



ACTION

ALERT

BLM has proposed a new national planning effort that could profoundly impact recreational access and we need your comments against this.

Issue Summary:

The Bureau of Land Management has proposed a new rule that would be a major alteration to their land management efforts. The BLM wants to manage for large intact landscapes but fail to tell us what that means, which is a problem. **BLM also proposes to allow for the creation of conservation leases and specifically states these could temporarily close legal access to areas that are leased. This is a major concern.** The BLM rule also moves quickly towards a model where large-scale conservation leases would create conservation credits that could be bought and sold, which creates far more concerns and questions for multiple use access on the landscape. No guidance is provided on how this goal would be achieved.

Our concerns for your comments in opposition (please rewrite in your own words to ensure they are not consolidated).

1. Conservation leases cannot close public access to public lands for any reason. Public access to public lands cannot be lost indirectly from the proposal either. The largest barrier we see on BLM lands is a lack of staff and management plans that can be horribly out of date. Any leasing effort must ensure that new staff is provided and that existing staff is simply not reallocated away from other projects.
2. Conservation leases must be managed by the BLM to ensure impacts are not occurring to other uses. The public should not be required to monitor areas with leases and then sue to the conservation lease holder when terms of the lease are violated. This would be entirely unfair.
3. The Proposal asserts multiple uses will not be impacted and that best management practices will be applied. The Proposal fails to address what best management practices would be to protect multiple uses on public lands. This is a major problem as all conservation leases to date have been targeting areas outside the multiple use mandate and as a result best management practices on this issue may not exist.

4. The Proposal needs to clearly define what the desired outcome of this effort is and right now simply fails to do that. As an example, is it unclear how leases were thought to be the proper way to provide conservation credits for efforts. This is a major concern as the motorized community self taxed and created the motorized trails programs across the country which provide between \$200 and \$300 million annually on the ground. Many of the projects undertaken by these programs could be worthy of obtaining conservation credits but would not be possible if large scale leases are necessary to create conservation credits. Allocation of credits must be based on an equitable system that includes all persons providing benefits. The proposed model of leasing for credits simply does not work for motorized usages as our projects are smaller and a lease would create significant additional paperwork and delay.

5. Basic consistency needs to be included in the Proposal, and terms should not be twisted to achieve desired outcomes. Concepts such as conservation should be consistently applied and currently are not. It is unclear if the effort seeks to create conservation credits or carbon offset credits. These are two entirely different efforts and basic questions such as this are simply not interchangeable.

6. The entire effort must focus on providing credits for projects that directly improve areas and resources and avoid benefits that are based on calculations and forecasts. As an example, the CPW OHV program has allocated significant funds to restoration efforts in fire impacted areas. These efforts will provide direct benefits on the ground as trees and the ecosystem will recover faster. Conceptual benefits must be avoided.

7. The Proposal seeks to protect intact landscapes but fails to explain what would cause a landscape to become impacted. This is a critical distinction as the USFS is proposing major expansions of timber harvest, which we have to believe would impact landscapes. The two efforts must be aligned and consistent between the agencies.

8. Any creation of areas suitable for leases and other conservation efforts must comply with federal land and NEPA requirements. We are not sure the proposal does either.

More information on the US Fish and Wildlife Service efforts

[BLM Public Lands Rule Public QAs.pdf](#)

Where to file written comments:

U.S. Department of the Interior,
Director (630), BLM
1849 C St. NW, Room 5646,
Washington, DC 20240, Attention: 1004-AE92

Where to file electronic comments:

[Federal Register :: Conservation and Landscape Health](#)

Deadline for comments

June 20, 2023