



July 20, 2016

Dear Supporters,

On June 10, 2016, the Confederated Salish and Kootenai Tribes (CSKT) released draft legislation that would transfer the National Bison Range in Montana from the U.S. Fish and Wildlife Service to the Secretary of the Interior to be held in trust for the tribe.

As the only nonprofit organization with a mission that includes “protecting, enhancing and expanding the National Wildlife Refuge System,” we cannot support the removal of a wildlife refuge from the System without a specific companion action that adds habitat of equal or greater value into the System. We believe that a transfer of the National Bison Range without such compensatory additions to the Refuge System would have the effect of creating an unintended precedent that would threaten the integrity of our nation’s only system of federal lands devoted specifically to wildlife. For these reasons, the National Wildlife Refuge Association cannot support the draft legislation as written.

If the proposed legislation were changed to ensure no net loss of habitat to the Refuge System, we would be willing to re-evaluate our position.

In addition, the Refuge Association remains supportive of the use of Annual Funding Agreements (AFAs) as an instrument for collaborative management by Department of the Interior bureaus and tribes. If the proposal is not amended to include the addition of lands to the System, we urge the Service and the tribe to return to an AFA and to pursue any further proposals for management changes through established public processes.

The tribe has requested comments on the draft legislation, which we will provide; however, until the fundamental issue of the impact of the proposed transfer without compensatory additions on the integrity of the Refuge System is addressed and reconciled, all other concerns -- including funding implications to the Refuge System, future public access, and transfers of property -- are secondary.

Meanwhile, we would like to share with our supporters our core beliefs with regard to this proposal:

**We believe** that historically the CSKT has played an essential role in the conservation and recovery of the American bison, and that the tribe has a vital role to play in the future management of the National Bison Range. The refuge was purchased from the Flathead Indian Reservation, and these lands hold special significance to the CSKT. When President Theodore Roosevelt worked with Congress to create the refuge in 1908, the iconic American bison had been nearly eradicated from the planet. Since 1908, the Service’s investment in the National Bison Range has been instrumental in the species recovery, and this success holds a special significance both as an outstanding

achievement and as a point of pride in the Refuge System's key role in recovering our newly designated national mammal. As a result, both the tribe and the Service have special connection to this place.

**We believe** that any proposal to transfer the National Bison Range must not be used as an open door to other divestments. Other legislative proposals to transfer parts of the Vieques National Wildlife Refuge in Puerto Rico to the territory for development, and to transfer management authority of lands at the Desert National Wildlife Refuge in Nevada to the Department of Defense, have occurred in the past several months.

**We believe** that strong science and public dialogue bring about the best solutions to the complex issues facing wildlife today, and that any proposal to transfer land out of the Refuge System must include a public process that includes sufficient analysis and review, consistent with the National Wildlife Refuge System Administration Act.

**We believe** that collaborative relationships between the Service and tribes are not only legally mandated but also essential to conservation success. There are many examples of successful collaboration, and in this context AFAs have been shown to be a demonstrated and fundamental tool for defining roles and creating a collaborative framework. Landscape-scale conservation to support wide-ranging wildlife like bison can only be successful through collaborative partnerships that engage many voices and interests to achieve common goals, and AFAs support these partnerships in achieving their common goals.

**We believe** that the genetics of the National Bison Range herd should continue to play an important role in the Department of the Interior's overall bison management plan.

The issues raised by a potential transfer of the National Bison Range are complex. Ultimately, we must all come together to address the needs of the Refuge System, the CSKT and our national mammal, the American bison.

Our goal is always to protect the integrity of the National Wildlife Refuge System and ensure that any action is in the best interest of America's wildlife. The National Wildlife Refuge Association has long been committed to collaborative conservation strategies, and we believe our role is to help find the path forward that unites seemingly disparate points of view towards shared efforts to conserve wildlife and the habitat on which they depend. We look forward to continued dialogue on this topic and to working with both the Department of the Interior and the tribe.