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Organization: Idaho Wild Sheep Foundation

Title:

Comments: Dear Ms. Hennessey. The Idaho Chapter of the Wild Sheep Foundation (ID WSF) commends the Nez Perce-Clearwater Forest for recognizing the Movi disease issue in bighorn sheep, plus the difficulties in capturing free-ranging bighorns for disease sampling, specifically in the Salmon River corridor. As you are aware, the Idaho Department of Fish and Game (IDFG) tried capturing and sampling bighorn sheep in the lower Salmon River corridor, using jetboat access, during November, 2021. Unfortunately, low water levels and icing, plus the availability of bighorns adjacent to the river, prevented IDFG from collecting their desired number of samples. There are no other practical options, thus the most viable option available to IDFG for successfully obtaining the sample size needed to adequately evaluate the prevalence of Movi within the bighorn sheep populations in the lower Salmon River corridor is helicopter net-gunning. As documented in your project overview, the negative effects of Movi in bighorn sheep populations include suppressed population growth and reduced genetic viability. Due to the connectivity of bighorn sheep herd units within the Salmon River corridor, it is imperative to sample bighorns within the entirety of their distribution in the corridor. Also documented is the success of the test-remove procedure developed in the Hells Canyon complex; justification to apply test-remove to the depressed, Movi infected bighorn populations in the Salmon River corridor. ID WSF is well aware of the values of wilderness and does not take them lightly. We also recognize bighorn sheep are an important component of wilderness. The Wilderness Act specifically does not preclude wildlife research and/or management, however such activities must be scrutinized and planned with the least impact to wilderness values. Regarding this sheep collaring/disease testing proposal, the activity is planned during a time access, other than by authorized motorized means, is extremely limited. In addition, the proposed activity and wilderness intrusion is restricted several ways: 1) number of wilderness captures (20), 2) cumulative hours of helicopter use (20 hrs), 3) number of days (3 max) and 4) when possible, select animal processing sites outside wilderness. Thus, the intrusion to wilderness values is minimized as much as possible. The Idaho Wild Sheep Foundation supports Sheep Collaring Project #61527. In our opinion, Section (4)(d)(1) of the 1964 Wilderness Act provides justification for the Nez Perce-Clearwater Forest to authorize IDFG to use helicopter net-gun capture in designated wilderness. 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. Again, thank you for considering this proposal and the opportunity to comment. Sincerely, Bill London