08 August 2016

RE: Opposition to Sections 2864–2866 of the National Defense Authorization Act for Fiscal Year 2017; regarding federal management of greater sage-grouse, lesser prairie-chicken, and American burying beetle.

Dear Members of the U.S. Congress Conference Committee for the National Defense Authorization Act for Fiscal Year 2017:

As the U.S. Senate and House of Representatives prepare to conference over the National Defense Authorization Act for Fiscal Year 2017, The Wildlife Society urges conferees to support science-based decision processes by removing Sections 2864–2866 of the House amendment to S.2943 regarding management of the greater sage-grouse, lesser prairie-chicken and American burying beetle respectively.

If signed into law, these provisions would disrupt the important, ongoing work of wildlife professionals to conserve these species while undermining the use of science in implementing core conservation statutes designed to ensure sustained management of our nation's resources.

The Wildlife Society (TWS), founded in 1937, represents nearly 10,000 professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

TWS' Standing Position Statement on <u>The Use of Science in Policy and Management Decisions</u> emphasizes that "[t]he role of science in policy and decision-making is to inform the decision process, rather than to prescribe a particular outcome." Each of the aforementioned sections included in the House amendment to S.2943 would prescribe unprecedented limitations on the ability of land managers to conserve wildlife and habitats by disrupting statutorily-established processes for using science to make informed wildlife management decisions.

Last September, the U.S. Fish and Wildlife Service withdrew the greater sage grouse from the list of candidate species for protections under the Endangered Species Act (ESA) as a result of an "unprecedented conservation planning effort by Federal, State, local, and private partners... [to] adequately address the loss and fragmentation of sage-grouse habitats." The ongoing efforts of wildlife professionals, land managers, and private landowners through cooperative efforts like the Sage Grouse Initiative have created strong partnerships for conserving this species and its valuable sagebrush habitat, upon which hundreds of other species rely.

Likewise, similar multi-state collaborative efforts to conserve the lesser prairie-chicken have produced early positive results that may also keep the lesser prairie-chicken from requiring ESA listing. The wildlife professionals who have spent countless hours working cooperatively on conserving these species using science-based information to make complex resource management decisions should be commended. Section 2864–2866, however, would undermine

these efforts by setting aside resource management plans and prohibiting implementation of ESA and other science-based conservation efforts.

In our Standing Position Statement on <u>The U.S. Endangered Species Act</u>, we recognize ESA as a vital tool in conserving biological diversity. ESA establishes a process for incorporating science-based information into policy decisions. If and when the best available science determines that a species meets the requirements for listing, this process should not be arbitrarily constrained. Regardless of the species, unilateral action by the legislature that circumvents scientific processes established by ESA for evaluating the status of a species, whether for listing or delisting, establishes a dangerous precedent.

As a result, TWS strongly urges the congressional conference committee to remove Sections 2864–2866 from the National Defense Authorization Act for Fiscal Year 2017.

Thank you for considering the recommendations of wildlife professionals. Please contact Keith Norris, AWB®, Director of Government Affairs & Partnerships at keith.norris@wildlife.org or (301) 897-9770 x309 if you require further information or have any additional questions.

Sincerely,

Gary Potts, CWB®

Dary E. Potts

President