

31 May 2013

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

Dear Secretary Jewell:

We the under signed sportsmen and conservation organizations are writing to express concerns about the status of mule deer and sage grouse populations throughout the West and continued threats to these species from a complex combination of climatic and other human caused factors. We are concerned that current Bureau of Land Management (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.

For example, the Colorado Parks and Wildlife Department noted in their comments to the BLM on the White River Field Office RMP draft amendment (letter dated 28 January 2013, page 11) that only one alternative even came close to meeting population management objectives for big game. Even this alternative falls far short of the state's management objective for mule deer in the region and projects a 10% decline to an already depressed mule deer population (35% below objective) if implemented. The BLM's preferred alternative and other alternatives in this RMP revision would yield even greater reductions to this important deer herd. This is but one example where BLM clearly has not developed land use plans and habitat objectives in coordination with the state wildlife agency, and this ultimately results in fewer opportunities for sportsmen and less economic return from sportsmen to local economies.

We believe the BLM planning handbook requires the BLM to coordinate with states to establish linkage of its habitat management objectives with state wildlife population objectives.

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 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 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 other species of wildlife, should be designated for special management or protection. However, all RMPs do not make such designations, nor is there consistent implementation of existing policy.

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. Therefore, we recommend that the Secretary of Interior:

- 1) instruct the BLM Director to issue an Instruction Memorandum sent to all field offices requiring them to adhere to the planning requirement discussed above and coordinate the development of habitat objectives and management activities, including protection, that are set to meet state agency coordinated population objectives for mule deer, sage grouse, and other species of wildlife.
- 2) instruct all BLM Districts in the western states to use in RMP revisions the following WAFWA Mule Deer Working Group guidelines and the WAFWA Greater Sage Grouse Comprehensive Conservation Strategy, 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 management and recovery of sage grouse.

3) instruct the BLM 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 believe if BLM implements its existing policies, follows the above mentioned Mule Deer and sage grouse guidelines, and coordinates closely with the state wildlife agencies, and adaptive management is implemented, mule deer and sage grouse population objectives can be met in the near future throughout the range of these critically important game species. We see an immediate opportunity for implementing our requests, as numerous BLM RMPs are under revision to accommodate new management direction for sage grouse. We look forward to working with DOI and BLM to ensure abundant mule deer and sage grouse populations integrated with other multiple uses of our federally managed lands.

Thank you for considering these recommendations to ensure that wildlife conservation and hunting objectives are effectively incorporated into land-use planning projects on BLM lands.

Sincerely,

Archery Trade Association
Association of Fish and Wildlife Agencies
Bowhunting Preservation Trust
Boone & Crockett Club
Campfire Club of America
Congressional Sportsmen's Foundation
Conservation Force
Dallas Safari Club
Delta Waterfowl
Ducks Unlimited

Mule Deer Foundation
National Trappers Association
National Wild Turkey Federation
North American Bear Foundation
North American Grouse Partnership
Orion The Hunter's Institute
Pope & Young Club
Quality Deer Management Association
Ruffed Grouse Society
Safari Club International
Texas Wildlife Association
Theodore Roosevelt Conservation Partnership
The Wildlife Society
Whitetails Unlimited, Inc.
Wildlife Forever
Wildlife Management Institute
Wild Sheep Foundation

Cc: Neil Kornze, Acting Director, BLM