

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