



June 22, 2015

Janice Schneider
Assistant Secretary for Land and Minerals Management
U.S. Department of the Interior
Washington D.C. 20240

Robert Bonnie
Undersecretary for Natural Resources and Environment
U.S. Department of Agriculture
Washington D.C. 20250

Dear Ms. Schneider and Mr. Bonnie,

The undersigned conservation organizations are writing to commend Bureau of Land Management and U.S.D.A. Forest Service wildlife and minerals staff for their efforts to reduce bird mortality caused by vertical pipes, such as mine markers, fence posts, and outhouse vents. Much work remains to be done to remove existing hazards, and long-term policies and procedures still need to be established to prevent this form of bird mortality from continuing to occur on public lands in the future.

Small birds often see the opening of PVC mining claim markers and other pipes as a hollow suitable for nesting. The birds enter the holes only to become trapped because the walls of the pipes do not allow them to extend their wings and fly out and are too smooth to allow them to grapple their way up the sides. Death from dehydration or starvation soon follows.

Fortunately, this threat to birds has been identified and some positive actions are underway to eliminate the problem and meet the respective agencies' responsibilities under the Endangered Species Act, the Migratory Bird Treaty Act and Executive Order 13186. This includes the BLM's creation of a flyer endorsed by partners including American Bird Conservancy and the National Mining Association that will be mailed to mine claim holders alerting them to the problem and urging they replace or remediate hazardous marker. And Forest Service staff are covering open vent pipes on outhouses that were trapping birds.

We would like to encourage BLM and USDA to continue efforts to identify priority areas for pipe removal, and further coordinate stake-pulling events as resources allow. In addition, federal agencies need to develop national policy to mitigate or remove existing open pipes, and to prevent their use in federal projects in the future.

In addition to these important steps, mining claimants need to be held responsible for their stakes through federal regulatory action that will require removal of hazardous markers. And to ensure the problem doesn't continue, standards can be set for bird-safe and environmentally friendly mining markers.

We therefore have several recommended actions to help carry out and bolster these efforts that we ask the administration to consider:

1. Issuing national policy directives to remove or modify existing pipes, and to delineate standards to prevent use of open pipes in the future.
2. Initiating a federal rulemaking to require that mining claim holders replace pipes that can cause mortality and to require non-hazardous markers on all current and future claims.
3. Dedicate sufficient resources annually to educate mine claim holders, to coordinate and carry out partnership efforts to remove pipes, and to carry out necessary infrastructure improvements on the Public Lands and National Forest Systems.

Thank you for considering these requests.

Sincerely,

Accipiter Enterprises, Educational Birds of Prey
Alaska Wild Animal Recovery Effort
Alberta Wilderness Association
Allegheny Highlands Alliance
Altacal Audubon Society
American Bird Conservancy
Anne Arundel Bird Club
Arizona Native Plant Society
Arkansas Audubon Society
Audubon of Kansas
Bird Conservation Network
Black Swamp Bird Observatory
Buka Environmental
Californians for Western Wilderness
Center for Biological Diversity
Center for Sierra Nevada Conservation
Chesapeake Wildlife Heritage
City Wildlife Inc.
Clearwater Audubon Society
Coast Range Association
Coastal Bend Audubon Society
Conejo Valley Audubon
Conservation CATalyst
Conservation Northwest
Cornell Lab of Ornithology
Crescent Bird Club

Dakubetede Environmental Education Programs (DEEP)
Delaware-Otsego Audubon Society
Earthworks
Eastern Long Island Audubon Society
Easton Birding Society
Eco-Logic, WBAI-FM
Endangered Habitats League
Environmental Solutions LLC
Facts About Wildlife and Nature Society (FAWNS)
Fort Collins Audubon Society
Friends of California Condors Wild and Free
Friends of Dyke Marsh
Friends of Stikine Society
Friends of the Boundary Mountains
Friends of the Clearwater
Friends of the Kalmiopsis
Friends of the San Pedro River
Georgia Ornithological Society
Gifford Pinchot Task Force
Golden Gate Audubon Society
Great Old Broads for Wilderness
Grouse Inc.
Highlands Plateau Audubon Society
Hilton Pond Center for Piedmont Natural History
Huachuca Audubon Society
Illinois Ornithological Society
Information Network for Responsible Mining
Kerncrest Audubon Society
Kestrel Land Trust
Kettle Range Conservation Group
Klamath Forest Alliance
Klamath Siskiyou Wildlands Center
Lane County Audubon Society
Laramie Audubon Society
Los Padres ForestWatch
Louisiana Audubon Council
Madrone Audubon Society, Inc.
Magic
Maricopa Audubon Society
Minnesota River Valley Audubon Chapter (MRVAC).
Northern Flint Hills Audubon Society
Northern Jaguar Project
Otter Creek Audubon Society
Palls Verdes South Audubon
Payne County Audubon Society
Pomona Valley Audubon
Prairie Hills Audubon Society
Prescott Audubon Society

Rainforest Biodiversity Group
Red Rock Audubon Society
Researchers Implementing Conservation Action
Roaring Fork Audubon Society
Rocky Mountain Wild
Safe Passage Great Lakes
Saint Louis Audubon Society
Salem Audubon Society
Santa Barbara Audubon Society
Save Our Cabinets
Save Our Sky Blue Waters
Saving Birds Thru Habitat
Sea and Sage Audubon Society
Sequoia Forest Keeper
Sierra Club, Rocky Mountain Chapter
Skagit Audubon Society
Soda Mountain Wilderness Council
South Bend Elkhart Audubon Society
South Florida Wildlands Association
Southern Maryland Audubon Society
The Clinch Coalition
The Environmental Protection Information Center (EPIC)
The Institute for Bird Populations
The Purple Martin Society of North America
The Tennessee Ornithological Society heartily
The Urban Wildlands Group
Threatened and Endangered Little Applegate Valley (TELAV)
Tribal Environmental Policy Center
Tucson Audubon Society
Umpqua Watersheds, Inc.
Uranium Watch
Virginia Bluebird Society
West Pasco Audubon Society
Western Nebraska Resources Council
Whidbey Environmental Action Network
Wild Bird Recovery Inc.
WildCare
WildEarth Guardians
Wildlife Information Center
World Temperate Rainforest Network
Yellowstone Valley Audubon Society
Yosemite Area Audubon Society