

*Wildlife and Hunting Heritage  
Conservation Council*

Feb 6, 2015

The Honorable Sally Jewell  
Secretary of the Interior  
1849 C Street NW  
Washington D.C. 20240

RE: Recommendations on BLM Planning 2.0

Dear Secretary Jewell:

The Wildlife Hunting and Heritage Conservation Council (Council) is pleased to recommend several specific actions to benefit wildlife and hunting as the Bureau of Land Management creates the first substantial revisions to its land use planning process in nearly 40 years. America's 245 million acres of BLM public lands provide crucial habitat for wildlife, and are an integral part of our hunting heritage. The following recommendations concerning public access, cooperation with state fish and wildlife agencies, conserving big game corridors, conserving undeveloped habitats, restoring and enhancing habitats, and clarifying multiple use are provided for your consideration as you plan for the sustainable future of some of America's best public lands.

1. Public access

Lack of access to lands open to hunting, fishing and recreational shooting is a primary reason that sportsmen and women stop participating in outdoor recreation. According to the U.S. Fish and Wildlife Service, 72% of all western hunters depend on public lands for part or all of their hunting access.

Section 201 of the Federal Lands Policy and Management Act directs the BLM to "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values including, but not limited to, outdoor recreation." The Council recommends that the BLM add language to its Land Use Planning Handbook instructing BLM field offices and districts to utilize the land inventory maintenance process to evaluate lands for their accessibility to the public. The resource management planning process should identify and provide public access to currently inaccessible parcels of public land for hunting, fishing and recreational shooting. We further recommend that the Land Use Planning Handbook require that resource management and travel plans describe how they are providing for public access to BLM lands for hunting, fishing and recreational shooting.

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## 2. Incorporating State agencies wildlife population objectives

The BLM should integrate state fish and wildlife agency wildlife population objectives into its land use planning decisions. This is necessary to ensure that agency decisions effectively conserve habitats that support abundant fish and wildlife populations. The Council recommends that the BLM develop land use plans and habitat objectives in close cooperation with the appropriate state fish and wildlife agency. This will increase opportunities for sportsmen and create greater economic return from sportsmen to local economies. Furthermore, the Council recommends that the BLM require that BLM incorporate state wildlife agency population and management objectives into its land use plans and habitat management objectives.

## 3. Conserving big game migration corridors and stopover habitat

A greater understanding of the importance of wildlife migration corridors and stopover habitats has created a clear need to conserve these habitats in land use planning. At present, there is no clear guidance or explicit language in the BLM Land Use Planning Handbook (1601) or the Wildlife and Fisheries Management Manual (6500) for the management and conservation of wildlife migration corridors and stopover habitats. These habitats are crucial for the long-term sustainability of important wildlife populations. The Council recommends that formal guidance be developed within the wildlife section of the handbook to define and ensure the recognition and conservation of big game migration corridors and stopover habitats.

## 4. Conserving and restoring intact and undeveloped habitat

Intact and undeveloped public lands, commonly known as backcountry, provide important wildlife security habitat and offer hunting opportunities where sportsmen can escape crowds and enjoy remote hunting experiences. The Council recommends that the BLM create a management tool through the Land Use Planning Handbook to ensure the conservation of backcountry hunting areas. This should ensure continued public access, support restoration and enhancement of habitats and conserve high value hunting lands from development that would degrade habitats or limit recreational opportunities.

## 5. Prioritizing restoration and enhancement of habitats

Many BLM managed habitats are threatened by noxious weeds and insufficient active restoration. Other areas are impacted by long-term fire suppression and overgrazing by domestic livestock that has resulted in excessive woody vegetation densities of some species, including juniper and pinyon pine. Mule deer and sage grouse are being negatively impacted by such deteriorating habitat conditions. The Council recommends that local BLM field offices and districts should work directly with state fish and wildlife agencies and seek on-the-ground partners for restoration and enhancement projects.

The Council further recommends that the BLM add language to the handbook that bolsters the agency's commitment to active habitat management to improve, restore and enhance wildlife habitat. Appropriate restoration practices may include pinyon pine and juniper removal, noxious weed control, reseeding after fires, installation of guzzlers, livestock exclosures, etc. Chemical treatments, mechanical treatments, rotational grazing and prescribed burns also should be among the tools available for habitat restoration and enhancement.

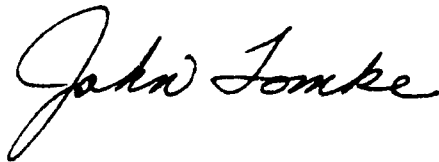
## 6. Multiple-use

A more effective working definition of multiple use management is needed. According to the multiple use and sustained yield mandates of Section 103(c) of FLPMA (43 U.S.C. 1702(c)), Congress clearly intended for the term “multiple use” to include “the use of some land for less than all of the resources.” The Council recommends that the BLM amend the Land Use Planning Handbook to recognize that statutorily defined “principal or major uses” of BLM-managed lands – including fish and wildlife management and outdoor recreation – may be exclusive of other defined uses in certain areas. Consistent with legislative intent, “multiple use” should not always mean “all uses in all places.” BLM should have the ability to prioritize fish and wildlife habitat conservation and outdoor recreation and these uses should be priorities in some locations where the presence of authorized but incompatible uses would diminish the public’s opportunity to utilize BLM lands for hunting, fishing and outdoor recreation.

## Conclusion

The Council appreciates your careful consideration of these recommendations on the BLM land use planning revision process. We believe that Planning 2.0 offers an opportunity to modernize and improve planning and management of BLM lands and we feel strongly that it should promote improved habitat, increased access and quality opportunities for American sportsmen and women to recreate on public lands. We look forward to working with you in this process, and would be pleased to discuss our recommendations in greater detail at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "John Tomke".

John Tomke, Chair  
Wildlife and Hunting Heritage Conservation Council

Cc:  
Neil Kornze, Director, BLM