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July 21, 2009

Honorable Governor C.L. "Butch" Otter
Office of the Governor
P.O. Box 83720
Boise, ID 83720

Chairman Dr. Wayne Wright
Idaho Fish and Game Commission
2664 E 2700 N
Twin Falls, ID 83301

Dear Governor Otter and Chairman Wright:

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 Idaho Senate Bill 1232, as amended, which was signed into law on May 7, 2009. With 19 of our 23 jurisdictions managing a wild sheep resource, WAFWA agency directors are very familiar with the long-standing controversy over interaction between wild sheep and domestic sheep and goats. In our collective view, Senate Bill 1232a places the Director of the Idaho Fish and Game Department (IDFG) in the very untenable position of having to certify that the risk of disease transmission between bighorn and domestic sheep is acceptable.

Over the past 30+ years, there is a growing body of evidence indicating that contact between the two species frequently leads to mortality of wild sheep. Senate Bill 1232a mandates that the IDFG Director must ignore the existing scientific knowledge that shows wild and domestic sheep are largely incompatible. Both of you, along with many others throughout the West, are well aware of the recent controversy involving comments from Dr. Marie Bulgin, Director of the University of Idaho's Caine Veterinary Teaching Center. Dr. Bulgin has denied Caine Center research findings from over 15 years ago that documented transmission of *Pasteurella* spp. bacteria from domestic sheep to wild sheep. It is our collective opinion that the strength of the evidence from Idaho, and elsewhere, is too substantial to come to any other conclusion. Legislation which mandates the IDFG Director to certify that risk of contact is acceptable and ignore existing scientific information does not reflect well on the State of Idaho, and does not aid in development of management practices to reduce contact.

WAFWA supports and encourages collaborative efforts from agencies and stakeholders to develop Best Management Practices (BMPs) and other measures to minimize the risk of contact between domestic and wild sheep. In fact, the WAFWA Wild Sheep Working Group authored, and the WAFWA directors endorsed, a 27-page report in July 2007 (*Recommendations for Management of Domestic Sheep and Goats in Wild Sheep Habitats* - attached) that recommended a number of management practices designed to increase the likelihood of effective temporal and spatial separation to help reduce the risk of bighorn/domestic sheep interaction. Nevertheless, we also acknowledged that in some cases, maintaining separation between wild and domestic sheep cannot be assured.

We believe the 90-day window for bi-lateral development of BMPs by IDFG and domestic sheep grazing permittees is far too short a time frame to accomplish any meaningful progress in meeting the intent of Senate Bill 1232a. In fact, we are aware of a parallel science and stakeholder effort (Baumer et al. 2009 - attached) in the Sierra Nevada range in California that involved numerous participants and diverse opinions; their planned six-month effort ultimately took almost three years to complete. Their process included an in-depth risk assessment, along with the identification of 21 BMPs primarily designed to reduce straying by domestic sheep. However, consensus on the definition of "acceptable risk" could not be reached. In those instances where BMPs were judged to be ineffective at accomplishing separation, it was agreed upon and recommended by this multi-party committee that such domestic sheep grazing allotments on federal land should, in fact, be closed.

Another obvious element in Senate Bill 1232a is that the U.S. Forest Service (USFS), responsible for managing National Forest lands, has been intentionally omitted from the ongoing discussions and BMP development between IDFG and the domestic sheep permittees. We recommend this omission be corrected, and encourage that USFS personnel be actively involved in these discussions.

Similar, formal or informal multi-disciplinary bighorn/domestic sheep interaction working groups have worked diligently for many years (9+ in Wyoming, 25+ in California, 10+ in Colorado, 30+ in Nevada, 10+ in British Columbia) in an attempt to derive solutions to this complex issue. The accelerated timetable mandated by Senate Bill 1232a does disservice to the complexity of this issue, and lessens the likelihood that viable options and practices can be identified in Idaho.

We are aware, Governor Otter, that your office had established a bighorn/domestic sheep collaborative working group to address this contentious issue in Idaho, and we commend you for this effort. We are also aware that this collaborative working group has disbanded, at least till the end of summer 2009. In our opinion, having sponsored and participated in many collaborative working group ventures that addressed numerous controversial issues, we strongly encourage your Idaho collaborative working group to re-engage, as soon as possible. We believe it is always better when disparate parties are communicating, rather than segregating themselves and ceasing to work together.

If the collective assistance of 23 fish and game agencies may be of benefit to the State of Idaho as this dialogue continues, WAFWA stands ready to offer our technical personnel and whatever assistance we can, to help Idaho's bighorn sheep advocates and domestic sheep permittees move toward acceptable solutions. We appreciate and look forward to hearing back from the Governor's Office and Fish and Game Commission on this vitally important matter.

Respectfully,



Donald Koch
WAFWA President

Attachments: (2)

cc: WAFWA Directors
Matt Hogan, AFWA
Tom Tidwell, Chief, USFS
Harv Forsgren, R4 Regional Forester, Ogden
Senator Mike Crapo (R-ID)
Senator Jim Risch (R-ID)