

June 7, 2023

Tracy Stone-Manning  
Director  
Bureau of Land Management  
1849 C Street NW  
Washington, D.C. 20240

Dear Director Stone Manning:

On April 3, 2023, the Bureau of Land Management (BLM) released the proposed rule entitled “Conservation and Landscape Health”, purportedly to “advance the BLM’s mission to manage the public lands for multiple use and sustained yield” by “wise management decisions based on science and data.” We write today to ask you, on behalf of the BLM, to uphold commitments you made in your June 8, 2021 testimony before the Senate Energy and Natural Resources Committee to “listen... and seek to work with all... That’s how we find durable solutions, by working together.<sup>1</sup>” The proposed rule and process surrounding the rule fall short of that commitment.

Despite the significant implications of the rule for all multiple use and conservation communities, the proposed rule was developed without stakeholder input or advanced notification. The concepts of the rule are not new; for decades, the agency has contemplated improvements to landscape health evaluations, how to avoid “random acts of conservation”, and how the agency can be more intentional about evolving land uses, however the mechanisms to address these issues have been difficult to find. There are few simple answers in natural resource management, so these are conversations that should be facilitated by the agency, with the involvement of all stakeholders, to develop durable solutions – not confined to a 75-day public comment period.

There are so many nebulous concepts in the proposed rule and the agency has thus far been unable to answer key questions about the concept of conservation leases. It is therefore unreasonable for the BLM to have published this proposal; instead, the agency should have pursued an Advanced Notice of Proposed Rulemaking or a Request for Information for a meaningful regulatory process. We therefore request the agency withdraw the proposed rule and reset the conversation to ensure appropriate stakeholders are at the table to find durable answers to some of the West’s most pressing challenges.

Absent the BLM’s willingness to restart the conversation, we request an extension to the comment period to facilitate robust discussion. We request a 105-day extension of the comment period to allow for the kind of meaningful back-and-forth that is required for such a significant shift in agency management. During that additional 105 days, we request you hold public meetings that provide opportunity for discussion in each state affected by the proposed rule. The current meeting schedule includes only three states of the twelve where BLM currently manages

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<sup>1</sup> <https://www.energy.senate.gov/services/files/BB980035-6C2E-47E4-9614-8F5151232144>

surface occupancy. Virtual meetings should not be a replacement for in-person engagement in 75 percent of the agency's footprint.

As the BLM moves through the regulatory process, we urge the agency to move with careful intention when engaging with the public. The undersigned organizations represent a wide variety of multiple use groups – people who live, work, recreate, and are generationally-invested in the 245 million surface acres and 700 million subsurface acres across the country.

Sincerely,

Public Lands Council  
National Cattlemen's Beef Association  
American Sheep Industry Association  
American Quarter Horse Association  
American Mining and Exploration Association  
National Association of Counties  
Association of National Grasslands  
Safari Club International  
Partnership of Rangeland Trusts  
American Farm Bureau Federation  
Federal Forest Resource Coalition  
Western Energy Alliance  
American Forest Resource Council  
American Council of Snowmobile Associations  
National Association of State Departments of Agriculture  
America Outdoors Association  
Farm Credit Council  
Essential Minerals Association  
Family Farm Alliance  
Wild Sheep Foundation