

Declaration of Kathleen L. Cadigan

I have personal knowledge of the matters set forth herein and if called to testify I could and would testify competently thereto.

1. I am a Wildlife Biologist for the Bureau of Land Management (BLM), Winnemucca District (WD), Black Rock Field Office (BRFO). I have been in this position since July of 2012.
2. I graduated from University of Nevada – Reno in 2012 where I earned a Bachelor of Science (B.S.) degree with a dual major in Wildlife Ecology & Conservation and in Biology.
3. I am experienced in Northern Nevada Wildlife Biology.

Bilk Creek Allotment

4. The Bilk Creek Allotment does not contain Occupied or Potential Bighorn Habitat according to the Bureau of Land Management (BLM) 2012 Bighorn Sheep Habitat GIS Layer. This GIS layer was obtained from the Nevada Department of Wildlife (NDOW).
5. The closest occupied bighorn sheep habitat to the Bilk Creek Allotment, according to the BLM 2012 Bighorn Sheep Habitat GIS Layer, (Winnemucca District) obtained from the NDOW, are within:
 - a. Trout Creek Mountains approximately 3 miles North East of the Bilk Creek Allotment
 - b. Montana Mountains approximately 9 miles East of the Bilk Creek Allotment
 - c. Double H Mountains approximately 10 miles East of the Bilk Creek Allotment
 - d. Jackson Mountains approximately 9 miles South of the Bilk Creek Allotment
 - e. Pine Forest Range approximately 7 miles West of the Bilk Creek Allotment
6. I have reviewed the “Nevada Bighorn Sheep Occupied Habitat and Domestic Sheep Grazing Allotments 2011 Map created 4/5/2012 by Karla Mayne, Lara Juliusson, Anthony Titolo, and Frank Quaman”, which was cited by appellant Western Watersheds Project in its motion for summary judgment. According to this map, the Bilk Creek Allotment contains the following:
 - a. “Bighorn Sheep Occupied Habitat”
 - b. “Areas of overlap between Bighorn Sheep Occupied Habitat and Billed BLM domestic sheep/goat grazing”

- c. "Sheep or Goat Use within All or Part of Allotment/Pasture (Includes Trailing Type Use)"
 - d. "Sheep or Goat Use within All or Part of Allotment/Pasture (Does Not Include Trailing Type Use)"
7. It is my professional opinion that the BLM 2012 Bighorn Sheep Habitat GIS Layer, obtained from NDOW is more accurate than the "Nevada Bighorn Sheep Occupied Habitat and Domestic Sheep Grazing Allotments 2011 Map created 4/5/2012 by Karla Mayne, Lara Juliusson, Anthony Titolo, and Frank Quaman".
8. I have been in contact with the NDOW, which is responsible for managing wildlife populations in Nevada. According to NDOW, the last documented occurrence of a bighorn sheep within the Bilk Creek Allotment was in 1987. An ewe was transplanted from the Granite Mountains into the Trout Creek Mountains and the ewe then entered the Bilk Creek Allotment. NDOW was informed about the ewe and subsequently removed it from the Bilk Creek Allotment.
9. According to NDOW, there is a 2006 Memorandum of Agreement (MOA) between NDOW, Nevada Department of Agriculture, and the Woolgrowers Association that NDOW uses as its guiding document when Domestic Sheep and Bighorn Sheep make contact in Nevada. The MOA contains protocols in the event of contact between domestic sheep and bighorn sheep, which include landowner contact and separation to prevent further contact.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 15th day of May 2014 in Winnemucca, Nevada.



Kathleen L. Cadigan

1 **CERTIFICATE OF SERVICE**

2
3 RE: Western Watersheds Project vs. Bureau of Land Management; N2-2014-01
4 Bilk Creek Allotment

5 I, the undersigned, declare that:

6 I am a citizen of the United States, over the age of eighteen, and not a part of this
7 litigation. On May 15, 2014, I served the

8 **"BLM CROSS-MOTION FOR SUMMARY JUDGMENT"**

9 by placing a true copy enclosed in a sealed envelope via U.S. Postal Service certified mail and
10 facsimile at Sacramento, California, addressed as follows:

11 U.S. Department of the Interior
12 Office of Hearings and Appeals
13 Departmental Hearings Division
14 351 South West Temple, Suite 6.300
15 Salt Lake City, Utah 84101
16 Fax: 801-524-5539

17 Kenneth Cole
18 Western Watersheds Project
19 P.O. Box 2863
20 Boise, Idaho 83701
21 Fax: 208-475-4702

22 by placing a true copy enclosed in a sealed envelope via U.S. Postal Service certified mail
23 at Sacramento, California, addressed as follows:

24 Mr. Alex Dufurrena
25 dba Dufurrena Sheep Company
26 397 Denio Highway
27 Winnemucca, Nevada 89445

28 John M. Doyle, Esq.
Doyle Law Firm
P.O. Box 1190
Winnemucca, NV 89446

I certify under penalty of perjury that the foregoing is true and correct. Executed on the
15th day of May 2014, at Sacramento, California.


James L. Hines
Administrative Assistant