

November 9, 2021

Tracy Stone-Manning
Director
Bureau of Land Management
760 Horizon Drive
Grand Junction, CO 81506

RE: Mitigation Policy

Dear Ms. Stone-Manning:

Thank you to you and your team for supporting effective, balanced, and durable mitigation policy at the Bureau of Land Management (BLM). Our hunting, fishing, conservation, professional society, outdoor-industry, and landowner organizations appreciate these efforts. We also greatly appreciate your staff taking the time to meet with the coalition of partners working on mitigation policy on August 25.

We commend BLM for rescinding IM-2019-018 (Compensatory Mitigation) and for reinstating the Bureau's Manual Section (MS-1794) and Handbook (H-1794-1) on mitigation. These were critical steps toward clarifying BLM's authority to recommend and require mitigation in a variety of circumstances and providing field offices with direction on how to utilize mitigation to balance use and conservation on public lands. We also were pleased to learn that BLM has signed an agreement with the U.S. Army Corps of Engineers to utilize its online mitigation tracking system (RIBITS) to provide the public with information on mitigation banks and in-lieu fee programs approved by the agency. This action will increase transparency around compensatory mitigation and help build public support for the approach. Finally, we appreciate BLM's commitment to training its field staff on how to make mitigation decisions. Training is essential to support increased consistency and efficient decision-making in the field. The BLM should look to reestablish Renewable Energy Coordination Offices (RECOs) to promote important federal enabling conditions necessary to achieving the administration's renewable energy goals. As siting commercial-scale renewable energy infrastructure will require balancing BLM's multiple use mandate, RECO teams should be prioritized for mitigation training.

With the release of these policies and BLM's commitment to training, we have increased confidence in the durability of these policies. However, there were few opportunities for the bureau to undertake outreach to the regulated community before finalizing these policies. We believe that it is important to solicit input from the regulated community that will be affected by these policies to understand their concerns and make improvements or clarifications in the coming years. Making a good faith effort to hear the perspectives of a wide array of stakeholders can help to deter future negative perceptions of mitigation. We stand ready to support BLM in undertaking this outreach.

Finally, we encourage BLM to clarify the role of states and other interested parties in the development of Regional Mitigation Strategies (RMS). If RMSs are developed without strong coordination with cooperating agencies, most notably the states, it will be difficult to gain and maintain much needed support. As such, we recommend that BLM clarify the role of states and others in the development of RMSs.

Thank you again for your work to improve BLM mitigation policies for our public lands. Our groups would appreciate a follow-up meeting with you and your staff to discuss mitigation policy further as you

advance agency directives. Please contact us if you have questions and to coordinate a future conversation (Madeleine West, mwest@trcp.org or Jessica Wilkinson, jwilkinson@tnc.org).

Sincerely,

American Sportfishing Association
Archery Trade Association
Backcountry Hunters and Anglers
Fly Fishers International
National Deer Alliance
National Wildlife Federation
National Wild Turkey Federation
North American Grouse Partnership
Orion: The Hunter's Institute
The Nature Conservancy
Theodore Roosevelt Conservation Partnership

Cc: Nada Culver, Deputy Director, Policy and Programs