

August 16, 2022

Executive Committee
Western Association of Fish & Wildlife Agencies
PO Box 190150
Boise, Idaho 83719

Dear Executive Committee:

We, the undersigned hunting and fishing conservation organizations and professional societies, representing America's 40 million hunters and anglers, are writing to highlight the need for the Western Association of Fish & Wildlife Agencies (WAFWA) to establish a working group, or a dedicated equivalent process, to focus on advancing science-based fish and wildlife conservation and management in areas subject to utility-scale renewable energy development, oil and gas development, and mining. Our community has advocated for responsible energy development for many years, and we are increasingly concerned about the impacts to wildlife and habitat from the push to rapidly expand development of battery-dependent critical minerals and utility-scale renewable energy projects—especially solar—on lands across the west.^{1,2}

In 2011, the WAFWA Mule Deer Working Group released its Energy Development Guidelines for Mule Deer.³ These guidelines addressed traditional oil and gas development, as well as renewable energy development, and provided state wildlife agencies, industry and the public valuable information based on the best available science regarding impact thresholds and management practices to reduce impacts. These guidelines established WAFWA as a leader in proactively addressing energy development impacts on western mule deer populations. There is a pressing need to expand and update these efforts to incorporate additional western wildlife species, address changes in development trends and technology, and recognize the habitat impacts associated with the greatly accelerated pace of battery-dependent critical minerals and utility-scale renewable energy development across the western United States.

We recognize that the Association of Fish & Wildlife Agencies (AFWA) currently has an Energy & Wildlife Policy Committee. AFWA's Energy & Wildlife Policy Committee has been a leader in advocating for best practices for siting wind and solar development. We strongly support the past and ongoing work of this group, and we also recognize the unique challenges faced by western state wildlife agencies managing wide-ranging migratory ungulate and grouse species in states dominated by federal public lands subject to this type of development. Recent research on both resident and migratory pronghorn in Wyoming documented surprisingly large indirect impacts and habitat loss due to avoidance behavior associated with utility-scale solar development.⁴ Not surprisingly, AFWA's recent state wildlife agency solar siting survey highlights both the need and desire for a regional approach for identifying best practices and policies for utility-scale solar facility siting.⁵ The potential impacts go beyond big game and solar -

¹ [https://www.blm.gov/sites/blm.gov/files/docs/2022-04/BLM Public Land Renewable Energy FY21 Report to Congress v4 508_0.pdf](https://www.blm.gov/sites/blm.gov/files/docs/2022-04/BLM%20Public%20Land%20Renewable%20Energy%20FY21%20Report%20to%20Congress%20v4%20508_0.pdf)

² <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/03/31/memorandum-on-presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended/>

³ <https://wafwa.org/wpdm-package/energy-development-guidelines-for-mule-deer/>

⁴ <https://esajournals.onlinelibrary.wiley.com/doi/10.1002/fee.2498>

⁵ 87th North American Wildlife and Natural Resources Conference. AFWA Energy and Wildlife Policy Committee, Solar Wildlife Work Group Update. March 11, 2022.

waterfowl dependence on isolated wetlands in the intermountain west and the associated impacts of wind developments on waterfowl distribution is another issue of concern. Many of the known largest battery-dependent critical mineral deposits are also on western public lands – supporting a regional approach to address wildlife concerns associated with their development.⁶

Finally, dedicating attention and resources within WAFWA to energy and mining policy would provide needed support to existing WAFWA initiatives and the important work being done by a variety of WAFWA committees and working groups. For example, the Sagebrush Conservation Initiative’s Sagebrush Conservation Strategy, Part II, identifies specific impacts to the sagebrush biome and key strategies for addressing energy and mining development. Implementation of these strategies would be greatly facilitated by the formation of an energy, mining, and wildlife policy working group, or similar equivalent, through WAFWA. Similarly, the Wildlife Movement/Migration Working Group is coordinating implementation of State Action Plans under DOI’s Secretarial Order 3362 (SO 3362), and recent state-specific programs developed to bolster the conservation of migration corridors and habitat connectivity. The SO 3362 State Action Plans and state-specific programs call for identifying and implementing best practices to address the conservation challenges associated with accelerated energy and mining development that impedes wildlife movements. Additionally, the Western Native Trout Initiative’s strategic plan identifies the need for research on habitat loss from energy development, as well as partnerships to address large-scale issues affecting native trout, including increased energy development and mining. A working group, or similar equivalent, focused on energy and mining policy would facilitate identifying and distributing best practices for implementation.

In summary, we respectfully request that WAFWA consider how best to dedicate attention and resources to this important issue as you make strategic planning and staffing decisions this year. Please know that our organizations stand ready to support your efforts. We are open to assisting with organizational needs to ensure this topic receives the necessary attention - recognizing that WAFWA and state agency staff already have significant commitments on their time.

Thank you for your consideration of this request and for all your work on behalf of wildlife.

Respectfully,

- American Bear Foundation
- American Fly Fishing Trade Association
- American Sportfishing Association
- Angler Action Foundation
- Backcountry Hunters & Anglers
- Christian Hunters of America
- Delta Waterfowl
- First Lite Performance Hunting Apparel
- Fly Fishers International
- International Game Fish Association
- Mule Deer Foundation
- Muley Fanatic Foundation
- National Deer Association

⁶ <https://www.opb.org/article/2022/02/16/lithium-oregon-mcdermitt-caldera-deposit-nevada/>

- National Wildlife Federation
- The Nature Conservancy
- North American Grouse Partnership
- Pheasants Forever
- Quail Forever
- Theodore Roosevelt Conservation Partnership
- Trout Unlimited
- Wildlife Management Institute
- The Wildlife Society

State and Local Organizations

- Arizona Antelope Foundation
- Arizona Big Game Super Raffle
- Arizona Council Trout Unlimited
- Arizona Backcountry Hunters & Anglers
- Arizona Chapter National Wild Turkey Federation
- Arizona Deer Association
- Arizona Desert Bighorn Sheep Society
- Arizona Houndsmen
- Arizona Outdoor Sports
- Arizona Predator Callers
- Ben Avery Clay Busters
- Be Outdoors Arizona
- Bosque Chapter, Trout Unlimited
- Bowhunters of Wyoming
- Carson Valley Chukar Club (NV)
- Colorado Wildlife Federation
- Dona Ana County Associated Sportsmen
- Fraternity of the Desert Bighorn
- Gila/Rio Grande Chapter, Trout Unlimited
- Hellgate Hunters and Anglers (MT)
- Idaho Backcountry Hunters & Anglers
- Idaho Chapter, Trout Unlimited
- Idaho Chukar Foundation
- Idaho Falconers Association
- Idaho Hunter Education Association
- Idaho Wildlife Federation
- Montana Backcountry Hunters & Anglers
- Montana Chapter, Trout Unlimited
- Montana Wildlife Federation
- Muley Fanatic Foundation of Colorado
- New Mexico Backcountry Hunters & Anglers
- New Mexico Council, Trout Unlimited
- New Mexico Wildlife Federation
- Nevada Bighorns Unlimited–Reno

- Nevada Bow Hunters Association
- Nevada Backcountry Hunters & Anglers
- Nevada Outdoorsmen in Wheelchairs
- Nevada Outfitters and Guide Association
- Nevada Sporting Dog Alliance
- Nevada Trapper's Association
- Nevada Waterfowl Association
- Nevada Wildlife Federation
- No Excuse Hunting & Outdoors
- Northern Nevada Safari Club International
- Oregon Hunters Association
- Outdoor Experience 4 All
- Rocky Mountain Bighorn Society
- Southern Arizona Chapter Quail Forever
- Southwest Consolidated Sportsmen
- Sportsmen's Business Alliance
- Texas Backcountry Hunters & Anglers
- Truckee River Flyfishers (NV)
- Utah Chapter Backcountry Hunters & Anglers
- Valley of the Sun Chapter Quail Forever (NV)
- Wild Turkey Sportsmen's Association
- Wyoming Wildlife Federation