



January 14, 2008

The Honorable Lyle Laverty  
Assistant Secretary for Fish and Wildlife and Parks  
U.S. Department of the Interior  
1849 C Street  
Washington, D.C. 20240

Dear Assistant Secretary Laverty:

Understanding that you begin negotiations this week with the Confederated Salish and Kootenai Tribes (CSKT) concerning a new annual funding agreement (AFA) for the National Bison Range, I wanted to present you with the enclosed principles developed by the National Wildlife Refuge Association that we believe should guide the creation of any such agreement. In addition, we respectfully believe that it is inappropriate for such negotiations to take place absent a U.S. Fish and Wildlife Service (FWS) policy governing such agreements.

The NWRA, formed in 1975 by former FWS Refuge System employees, counts current and past FWS employees as members, as well as 148 affiliate “Friends” groups and thousands of concerned citizens nationwide. Our mission is to protect, enhance and expand the National Wildlife Refuge System. Because the purported scope of a Bison Range AFA is so comprehensive in terms of staffing positions and resources, the NWRA views a new agreement as being precedent-setting and thus requiring the utmost caution and attention to detail.

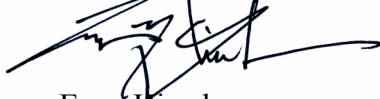
To summarize our principles, the NWRA believes that the Department of Interior should enter into AFAs on National Wildlife Refuges only when such agreements contribute to the mission and purposes of the refuge and System, are cost effective and include provisions allowing for complete transparency and accountability. Further, such agreements should not include refuge staff positions that are “inherently federal,” such as the refuge manger. At a time when the National Wildlife Refuge System faces a nearly \$3 billion funding operations and maintenance backlog, it would be irresponsible to enter into a contract or agreement with *any* party that does not provide a high level of accountability, transparency and economy.

Further, we again urge the Department of the Interior to expeditiously publish a draft FWS AFA policy in the Federal Register so as to provide the public with an opportunity to comment on the proposed conduct of the Service relative to creation of such agreements. As was apparent from the Department of the Interior Inspector General’s report concerning the crafting of the initial agreement, the lack of a clear policy contributed to uncertainty on the part of both FWS and tribal negotiators, and an abuse of

influence over FWS negotiators by some within the Interior Department. It should be in the interest of both FWS and the CSKT to conduct negotiations under clear policy auspices specifically relating to the National Wildlife Refuge System.

As you and members of the negotiating team consider a new Bison Range AFA, we urge you to take these concerns and principles into account. Thank you for your consideration and we look forward to our discussion about this and other important refuge issues on the afternoon of January 31<sup>st</sup>.

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan Hirsche', with a long horizontal flourish extending to the right.

Evan Hirsche  
President

Enclosure