



Feb. 22, 2022

Carol Hennessey
Nez Perce-Clearwater National Forest
104 Airport Road
Grangeville, Idaho 83530
Comments-northern-nezperce@usda.gov

RE: TRCP comments on IDFG Sheep Collaring Project #61527

Ms. Hennessey,

Thank you for the opportunity for the Theodore Roosevelt Conservation Partnership, the Idaho Wildlife Federation and Backcountry Hunters and Anglers to comment on the Idaho Department of Fish and Game Sheep Collaring Project #61527.

The TRCP is a national conservation organization working to guarantee all Americans quality places to hunt and fish. In addition to our 60 formal partner groups, the TRCP represents more than 116,000 individual members across the United States and 3,500 specifically in Idaho. In cooperation with other sporting and conservation organizations, we collaborate with willing partners to ensure access to public lands while also working through federal land use planning to make sure big game animals – such as deer, elk, bighorn sheep, and pronghorn – have room to thrive.

IWF is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, IWF represents a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and supporters in Idaho.

BHA is a non-profit conservation group with 40,000 members in chapters across 48 states, two Canadian provinces and one territory. The Idaho chapter has more than 2,000 dedicated public landowners as members.

Our groups are supportive of the capture effort because of its goal of identifying disease levels in bighorn sheep in the Salmon River corridor, and subsequently managing the herd so it can grow and not infect other nearby herds.

The Salmon River corridor contains one of the remaining native bighorn sheep populations in Idaho. The native population has struggled in recent decades because of all-age die-offs because of *Mycoplasma ovipneumoniae* (Movi) in the 1980s along the Salmon River corridor. A strain of Movi is still present in this population. The TRCP believes chronic Movi infection will prevent recovery of this native bighorn sheep population if there is no effort to reduce disease persistence in the herd. There is also a risk that infected sheep in the Salmon River corridor could reinfect populations located in the Snake River corridor and Hells Canyon National Recreation Area that are now clean following previous testing and removal programs.

Regarding this sheep collaring/disease testing proposal, the activity will happen during a time that access to the corridor, other than by authorized motorized means, is extremely limited. In addition, the proposed activity and wilderness intrusion is restricted in several ways: number of wilderness captures (20), cumulative hours of helicopter use (20), total number of days in the wilderness (3) and the limited number of days of the entire project.

Without helicopter access to implement the test-remove management technique, IDFG will not be able to determine the prevalence of Movi in the bighorn populations within the Salmon River corridor or achieve Movi-free status.

The importance of Movi-free bighorn populations is paramount to increasing bighorn populations and genetic diversity throughout the Salmon River corridor. Also, without clearing Movi from the Salmon River corridor, those bighorns represent a threat to infecting bighorn populations in Movi-free populations in surrounding drainages. In addition, those bighorn populations will always be held significantly in check, below the capacity of the available habitat.

Our groups believe that capture effort will not significantly impact the wilderness values of the corridor. In fact, our groups believe the Central Idaho Wilderness Act of 1980 and the Wild and Scenic Rivers Act make allowances for the use of motorized craft in the river corridor.

Specifically, the forest's own scoping document claims, "even though the Salmon River is within the FC-RONRW, the Wild section of river was to be administered differently. In order to recognize and maintain existing motorized jetboat use and other nonconforming uses along the river corridor, Congress provided that the less restrictive management direction of the Wild and Scenic Rivers Act would prevail in the Salmon River corridor, rather than the provisions of the Wilderness Act."

At the same time, the Central Idaho Wilderness Act of 1980 includes a special provision for use of motorized aircraft necessary for disease control. Again, from your scoping document: "For those lands in wilderness, but outside of the designated wild and scenic corridor, the Wilderness Act of 1964 (Section (4)(d)(1)) includes a special provision for use of motorized aircraft necessary for disease control."

Taken together – the timing of the project, the existing motorized use in the corridor, and the provision for the use of motorized aircraft for disease control – our group believes the project is worthy of a conditional special use permit.

Thank you for your time and attention to this matter. If you have any questions, please reach out to Rob Thornberry at (208) 569-8032.

Sincerely,



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