6-19-23

**FROM**: Great Old Broads for Wilderness

Aldo’s Silver City Broadband

Silver City, NM 88062

**TO**: U.S. Department of the Interior, Director

Bureau of Land Management

1849 C St. NW, Room 5646

Washington, DC 20240

**Re:** **43 CFR Parts 1600 and 6100, Conservation and Landscape Health**

**AGENCY:** Bureau of Land Management, Department of Interior.

**ACTION:** Proposed Rule. **Subpart 6101**

**To Whom It May Concern:** The Great Old Broads for Wilderness is a national women-led grassroots organization dedicated to advocating for healthy public lands. We are the Aldo’s Silver City Broadband, a sub-group located in SW New Mexico.

Many of our members have engaged in various activities on BLM managed public lands, ranging from hiking to work related activities. Based on our relevant experiences, we want to comment on the proposed *Conservation and Landscape Health Rule.*

We welcome and appreciate that this proposal is initiating a plan to bring balance to the BLM management of our public lands. We robustly support the Public Lands Rule, including designation of more Areas of Critical Environmental Concern, but realize this proposal needs strengthening to help ensure a vibrant future for western communities’ water supplies, wildlife, and western communities. It is indeed past time to elevate conservation on par with other BLM multiple uses. However, to make this rule effective for resiliency, healthy public lands, and biodiversity, conservation use needs to be prioritized relative to various multiple uses. If strengthened, this rule has great potential for beneficial land management across a vast area.

Specifically, livestock grazing needs to be specifically addressed in this Rule. It is a major land use on BLM lands, constituting approximately 60% of BLM acreage with widespread impacts. Impacts from this pervasive use are exacerbated with climate change, especially in the arid and desert regions in the western states. Passive restoration actions such as removing grazing on some allotments, especially in sensitive stream and riparian habitat, would serve as an opportunity to restore our public lands and initiate carbon sequestration using native vegetation to replace depletion and loss of carbon sequestration caused by the impacts of livestock grazing.

Please find our specific comments as follows:

**Subpart 6101—General Information**

**6101.1 Purpose.**

Biodiversity is mentioned in the first paragraph, about halfway through. Specifically in this sentence, “**Pursuant to Executive Order 14072, Strengthening the Nation’s Forests, Communities, and Local**

**Economies, and consistent with managing for multiple use and sustained yield, the BLM is working on various aspects of ensuring that forests on Federal lands, including old and mature forests, are managed to: promote their continued health and resilience; retain and enhance carbon storage;**

**conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development.”**

It is the only place in the document that has this important term/concept. This needs to be incorporated as a key consideration in this Rule, particularly given substantially declining biodiversity and the amount of land the BLM manages in the west. The protection and restoration of ecosystem biodiversity must be the prime consideration for conservation and should be effectively applied throughout this proposal.

Biodiversity is especially challenged in areas where cattle grazing is the main use. In general, livestock grazing wipes out wild plants and woody trees, crowding out deer and elk from grazing. Even low-density grazing alters ecosystem biodiversity and the quality and quantity of food available for native wildlife.

**6101.2 Objectives.**

**e) Accelerate restoration and improvement of degraded public lands and waters to properly functioning and desired conditions –** This objective is very important in the overall health of the ecosystem, especially in stream and riparian ecosystems in the southwest. These ecosystems are fragile in the desert southwest, and they have suffered tremendously under livestock grazing pressure. The majority of threatened and endangered species in the arid southwest are dependent on streams and riparian areas for survival. Fencing stream and riparian areas to create exclosures to livestock is the fastest and cheapest way to help these systems recover.

**(f) Ensure that ecosystems and their components can absorb, or recover from, the effects of disturbances or environmental change through conservation, protection, restoration, or improvement of essential structures, functions, and redundancy of ecological patterns across the landscape** – Again, fencing stream and riparian areas to exclude cattle grazing, especially in arid and desert regions is key to success for this objective. In addition, passive restoration by removal of cattle on some allotments would move a landscape toward restoration and recovery.

**Subpart 6102—Conservation Use to Achieve Ecosystem Resilience**

**Sec.**

**6102.2 Management to protect intact landscapes.**

**(b) (1) The BLM can establish partnerships to work across Federal and non-Federal lands to protect intact landscapes;**

Establishing partnerships is key in this current climate of funding deficiencies for many of the Federal agencies. The Great Old Broads for Wilderness, Aldo’s Silver City Broadband currently partners with the US Forest Service (FS), Gila National Forest, monitoring the cattle exclosures for the presence of trespass cattle. We use FS survey program to report our findings back to the FS so that they can take any necessary action to remove these cattle from sensitive areas on the Gila and San Francisco river systems.

We encourage you to partner with the public, especially conservation groups such as ours, to enhance your own productivity in monitoring BLM lands.

**6102.3 Restoration.**

**6102.3–1 Restoration prioritization.**

**6102.3–2 Restoration planning.**

Actions incorporated as a restoration tool in this proposal should be commensurate with the definition of ecological restoration, rather than skewed for special interests. For example, replanting invasive plant species for livestock grazing is included as “restoration.” This is not at all conducive to restoration, but instead is an impacting action relative to biodiversity, climate change, and healthy public lands. It favors only the interests of livestock grazing rather than a resilient ecosystem for all of us.

We have directly observed the damaging impacts of grazing in the semi-arid and arid western public lands, and know that planting invasive plant species for livestock grazing is not a restoration action. We have observed how particularly damaging the effects of grazing can be in riparian areas of the southwest. Restoration of creeks and riparian zones should be a high priority for landscape recovery, given the high ecological value of stream corridors on BLM managed public lands.

Passive restoration should be incorporated as a restoration action in this proposal. For example, removal of major stressors such as livestock grazing is important in meeting your stated goals in this rule. We actively monitor specific areas of public lands nearby where livestock grazing is excluded, and have observed first-hand what an effective tool this can be for attaining healthy land standards, watersheds, and riparian restoration.

Passive restoration is an effective and relevant restoration tool and needs to be included.

The final rule should adopt and follow the “Society for Ecological Restoration’s International Principles and Standards”, [https://www.ser.org/page/SERStandards](about:blank). The Society for Ecological Restoration is an international non-profit organization with members in 70 countries. SER advances the science, practice and policy of ecological restoration to benefit, and to create a healthy relationship among people, biodiversity, ecosystems, and climate. The Rule should specify that passive restoration by removing stressors (such as livestock grazing) that caused the degradation, is the preferred restoration method. Where active restoration is implemented, only native plants from the region, locally sourced, should be utilized for the restoration.

**6102.4 Conservation leases.**

**Sec (a) (1) Conservation leases on the public lands may be authorized for the following activities:**

**(i) Conservation use that involves restoration or land enhancement;**

“Land enhancement” as it would be applied, needs to be specified with guidelines that are commensurate with conservation in order to avoid abuse. For example, would impacting uses in arid and semi-arid lands such as grazing be allowed as a conservation lease? Would mining, oil, and gas industries be allowed to use such leases as a way to offset damage they do to public lands elsewhere? Would the leaseholder or the BLM pay for the restoration? Will the leases be effectively monitored to avoid impacts or abuses?

**and**

**(ii) Conservation use that involves mitigation.**

**(2) Authorized officers may issue conservation leases to any qualified individual, business, non-governmental organization, or Tribal government.**

The entities listed under this section are encouraging in that they include non-governmental organizations and tribes. Restoration and mitigation activities by these two groups could make a substantive difference in the health of BLM lands.

In order to ensure the integrity of the restoration and conservation leasing processes, the public should be able to participate in ongoing review of the implementation of these processes. In terms of restoration, for instance, the proposed rule calls for authorized officers to annually track restoration-project progress, and, when restoration outcomes have not been met, assess and track why restoration outcomes are not being achieved

The public should have ready access to information regarding all these processes, and managers should be required to respond when the public submits objective, documented information relevant to decision-making regarding conservation lease issuance, and assessment of outcomes of restoration activities and conservation leases. This will require a commitment to maintain information on restoration and conservation lease processes online to avoid requiring reliance by the public on the FOIA; and to retain all objective, documented information submitted by the public in the files of the relevant project.

**Summary comments**: We believe that this proposed rule is a step in the right direction for the BLM, but we would like to see the above comments considered and included in the final Rule. We are especially concerned that the Rule does not include specific reference to uses such as cattle grazing and mineral extraction as these activities pertain to protection and conservation of sensitive stream and riparian habitat in the arid southwest.

Sincerely,

Denise Smith and Marcia Stout

Co-leaders, Aldo’s Silver City Broadband, Great Old Broads for Wilderness