

Data Submitted (UTC 11): 2/23/2022 12:00:00 PM

First name: Walter

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Organization: WA OR Sheep Foundation

Title: President

Comments: SUBJECT: 2022 IDF&G Sheep Collaring Project #61527 Dear Ms. Hennessey, The Oregon (OR WSF) and Washington Wild Sheep Foundations (WA WSF) commends the Nez Perce-Clearwater Forest for recognizing the role of *Mycoplasma ovipneumoniae* (Movi) and associated pneumonia in the health of bighorn sheep and the difficulties in capturing free ranging bighorn for disease sampling, specifically in the Salmon River corridor of the Frank Church and Gospel Hump Wilderness areas. This work is also part of a multi-jurisdictional project using "test and remove" to clear Movi from bighorn, improve overall animal health, and restore populations. During November 2021 the Idaho Department of Fish and Game (IDFG) attempted to capture and sample bighorn sheep in the lower Salmon River corridor using jetboats for access. Unfortunately, low water levels, icing, and the difficult locations of the bighorn sheep populations, prevented IDFG from collecting the desired number of samples. The most viable management option available to successfully obtain an adequate sample size to evaluate the prevalence of Movi in the bighorn sheep populations in the lower Salmon River corridor is utilizing helicopters and net guns for capture operations. As you documented, the negative effects of Movi in bighorn sheep populations include suppressed population growth and reduced genetic viability. Pathogens associated with the respiratory disease complex are spread among interconnected bighorn populations, resulting in mortality in multiple populations over time. Overall, this will chronically limit bighorn numbers and distribution in areas where respiratory disease occurs. Consequently disease, especially recurring events, will depress bighorn populations and/or eventually lead to local extinction. Due to the connectivity of bighorn sheep herds within the Salmon River corridor, it is imperative to sample individuals within the entirety of their distribution in the corridor. The documented success of using the test and remove procedure that was developed in the Hells Canyon Initiative area and used elsewhere around the west; provides justification to apply test and remove to the Movi infected bighorn sheep populations in the Salmon River corridor. OR and WA WSFs are keenly aware of the value of wilderness, and we believe bighorn sheep are an important component of these wilderness areas. We believe that the potential reduction or worse the loss of bighorn sheep populations would diminish the value of these wilderness areas. The Wilderness Act does not preclude wildlife research and/or management, however such activities must be reviewed, planned, and implemented with a minimal impact to wilderness values. The proposed sheep collaring, and disease testing activity is planned during a time of low visitation. The proposed motorized activity is managed to reduce the number of intrusions into the wilderness area by limiting the number of wilderness captures, cumulative hours of helicopter use, the total number of days, and whenever possible, select animal processing sites outside the wilderness boundaries. The intrusion on wilderness values is minimized as much as possible. The OR and WS WSFs do support the Sheep Collaring Project #61527. We believe, 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 and remove management procedures, IDFG will not be able to determine the prevalence of Movi in the bighorn populations within the Salmon River corridor or attempt to reduce the effects of Movi on the populations. The importance of Movi free bighorn populations is paramount to increasing bighorn populations and genetic diversity throughout the Salmon River corridor. Without reducing Movi in the Salmon River corridor, those bighorns represent a threat to bighorn populations up and down the river corridor, including potentially into the Snake River/Hells Canyon bighorn sheep populations where we have been expending considerable time and resources to manage and reduce Movi. The current strain of Movi was introduced into the Lower Salmon over two decades ago, and at this point natural clearance is unlikely in an acceptable timeframe. That is why this project is so critical to support. Thank you for the opportunity to comment to this important proposal. Sincerely, Walter Chuck Andy Kelso President, OR WSF President, WA WSFCC WSFID