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September 25, 2009

Ms. Susanna Henry
U.S. Fish and Wildlife Service
Manager, Kofa National Wildlife Refuge
9300 E. 28th Street
Yuma, AZ 85365

Dear Ms. Henry:

On behalf of 23 state, provincial, and territorial fish and wildlife member agencies in the western United States and Canada, the Western Association of Fish and Wildlife Agencies' (WAFWA) Wild Sheep Working Group has reviewed the USFWS' (Service) Draft Environmental Assessment (Draft EA) for Limiting Mountain Lion Predation on Desert Bighorn Sheep on the Kofa National Wildlife Refuge (Kofa NWR), released to the public on August 4, 2009. With 19 of our 23 jurisdictions managing a wild sheep resource, our agency personnel are well versed in the interaction and predator/prey relationship between mountain lions and mountain sheep.

WAFWA commends the Service for pursuing options to manage mountain lion predation that is negatively affecting the desert bighorn sheep population on the Kofa NWR. We understand and appreciate the regional importance of the Kofa NWR desert bighorn sheep herd, which has been a source for desert sheep translocations throughout the Southwest since 1957. Throughout the Draft EA, it is repeatedly stated that conservation and management of desert bighorn sheep was the primary reason Kofa NWR was established 70 years ago. Given the status of desert bighorn sheep in seven southwestern states – Arizona, California, New Mexico, Utah, Nevada, Colorado, and Texas – it is anticipated that the need for robust, healthy source herds for future translocations will continue, and we collectively view the Kofa NWR as an important historic and future source for desert bighorn sheep.

Desert bighorn sheep recovery will ensure long-term population viability in the face of increasing human encroachment, allow the resumption of translocations of desert sheep from the Kofa NWR to support declining populations across the state and throughout the Southwest, and reduce the likelihood that this desert bighorn sheep population will need to be listed as either a state- or federally-protected threatened or endangered species in the future.

As we understand, the purpose of the proposed action is to provide the Service with additional options for management of the Kofa NWR desert bighorn sheep population by allowing the Service to limit predation by mountain lions. Under Alternative B (Proposed Action), this would include the removal of “offending” lions by either lethal means or through translocation. Alternative B is acknowledged to be the most costly alternative, involving capture, radio-

collaring, monitoring, and if warranted, subsequent removal of “offending” mountain lions, after they have been found to have killed desert bighorns. Data cited in the Draft EA indicate that virtually every mountain lion known to occupy portions of the Kofa NWR has, in fact, killed desert bighorn sheep.

Alternative C is depicted as “indiscriminate” killing of mountain lions, with concerns expressed that “non-offending” lions could also be removed under this alternative. However, it is stated (page 37) “...*Alternative C would be the most effective and cost-efficient way to remove mountain lions...*” and “...*removal of mountain lions under this alternative would likely have the same or slightly better effect on the bighorn sheep population than under Alternative B.*” Even if Alternative C was adopted fully, it is our collective opinion that mountain lions would not be eradicated from the Kofa NWR (one of the stated objectives), for the reasons stated in Section 2.0 – Background and Resource Issues.

One of WAFWA’s member agencies – the New Mexico Department of Game and Fish (NMDGF) – has considerable experience managing mountain lion predation to benefit desert bighorn sheep. Since implementing an aggressive mountain lion control program eight years ago, New Mexico’s wild desert bighorn sheep population increased from <170 to >450 individuals, leading to the New Mexico Game and Fish Commission’s December 4, 2008, down-listing of desert bighorn from state endangered to state threatened. We are aware that NMDGF intends to continue mountain lion management efforts to further increase statewide desert bighorn sheep numbers, so they may be completely delisted in the near future. We understand NMDGF will be separately submitting comments and suggestions on the Kofa NWR Draft EA, based on their experience in New Mexico.

Considering the alternatives described in the Draft EA and our understanding and concern for the desert bighorn sheep herd on the Kofa NWR, WAFWA supports Alternative B as a minimum strategy to be adopted. However, we also see enhanced benefits to desert bighorn sheep population management by adopting some facets of Alternative C.

We believe Alternative B calling for limited removal of mountain lions should help the Kofa NWR desert bighorn sheep herd increase somewhat, toward historic population levels. We further believe Alternative C would expedite that population increase. Again, this is more consistent with the primary purpose for establishment of the Kofa NWR (i.e. conservation and management of desert bighorn sheep).

We are aware that NEPA-deciding officials have the ability and flexibility to adopt facets of multiple alternatives, to create new, “hybrid” alternatives. In this case, WAFWA’s Wild Sheep Working Group recommends the Service consider adopting an adaptive, phased approach to mountain lion removal, depending on desert bighorn sheep population demographics and response (e.g. population size, timelines, growth rate, yearling bighorn recruitment, etc.). We truly see an alternative midway between Alternatives B and C, where mountain lion removal is actively emphasized to enhance desert bighorn sheep numbers and population performance, while continuing to have some limited mountain lion occupancy on the Kofa NWR.

Susanna Henry
Manager, Kofa National Wildlife Refuge
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We believe that either Alternative B or C, as described, can help the Service and the Arizona Game and Fish Department reach their desert bighorn sheep population goals, although timelines to achieve those demographic goals would differ considerably, depending on the alternative selected.

We understand this issue is controversial, but we also believe that taking an active role in managing mountain lion predation, as well as other potential impacts, is critical to recover the desert bighorn sheep population on the Kofa NWR to historic and desired population levels.

WAFWA appreciates the opportunity to review and comment on this Draft EA. We offer our collective expertise to the Service in implementation of provisions proposed in this document and in future management of desert bighorn sheep on the Kofa NWR.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. S. Lloyd".

Denby S. Lloyd
WAFWA President

cc: WAFWA Directors
WAFWA Secretary Larry Kruckenberg
WAFWA Wild Sheep Working Group Chair Kevin Hurley
WAFWA Wild Sheep Working Group