



October 11, 2017

***Via Electronic Submission and Post***

Bureau of Land Management  
Winnemucca District Office  
5100 East Winnemucca Boulevard  
Winnemucca, NV 89445-2921  
WFOWeb@blm.gov

**RE: NDOW Wildlife Management Activities in Wilderness (Cadigan) 6300/6840 (NV030.09)**

Ms. Kathy Cadigan, Project Lead

ASI is the national trade organization representing the interests of nearly 90,000 sheep ranchers, located throughout the country, who produce America's lamb and wool. On behalf of its members, ASI stands opposed to the proposed action alternative in the above referenced Environmental Assessment and in support of the "No Action Alternative" for the following reasons:

The Program does not serve any of the purposes listed in the Wilderness Act: recreation, scenic use, science, education, conservation, or historical value." 16 U.S.C. § 1133(b). In *Wilderness Watch v. Vilsack*, 4:16-cv-12-BLW (D. Idaho 2017), the Court considered a similar case where the Idaho Department of Fish and Game sought to collar elk and wolves to track their movement. In this case, aerial operations were used on a wilderness and the Court found IDFG violated both the National Environmental Protection Act (NEPA) and the Wilderness Act of 1964, and enjoined IDFG from utilizing the information collected. Hereto, it is the contention of ASI that using a helicopter on a wilderness would not pass the daunting judicial review, as it does not meet the minimum requirements for administration of the wilderness area in question. Therefore, ASI asserts that the "No Action Alternative" is in fitting with current case law.

Further, the program would have a potential detrimental impact on the health of the bighorn sheep collared. While disease events in bighorn sheep populations are not yet fully understood, it is clear that stress and environmental factors play a major role in allowing pathogens opportunity to cause disease in otherwise healthy populations. The very nature of bighorn sheep used as the basis for a mechanized capture here, namely the remote and rugged terrain that wild sheep occupy, is also the reason such a capture would result in undue stress. The presence of wildlife specialists and aircraft, combined with the process of netting, hobbling, blindfolding and collaring would result in stress to the animal and the herd. This stress alone, or combined with subsequent environmental and nutritional factors, has the potential to result in disease outbreak and losses of wild sheep. Therefore, the "No Action Alternative" holds the least risk to the health of the bighorn sheep, especially in light of the possibility that this action

would be found to be in violation of the Wilderness Act; and the resulting information sought, may be enjoined from use as in *Wilderness Watch*.

In addition to the aforementioned reasons, ASI also renews many of the same concerns outlined in its comments submitted to this agency in “**Comments on the Winnemucca BLM District Office’s November 22, 2016 Notice of Proposed Action in Wilderness Area (NV030.09)**”.

Thank you for the opportunity to comment on the Program. Please do not hesitate to contact me with question.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Adams", written in a cursive style.

Chase Adams  
Senior Policy and Information Director  
American Sheep Industry Association