

July 25, 2015

Neil Kornze, Director
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington DC 20240

Dear Mr. Kornze:

The Western Association of Fish and Wildlife Agencies (WAFWA) recognize there are many species and natural resources issues that require the attention of the Bureau of Land Management (BLM) during your planning and management implementation processes. However, big game animals and their habitat, which are vital to sportsmen, state wildlife agencies and the public, often are taken for granted because of their wide distribution and status as game animals. In particular, mule deer populations have declined in many parts of their range and are still below population objectives in most jurisdictions. To the public, mule deer are an integral part of the American West representing an important economic and recreational foundation, as well as serving as environmental sentinels for well-managed and unfragmented landscapes. It is more important now, than ever before, that mule deer habitat requirements are at the forefront of landscape management conversations and planning efforts.

The WAFWA Directors are aware BLM has undertaken revision of its planning policy manuals – an effort coined Planning 2.0. In concert with BLM’s stated goals of providing “new and enhanced opportunities for collaborative planning with the public and partners” we view this as an excellent opportunity to increase BLM coordination with state wildlife agencies to help meet wildlife conservation objectives. In particular, we support the identification of big game migration corridors and stopover sites and their inclusion in land-use planning on BLM lands. With advances in GPS technology, researchers are revealing the critical importance of migration and stopover sites to big game populations and can now identify and prioritize migration routes across large western landscapes. This recent accumulation of reliable knowledge provides excellent opportunity to include these critical habitats in BLM land use planning. At present, neither the BLM Land Use Planning Handbook (1601) nor the Wildlife and Fisheries Management Manual (6500) contain clear guidance or explicit language for the management and conservation of wildlife migration/movement corridors and stopover habitats. These habitats are critically important for the long-term sustainability of healthy wildlife populations, particularly mule deer and other big game animals. Moreover, recent research indicates that development on public lands diminishes the functionality of these routes; development causes mule deer to speed up and stopover less often to feed on the best spring forage. Formal guidance should be developed within the wildlife and special designations sections of the handbook to ensure their continued existence and conservation. Protecting wildlife corridors and other important habitat through the use of special administrative designations such as “Area of Critical Environmental Concern (ACEC)” or others, helps many other species and is consistent with the BLM’s obligations under the Federal Land Policy and Management Act (FLPMA), 42 U.S.C. § 1701, *et seq.*, and National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, *et seq.*

The value of abundant mule deer and other big game populations cannot be overemphasized. In 1997, WAFWA established a Mule Deer Working Group (MDWG) that consists of representatives from 23 western states and Canadian provinces. Members represent the West's leading mule deer experts who have worked closely at every step with representatives of the Bureau of Land Management and the U.S. Forest Service. The purpose of this working group is to develop strategies to assist agencies in the management of declining black-tailed and mule deer populations and to improve communication among those responsible for managing this species throughout their range. The MDWG has produced multiple publications and products that provide specific technical guidance and important information to aid in the planning and management of mule deer populations and their habitat. These products are available at www.muledeerworkinggroup.com and include:

- *North American Mule Deer Conservation Plan* (including the MOU with your agency)
- *Mule Deer Habitat Guidelines* for each of the 7 Ecoregions in western North America
- *Energy Development Guidelines for Mule Deer*
- *Mule Deer Conservation: Issues and Management Challenges* (book)
- *Seasonal range map of mule deer distribution in North America*

We encourage you to reach out to state partners to continue to work collaboratively on issues affecting mule deer and their habitat. Many western states recognize that migration routes are a critical habitat requirement for big game and are actively developing migration route definitions and appropriate stipulations to improve management and land-use planning. Similarly, we support and strongly encourage inclusion of explicit language in your planning manual revisions to require evaluation and protection of wildlife migration/movement corridors, stopover habitats and other important habitats particularly for mule deer. The products of the MDWG reflect the best available information on the species and, as such, provide reliable knowledge upon which to base land use plans. We encourage you to use these products, and new emerging science, in your planning revisions. By doing so, this important information can be incorporated into your landscape planning efforts and management decisions.

Thank you for all the work you do for conservation. We look forward to continuing to work collaboratively with you and other BLM staff on the Planning 2.0 process to ensure a healthy future for mule deer and other wildlife.

Sincerely,

Tony Wasley
WAFWA President

cc: Joe Stout, BLM Division Chief, Decision Support, Planning and NEPA
Steve Small, Chief – BLM Division of Fish and Wildlife Conservation
WAFWA Directors
Ron Regan, AFWA Executive Director
WAFWA Mule Deer Working Group