September 17, 2010

Nancy Sutley, Chair
Council on Environmental Quality

Lisa Jackson, Administrator
Environmental Protection Agency

Ken Salazar, Secretary
U.S. Department of the Interior

Tom Vilsack, Secretary
U.S. Department of Agriculture

Dear Chair Sutley, Administrator Jackson, Secretary Salazar and Secretary Vilsack:

Thank you for the opportunity to provide thoughts and feedback on the America's Great Outdoors Initiative. You have received many worthwhile comments from conservation groups across the nation. In this letter, the undersigned groups would like to reiterate the importance of wildlife corridors as one of the most important landscapes to protect in order to build resiliency in a changing world. Comments from Freedom to Roam, National Parks Conservation Association, The Wilderness Society, and Sierra Club have all highlighted the need to protect wildlife corridors and ecological connectivity, especially in light of climate change impacts.

We have written this additional letter to call out a recommendation to America's Great Outdoors that will protect wildlife corridors and the communities that rely on these landscapes for their economic health, recreation, and spiritual and cultural sustenance.

Recommendation: Develop a new type of administrative land-use designation entitled wildlife corridor. This new designation would be employed by all federal land management agencies through land management plans. The binding standards and guidelines associated with this designation would be consistent across federal land management boundaries and maintain ecological connectivity between our nation's most important habitats and iconic landscapes – our National Parks, Monuments, Wilderness areas, Forest Service lands, National Wildlife Refuges, National Landscape Conservation System lands, and other crucial wildlife habitats.

You have ample authority to support such a designation and the procedures for applying it are already built into your land management processes. Just a few of these authorities include: the duty to manage for biological diversity on the forest system; the duty to enhance the recovery of listed species, under Section 7(a)(1) of the Endangered Species Act (ESA); the sustained yield mandate of the Federal Land Policy and Management Act (FLPMA); and the Antiquities Act, which allows the President to designate and protect such areas.

In order for these newly designated corridors to be protected, the America's Great Outdoors Initiative will need to fund programs and legislation that prioritize wildlife corridors for current and future generations. Accordingly, we recommend that new funding sources be allocated to

the protection of wildlife corridors that have been chosen by agreed-upon criteria and qualities set forth by America's Great Outdoors and the stakeholders you represent.

In the box called out to the right, we have described what a new wildlife corridor land designation would accomplish. This is not the only example, as marine and freshwater species also rely on wildlife corridors and deserve a corresponding aquatic designation. However, we hope it articulates our recommendation more fully and shows the benefit of a new administrative land designation.

The protection of wildlife corridors maintains the integrity of our past century's conservation investment and ensures that American citizens can be connected to the natural places they need for health and recreation. To not connect, to not protect, will jeopardize not just wildlife but the values in life that we Americans have enjoyed for more than two centuries.

If you have any questions about our comments, please don't hesitate to contact the signatories of this letter. Thank you for your leadership and vision in creating a conservation agenda for the 21st century and beyond.

Sincerely,

Greg Costello, Executive Director
Western Environmental Law Center
1216 Lincoln Street
Eugene, OR 97401
541-485-2471 x107
costello@westernlaw.org

John Fitzgerald, Policy Director
Society for Conservation Biology

The HD Mountains Mule Deer Migration Corridor

Southwest, Colorado is home to a 100-mile mule deer migration corridor between low elevation winter ranges on the Southern Ute Indian reservation and the HD Mountains, to high elevation summer ranges in the rugged Weminuche Wilderness of the San Juan Mountains. Primarily migratory animals, mule deer depend on connected landscapes to move seasonally between their summer and winter ranges, and are an important game species and resource for the Southern Ute Tribe.

An official wildlife corridor land designation would identify and protect this corridor through binding standards agreed upon by federal land management agencies and in cooperative agreements with Departments of Transportation, other state agencies, private landowners, and local governments.

The designation of the HD Mountains Mule Deer Migration Corridor would have the following effect: 1) a female and fawn start their migration in the ragged peaks of the Weminuche Wilderness and benefit from the protections that wilderness lands provide; 2) they approach US 160 and are led by a wildlife fence to an underpass that delivers them safely onto private land; 3) as they pass through private lands they find safe passage thanks to wildlife friendly fencing and a conservation easement; 4) they then enter into their winter range in the HD Mountains where natural gas drilling operations have been located to avoid important movement areas and activities have been reduced during migration periods; and 5) the Southern Ute Tribe, that has been tracking and studying mule deer for the past 7 years, has agreed not to develop gas resources in the southern HDs to allow the mule deer to survive and start their journey again to their summer range in the spring. All of this would be supported by a Memorandum of Understanding (MOU) between the Governors of New Mexico and Colorado thanks to the Western Governors' Wildlife Corridors Initiative.

Some of this scenario, such as the Tribe's data collection and concentration of energy development as well as the Governors' MOU, is currently a reality. The new land designation with binding land use standards across agencies and cooperative agreements are not yet a reality.

America's Great Outdoors (AGO) has a unique opportunity to be a leader by creating this new wildlife corridor land designation. AGO can utilize ongoing work, such as BLM's Ecoregional Assessments, to help identify corridors and then create and apply designations through land management plans and executive order. An important component will be inviting partners to join in wildlife corridor protection by providing funding and incentives through the Farm Bill, Land and Water Conservation Fund, Transportation Bill, Climate Bill, Energy Bill, and several internal DOI programs such as the Partners for Fish and Wildlife.

Rob Buffler, Executive Director
Yellowstone to Yukon Conservation Initiative

Margo McKnight, Executive Director
Wildlands Network

Karin Sheldon, Executive Director
Western Resource Advocates

Mark Wenzler, Vice-President Clean Air and Climate
National Parks Conservation Association

Michael Brune, Executive Director
Sierra Club

Jeff Parrish, Executive Director
Freedom to Roam

Ryan Bidwell, Executive Director
Colorado Wild

Peter Coppolillo, Executive Director
American Wildlands

Gary Tabor, Director
Center for Large Landscape Conservation

Tom Franklin, Director of Policy and Government Relations*
Theodore Roosevelt Conservation Partnership

Dave Werntz, Science and Conservation Director
Conservation Northwest

John Calvelli, Executive Vice President, Public Policy
Wildlife Conservation Society

* Signatories below this line were added on September 21, 2010.