June 17, 2013

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

Secretary Jewell:

As members of the Wildlife and Hunting Heritage Conservation Council (Council), a Federal Advisory Committee tasked with advising the Departments of Interior and Agriculture about agency actions that impact recreational hunting and wildlife resources on public land, we write today to request your assistance in addressing an issue of great importance to the sporting conservation community.

As you know, the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.), as amended by the Public Rangelands Improvement Act of 1978 (43 U.S.C. 1901 et seq.), prompted the establishment of the Bureau of Land Management’s (BLM) Resource Advisory Councils (RACs) consisting of major citizen interests concerned with resource management planning or the management of public lands. Intended to incorporate formalized citizen participation into the management of public lands, these RACs provide individuals with diverse backgrounds and interests with the opportunity to become active and engaged citizen-participants in the management of a federal resource that is of undeniable value to the American People.

Pursuant to 43 C.F.R. § 1784.2-1, each RAC, through the Secretary’s requirements, shall be structured to provide fair membership balance, both geographic and interest-specific, in terms of the functions to be performed and points of view to be represented, as prescribed by its charter. Additionally, § 1784.2-1 states that each RAC shall be formed with the objective of providing representative counsel and advice about public land and resource planning, retention, management and disposal.

Presumably to ensure this membership balance, 43 C.F.R. § 1784.6-1 (c) directs the Secretary to select and appoint RAC members that fall into one of the following three categories, as described on the BLM RAC website: “Commercial/commodity interests”; “Environmental/Historical groups” and; “State and local government, Indian tribes, and the public at large.”

As it currently stands, the Council interprets § 1784.6-1 (c) to mean that applicants wishing to nominate themselves or others as representatives of the sportsmen’s community on a RAC should do so under the second appointment category, “Environmental/Historical groups,” representing “Dispersed recreational activities.”

Although the sportsmen’s conservation community often works hand-in-hand with environmental groups to achieve common goals such as wildlife habitat improvement and range conservation, the Council feels strongly that hunters, anglers and recreational shooters are a unique and identifiable group in and of themselves.
43 U.S.C. § 1702 (l) defines “principal or major uses” of BLM land as including and limited to domestic livestock grazing, fish and wildlife development and utilization, mineral exploration and production, rights-of-way, outdoor recreation and timber production. In this context, sportsmen and women represent a unique community of interest as users of federal public land managed according to the Federal Land Policy Management Act because hunters, anglers, trappers and recreational shooters serve as the critical link between fish and wildlife development and outdoor recreation, two statutorily recognized principal or major uses of BLM-managed lands.

Sportsmen and women are also the foundation of the American System of Conservation Funding. The U.S. Fish and Wildlife Service’s most recent National Survey of Fishing, Hunting, and Wildlife Associated Recreation indicates that 37.4 million Americans over the age of 16 hunted and fished in 2011, spending $90 billion in pursuit of their passion for conservation and the outdoors. Since the inception of the Wildlife and Sport Fish Restoration programs in 1939, this spending has generated $14.5 billion dollars of excise tax revenue ultimately distributed to states for fish and wildlife management and sportsmen’s access as part of this unique “user pays-public benefits” system of conservation and wildlife funding.

According to Volume 196 of BLM’s Public Land Statistics publication, the agency estimates that hunters spent 5,403,000 days and anglers spent 2,306,000 days for a total of 7,709,000 recreation days on BLM land. As a result of their pursuit of these outdoor recreation activities, sportsmen and women highlight the importance of access to outdoor recreation opportunities and their contributions to active management of fish and wildlife as public land users who have a vested interest in multiple principal uses of federal public land.

Consequently, we believe it is appropriate for Department of Interior to initiate rule change proceedings to modify §1784.6-1 (c) (2) to include an appointment category for individuals wishing to represent sportsmen and women via their affiliation with nationally or regionally recognized hunting, fishing or recreational shooting organizations. Doing so will further the goals of identifying the sportsmen’s conservation community as unique users of America’s public lands and providing for balanced and broad representation within this category of RAC appointees.

Sincerely,

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc: Neil Kornze, Acting Director, BLM