

Wildlife and Hunting Heritage Conservation Council

February 12, 2013

The Honorable Ken Salazar, Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Salazar:

The Wildlife and Hunting Heritage Conservation Council is writing to recommend actions needed by the Department of the Interior to address declining mule deer and sage grouse populations throughout the West. We are specifically concerned with threats to these species from climatic factors and increased development of energy resources on public lands.

Council Recommendations:

1) Instructing the Bureau of Land Management (BLM) Director to issue an Instruction Memorandum to all field offices requiring them to explicitly adhere to the planning requirement discussed below and coordinate on development of habitat objectives and management activities, including protection, that are set to meet state agency population objectives for mule deer, sage grouse and other species of wildlife;

2) Instructing all BLM Districts in the western states to use in RMP revisions the following Western Association of Fish & Wildlife Agencies (WAFWA) Mule Deer Working Group guidelines and the WAFWA Greater Sage-grouse Comprehensive Conservation Strategy (Stiver et al. 2006), which include: a) Energy Development Guidelines for Mule Deer, b) North American Mule Deer Conservation Plan, c) Habitat Guidelines for Mule Deer (developed for 7 different regions), and d) state wildlife agency management guidelines for recovery and management of sage grouse; and

3) Instructing the BLM to follow existing DOI policy guidance on adaptive management.

These recommendations are consistent with implementing action items 41, 43, 47, 51 and 53 of the Recreational Hunting and Wildlife Resources Conservation 10-year Plan upon which our charter is based.

We are concerned that current BLM Resource Management Plans and management activities administered by the agency (e.g., energy development, habitat management) do not adequately or consistently address population objectives for mule deer and sage grouse set forth by each state. We are concerned not only about a general lack of coordination, but also virtually no establishment or linkage of BLM habitat management objectives with population objectives, which fall under the authority of the state. The following excerpt is from the BLM planning handbook:

The BLM planning Handbook (H-1610 Appendix C, p. 6) requires field offices to: "Designate priority species and habitats, in addition to special status species, for fish or wildlife species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age. Identify desired outcomes using BLM strategic plans, state agency strategic plans, and other similar sources. Describe desired habitat conditions and/or population for major habitat types that support a wide variety of game, non-game, and migratory bird species; acknowledging the states' roles in managing fish and wildlife, working in close

CHAIRMAN

John Tomke
Ducks Unlimited

VICE CHAIRMAN

Christine Thomas
University of Wisconsin-Stevens Point

MEMBERS

M. David Allen
Rocky Mountain Elk Foundation

Jeffrey S. Crane
Congressional Sportsmen's Foundation

Robert R. Fithian
Alaska Professional Hunters
Association, Inc.

Thomas Franklin
Theodore Roosevelt Conservation
Partnership

Winifred B Kessler
The Wildlife Society

Jonathan Gassett
Kentucky Department of Fish &
Wildlife Resources

Robert Manes
The Nature Conservancy

Baasewe Frederick D. Maulson
Great Lakes Indian Fish and Wildlife
Commission

Tommy Millner
Cabela's

Robert Model
Boone and Crockett Club

Joanna Prukop

Stephen L. Sanetti
National Shooting Sports Foundation

Larry Schweiger
National Wildlife Federation

George C. Thornton
National Wild Turkey Federation

Howard K. Vincent
Pheasants Forever

Steve Williams
Wildlife Management Institute

EX OFFICIO REPRESENTATION

*Association of Fish and Wildlife Agencies
Bureau of Land Management
National Park Service
U.S. Fish and Wildlife Service
Farm Service Agency
U.S. Forest Service
Natural Resources Conservation Service*

Council Coordinator

U.S. Fish and Wildlife Service
Division of Program & Partnership
Support
4401 N. Fairfax Drive, MS EA-3103
Arlington, VA 22203
P 703 358-2639
F 703 358-2548

coordination with state wildlife agencies, and drawing on state comprehensive wildlife conservation strategies. Identify actions and area wide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships.”

This existing guidance clearly indicates BLM already has policy in place to work in close coordination with state agencies to set population goals for wildlife species and that important habitats for game species, as well as non-game and other wildlife species, should be designated for special management or protection. However, because of an apparent lack of support and/or inconsistent implementation of this existing policy at the BLM state level, we do not believe all resource management plans (RMPs) make such designations, nor do we see much evidence of effective on-the-ground implementation of this policy in some key habitats that are also energy development areas.

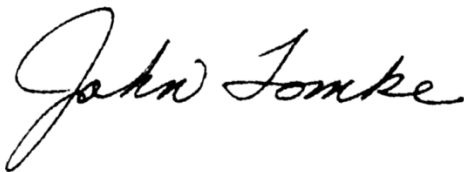
We are also concerned about energy development impacts on mule deer and sage grouse populations and use of the best available science and management recommendations to manage habitats and populations. We believe if BLM employs its existing policies, follows the above mentioned WAFWA Mule Deer Working Group guidelines and Greater Sage-grouse Comprehensive Conservation Strategy, and coordinates closely with state wildlife agencies, mule deer and sage grouse population objectives can be met throughout the range of these critically important game species. We see an immediate opportunity for implementing our requests, as currently ninety-eight BLM RMPs are under revision to accommodate new management direction for sage grouse.

In addition, we advise that BLM should be required to follow existing DOI guidance on adaptive management to ensure the integrity of the energy development process. As per that guidance, adaptive management plans must set wildlife habitat and population goals and incorporate mitigation that is commensurate with habitat degradation caused by energy development throughout the time span of each project. These plans should indicate at the outset, based on the best available scientific information, mitigation measures and restrictions on the pace and intensity of development that may be used to achieve habitat management and wildlife population goals. Each plan should establish measurable and quantifiable criteria for evaluating whether the performance goals of adaptive management are being met. Adequate monitoring, timely evaluation of measurement data, and adaptive management actions must then follow.

We also note that tribal interests in wildlife conservation would be better served if these policies were implemented effectively.

Thank you for considering these Council recommendations to ensure that wildlife conservation and hunting objectives are effectively incorporated into energy development projects on BLM lands.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc: Mike Pool, Acting Director, BLM
Neil Kornze, Acting Deputy Director, BLM