To: DOI, Bureau of Land Management

Federale Rulemaking Portal: <https://www.regulations.gov>

Sirs:

Regarding the request for comments on proposed rulemaking,

<https://www.regulations.gov/document/BLM-2023-0001-0001>:

I am writing to propose some suggestions for how the Bureau of Land Management (BLM) should “advance the BLM’s mission to manage the public lands for multiple use and sustained yield by prioritizing the health and resilience of ecosystems across those lands” (from Summary of the Request).

In order to support President Biden’s 30 X 30 target and even larger 50 X 50 target, the BLM must prioritize a large percentage (50%) of public lands to remain in their natural state with fully functioning ecosystems. It is crucial that the BLM conserve and protect these public lands and create rules and policies that, per Executive Order 14072, “deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities. This must be a diversion from the environmentally damaging and short-sighted practices that have dominated public land use in the past many decades by prioritizing resource extraction and the destruction of natural landscapes and Indigenous sites. These natural landscapes have previously provided us with clean air, water, and natural beauty that we depend upon in the US and globally.

The BLM is responsible for millions of acres of land having multiple use in which conservation and environmental protection should be given equal and even higher standing. The entire public benefits from clean water and clean air, as well as the economic welfare of recreation. These perks must be documented and counted. Other benefits of protected public lands include the carbon sequestering power of natural landscapes in our attempts to reduce anthropogenic climate change. I believe that climate change is the greatest challenge we currently face; therefore, strategies to reduce global warming should prioritize our efforts. Environmental health must be supported with rules, practices, and policies that protect public lands, and the BLM needs to serve as a model for these strategies.

Congress has required the BLM to protect the quality of our public land for non-extractive uses under the Federal Land Policy and Management Act of 1976 (FLPMA). The act quotes:

“ *the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environment, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use,”*

Thus, FLPMA delegates the authority and duty to include environmental conservation and associated benefits in its land management policies. Executive Order 14072 mandates this responsibility by the BLM for both local and global human society considering the crucial needs and great good that this provides.

I urge the BLM to treat conservation and non-motorized recreation as a priority over secondary uses. Nature can best restore itself when fully protected and, also by removing roads. The BLM has, for far too long, prioritized extractive industries, such as mining, oil, timber, and grazing. We need to severely curtail our permitting of mining and timber harvests and start enforcing the regulations that support these protections. We could procure grazing fees for enforcement of these policies; better yet, we could allow grazing leases to be retired when not needed. We could also restrict renewed grazing permits to only when rangeland standards are met following evaluations every 10 years. Opportunities for ranchers to improve their rangeland standards and improve the health of the public land sshould be addressed though 10-year assessments. These public lands, upon which we allow grazing, belong to the public, not just livestock permittees.

The BLM has a responsibility to mitigate climate change by managing forests for carbon sequestration, not just timber extraction. Large trees sequester carbon, improve water quality, and restore ecosystem health. Specifically, trees older than 80 years of age or larger than 20 in DBH should be preserved for their carbon storage capacity and impact on ecosystems.

The importance of all ecosystems should not be underestimated. Renewable power developments for wind and solar sites are ubiquitous across the landscape. These developments harm the land and fragment the ecosystem, impairing wildlife migration, as well. These developments must be charged commensurate fees and located to minimize destruction of natural conditions and habitat fragmentation. Deserts, prairies, grasslands, forests, rivers, wetlands, and lakes are all valuable ecosystems with economic and social values beyond what a solar farm might provide. Solar farms can also be set alongside roads and upon warehouses and buildings to alleviate impacts on wildlife migration.

In the new rules being crafted by the BLM, it is easy to hide behind the precise meaning of words like “restoration”, “health”, and “resilience”. The BLM must offer specific definitions of these terms, and not generalize them by saying “scientifically based”. I recommend the BLM use these definitions when referring to actions impacting public lands, and I use these definitions in my comments:

• Restoration: Ecological Restoration. Remove the human source of disturbance from an area.

Some minimum human interventions may be taken to offset the destructive result of previous

human activities in the area, using the best practices of restoration ecology. Nature is left to heal the area with ecological processes. Some call this “passive restoration”.

• Health: An area is biologically diverse with fully functioning ecological processes. Humans

benefit from ecosystem services.

• Resilience: An area has fully functioning ecological processes with minimal disturbance from

humans. Natural processes restore the area after natural disturbances such as wildfire, or

from human disturbances as well.

There are many reasons for the BLM to change from its current policy of active management to one of passive restoration:

• Much reduced cost;.

• More effective long-term health for the ecosystem;

• More areas to study natural healing processes following a disruption;

• Removing human disturbance, when attempting to counter past damages, is least damaging to the ecosystem.

• Over 100 years of active management have failed to meet the needs of a “healthy and resilient ecosystem”, and there is no reason to think this will change, unless current rules change and the culture of the BLM changes as well.

In establishing regulations and policies for “rewilding” or “passive restoration”, the BLM should incorporate rules targeting these specific changes:

• Stop all harvesting of mature and old-growth trees, specifically, no cutting trees older than 80 years or larger than 20 inch DBH. These trees provide important habitats as well as carbon sequestration to counter anthropogenic climate change.

• Protect and preserve riparian areas.

• Properly manage and regulate grazing to protect ecological processes, with the goal of reducing and eventually removing grazing from public lands. Charge commensurate fees for active grazing allotments

• Vacant grazing allotments should be permanently closed. These parcels can serve as a model for measuring rangeland health before and after grazing.

• Protect Areas of Critical Environmental Concern (ACEC).

• Protect Lands with Wilderness Characteristics (LWC).

• Decommission roads and do not build new ones.

• Expand wild and wilderness areas. Expand wilderness study areas (WSA). Wild areas with

healthy, natural ecosystems and, with minimal to no human disturbance, offer the optimal conditions for understanding how Nature works.

• Decrease fragmentation of the land. Do not create new fragments with road building and

other developments.

• Increase connectivity of larger natural landscapes.

• Plan for changing vegetation types across the landscape as the climate changes.

• Use proper locations for new developments, such as mines, and solar and wind farms

to minimize damage to the land and fragmentation of habitats.

• Require field managers to actually (a) curtail abusive land management practices, and (b)

designate and fully protect natural areas while imposing consequences for violations.

• Mandate specific levels and kinds of protections for ACECs everywhere and not limit it to

discretion in the field.

• Precisely define particular kinds of ACECs, including but not limited to: research natural areas,

national natural landmarks, outstanding natural areas, forest carbon reserves, sagebrush sea

preserves, municipal watershed areas, and intact landscape areas—and then require field

managers to designate and protect more of all of them better.

• Use FLPMA authority to define additional “multiple uses,” such as

archeological, air and atmospheric, ecological, ecosystem carbon storage and sequestration,

quiet, and darkness.

• Quantify the “sustained yield” of all multiple uses as is already done for the multiple uses of

timber (logging) and range (grazing). One cannot manage what one does not measure.

• Expressly define in the rule—as FLPMA requires—the “combination [of multiple uses] that

will best meet the present and future needs of the American people.” Present and future needs

include carbon storage and sequestration, where public lands can play a vital role in addressing

climate change. Only 1.3 percent of the nation’s forage and feed for livestock come from public

lands. Only 0.34 percent of the nation’s wood supply comes from BLM lands. Although nonfederal lands could easily fill the voids, nonfederal lands cannot accommodate the need for biological diversity. Only federal lands can do so.

• Ensure that any area of public lands established for conservation receives a FLPMA

withdrawal from mining and other development.

• Additionally, ensure that any area of public lands established for conservation receives a

FLPMA withdrawal for nature conservation and ecological restoration.

Because the BLM has a tremendous responsibility in managing millions of acres of public lands for multiple use, it is imperative that we start preserving public lands for ecological and climate resilience. Furthermore, we have a responsibility to protect these wild places for our grandchildren and future generations. Thank you for the opportunity to comment.