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May 24, 2012

The Honorable Michael K. Simpson
Chairman, House Interior and Environment Appropriations Sub-Committee
United States House of Representatives
2312 Rayburn House Office Building
Washington, D.C. 20515

**Re: Section 431, FY 2012 Department of Interior, Environment, and Related Agencies
Appropriations Act**

Dear Representative Simpson:

On behalf of 23 fish and wildlife management agencies in the western United States and Canada, the Western Association of Fish and Wildlife Agencies (WAFWA) respectfully submits this letter concerning Section 431 of the FY 2012 Department of Interior, Environment, and Related Agencies Appropriations Act. While we recognize and appreciate your efforts to seek a reasonable compromise to the extremely contentious issue of domestic and wild sheep interaction, we are gravely concerned about the current and long-term implications of Section 431 on wild sheep populations throughout the western United States.

As directors of the western state agencies charged with management of the public's wildlife resources that includes all wild sheep throughout North America, we are familiar with controversy. We believe that public participation, including a wide range of opinions in a collaborative process, is essential to resolve conflicting demands. However, for collaborative processes to work, all parties must believe that the decisions reached through the process can and will be implemented. As presented in our letter of July 28, 2011 (attached), we believe collaborative processes have suffered as a result of Section 431 and will continue to do so, if this section remains in place for FY 2013 or beyond.

Scientific, critical analyses of proposed management actions on federal land are conducted through the National Environmental Policy Act (NEPA) process, which we believe is vital to effective conservation, communication, collaboration and accountability among diverse stakeholders. The Record of Decision for the Final Supplemental Environmental Impact Statement and Forest Plan Amendment concerning domestic sheep grazing and bighorn sheep management on the Payette National Forest, was duly-rendered and based on a 7-year NEPA

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analysis that included some of the most comprehensive and quantitative risk assessment ever conducted. These efforts have now been undermined by Section 431.

Strategies such as Section 431 that are intended to address a problem in one specific area (i.e., Payette National Forest in Idaho), cannot be applied across all federal lands without adverse consequences to wildlife populations and collaborative processes in other areas. One unforeseen and unfortunate impact of Section 431 is that it imposes serious limitations to management of domestic sheep and wild sheep in different situations across all western states, including those where separation is necessary to protect soil, vegetation, and other range resources.

While we appreciate your efforts to minimize impacts to livestock producers pending development of a vaccine or some other new technology to prevent disease outbreaks following contact between domestic sheep and wild sheep, we do not believe that more practical action should be deferred in the hope of a scientific breakthrough because the field applications of new technologies could well be more than a decade away. Rather, we recommend implementing spatial and/or temporal separation strategies while continuing to collaboratively support and pursue vaccine research and other management tools, as they become available.

Accordingly, as custodians of public wildlife resources within our respective jurisdictions, we respectfully request that Section 431 be removed from future appropriation acts in the best interest of a cooperative spirit and common sense approach towards resolving these important issues. Once again, WAFWA stands ready to offer our collective experience and assistance toward developing acceptable solutions.

We appreciate and look forward to hearing from you on this vitally important matter.

Sincerely,

A handwritten signature in black ink that reads "Paul J. Conry". The signature is written in a cursive, flowing style.

Paul J. Conry
WAFWA President

Attachments: (1)

cc: WAFWA Directors
The U.S. House of Representatives Appropriations Committee (Full)
The U.S. Senate Appropriations Committee (Full)
Ron Regan, Executive Director, AFWA