



Proposed Sierra Nevada Bighorn Sheep Study and Environmental Assessment

Public Scoping Comment Analysis Report June-July 2010



National Park Service
Sequoia and Kings Canyon National Parks
Prepared August 2010

INTRODUCTION AND GUIDE

INTRODUCTION

Public scoping was initiated for the proposed Sierra Nevada Bighorn Sheep Study on June 18, 2010. The 30-day public comment period ended on July 19, 2010. A press release was distributed to area media outlets, and letters with project information requesting public input were mailed to 83 individuals, agencies and organizations, and to 34 tribes or tribal representatives. In addition, scoping information was emailed to 311 agencies, organizations, businesses, and individuals.

Notification of the scoping period was published in the Kaweah Commonwealth newspaper on July 2, 2010. Information was also posted on the National Parks Travelers and the Wilderness Watch websites. Additionally, information was posted on the National Park Service (NPS) Sequoia and Kings Canyon website and links were provided to the NPS Planning, Environment, and Public Comment website (PEPC)

Five comment letters were received; two from individuals; one “no comment” letter was received the California Department of Transportation; and two comment letters were received from interest groups including High Sierra Hikers Association and Wilderness Watch. Commenters provided input by a variety of methods, including letters, email, and completing and submitting the form provided by the parks. All comments received were entered into the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) system and are a part of the public record. Each comment letter was reviewed by park staff to determine the potential issues and impact topics related to the proposed project.

This scoping report provides a synopsis of the comments generated during the scoping period.

THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the interdisciplinary team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues.

The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a comment was received, or whether a commenter supported or opposed the proposed project or alternatives.

Definition of Terms

Primary terms used in the document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as opinions on the use of a potential management tool, to request or provide additional data regarding the existing condition, to provide information on laws and regulations, or provide an opinion debating the adequacy of an analysis.

Code: A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the analysis.

Concern: Concerns are subdivisions of codes. Codes can be further separated into several concern statements if necessary to provide a better focus on the content of comments. For the purpose of this scoping report, the entire comment on an issue was included but concern statements were not developed.

All scoping comments were considered to be important as useful guidance and public input to the scoping process, but only substantive comments were analyzed in the Public Scoping Comment Summary Report. At this phase of the project, almost all comments are treated as being substantive. No opinions expressing support or opposition for the proposed project are included in this summary.

Guide to This Document

This report is organized as follows:

Content Analysis Report- This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Scoping Comment Summary- This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and have been taken from the text of the public's comments.

Correspondence Index of Organizations- This table provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC (and in this order): businesses; conservation/preservation groups; federal government; university/professional society. Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments.

Index By Organization Type- This list identifies all of the codes that were assigned to each individual piece of correspondence and is arranged by organization type. Individual commenters are also included in this report and are identified as Unaffiliated Individuals.

Index by Code- This table lists which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

CONTENT ANALYSIS REPORT

Summary of Issue Topics, Codes, and Number of Comments Received

Code	Description	# of Comments
AL4000	Alternatives: New Alternatives Or Elements	8
BHS1000	Sierra Nevada Bighorn Sheep: Impacts from proposed action	12
BHS2000	Sierra Nevada Bighorn Sheep: Available information and studies	12
BHS3000	Sierra Nevada Bighorn Sheep: Affected Environment	1
BHS4000	Sierra Nevada Bighorn Sheep: Status of Species	1
CT1000	Cost of the proposal	1
PN1000	Purpose And Need: Planning Process And Policy	1
PN8000	Purpose And Need: Objectives In Taking Action	12
PO5000	Park Operations: Impacts	1
WI1000	Wilderness: Guiding Policies, Regs, Laws	2
WI4000	Wilderness: Impact of Proposal and Alternatives	2
Total		47

PUBLIC SCOPING COMMENT SUMMARY

AL4000 Alternatives: New Alternatives Or Elements

Correspondence Id: 3 **Comment Id:** 144534 **Coder's Initials:** NH

Comment Text: Your EIS process should begin by carefully examining alternatives for obtaining needed information without the need for harmful net-gun capture methods. This could include, but not be limited to, placing observers in key locations to study interactions between SNBS and recreational users, as well as applying existing habitat models to the meadows of SEKI to determine if they are suitable habitat for the SNBS.

Organization: High Sierra Hikers Association

Correspondence Id: 5 **Comment Id:** 144851 **Coder's Initials:** NH

Comment Text: You should close the entire bighorn summer range to all recreational users for a period of 4-5 years, and monitor the sheep to see where they like to be AFTER they have become accustomed to having the mountains to themselves again. Then you would be able to declare where the sheep really like to be, where are their most preferred habitats, etc., and you can then close those preferred places to competing uses such as horses, mules, dogs, etc.

Correspondence Id: 4 Comment Id: 144561 Coder's Initials: NH

Comment Text: Direct observation of habitat utilization by bighorn sheep, backpackers, and packstock could preclude the need to capture/collar bighorn sheep for a study.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144560 Coder's Initials: NH

Comment Text: Existing habitat models could be overlaid with SEKI meadows to predict/determine the suitability of SEKI's meadows as habitat for the Sierra Nevada bighorn sheep. This could provide a scientifically valid means of meeting management objectives without any need for capture/collaring of helicopter overflights of wilderness.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144558 Coder's Initials: NH

Comment Text: Consider alternatives for gathering any needed information about the critically endangered Sierra Nevada bighorn sheep without the need for invasive, harmful capture methods or intrusive helicopter operations.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144554 Coder's Initials: NH

Comment Text: If information on the use of these meadows and other habitats is necessary to administering the Wilderness, then those who undertake the project should be prepared to spend a season in the wilderness monitoring the meadows and observing the habitat use by the bighorns. The information gained is likely to be more useful than remote sensing, since remote sensing won't provide any information as to why bighorns may or may not be using specific areas (i.e. avoiding human visitors, predators, etc.). Collecting information without the use of mechanized transport of equipment appears to be the option that meets the agency's "minimum tool" test.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144551 Coder's Initials: NH

Comment Text: The existing models may be adequate to manage competing uses of the SEKI Wilderness. A "No Action" alternative which uses the existing models must be truthfully evaluated, clearly disclosed, and fully considered in a public NEPA process.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144547 Coder's Initials: NH

Comment Text: Determining whether the use of meadows and other habitats by packstock or backpackers limits use by bighorn sheep can be accomplished without invasive capture methods and the deployment of telemetry/GPS collars. For example, a study by Hicks and Elder (1979)

used direct observation, pellet transects, and hiker interviews to assess overlap in areas of use and nature of interactions between bighorn sheep and recreationists.

Organization: Wilderness Watch

BHS1000 Sierra Nevada Bighorn Sheep: Impacts from proposed action

Correspondence Id: 3 **Comment Id:** 144528 **Coder's Initials:** NH

Comment Text: The HSHA is concerned that the helicopter "net-gun" capture method has been shown to harm (even kill) bighorn sheep.

Organization: High Sierra Hikers Association

Correspondence Id: 4 **Comment Id:** 144563 **Coder's Initials:** NH

Comment Text: The Recovery Plan cautions that stand-alone collaring projects would be harmful, due to direct "major disturbance," and may cause sub-lethal effects such as winter range avoidance, and it notes that such unnecessary collaring projects "may trade off population recovery for easier and better information." SEKI should heed this warning and refrain from any action(s) that could risk, delay, or otherwise impede population recovery due to its desire for easier and better information.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144556 **Coder's Initials:** NH

Comment Text: Evaluate and disclose the environmental consequences, including direct, indirect, and cumulative effects to the critically endangered Sierra Nevada bighorn sheep.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144555 **Coder's Initials:** NH

Comment Text: The mere presence of helicopters (even without capture activities) can have significant adverse affects on bighorn sheep. One study (Stockwell et al. 1991) found that bighorn sheep were sensitive to disturbance by helicopters during winter and-experienced a 43 percent reduction in foraging efficiency. Numerous other studies have also found that mountain sheep are dramatically affected by helicopter disturbance. See, for example, Bleich et al. (1990, 1994), and Frid (2003).

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144543 **Coder's Initials:** NH

Comment Text: The bighorn sheep---after being substantially harassed, frightened, and stressed by numerous helicopter net-gun assaults within their winter range--may avoid portions of crucial winter habitats in the future. The official Recovery Plan/or the Sierra Nevada Bighorn Sheep (USFWS 2007) acknowledges that such capturing of Sierra bighorn is certain to cause "major disturbance" and may cause "winter range avoidance."

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144542 Coder's Initials: NH

Comment Text: Kock et al. (1987b) documented some of the impacts of capture on the long-term survival of bighorn sheep. They concluded that net-gun capture "may not be associated with the best long-term survival in some bighorn sheep," and noted differences in biochemical parameters among older-aged males, young males, and females, suggesting a potential age effect on capture-related stress and subsequent mortality.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144541 Coder's Initials: NH

Comment Text: Capture may alter individual (and/or herd) behavior, and may affect reproduction, social status (dominance), and other life history traits.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144540 Coder's Initials: NH

Comment Text: Bighorn sheep are easily stressed, and have been documented to be susceptible to a condition called "capture myopathy" when handled (see, for example, Bunch et al. 1999). Capture myopathy is a non-infectious disease characterized by serious damage to muscle tissues due to physiological changes following extreme exertion, struggle, and/or stress. In one study, Kock et al. (1987b) documented capture myopathy (CM) in bighorn sheep captured via the net-gun method, and concluded that net-gunning appears to have the potential to cause some post-capture CM mortality."

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144539 Coder's Initials: NH

Comment Text: Bighorn sheep can overheat when chased by helicopters, and/or be injured while being restrained, tied up, processed, or released. Kock et al. (1987a) found that at least 17 of 137 bighorn sheep subjected to net-gun capture were, either killed or directly "compromised" by the procedure.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144538 Coder's Initials: NH

Comment Text: Bighorn sheep can be--and have been--chased by helicopters into steep or otherwise treacherous terrain where they can fall and be accidentally injured or killed.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144537 Coder's Initials: NH

Comment Text: The net-gun capture process is very invasive, and includes many steps that are potentially harmful (or fatal) to bighorn sheep.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144536 **Coder's Initials:** NH

Comment Text: Since fewer than 400 of these animals remain alive, capturing forty of them would result in the harassment, harm; and/or death of a significant proportion of the remaining population.

Organization: Wilderness Watch

BHS2000 Sierra Nevada Bighorn Sheep: Available information and studies

Correspondence Id: 3 **Comment Id:** 144531 **Coder's Initials:** NH

Comment Text: Two prior studies on the extent of human disturbance of the SNBS were funded by the Park Service in 1976, each of which resulted in an M.S. Thesis at the University of Michigan. Both provided strong cautions about large packstock groups in SNBS range based on their observations. (James Elder, "Human Interaction with Sierra Nevada Bighorn Sheep: The Mt. Baxter Herd," 1977)

Organization: High Sierra Hikers Association

Correspondence Id: 5 **Comment Id:** 144861 **Coder's Initials:** NH

Comment Text: The bighorn tend to avoid places that are used by horses, dogs, and humans.

Correspondence Id: 4 **Comment Id:** 144555 **Coder's Initials:** NH

Comment Text: The mere presence of helicopters (even without capture activities) can have significant adverse affects on bighorn sheep. One study (Stockwell et al. 1991) found that bighorn sheep were sensitive to disturbance by helicopters during winter and-experienced a 43 percent reduction in foraging efficiency. Numerous other studies have also found that mountain sheep are dramatically affected by helicopter disturbance. See, for example, Bleich et al. (1990, 1994), and Frid (2003).

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144550 **Coder's Initials:** NH

Comment Text: The third stated objective of the study is to develop a resource selection function model to predict the relative probability of use of various habitats by bighorn sheep, including those areas used by packstock and backpackers. It is our understanding that adequate habitat suitability models may already exist for the Sierra Nevada bighorn sheep. The Recovery Plan suggests that models were already being developed in 2007: "A spatial model of bighorn sheep habitat suitability in the Sierra Nevada is in preparation ..." (USFWS 2007).

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144545 **Coder's Initials:** NH

Comment Text: The Recovery Plan explicitly favors the incremental addition of telemetry collars to the Sierra Nevada bighorn sheep population during translocation projects (i.e. when sheep are already being captured for another purpose, as opposed to conducting stand-alone collaring projects, as SEKI proposes here). The Recovery Plan cautions that stand-alone

collaring projects would be harmful, due to direct "major disturbance," and may cause sub-lethal effects such as winter range avoidance, and it notes that such unnecessary collaring projects "may trade off population recovery for easier and better information." SEKI should heed this warning and refrain from any action(s) that could risk, delay, or otherwise impede population recovery due to its desire for easier and better information.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144544 **Coder's Initials:** NH

Comment Text: The proposed project conflicts with the Recovery Plan (USFWS 2007). The Recovery Plan "calls for the monitoring of habitat use patterns only relative to winter ranges." Thus, the Recovery Plan clearly anticipated that Sierra Nevada bighorn sheep would not be subjected to the dangers of capture/collaring to facilitate the monitoring of summer habitats (as is proposed here by SEKI); the Recovery Plan clearly acknowledges the potential harm of doing so.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144543 **Coder's Initials:** NH

Comment Text: The bighorn sheep---after being substantially harassed, frightened, and stressed by numerous helicopter net-gun assaults within their winter range--may avoid portions of crucial winter habitats in the future. The official Recovery Plan/or the Sierra Nevada Bighorn Sheep (USFWS 2007) acknowledges that such capturing of Sierra bighorn is certain to cause "major disturbance" and may cause "winter range avoidance."

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144542 **Coder's Initials:** NH

Comment Text: Kock et al. (1987b) documented some of the impacts of capture on the long-term survival of bighorn sheep. They concluded that net-gun capture "may not be associated with the best long-term survival in some bighorn sheep," and noted differences in biochemical parameters among older-aged males, young males, and females, suggesting a potential age effect on capture-related stress and subsequent mortality.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144540 **Coder's Initials:** NH

Comment Text: Bighorn sheep are easily stressed, and have been documented to be susceptible to a condition called "capture myopathy" when handled (see, for example, Bunch et al. 1999). Capture myopathy is a non-infectious disease characterized by serious damage to muscle tissues due to physiological changes following extreme exertion, struggle, and/or stress. In one study, Kock et al. (1987b) documented capture myopathy (CM) in bighorn sheep captured via the net-gun method, and concluded that net-gunning appears to have the potential to cause some post-capture CM mortality."

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144539 **Coder's Initials:** NH

Comment Text: Bighorn sheep can overheat when chased by helicopters, and/or be injured while being restrained, tied up, processed, or released. Kock et al. (1987a) found that at least 17 of 137 bighorn sheep subjected to net-gun capture were, either killed or directly "compromised" by the procedure.

Organization: Wilderness Watch

Correspondence Id: 3 **Comment Id:** 144535 **Coder's Initials:** NH

Comment Text: If helicopters and net-gun capture are to be considered, your EIS should compile, carefully evaluate, and fully disclose all records documenting mortality and/or injury during past bighorn sheep capture operations. It is our understanding that the California Department of Fish and Game has records of capture outcomes dating back many years.

Organization: High Sierra Hikers Association

Correspondence Id: 3 **Comment Id:** 144532 **Coder's Initials:** NH

Comment Text: See also: Lorin Hicks, "Human Disturbance of the Mt. Baxter Herd of Sierra Nevada Bighorn Sheep," 1977.

Organization: High Sierra Hikers Association

BHS3000 Sierra Nevada Bighorn Sheep: Affected Environment

Correspondence Id: 1 **Comment Id:** 142750 **Coder's Initials:** NH

Comment Text: What I can't understand is your concern for an animal whose population in the late 1990's was about 100 animals and today numbers about 370 animals. That seems like an excellent comeback to me.

BHS4000 Sierra Nevada Bighorn Sheep: Status of Species

Correspondence Id: 1 **Comment Id:** 142751 **Coder's Initials:** NH

Comment Text: You already have a recovery goal based on an adult female population of 305 animals and your current estimate of adult females is below 200. At their current growth rate they should easily surpass your recovery goal within 5 years without any changes in the human interaction with the existing herds.

CT1000 Cost of the proposal

Correspondence Id: 1 **Comment Id:** 142753 **Coder's Initials:** NH

Comment Text: We can't afford expensive studies in our current economic situation.

PN1000 Purpose And Need: Planning Process And Policy

Correspondence Id: 4 **Comment Id:** 144562 **Coder's Initials:** NH

Comment Text: A joint environmental impact statement and environmental impact report (joint EIS/EIR) be prepared. The regulations for both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) call for the preparation of joint environmental documents for joint federal/state projects. Joint documents streamline the environmental review process, better facilitate public involvement, and ensure that decision-makers have access to the best-available and most complete information regarding alternatives, environmental consequences, and mitigation measures.

Organization: Wilderness Watch

PN8000 Purpose And Need: Objectives In Taking Action

Correspondence Id: 1 **Comment Id:** 142749 **Coder's Initials:** NH

Comment Text: Why go through this nonsense of accepting comments and going through the development of a resource selection function model that will only say exactly what you already want it to say, that you must restrict backpackers (humans) and their pack stock from these meadows.

Correspondence Id: 1 **Comment Id:** 142752 **Coder's Initials:** NH

Comment Text: Don't go to the trouble and expense to capture and collar 40 of the animals. Just tell us what you want to do and move on.

Correspondence Id: 1 **Comment Id:** 142755 **Coder's Initials:** NH

Comment Text: You have obviously determined that bighorn sheep can more effectively use meadows within Sequoia and Kings Canyon National Parks if they don't have to compete with pack stock and backpackers.

Correspondence Id: 3 **Comment Id:** 144529 **Coder's Initials:** NH

Comment Text: We request that you articulate specifically how your agency intends to use the data. The risk of injury and death to endangered SNBS would not seem warranted unless the data are essential for some management purpose.

Organization: High Sierra Hikers Association

Correspondence Id: 3 **Comment Id:** 144530 **Coder's Initials:** NH

Comment Text: The Park Service should articulate how it intends to use the new data, and conduct a public EIS process to evaluate the merits of the proposed study and consider alternatives, before endangered SNBS are subjected to harmful net-gun capture.

Organization: High Sierra Hikers Association

Correspondence Id: 3 Comment Id: 144533 Coder's Initials: NH

Comment Text: While tracking of SNBS using telemetry and/or GPS may provide relatively easy and better information about where the SNBS go (and don't go), how would this study determine why SNBS avoid certain places? As previous studies have shown, the SNBS may avoid many preferred locations due to encounters with packstock, or even the memory of encounters with packstock. In other words, just because SNBS may be found to avoid a certain meadow, it does not mean that they wouldn't use that habitat if packstock were prohibited, as suggested by researchers more than thirty years ago.

Organization: High Sierra Hikers Association

Correspondence Id: 4 Comment Id: 144544 Coder's Initials: NH

Comment Text: The proposed project conflicts with the Recovery Plan (USFWS 2007). The Recovery Plan "calls for the monitoring of habitat use patterns only relative to winter ranges." Thus, the Recovery Plan clearly anticipated that Sierra Nevada bighorn sheep would not be subjected to the dangers of capture/collaring to facilitate the monitoring of summer habitats (as is proposed here by SEKI); the Recovery Plan clearly acknowledges the potential harm of doing so.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144546 Coder's Initials: NH

Comment Text: The stated objectives include such things as determining whether packstock or backpackers affect the selection and use of meadow habitats in SEKI, yet the only proposed action is to capture and collar endangered sheep. Simply collaring and tracking the movements of bighorn sheep cannot, by itself, provide information that would help answer such questions.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144548 Coder's Initials: NH

Comment Text: If bighorn sheep avoid or make limited use of certain meadows, it would not be possible without extensive direct observations (and/or GPS beacons on all stock/hiker groups who visit certain areas) to determine why the sheep are avoiding or limiting use of an area. SEKI cannot infer or conclude that a meadow (or other habitat) is unsuitable or non-preferred simply because bighorn sheep don't (or rarely) go there. The bighorn sheep may avoid many places because of direct encounters--or even the experience of past encounters--with packstock or backpackers.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144549 Coder's Initials: NH

Comment Text: SEKI should at minimum: 1) articulate the specific research questions to be addressed; 2) design a study(ies) based on the principles of scientific experimentation that is/are capable of answering the research questions; and 3) obtain scientific peer review of the research design from multiple (at least three or four) external and unaffiliated scientists. The peer review

comments should be made public, and the peer review of the research design should be completed before your staff develops alternatives for a public NEPA process.

Organization: Wilderness Watch

Correspondence Id: 5 **Comment Id:** 144850 **Coder's Initials:** NH

Comment Text: Don't you think the bighorn are avoiding many preferable places because of all the horses, dogs, humans, helicopters, etc.? How are you going to determine WHY the bighorn sheep avoid certain places?

Correspondence Id: 5 **Comment Id:** 144862 **Coder's Initials:** NH

Comment Text: If you're going to harass & kill endangered bighorn, at least you design the best possible study and disclose the many serious impacts before doing so.

PO5000 Park Operations: Impacts

Correspondence Id: 1 **Comment Id:** 142754 **Coder's Initials:** NH

Comment Text: If impacts to bighorn sheep from backpackers and stock are found, would you prohibit access to these areas by your own staff?

WI1000 Wilderness: Guiding Policies, Regs, Laws

Correspondence Id: 4 **Comment Id:** 144552 **Coder's Initials:** NH

Comment Text: The Wilderness Act prohibits the use or landing of aircraft (i.e., helicopters) in wilderness except in emergencies, rescue operations, and as necessary to meet the minimum requirements for the administration of the area to protect its wilderness character. SEKI has not shown, and must make a credible showing before allowing the use of aircraft within the SEKI Wilderness, that this project is necessary for this purpose or that the minimum requirements for the administration of the area cannot be met in any other way.

Organization: Wilderness Watch

Correspondence Id: 4 **Comment Id:** 144559 **Coder's Initials:** NH

Comment Text: Consider only alternatives that are consistent with the requirements of the Wilderness Act.

Organization: Wilderness Watch

WI4000 Wilderness: Impact of Proposal and Alternatives

Correspondence Id: 4 **Comment Id:** 144553 **Coder's Initials:** NH

Comment Text: Helicopters intrude on the primitive character of wilderness, and significantly detract from the "wilderness experience" of visitors. Helicopters shatter the natural quiet and destroy solitude. These are significant adverse effects that must be acknowledged and disclosed in a public NEPA process.

Organization: Wilderness Watch

Correspondence Id: 4 Comment Id: 144557 Coder's Initials: NH

Comment Text: Evaluate and disclose the environmental consequences, including direct, indirect, and cumulative effects to the wilderness character of the SEKI Wilderness and adjacent wilderness areas on National Forest System lands.

Organization: Wilderness Watch

INDEX BY ORGANIZATION TYPE

Conservation/Preservation

High Sierra Hikers Association - 3; AL4000 - Alternatives: New Alternatives Or Elements. BHS1000 - Sierra Nevada Bighorn Sheep: Impacts from proposed action. BHS2000 - Sierra Nevada Bighorn Sheep: Available information and studies. PN8000 - Purpose And Need: Objectives In Taking Action.

Wilderness Watch - 4; AL4000 - Alternatives: New Alternatives or Elements. BHS1000 - Sierra Nevada Bighorn Sheep: Impacts from proposed action. BHS2000 - Sierra Nevada Bighorn Sheep: Available information and studies. PN1000 - Purpose and Need: Planning Process and Policy. PN8000 - Purpose and Need: Objectives in Taking Action. WI1000 - Wilderness: Guiding Policies, Regs, Laws. WI4000 - Wilderness: Impact of Proposal and Alternatives.

Unaffiliated Individual

N/A - 1; BHS3000 - Sierra Nevada Bighorn Sheep: Affected Environment. BHS4000 - Sierra Nevada Bighorn Sheep: Status of Species. CT1000 - Cost of the proposal. PN8000 - Purpose and Need: Objectives in Taking Action. PO5000 - Park Operations: Impacts. 5; AL4000 - Alternatives: New Alternatives or Elements. BHS2000 - Sierra Nevada Bighorn Sheep: Available information and studies. PN8000 - Purpose and Need: Objectives in Taking Action.

INDEX BY CODE

AL4000 - Alternatives: New Alternatives Or Elements

High Sierra Hikers Association - 3

Wilderness Watch - 4

N/A - 5

BHS1000 - Sierra Nevada Bighorn Sheep: Impacts from proposed action

High Sierra Hikers Association - 3

Wilderness Watch - 4

BHS2000 - Sierra Nevada Bighorn Sheep: Available information and studies

High Sierra Hikers Association - 3

Wilderness Watch - 4

N/A - 5

BHS3000 - Sierra Nevada Bighorn Sheep: Affected Environment

N/A - 1

BHS4000 - Sierra Nevada Bighorn Sheep: Status of Species

N/A - 1

CT1000 - Cost of the proposal

N/A - 1

PN1000 - Purpose And Need: Planning Process And Policy

Wilderness Watch - 4

PN8000 - Purpose And Need: Objectives In Taking Action

High Sierra Hikers Association - 3

Wilderness Watch - 4

N/A - 1 , 5

PO5000 - Park Operations: Impacts

N/A - 1

WI1000 - Wilderness: Guiding Policies, Regs, Laws

Wilderness Watch - 4

WI4000 - Wilderness: Impact of Proposal and Alternatives

Wilderness Watch - 4

OTHER INFORMATION

Comment distribution by State

State	Percentage	# of Correspondences
UN	20%	1
CA	60%	3
MT	20%	1
Total		5