

Hunting and Wildlife Conservation Council

June 5, 2024

The Honorable Deb Holland
Secretary
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council (Council) is writing to recommend that the Bureau of Land Management (BLM) establish land tenure teams in strategic locations to enhance access to public lands that are landlocked and those that currently have fragmented ownership patterns, the so-called “checkerboard” public lands in the Western United States.

The 245 million acres of federal public lands administered by the BLM are vital for public access to outdoor recreation. However, a lack of access is consistently cited as a primary reason people stop hunting.¹ Unfortunately, due to fragmented land ownership patterns (the aforementioned “checkerboard”), approximately 8.87 million acres of BLM lands in the West are landlocked and difficult to access.² This issue is particularly prevalent in specific regions such as eastern Montana and eastern Wyoming, where a considerable portion of BLM lands lack available public access. For instance, roughly a third of the 2.7-million-acre Miles City BLM Field Office in eastern Montana is landlocked, with limited to no public access available, and some of these isolated parcels are sizable. This lack of access not only deprives the public of enjoying their lands but also contributes to conflicts and tensions between the public and private landowners.

By consolidating small, inaccessible parcels into larger contiguous blocks and acquiring access to isolated parcels, the BLM could alleviate tensions between public and private landowners while simultaneously expanding public access for hunting and other recreational activities.

¹ Responsive Management. Issues Related to Hunting Access in the United States (2010): <https://responsivemanagement.com/wp-content/uploads/2018/10/Issues-Related-to-Hunting-Access-in-the-United-States-January-2010.pdf>

² Theodore Roosevelt Conservation Partnership & onX. (2018). Landlocked: Unlocking Public Lands in the West. Retrieved from <https://www.trcp.org/wp-content/uploads/2019/02/TRCP-onX-Landlocked-Report-8-26-2018.pdf>

CHAIR
John Devney

VICE CHAIR
Collin O'Mara

MEMBERS

Andrew Schmidt

Colin Beck

Ryan Busse

Jeffrey Crane

Michael Crowder

George Dunklin, Jr.

Daniel Forster

Wayne Hubbard

Cole Mannix

Lucas Martinez

Brian Nesvik

Joel Pedersen

Land Tawney

Keith Tidball

Lauren Ward

Joel Webster

Designated Federal Officer

Douglas Hobbs
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS-OC
Falls Church, Virginia 22041
P 703-358-2336

Fortunately, the BLM possesses various tools to address this issue. The agency has long had the authority to conduct land exchanges with private landowners. Additionally, the permanent reauthorization of the Land and Water Conservation Fund in 2019 allocated a minimum of 3 percent annually for expanding recreational access on federal lands, and Congress has recently appropriated \$60+ million annually for these purposes. Moreover, the permanent reauthorization of the Federal Land Transaction Facilitation Act in 2018 allows the proceeds from land disposals to be used for strategic acquisitions.


Regrettably, few of these authorities are being utilized to strategically open public access and consolidate disjointed public lands. To the Council's knowledge, there are no instances of the BLM opening access to its priority list created in response to Sec. 4105 of the Dingell Act (<https://www.blm.gov/about/laws-and-regulations/dingell-act/biennial-summary>).

It is imperative that more action be taken to address these challenges. Therefore, the Council respectfully recommends that the BLM establish land tenure teams in strategic locations dedicated to opening public access through targeted fee title and easement acquisition, implementation of FLTFA, and strategic land exchanges. These teams should be comprised of agency personnel trained in land transactions and prioritize unlocking Sec. 4105 priority areas. Furthermore, the Council urges the BLM to collaborate closely with local communities and sporting groups, landowners, state fish and game agencies, tribal governments, and other relevant state officials.

Finally, as the BLM works to increase public access through FLTFA land transactions and exchanges, the Council request that the agency keep already accessible parcels in public hands as much as practicable as consistent with Secretarial Order 3373, "Evaluating Public Access in Bureau of Land Management Public Land Disposals and Exchanges (2019)."

The Council looks forward to working with the DOI and BLM to assist in increasing access to these access-restricted public lands. Thank you for your consideration of this matter. Should you have questions or need more information, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,



John Devney
Chair

Cc: HWCC members
Steve Feldgus, Principal Deputy Assistant Secretary - Land and Minerals Management,
Department of the Interior
Matt Strickler, Deputy Assistant Secretary – Department of the Interior
Tracey Stone-Manning, Director – Bureau of Land Management