Dear Secretary Bernhardt,

The importance of America’s public lands to sportsmen and women cannot be overstated. The lands administered by the Bureau of Land Management (BLM), the country’s largest public land manager, provide extensive hunting, recreational shooting and fishing opportunities, some of the best in the world. We are encouraged that the Department recognizes in Secretarial Orders 3347, 3356, 3362 and 3366 that these opportunities face challenges due to lack of public access, changes in size and quality of habitat for game species, and multiple land management priorities. We applaud these and other Department efforts to elevate and address these challenges, and your continuing support of the sportsmen and women.

Agencies can address these challenges by prioritizing elements of public lands management that are important to sportsmen and women, especially public access and increasing productivity of game species, and then applying appropriate solutions to ensure that current and future generations can enjoy our public lands.

One management tool that adds management emphasis to areas and issues important to sportsmen is the Backcountry Conservation Area (BCA). This management approach allows and encourages the BLM to prioritize and focus on ensuring and expanding public access and conserving, restoring and enhancing fish and game habitats through actions such as reducing fire risk through forest thinning, the removal of invasive species, and improving riparian areas – all with the goal of supporting hunting, recreational shooting, trapping, fishing, and other outdoor recreation.

Existing statutes, regulations and policies allow the BLM to use the Special Recreation Management Area (SRMA) designation to define areas that will be managed to maintain or enhance high-quality, wildlife-dependent recreation opportunities as BCAs. The Council recognizes that the SRMA designation has long been used to provide focused management for an administrative unit where existing or proposed recreation opportunities are recognized for their unique value, importance, and/or distinctiveness, especially as compared to other areas used for recreation. In practice, this has allowed the agency to establish, maintain and manage specified public lands as OHV Management Areas, hiking trail systems, biking trail systems and technical climbing areas that cater to specific user groups. With this in mind, we believe that BCAs, when crafted carefully with public and partner agency input, have the potential to provide for focused
management that similarly benefits the nation’s hunters and anglers as public land stakeholders with unique needs.

The BLM targets the use of BCAs in largely intact landscapes, in areas with minimal fluid or hard rock mineral potential or other resource conflicts. BCAs support existing uses, and aren’t intended to limit ongoing uses of public lands, nor be a tool to do so. BCAs simply allow BLM to prioritize and focus on sportsmen’s concerns, issues, and opportunities for continued enjoyment of our public lands. The state wildlife agencies of Idaho, Nevada, Oregon, Colorado and Montana support BLM’s use of BCAs and BCAs are widely supported by local hunting, fishing, off-road vehicle and other outdoor recreation groups across the West.

The Hunting and Shooting Sports Conservation Council also supports BLM’s use of BCAs when the following conditions are met: First, BCAs should encourage the use of active management as a means to achieve their objectives. For example, pinon and juniper removal, forest health projects, the placement of water supply devices and other practices that benefit wildlife and habitat should be utilized where it is appropriate. Second, BCAs should, to the extent possible, avoid and minimize conflicts with grazing, oil and gas and mineral development. Finally, BCAs should be developed and implemented consistently with the wildlife management objectives of the states in which they are located.

The Council believes BCAs help DOI and BLM implement Executive Order 13443 and the hunting SOs, and we encourage the Department and BLM to incorporate this tool into the Resource Management Planning processes where appropriate.

We thank you for all your efforts to support sportsmen and women and the issues important to us. Please contact us with any questions or feedback, we look forward to working with the Department and BLM on approaches and issues important to our community.

Sincerely,

Jeffrey Crane
Chairman
Dear Secretary Bernhardt,

The members of the Hunting, Shooting Sports Conservation Council are most appreciative of the leadership from Interior staff and the efforts of the United States Fish and Wildlife Service (USFWS) staff to increase hunting access to our Nation’s refuges. As you well know, these refuges have been largely acquired as a result of the support by hunters, most notably via the Federal Duck Stamp, and providing increased and enhanced access is demonstrating not only that hunting is a compatible use on refuge lands, but hunting and enhanced hunting opportunity should be prioritized. As many hunters rely extensively on public lands, this increased access and opportunity is very welcome news.

Today, we are writing to urge you to maintain the momentum generated in the last two years and also seeking clarity on the impact of the actions taken to date. We would like to ask the following:

1) **We ask the USFWS to maintain momentum from the last two years and maintain aggressive pace to increase access on USFWS refuges at levels similar or greater than those levels seen in 2018 (248,000 acres).**

Increasing hunting access on existing USFWS refuges provides the most cost effective means of significantly increasing hunting access and last year’s efforts to increase access were widely heralded by wildlife and conservation organizations as well as hunters across the country. As access consistently ranks as the most important determinant in hunter satisfaction, any and all efforts to provide incremental access and hunting opportunities is a high priority for the Council.

2) **We ask the USFWS to provide a detailed report of accomplishments from the two previous years as to access on Refuge lands (clarify as to what land has been opened and what hunting opportunities has been expanded and provide detailed explanations on the definition of terms used by the USFWS to provide clarity to stakeholders).**

A summary of the different actions taken by the USFWS will help the Council and partners properly convey the value of past actions as well as more fully describe the real value to hunters of these efforts and assess its impact.

3) **We ask the USFWS to provide a summary of actions taken to make USFWS regulations consistent with State regulations.**

We recognize that this represents a perhaps under-celebrated but significant achievement that deserves recognition at least on par with the raw acres opened for increased access. While a full reporting of the 3,000 lines of regulations that have been stricken is certainly not necessary, a working summary of high impact hunting regulations reform would be valuable to the Council and as a communication output to hunters.

4) **Progress on Consistency of Method of Take**
In managing their facilities for hunting the USFWS establishes rules governing the method of take for these federal lands. The Council is seeking to understand the methodology the USFWS utilizes in establishing these rules, their consistency, or lack thereof, between states, and the extent to which federal law governs these federally administered lands.

Acting Secretary Bernhardt, again we are most appreciative of the leadership from the Department, the continued hard work from USFWS leadership and the Hunt-Fish teams on these very important topics and we look forward to a full briefing and more good progress to provide more access and opportunities for sportsmen and women.

Sincerely,
The Honorable David Bernhardt  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Secretary Bernhardt,

The Hunting and Shooting Sports Conservation Council (Council) recommends that the Secretary take action to prohibit the National Park Service (NPS) from closing lands to hunting in circumstances where the NPS attains management authority over the lands without Congressional action.

The problem arises because the NPS has adopted a rule that gives the agency the authority to prohibit hunting and trapping in any National Park System unit unless Congress has expressly directed that hunting must or can be carried out in that unit. The rule states that “[h]unting shall be allowed in park areas where such activity is specifically mandated by Federal statutory law.” 36 C.F.R. §2.2(b)(1). Under authority of this regulation, the NPS has closed lands to hunting, not only where Congress has explicitly stated its intention to prohibit hunting, but also in cases where Congress has remained silent in the unit’s enabling legislation. This regulatory approach is also reflected in NPS policy.


The NPS regulation and policy that rely on Congressional silence to close to hunting those lands specifically identified by Congress as NPS units runs contrary to this Administration’s efforts to increase hunting activities and access on federal lands. While the Council would like the Secretary’s assistance in amending this general approach to hunting on NPS lands, the subject of this letter is more specific.

---

1 The regulation also provides for circumstances where Congress gives the agency authority to permit hunting and trapping: “Hunting may be allowed in park areas where such activity is specifically authorized as a discretionary activity under Federal statutory law if the superintendent determines that such activity is consistent with public safety and enjoyment, and sound resource management principles. Such hunting shall be allowed pursuant to special regulations.” 36 C.F.R. §2.2(b)(2).

2 Hunting, trapping, or any other methods of harvesting wildlife by the public will be allowed where it is specifically mandated by federal law. National Park Service, Management Policies 2006, 8.2.2.6 Hunting and Trapping, at 103.
The issue is the NPS’s application of the regulation and policy to lands that are transferred to the NPS’s administrative authority without Congressional involvement. This happens, for example, when a President designates federal (or private) land as a national monument and transfers the monument to NPS administrative authority. In such cases, regardless of whether the previous administrative agency authorized hunting in the land unit, the NPS, relying on the afore-referenced regulation and policy, prohibits all hunting activities in the area.

Castle Mountains National Monument (CMNM) provides an excellent example. Castle Mountains National Monument became a national monument by Executive Order in February of 2016. The Monument’s proclamation identified the NPS as the agency to administer the unit. The NPS, relying on its “Hunting and Trapping” regulation and policy, closed the area to hunting.

In response to concerns raised by representatives of hunting non-governmental organizations and others, former Secretary of the Interior Zinke took note of the problem. In a Memorandum he prepared for the President entitled “Final Report Summarizing Findings of the Review of Designations Under the Antiquities Act,” former Secretary Zinke noted that the designation of Castle Mountains National Monument and transfer from Bureau of Land Management (BLM) administration to NPS authority resulted in the NPS’s closure of valuable hunting opportunities.

One example is the Castle Mountains National Monument (CMNM), which was established by Proclamation No. 9394 on February, 16, 2016. The CMNM consists of approximately 21,000 acres and is managed by the NPS. The CMNM was designated adjacent to the Mojave National Preserve, which by statute permits hunting. However, the CMNM Proclamation is silent as to hunting. As a result, hunting is prohibited within the 21,000-acre Monument, while it is permitted in the adjacent Mojave National Preserve.

The arbitrariness of the NPS’s decision to close hunting is highlighted by the fact that of the three National Monuments established that same day, only CMNM is closed to hunting. Sand to Snow National Monument, administered by the U.S. Forest Service (USFS), and Mojave Trails National Monument, administered by the BLM, both remain open to hunting. This disparity in hunting opportunities is due to the fact that neither the USFS nor the BLM have adopted regulations or policies similar to those of the NPS.

The Council believes that a transfer of lands to NPS administration should not result in a loss of hunting opportunities, particularly for land transfers that have not involved Congressional direction. While a President, when drafting the Executive Order to establish a monument, can expressly require the continuation of hunting, there are no guarantees that future presidents will take the necessary actions to protect hunting opportunities. This Administration needs to take action to make sure that lands open to hunting remain open to hunting, even when those lands are transferred to the administration of the NPS by executive, and not Congressional, action.

To address this issue, the Council recommends that the Secretary issue a directive in the form of a Secretarial Order that prohibits the NPS from applying its “Hunting and Trapping” regulation
and policy to NPS administered land units established by National Monument designation or other executive action and/or any transfer or redesignation of land unit or administrative authority that does not involve Congressional action. The Council also recommends that the Secretary direct the NPS to revise both the “Hunting and Trapping” regulation and policy to reflect this exclusion.

The Council appreciates your willingness to consider this recommendation as part of your efforts in maintain and increase opportunities for hunting on federal lands managed by DOI. We look forward to continue to work with you and your staff to find solutions that will prevent further losses of important hunting opportunities.

Sincerely,

Jeffrey S. Crane
Chairman

Cc:
Dear Secretary Perdue,

The Hunting and Shooting Sports Conservation Council (HSSCC) is chartered to provide recommendations to the Federal Government, through the Secretary of the Interior and the Secretary of Agriculture, regarding policies and endeavors that benefit wildlife resources; encourage partnership among the public; sporting conservation organizations; and Federal, state, tribal, and territorial governments; and benefit recreational hunting and recreational shooting sports. It is with this in mind, that we write today to request your assistance in addressing an issue that has recently come to the HSSCC’s attention.

In November, 2018, the U.S. Forest Service issued a Draft Decision Notice for the Central Cascades Wilderness Strategies Project Environmental Assessment (EA), a planning exercise undertaken jointly by the Deschutes and Willamette National Forests. This project involves five designated wilderness areas in the Oregon Cascades where, according to the Forest Service’s analysis, increases in visitation are leading to degraded wilderness character in some locations and high-use travel corridors. To address this issue, the EA proposes to institute an Adaptive Management Plan and trailhead quotas that will limit public access for both day use and overnight use at numerous wilderness access points throughout the planning area.

Although the EA does not make the wilderness areas within the planning area “off-limits” to hunting, we are concerned that the proposal will have a negative impact on many hunting opportunities managed by the Oregon Department of Fish and Wildlife (ODFW). While we appreciate that the Draft Decision identifies some exemptions from limited entry permit requirements for certain state-issued hunting license holders, many others will face new problems gaining access to public land. Limited quotas will negatively impact the ability to scout for game species prior to an established hunting season, limit hunters’ ability to hunt in groups with friends and family and restrict access to habitat that is productive for big game species.

We also recognize that a limited entry permit system will likely interfere with ODFW’s mission to develop and maintain public access to the lands and waters of the state and the wildlife resources thereon; to provide optimum recreational benefits; and to make decisions that affect wildlife resources of the states for the benefit of the wildlife resources and to make decisions that allow for the best social, economic and recreational utilization of wildlife resources by all user groups. In general, the HSSCC is opposed to federal land management planning actions that negatively impact state wildlife management objectives and / or administrative duties.

The HSSCC recognizes that the statutory mandate to preserve the wilderness character of a designated area can present unique challenges for federal land management agencies, including the Forest Service. Unfortunately, we also recognize that increased visitation and outdoor recreation participation in designated wilderness areas will likely lead to future analyses and planning to address impacts in other areas throughout the National Forest System. With this in mind, we believe the public, including hunters, would benefit from a standardized approach to these evaluation and planning processes. Should you choose to move forward with this recommendation, we urge you to consider the following points:
Most hunters utilizing wilderness areas spend the majority of their time away from heavily used trails and areas that attract most day use visitors. Consequently, hunters’ impact (or lack thereof) on the wilderness character of a designated area merits special consideration when developing limited entry permit systems that control public access to federal land.

State issued hunting and fishing licenses should serve as an “in lieu” wilderness use permit.

Special exemptions from limited entry permit systems should be granted to those hunting in groups.

Special exemptions from limited entry permit systems should be granted to state issued hunting license holders wishing to scout prior to a hunting season if they possess a hunting license that is valid for the area in which the limited entry permit system exists.

Restricted access to designated wilderness should be implemented only when high visitor use is a demonstrated threat to wilderness character.

Use of limited entry permit systems should be limited to temporal periods during which visitor use that impacts wilderness character is present. For example, in many wilderness areas, it may be necessary to limit public access only during high use periods from Memorial Day to Labor Day.

Consistently applied exemptions for administration of state fish and wildlife management duties should be incorporated into planning guidance that considers the need for limiting access to the National Wilderness Preservation System.

It is our hope that developing a process to balance the integrity of wilderness with the public’s recreation needs will allow the Forest Service to address these challenges proactively and holistically. If the HSSCC can be helpful throughout this process, we stand ready and willing to assist.
Mr. David Bernhardt  
Deputy Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240  

Dear Secretary Bernhardt,

Congress adopted the Endangered Species Act (ESA) to give the Department of the Interior (DOI), the states and the public effective strategies and mechanisms to improve the conservation status of species in greatest jeopardy. The implementation of that law over the last four decades has been hindered by the ESA’s ambiguities. These ambiguities have often led to costly and unnecessary litigation that has hindered rather than supported the DOI’s ability to facilitate important programs intended to benefit the world’s wildlife and plants.

Last year, the DOI, through the U.S. Fish and Wildlife Service (Service), proposed several regulations designed to resolve some of the ESA’s ambiguities and to improve the Service’s ability to administer the law. These proposed changes included “Revisions of the Regulations for Prohibitions to Threatened Wildlife and Plants,” 83 Fed. Reg. 35174 (July 25, 2018) – Docket FWS-HQ-ES--2018-0007 and “Revision of the Regulations for Listing Species and Designating Critical Habitat,” 83 Fed. Reg. 35193 (July 25, 2018) – Docket FWS-HQ-ES-2018-0006. The Hunting and Shooting Sports Conservation Council (Council) strongly supports these proposed regulatory revisions. In this letter, we address our positions on specific proposals, which, if finalized, will have beneficial impacts for the wildlife that our community works to conserve and enjoy.

Support for the Promulgation of Individual 4(d) Rules, Where Necessary, for Species Classified as Threatened

The Council agrees with the Service’s proposal to abandon its practice of generally extending by regulation to threatened species most of the prohibitions statutorily applicable to endangered species. The Council supports the proposed revision that would now require the Service to determine which if any protective regulations are appropriate for each future species classified as threatened. Where such protections are deemed necessary, the Service would promulgate a unique regulation, pursuant to 16 U.S.C.§ 1533(d), for that threatened species (4(d) rules).

The Council supports this proposed regulatory modification because it will give the Service greater flexibility in designing conservation mechanisms that will be most effective for each individual species classified as threatened. Not all species benefit from the same conservation strategies. In some cases, as demonstrated by Congress’ decision to include “regulated taking” in the ESA’s definition of “conservation,” hunting can serve as an effective conservation strategy for species classified as threatened. 16 U.S.C. § 1532(3). The proposal to address the conservation strategies for each threatened species, on an individual basis, ensures that the
Service will maintain the regulatory flexibility to utilize regulated taking as a conservation mechanism for specific species, when circumstances call for such strategies.

The Council encourages the Service to consider utilizing regulated take for the conservation of some threatened species and to build that option into the conservation strategies for appropriate species before urgent need for the strategy arises. The Council recommends that, when it develops 4(d) rules to provide conservation strategies for threatened species, the Service should promulgate regulations for appropriate species that make regulated take an option that can be exercised when the species is facing population pressures that cannot otherwise be relieved within the relevant ecosystem.

**Support for Using the Same Factors for Listing and Delisting Determinations**

The Council supports the Service’s proposal to clarify that the same five risk factors used to determine if a species should be classified as threatened or endangered will also apply to delisting determinations. Because of regulatory ambiguities, courts have required the Service to look beyond the five statutory factors to determine whether a species should be removed from the threatened or endangered species lists. Nothing in the ESA demonstrates that Congress intended to make it more difficult for a species to be removed from listing status than for a species to be listed. This proposed regulatory change will clarify the Service’s understanding of Congressional intent and will help to prevent listings of species from becoming permanent simply because the species cannot meet the higher delisting hurdles imposed by courts in their review of litigation challenges to delisting decisions. This proposed change will also enable the Service to recognize and reward the conservation efforts and successes of states, regions and other entities, when those efforts have made it so that the species no longer meets the statutory criteria for classification as an endangered or threatened species.

**Support for Delisting of Entities That Do Not Qualify as “Species”**

The Council supports the proposed change that would enable the Service to remove listed entities from federal protection when they do not meet the statutory definition for “species.”

The Council recognizes that ambiguities in the ESA and its regulations have allowed courts to deprive the Service of flexibility in its classification of populations of species. This proposal recognizes the fact that the Service’s understanding of the taxonomic and sometimes biological status of populations can change over time due to better data, scientific developments and changes in research methodologies. The Council supports this proposed change because it should help the Service to focus its efforts and resources on only those species that will benefit from the protections and restrictions associated with listed status.

The Council thanks you and Departmental staff for your efforts to support the hunting and wildlife conservation communities. Please contact us with any questions or feedback, we look forward to working with you on strategies that will improve the Service’s administration of the ESA.
Sincerely,
Mr. David Bernhardt  
Deputy Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

Dear Secretary Bernhardt,

On behalf of the members of the Hunting and Shooting Sports Conservation Council, we wish to offer our sincerest thanks for your affirmation of the importance of significantly increasing migratory waterfowl populations and hunting opportunities as described in Secretarial Order #3356. This action clearly demonstrates the importance of waterfowl conservation efforts across North America.

Additionally, we appreciate your specific note on the use of voluntary perpetual wetland and grassland easements in the Order. These easements have been the backbone of waterfowl habitat conservation in the Prairie Pothole Region for nearly sixty years and represent an unparalleled conservation legacy. This legacy not only includes the habitat the Service has protected, which is one of the most impactful conservation efforts in history, but also demonstrates an incredible linkage between waterfowl hunter’s contribution via the Federal Duck Stamp to a tangible and durable impact in wetland and grassland conservation on the Prairies. As an anecdote of the value these easements have for duck hunters, one easement tract in north central South Dakota, where banding has occurred, has produced ducks harvested in 31 states and 13 countries.

Mr. Secretary, these easements are truly working land easements and demonstrate how the public and private landowners can unite in a partnership for a common purpose. Farmers with wetland easements can continue to farm and grassland easements can continue to be used for haying and grazing. These working land easements provide producers with a payment in return for the retaining valuable habitat all the while doing so in a manner that works for their land, their business and their families.

Today, the waiting list for USFWS easements is long, demonstrating that producers in the Prairies are eager to enter into these agreements. As of this note, more than one thousand farming and ranching families in North and South Dakota alone are awaiting funds to complete the easement transaction. This means a thousand farmers and ranchers have made the business decision that these easements are a good business decision for them and their families, making USFWS easements one of the most popular and desirable conservation options for private landowners in the Prairies.

Mr. Secretary, these easements represent a profound property right and the represent a serious decision of individuals about both their legacy for their land and their families. We sincerely
appreciate your identification of these easements as a priority for Interior and the USFWS and we appreciate your efforts to maintain these tools as the foundation for waterfowl conservation efforts.

Sincerely,
The Honorable Sonny Perdue  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20240

Dear Secretary Perdue,

In passing HR 2, the Agriculture Improvement Act of 2018, Congress and the President made a commitment to our Nation’s farmers and ranchers. The legislation also affords a great deal of opportunities for conserving and enhancing habitat on our working farms and ranches. We are especially grateful for the good work done by Congressional leaders and their staff to craft good legislation and ensure the Bill’s passage in the 115th Congress.

The voluntary, incentive-based conservation programs of the farm bill help private landowners conserve millions of acres of vital habitat across the country. Congress clearly prioritized several conservation programs with increases in the 2018 Farm Bill. The Conservation Reserve Program’s acre cap will be increased by 3 million acres providing for greater grassland habitat and nesting cover. The Agricultural Conservation Easement Program funding level was increased to $450 million/annually providing permanent conservation of marginal farmland.

Of particular interest are revisions to the Environmental Quality Incentives Program (EQIP). Congress made several adjustments to EQIP that we perceive to be of high value in enhancing the program’s outcomes for wildlife. They include an increase to 10% for EQIP practices directed to wildlife conservation and the allowance of agreements up to ten years for practices that benefit wildlife. This will provide more opportunities for farmers and ranchers to implement practices on their working lands with real and measurable benefits to habitat and wildlife.

Additionally the new EQIP language calls out the use of EQIP to provide seasonal migratory bird habitat including both the conservation of small temporary and seasonal wetlands as well as providing for migratory bird habitat via post-harvest flooding of agricultural fields. These habitats in aggregate provide the essential needs of migratory birds from the breeding grounds through key wintering areas.

An emphasis on conserving small prairie pothole wetlands will provide the essential carrying capacity for breeding ducks yet they also provide significant public benefits in flood attenuation, nitrogen and phosphorus cycling and carbon storage. An incentive paid to farmers will provide the market signal that these wetlands are valuable to the public while also preserving the producers’ ability to continue to farm the land as they always have.

Post-harvest flooding provides essential foraging resources in many wintering areas for migratory birds while also minimizing soil erosion, aiding in aquifer recharge and improving
water quality. An investment in these resource concerns will provide for stacked benefits providing significant positive outcomes for a modest investment again while not negatively impacting agricultural production.

Finally, these practices have been developed in concert with agricultural producers to ensure that they fit well within their operations. These tools have documented high acceptance and enthusiasm amongst producers and will result in a productive collaboration amongst conservation and agricultural interests for the benefit of waterfowl, other migratory birds and myriad other public benefits.

Secretary, we urge your staff to work with the interested partners to ensure that these new opportunities to conserve and enhance migratory bird habitat are fully realized and implemented.

Sincerely,
Mr. David Bernhardt  
Deputy Secretary  
U.S. Department of the Interior  
1849 C Street, SW  
Washington, D.C. 20240

Dear Secretary Bernhardt,

The Hunting and Shooting Sports Conservation Council (Council) appreciates the efforts of the Department of Interior to advance collaborative conservation by “working harmoniously with our state, tribal, territorial, and local partners,” as demonstrated through the implementation of Secretarial Order 3356, “Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories” and the Department’s investment in state research and conservation projects to advance Secretarial Order 3362, “Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors.”

In furtherance of the Department of Interior’s efforts to improve collaborative conservation and recovery of species, the Council requests that the Administration support the “Recovering America’s Wildlife Act,” when it is introduced during the 116th Congress. If passed, the legislation would provide resources to State and Territorial Fish and Wildlife Agencies to support state-based conservation and restoration of fish, wildlife, and their habitats to the direct benefit of sportsmen and women. The legislation has been revised to ensure it does not conflict with the Administration’s priority of establishing a Public Lands Infrastructure Fund.

The “Recovering America’s Wildlife Act” was developed by the Blue Ribbon Panel on Sustaining America’s Diverse Fish and Wildlife Resources, chaired by Johnny Morris, founder of Bass Pro Shops, and former Wyoming Governor Dave Freudenthal, and comprised of national business and conservation leaders. By fostering on-the-ground, collaborative conservation, the Act will accelerate the restoration and recovery of the more than 12,000 species of greatest conservation need (SGSN), as defined in the State Wildlife Action Plans. Recovering SGSN through voluntary, collaborative efforts—before populations reach a crisis point—is the most efficient and cost-effective way to restore wildlife populations, while simultaneously reducing the need for future listings under the Endangered Species Act and decreasing potential regulatory uncertainty for private landowners and industries.

The Council thanks you for your efforts to support collaborative conservation. We look forward to working together to accelerate the recovery of America’s fish and wildlife populations. If you have question or need more information, please contact Council Designated Federal Officer Doug Hobbs at doug hobbs@fws.gov or (703) 358-2336.

Sincerely,
Dear Acting Secretary Bernhardt:

The Hunting and Shooting Sports Conservation Council (Council) requests your assistance in facilitating discussions between the Bureau of Land Management (BLM) and the Shooting Committee of the Council to address and resolve long standing issues, as well as opportunities, associated with recreational shooting on BLM managed lands.

In 2012 the BLM signed the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding with hunting, wildlife conservation and shooting sports organizations (NGOs) to assist in addressing national issues and to facilitate cooperative relationships associated with these activities on federal lands. Nine years ago the BLM attempted to adopt a recreational shooting policy without benefit of counsel or review of the Roundtable NGOs nor of our predecessor council, the Wildlife and Hunting Heritage Conservation Council (WHHCC). Fortunately, the WHHCC effectively interceded and was given an opportunity to review and comment on the draft policy, a policy that raised serious concerns among the NGOs we represent. The policy was ultimately abandoned by the BLM at the direction of former Secretary of the Interior Ken Salazar. Attached are the comments and recommendations submitted to the BLM in December 2011 by the WHHCC.

Repeated efforts have been made over the last nine years to engage the BLM in the development of an agency-wide policy that would provide consistency, fairness, and predictability for recreational shooting management and, at the same time, resolve issues associated with this activity. Thus far, those efforts have produced little in results, with the significant exception that the BLM is working with the Arizona Game and Fish Department to identify sites on public lands where recreational shooting management would benefit from improvements (i.e. berms). That would never have happened without Secretarial leadership in this Administration. Attached for your reference is a list of issues we believe would help to shape the parameters of the discussions.

You have strongly expressed your desire to ensure a sound future for hunting, fishing and recreational shooting on BLM lands by speaking to this in your capacity as Deputy Secretary and most recently in March in your comments as Acting Secretary at the North American Wildlife and Natural Resources Conference concerning disposal of BLM lands that may impact recreational access and opportunities. We firmly believe that with your oversight, a series of meetings between the Council’s Recreational Shooting Committee and BLM leadership should be able to achieve resolution of policy and management issues leading to the development of a consistent, fair and predictable policy for recreational shooting.

The Council is in receipt of BLM’s response to its letter of last September asking specific questions regarding recreational shooting. That information coupled with the comments and recommendations of the WHHCC, and the Shooting Committee’s knowledgeable of the issues should be all that is necessary to bring to close a struggle exceeding a decade to achieve what should be mutual objectives which are security of access and opportunities for recreational shooting and enhanced stewardship of our public lands.

We are most anxious to begin the discussions that will lead to fulfillment of these objectives.
Sincerely,