alaska Wild Sheep Foundation



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