



June 26, 2023

Bureau of Land Management, Department of Interior

Re: Comments on BLM Proposed Conservation and Landscape Health Rule
Submitted via Federal Rulemaking Portal at [regulations.gov](https://www.regulations.gov), 1004-AE-92

Dear Director Stone-Manning;

These comments are being submitted by the Great Old Broads for Wilderness, Northern San Juan Chapter. Great Old Broads for Wilderness (Broads) is a women-led national grassroots organization that engages and inspires activism to preserve and protect wilderness and wild lands. The Northern San Juan Chapter of Broads operates in five Colorado counties. Our members engage in various activities on BLM managed public lands from hiking, rafting, wildlife watching as well as stewardship and wildlife and plant monitoring projects. One of our major chapter concerns is grazing on public lands. Our Leadership Team and key members include a former BLM ecologist, and members with backgrounds in botany, ecology and wildlife biology.

Based on our relevant experiences, we want to comment on the proposed *Conservation and Landscape Health Rule* (Public Lands Rule). We support that this proposal as initiating a plan to bring balance to the BLM management of our public lands, but realize this proposal needs strengthening to help ensure a vibrant future for western communities, through biodiversity and protection of wildlife, resilient public lands, intact landscapes, and restoration of degraded habitats.

The following are our specific comments on **Subparts 6101 and 6102 of the Rule**.

§ 6101.2 Objectives: We strongly support these objectives because they are comprehensive, relatively up-to-date state of the science, and the way the agency needs to be thinking if it is to address the growing ecological problems. In the absence of these, there is no consistency from office to office in this approach to management.

(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.” Suggest specifically listing assisted migration to help species and ecological communities survive the changing climate.

Subpart 6102—Conservation Use to Achieve Ecosystem Resilience§ 6102.1 Protection of intact landscapes. Suggest adding that these areas become priorities for ensuring that all existing uses (e.g. livestock grazing, travel management) must follow best management practices on their permits, plans, or workload priorities.

§ 6102.2 Management of intact landscapes. This section is unclear about whether lands can be managed as intact landscapes if they have not been identified in the Resource Management Plan (RMP) planning process. At the rate of RMP revisions, management of intact landscapes will not occur on most areas of public land. Suggest there be another mechanism to manage for intact landscapes outside of the standard planning process.

§ 6102.3–2 Restoration planning. Should include as a requirement for an area to undergo restoration, that all existing uses such as livestock grazing must be authorized with best management practices. Otherwise restoration will be ineffective. This is a huge issue in western Colorado where we live. MANY permits do not follow Best Management Practices (BMPs) for stocking rates, season of use, or grazing in drought conditions, and Allotment Management Plans are not up-to-date or followed.

§ 6102.4 Conservation leasing. Can the lease fees be put in a BLM restoration account to help fund its own restoration activities? (like grazing permit fees?)

§ 6102.4–2 Bonding for conservation leases. Isn't this together with the fees going to preclude nearly all individuals and nonprofit groups from pursuing conservation leases? Leaving only wealthy companies or organizations to use it, and that would probably only be for mitigation of some other damaging development on BLM land. The mechanism behind conservation leases should be restructured. If BLM put forth its list of restoration areas that it needs assistance with, then it seems like nonprofits or individuals could choose ones that were a good fit for them and do the implementation, with BLM holding the conservation lease.

§ 6102.5 Management actions for ecosystem resilience. include requirement for existing permitted uses to adopt best management practices (as they have been defined in this rule) when the permits are being renewed. Otherwise managing for resilience will not be successful. Again, this is a huge issue in western Colorado. MANY grazing permits do not follow BMPs for stocking rates, season of use, or grazing in drought, and Allotment Management Plans are not up to date or followed. The BLM has done a very poor job of consistently applying the grazing guidelines. Unless the underlying reasons are addressed in this rule, we can't expect any improved management for resilience. The BLM needs to use its hierarchical structure: National. State, District, Field Office - to identify updated, specific BMPs that the Field Offices must adopt. The science has been moving along and Field Offices are not capable of keeping up with it on their own. There needs to be centralized interpretation of the science, development of BMPs and dissemination of what BMPs should be used where. Otherwise, this will not succeed.

Finally, we ask that BLM enter into co-stewardship with Tribal nations in all decision making.

Submitted by
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