



*Shaping the future for birds*

February 22, 2016

The Honorable Louie Gohmert  
U.S. Representative  
Chair, House Natural Resources Committee  
Subcommittee on Oversight and Investigations  
Washington, D.C. 20515

The Honorable Debbie Dingell  
U.S. Representative  
Ranking Member, House Natural Resources Committee  
Subcommittee on Oversight and Investigations  
Washington, D.C. 20515

Dear Representatives Gohmert and Dingell:

On behalf of the undersigned conservation groups, we are writing in support of the Presidential Memorandum promoting appropriate mitigation to protect our natural resources. We believe the administration's mitigation policy has great potential to enable federal managers to foster wildlife and habitat conservation, to avoid the loss of irreplaceable resources, and to encourage private investment in the restoration of natural resources that are affected by development.

We believe that the best way to prevent the loss of wildlife and other natural resources is the maintenance of intact ecosystems. However, when development is deemed necessary, the policies outlined in the Memorandum are likely to have significant benefits for wildlife and their habitats.

Foremost among these is calling on federal agencies to ensure projects provide a net benefit and no loss of irreplaceable resources by mitigating the impact of development projects on the environment and offsetting any impact those projects have on wildlife and their habitats. We also strongly endorse the mitigation hierarchy it proposes to avoid habitat loss on state and federal lands through smart planning, to minimize impacts by requiring best management practices, and, when needed, to compensate for any unavoidable impacts.

This policy is timely and urgently needed because, under current regulations, we are losing irreplaceable resources to development of all kinds on public and private lands at an alarming rate, including endangered species habitat. Rare and endangered habitats such as sagebrush, desert riparian areas, grasslands, and mature forests are all being lost without effective mitigation taking place.

A review of the final Greater Sage-Grouse conservation plans finds that the plans identify the most important sagebrush habitat “the irreplaceable resource”, but development and use of priority Sage Grouse habitat are allowed to continue with some important exceptions and limitations, provided that any unavoidable impacts will be mitigated. As a result, this mitigation policy is critically important to ensuring that the remarkable Sage Grouse conservation initiative is a success.

To ensure avoidance is given a fair opportunity it must come first in the process. This coalition agrees with the Department of the Interior Landscape-Scale Mitigation Policy’s direction regarding compensatory mitigation, which says, “measures should not be considered until after all appropriate and practicable avoidance and minimization measures have been applied.” We further believe that through the creation of a fair and transparent compensation system, significant private resources can be directed to conserving and restoring important bird habitats.

We support the Landscape-Scale Mitigation Policy’s consideration of greenhouse emissions and carbon storage. America’s forests and grasslands play a critically important role in sequestering carbon emissions, and providing habitat for a vast array of bird species. It is essential that we keep forests as forests, and ensure that grasslands and federal forests are managed sustainably by accounting for carbon emissions and recognizing the benefits of protecting and restoring habitats and ecosystems that store carbon.

Thank you for reviewing this important initiative which advances conservation by protecting irreplaceable resources and better balancing development by mitigating impacts.

Sincerely,

American Bird Conservancy  
Alberta Wilderness Association  
Arkansas Audubon Society  
Association of Northwest Steelheaders  
Bird Conservation Network  
Bird Education Network  
Black Swamp Bird Observatory  
Bozeman Birder  
Brooks Range Council  
Bucks County Audubon Society  
Californians for Western Wilderness  
Cascadia Wildlands  
Chesapeake Wildlife Heritage  
City Wildlife, Inc.  
Clean Water Alliance  
Connecticut Ornithological Association  
Conservation Congress  
Conservation Northwest  
Coulee Region Audubon Society  
Council for Environmental Education  
Eastern Long Island Audubon Society  
Endangered Habitats League  
Environmental Protection Information Center (EPIC)

Fire Island Raptor Enumerators (FIRE)  
Flying WILD  
Fondation Seguin  
Forests Forever  
Fort Collins Audubon Society  
Friends of Grays Harbor  
Friends of the San Pedro River  
Friends of the Wild Whoopers  
Georgia Ornithological Society  
Grand Valley Audubon Society  
Great Plains Restoration Council  
Great Old Broads for Wilderness  
Hawk Mountain  
Huachuca Audubon Society  
Huntington-Oyster Bay Audubon  
Idaho Conservation League  
Illinois Ornithological Society  
Kettle Range Conservation Group  
Klamath Forest Alliance  
The Lands Council  
Lane County Audubon Society  
LEAD Agency, Inc.  
Lehigh Valley Audubon Society  
Maryland Conservation Council  
Maryland Ornithological Society  
Mesilla Valley Audubon Society  
Natural Resource Economics  
New Mexico Audubon Council  
North American Falconers Association  
North American Grouse Partnership  
North Cascades Audubon  
Northcoast Environmental Center  
Northern San Juan Broadband  
Oregon Natural Desert Association  
Pomona Valley Audubon  
Quad City Audubon Society  
Rockfish Valley Foundation  
Rocky Mountain Recreation Initiative  
Rocky Mountain Wild  
Salem Audubon Society  
San Juan Citizens Alliance  
Santa Barbara Audubon Society  
Save Our Allegheny Ridges  
Saving Birds Thru Habitat  
Seattle Audubon Society  
Sierra Forest Legacy  
Soda Mountain Wilderness Council  
Southern Maryland Audubon Society

St. Louis Audubon Society  
Tennessee Ornithological Society  
Umpqua Watersheds, Inc.  
Uranium Watch  
Watchable Wildlife, Inc.  
Western Environmental Law Center  
Western Watersheds Project  
Wisconsin Wildlife Federation  
Wissahickon Valley Watershed Association  
Yellowstone Valley Audubon Society

Cc: Senate Energy and Natural Resources Committee Members