

Association of Fish and Wildlife Agencies * Camp Fire Club of America * Congressional Sportsmen's Foundation * Conservation Force * Council to Advance Hunting and the Shooting Sports * Dallas Safari Club * Delta Waterfowl Foundation * Houston Safari Club * Masters of Foxhounds Association * Mule Deer Foundation * National Rifle Association * National Shooting Sports Foundation * National Wild Turkey Federation * North American Grouse Partnership * Pheasants Forever Inc. * Pope and Young Club * Professional Outfitters and Guides of America * Quail Forever * Quality Deer Management Association * Rocky Mountain Elk Foundation * Safari Club International * Sportsmen's Alliance * Texas Wildlife Association * Whitetails Unlimited * Wildlife Forever * Wildlife Management Institute * Wild Sheep Foundation

September 27, 2018

The Honorable Ryan Zinke
Secretary, U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Re: Request for Department-wide Policy Recognizing the Benefits of Man-made Water Developments for Wildlife Conservation

Dear Secretary Zinke:

Water, particularly in desert areas, is both scarce and essential to wildlife. Nevertheless, some valuable sources of water, simply because of their man-made origin, are often rejected by Federal land managers. Wildlife conservationists, many from the hunting community, have done their best to maintain, restore and advocate for the preservation of these water sources. Despite wildlife reliance on these water developments, some Federal managers persist in treating these water sources as unnecessary, if not detrimental to the landscape.

The decision to remove, maintain, or add a wildlife water development is always a matter of agency discretion but while some personnel work with state agencies to repair, restore and maintain these beneficial conservation tools, others appear to view existing statutes, regulations, policies, and procedures as edicts for the removal of such developments. The Bureau of Land Management (BLM), the Fish and Wildlife Service (FWS) and the National Park Service (NPS) have inconsistently addressed, both within and among the agencies, the presence of man-made water developments. Those inconsistencies have wasted Federal and state resources, confounded state management and conservation of wildlife, and detrimentally impacted the game and non-game species that rely on man-made water developments for survival.

For decades, many hunting and wildlife conservation organizations have been working to alter the Federal attitude towards man-made water developments. In 2006, 18 of these organizations approached former Secretary of the Interior Gale Norton with the proposal of a Department-wide supportive policy towards man-made water sources. The proposed policy

language would have set a Department-wide standard for utilizing and maintaining these valuable tools. Secretary Norton rejected the proposal, choosing instead to continue the Department's approach of treating artificial water developments as detrimental unless proponents could prove the necessity of the specific devices.

The Department's approach has resulted, again and again, in the removal of some water developments and the allowance of others to fall into disrepair only to become useless. Personnel within the agencies have made it difficult, if not prevented volunteers from using their own time and money to restore water developments in desert areas. The most recent example of this is taking place right now in the Mojave National Preserve, where the NPS prematurely terminated a research project being conducted to determine the use of artificial water sources by mule deer and instead proposed a plan to remove and/or relocate several man-made water sources and allow several others to fall into disrepair. Many of our organizations submitted a letter (attached) opposing the NPS's plan.

We, the undersigned organizations ask you to adopt a Department-wide policy that will direct agency personnel to recognize the beneficial role that man-made water developments play in the conservation of our nation's wildlife. We propose the language below for your consideration:

The U.S. Department of the Interior recognizes that man-made water developments and installations (e.g. guzzlers, drinkers, etc.) provide significant benefits to the wildlife that reside on Federal lands, including but not limited to those lands that have been designated as Wildlife Refuges, Wilderness Areas, Wilderness Study Areas, National Preserves, Parks, National Monuments, etc. The Department and its agencies that administer these Federal lands expressly recognize that these water sources are necessary for the administration, management and conservation of wildlife on Federal lands. The agency assigned responsibility for the administration of the Federal land in question shall allow for the maintenance, restoration, and improvement of existing or historical man-made water developments. The installation of additional water developments will be permitted where natural water sources have been determined to be inadequate for the conservation of wildlife. No additional water developments and installations may be installed where it has been scientifically determined that they will cause a permanent or significant negative effect on native wildlife or plant species. Nothing in this policy is intended to use the maintenance, restoration, improvement or installation of man-made water developments as a means to circumvent statutory, regulatory, or plan-specific restrictions that prohibit non-water related uses of designated Federal lands.

A Secretarial level policy directive is needed to instruct the Department of the Interior agencies to acknowledge and facilitate the use of water developments as valuable and effective tools for the management or conservation of wildlife on Federal lands. The proposed policy has three primary elements. First, it expressly acknowledges the effectiveness and efficacy of water developments as a valuable wildlife conservation and management tool. Second, by favoring

approval of water development projects (often state-initiated and maintained), the policy recognizes the fact that states retain primary authority over resident wildlife, even on Federal lands, and that states are important partners in wildlife conservation. Third, it directs BLM, FWS and NPS to maintain and restore water developments already present on Federal lands in cooperation with state agencies and/or private wildlife conservation entities, in accordance with the laws, regulations, and existing agency policies that permit and/or require such conservation measures. In the case of new projects, the policy directs the agencies to install additional water developments where natural water sources have been determined to be inadequate for the conservation of wildlife. Such a policy will bring consistency and better management practices to all the Department's land managing agencies.

The undersigned organizations ask that you give this matter serious consideration and will be happy to provide you with additional information and examples to demonstrate the need for this important step in your administration of Federal lands. Should you have any questions, please contact Anna Seidman of Safari Club International at aseidman@safariclub.org and/or Susan Recce of the National Rifle Association at srecce@nrahq.org.

Sincerely,

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