

January 14, 2022

Tracy Stone-Manning
Director, Bureau of Land Management
1849 C Street, N.W.
Washington, DC 20240

RE: BLM Habitat Management Areas

Dear Director Stone-Manning:

The hunting and wildlife conservation organizations and professional societies signed below are writing in regard to the conservation and management of vital habitat for ungulate, upland bird, and migratory bird species on Bureau of Land Management-administered public lands. Simply put, in a changing world with increasing human pressures and climate impacts on natural systems, vital habitat for these taxa must be identified, conserved, and restored. Doing so would not only maintain wildlife abundance and biodiversity, it would also benefit hunting and other wildlife-dependent recreation while supporting the nation's \$689-billion outdoor recreation economy.

To that end, as the BLM develops internal guidance for the conservation of wildlife habitat and migration corridors in accordance with the priorities identified in the May 2021 *Conserving and Restoring the America the Beautiful* report and Secretarial Order 3362, **we encourage you to develop formal direction for the consistent application of the BLM's "Habitat Management Area" (HMA) tool**, where appropriate, in individual resource management plans to ensure the conservation, restoration, and enhancement of these habitat.

As you know, HMAs are an existing BLM land use tool that have been used in various ways to conserve and guide management of important wildlife habitat, including Columbia white-tailed deer habitat in western Oregon, and greater sage grouse habitat in several western states. Because of their narrow wildlife habitat focus, we believe HMAs would be particularly well-suited to provide management direction for habitat that have been identified—in partnership with state and tribal wildlife agencies—as critically important for high-value species. This could include BLM lands adjacent to state-owned wildlife management areas that are managed for the purpose of protecting ungulate winter range and migratory habitat, grouse lekking and nesting areas, and wetlands identified as important for migratory bird stopovers.

Because both game and nongame species are highly valued in both rural and urban communities, we believe the HMA management tool could be applied to conserve important habitat for these species in ways that are of low controversy and locally supported. Further, habitat conserved through these efforts may benefit many additional non-game species and other resource values on the landscape.

Despite its potential, the existing HMA management tool lacks formal direction to ensure its consistent use, resulting in its underutilization by the BLM and—as a result—missed opportunities to conserve vital habitat. Furthermore, a lack of guidance has resulted in the BLM's reliance on novel, one-off habitat-focused land use allocations in RMPs—such as Ecological Emphasis Areas and Wildlife Management Areas—that, in the absence of an established track-record, can make them, at times, confusing or

controversial. The same conservation outcomes and habitat management objectives could be achieved more easily and more effectively by the agency through clearly and consistently defined HMAs.

In short, the BLM's wildlife program could most effectively serve the agency's mission by formalizing a dedicated land use allocation, and corresponding management direction, to conserve, restore, and enhance vital wildlife habitats in cooperation with state agencies and tribes. HMAs would serve this purpose effectively, and they complement the BLM's suite of other available conservation management tools. Below are specific recommendations to help inform the adoption of HMA guidance, and we thank you for your consideration and for your commitment to the conservation of wildlife habitat.

Sincerely,

Backcountry Hunters & Anglers

Boone and Crockett Club

California Waterfowl

Delta Waterfowl

Mule Deer Foundation

Muley Fanatic Foundation

National Deer Association

National Wild Turkey Federation

National Wildlife Federation

North American Grouse Partnership

Pheasants Forever

Pope and Young Club

Quail Forever

Theodore Roosevelt Conservation Partnership

The Wildlife Society

Wildlife Management Institute

Cc:

Nada Culver, Deputy Director of Policy and Programs

David Jenkins, Assistant Director, Resources and Planning

Brian St George, Deputy Assistant Director for Resources and Planning

Matt Preston, Acting Division Chief of Wildlife Conservation, Aquatics, and Environmental Protection

HABITAT MANAGEMENT AREA GUIDANCE RECOMMENDATIONS

Program Area: Wildlife

Purpose: Consistent with multiple use and sustained yield, the BLM recognizes the value of conserving, restoring, and enhancing critical ungulate winter ranges, transitional ranges, and migratory habitat; upland bird habitat such as lekking and nesting habitat; and migratory bird habitat to support landscape-scale habitat connectivity and function, wildlife abundance and biodiversity, and to support species resilience and adaptation to climate change. Further, conserving, restoring, and enhancing these habitats supports other compatible multiple uses—including hunting, wildlife watching, and livestock grazing.

Goal(s): For each geographic area under consideration, define a goal or goals in coordination with tribal and state wildlife agencies, that describe(s) the desired habitat outcomes for ungulate winter range, transitional ranges, and migratory habitat; upland bird habitat; and migratory bird habitat that support tribal and state wildlife population objectives.^{1,2}

Objective(s): For each geographic area under consideration, define specific, measurable, outcome-focused implementation actions needed to achieve the desired habitat outcomes. In developing these implementation actions, BLM should incorporate a timeline³ and consider, to the extent appropriate, the corresponding fish and wildlife habitat objectives.

Allowable Uses: Within HMAs, identify uses, or allocations, that are allowable, restricted, or prohibited on the public lands and mineral estate.⁴ Allowable uses should be developed that support compatible multiple uses, while achieving the primary goals and objectives of the HMA.

These could include, but are not limited to:

- OHV designations to maintain habitat function while providing access for compatible multiple uses.
- Right-of-way and wind and solar energy avoidance or exclusion areas.
- Resource use determinations for fluid mineral development, such as leasing closures or major constraints such as No Surface Occupancy stipulations.
- Resource use determinations for mineral materials and/or non-energy leasable minerals.
- Recommendations for locatable mineral withdrawals.
- Disturbance caps on surface-disturbing activities and limitations on route density.

Management Actions: Identify the actions anticipated to achieve desired outcomes within HMAs, including actions to maintain, restore, or improve habitat conditions.⁵ Management actions should support compatible multiple uses, while achieving the primary goals and objectives of the HMA.

¹ See BLM Manual Sections 6500.08.B. and .12.A-E

² See BLM Manual Sections 6780.02.C. and .06.A

³ See BLM Manual Sections 6500.12.B.2.c.

⁴ See BLM Manual Sections 6500.08.A-B

⁵ Habitat Management Plans should be encouraged consistent with BLM Manual Section 6780; See also BLM Manual Sections 6500.08.A-B and .12.A-E

These could include, but are not limited to:

- Vegetation management, including timber management projects, fuels treatments, and wildlife treatments within HMAs to retain or enhance wildlife habitat diversity and connectivity, and to maintain or enhance forage production and availability.
- Vegetation treatments to address conifer encroachment and restore sagebrush steppe habitats and winter range.
- Riparian-wetland and bird habitat restoration activities that provide for wildlife cover, forage, nesting, and movement activities.
- Weed treatments to control the spread of invasive annual grasses and to restore bunchgrass communities.
- Allotment fence modification or replacement to facilitate wildlife movement.
- Construction of exclusion areas to restore riparian habitats and quaking aspen forest communities.
- Motorized and mechanized route density thresholds, and seasonal and area closures as necessary to maintain habitat function, while working with state wildlife agencies to provide appropriate access during regulated hunting seasons.
- Infrastructure removal or realignment to decrease habitat fragmentation and increase wildlife security and habitat connectivity.
- Water developments to increase water availability to wildlife.
- Residual impacts from proposed development, after efforts to avoid and minimize, should be compensated for pursuant to BLM policy.