

July 5, 2023

Director Tracy Stone-Manning
Bureau of Land Management
1849 C St. NW, Room 5646,
Washington, DC 20240
Attention: 1004–AE92

RE: (Doc # 2023-06310) Support for BLM Public Lands Rule – Conservation and Landscape Health

Dear Director Stone-Manning:

We are a consortium of 194 independent chapters of the National Audubon Society, with members from 41 states across the country. We submit this letter because we are interested in seeing that America's public lands are managed in a balanced way that benefits current and future generations. While scientific understanding has improved and tools to manage the lands have expanded, the challenges to our nation's public lands have increased. Therefore, we applaud the Bureau of Land Management's (BLM) Public Lands Rule and the intention to promote conservation and prioritize the health and resilience of ecosystems across those lands.

Our nation needs this forward-thinking approach to create a clear process by which to manage our nation's public lands to ensure healthy landscapes, abundant wildlife habitat, clean water and balanced decision-making.

The BLM's impact on our nation cannot be overstated, as it manages one out of every 10 surface acres across the country and 30% of the nation's mineral and soils. With more than 245 million acres of rolling sagebrush hills, deserts, grasslands, forest, and wetlands, the BLM manages some of our nation's most iconic and loved landscapes.

Congress tasked the BLM with a mandate of managing public lands for a variety of uses such as energy development, livestock grazing, timber harvesting, and recreation while ensuring maintenance of natural, cultural, and historic resources. It is the latter obligations that we are collectively interested in, and the important step the BLM has taken to put conservation on equal footing with other uses.

BLM lands bring substantial recreational dollars to nearby communities, provide physical and mental health opportunities for people of all means and backgrounds, hold invaluable evidence of human prehistory, are rich in cultural heritage and sacred sites, provide critical wildlife corridors across the western United States as well as habitat for more than 3,000 species, many of which can be found nowhere else. These public lands, and the diverse animal and plant ecosystems they support, are an essential part of the way of life for many western communities and Tribal nations. They also are an important legacy.

Conservation is a shared American value, perhaps the most fertile political common ground today. Americans love nature and the outdoors, wild landscapes and iconic wildlife, and conservation remains a common bond among us, regardless of where you live. We want our public lands managed sustainably so that we may be able to pass them on in healthy condition to our children, grandchildren and generations to come.

We commend the BLM for taking action to promote conservation and land health, which are consistent with its mission, authorities and responsibility. While the federal agency has largely focused on oil and gas, mining and other extractive uses, we feel that these must be balanced with conservation, recreation, wildlife and watershed health, and cultural resource protection. Thus, together, we voice our support for the BLM's three main components of the proposed Public Lands Rule: (1) protect the most intact, healthiest landscapes, (2) restore landscapes back to health, and (3) ensure wise decision-making, based on science and data.

Our nation's public lands are experiencing extreme weather events such as wildfires, droughts, and severe storms – which are occurring at increasing frequency and intensity. This proposed Rule drives us in the direction of having healthy intact landscapes that are more resilient and able to recover more easily in the face of natural disasters. In keeping with passage of the Inflation Reduction Act and the Infrastructure Investment and Jobs Act, this proposed Rule would allow federal land managers to identify and prioritize lands and waters that require ecosystem restoration work, such as removing invasive species.

Where there are existing intact landscapes, the use of conservation management tools should be encouraged. Areas of Critical Environmental Concern (ACECs) is an existing administrative tool available to the BLM which has historically been under-utilized and inconsistently applied. The proposed Rule includes the first-ever regulations on ACECs, and we are happy to see that it provides clarification on and expansion of its use. With the adoption of the Rule, ACECs can play a critical role in protecting important natural, cultural, and scenic resources, intact landscapes, habitat connectivity, and ecosystem resilience.

We are also encouraged to see habitat connectivity and wildlife corridors emphasized in the proposed Rule. Such connectivity is essential to allow migrating wildlife – including birds – to adapt to a changing climate, and BLM could strengthen the language to more broadly identify habitat connectivity and migration corridors as a conservation priority in recognition of their important role in supporting ecological resilience.

With 90% of the lands managed by BLM being open to natural resource leasing and development, we are encouraged to see conservation leases discussed in the proposed Rule. We recognize that conservation leases would not disturb existing authorizations, valid existing rights, or state or Tribal land use management. As presented, conservation leases could be used for two purposes: restoration and compensatory mitigation (where impacts cannot be avoided). Therefore, we support conservation

leases as a mechanism that can lead to better managed lands by realizing more durable protections and restoration efforts.

In closing, we believe that America's public lands are a national treasure. This rulemaking is an important opportunity for BLM to restore balance to its land management priorities and to encourage an inclusive approach to conservation that includes co-management with Tribal nations and the consideration of land health in all decision-making.

Sincerely,

Admiralty Audubon Society
Port Townsend, Washington

Aiken Audubon Society
Colorado Springs, Colorado

Alabama Audubon
Birmingham, Alabama

Alachua Audubon Society
Gainesville, Florida

Albert Lea Audubon Society
Albert Lea, Minnesota

Altacal Audubon Society
Chico, California

Antelope Valley Audubon Society
Lancaster, California

Arkansas River Valley Audubon Society
Pottsville, Arkansas

Arkansas Valley Audubon Society
Pueblo, Colorado

Audubon Everglades
West Palm Beach, Florida

Audubon of Southwest Florida
Fort Myers, Florida

Audubon Society of Central Arkansas
Little Rock, Arkansas

Audubon Society of Central Maryland
Mt. Airy, Maryland

Audubon Society of Mahoning Valley
Boardman, Ohio

Audubon Society of Northern Virginia
Reston, Virginia

Audubon Society of Omaha
Omaha, Nebraska

Audubon Society of the Capital Region
Albany, New York

Bergen County Audubon Society
Paramus, New Jersey

Bexar Audubon Society
San Antonio, Texas

Bighorn Audubon Society
Sheridan, Wyoming

Black Canyon Audubon Society
Delta, Colorado

Blue Mountain Audubon Society
Walla Walla, Washington

Blue Ridge Audubon
Asheville, North Carolina

Boulder County Audubon Society
Boulder, Colorado

Bridgerland Audubon Society
Logan, Utah

Bristlecone Audubon
Elko, Nevada

Bronx River-Sound Shore Audubon
Scarsdale, New York

Bucks County Audubon Society
New Hope, Pennsylvania

Buena Vista Audubon Society
Oceanside, California

Burroughs Audubon Society of Greater
Kansas City
Blue Springs, Missouri

Canton Audubon Society
Canton, Ohio

Cape Fear Audubon
Wilmington, North Carolina

Cape Henry Audubon Society
Norfolk, Virginia

Central Kentucky Audubon Society
Lexington, Kentucky

Central New Mexico Audubon Society
Albuquerque, New Mexico

Central Sierra Audubon Society
Sonora, California

Champaign County Audubon Society
Urbana, Illinois

Charleston Natural History Society
Charleston, South Carolina

Chemung Valley Audubon Society
Elmira, New York

Chesapeake Audubon Society
Baltimore, Maryland

Cheyenne-High Plains Audubon Society
Cheyenne, Wyoming

Choctawhatchee Audubon Society
Fort Walton Beach, Florida

Clearwater Audubon Society
Clearwater, Florida

Columbus Audubon
Columbus, Ohio

Cumberland-Harpeth Audubon Society
Nashville, Tennessee

Delaware Audubon
Newark, Delaware

Delaware-Otsego Audubon Society
Oneonta, New York

Denver Audubon
Littleton, Colorado

Desert Rivers Audubon Society
Gilbert, Arizona

Eagle Audubon Society
Sun City Center, Florida

Eastern Long Island Audubon Society
East Quogue, New York

Eastside Audubon
Kirkland, Washington

El Paso/Trans-Pecos Audubon Society
El Paso, Texas

Evansville Audubon Society
Evansville, Indiana

Evergreen Audubon
Evergreen, Colorado

Flathead Audubon Society
Kalispell, Montana

Florida Keys Audubon Society
Key West, Florida

Forsyth Audubon
Winston Salem, North Carolina

Fort Collins Audubon Society
Fort Collins, Colorado

Four Harbors Audubon Society
Saint James, New York

Francis M. Weston Audubon Society
Pensacola, Florida

Garland County Audubon Society
Hot Springs, Arkansas

Golden Eagle Audubon Society
Boise, Idaho

Golden Gate Audubon Society
Berkeley, California

Grand Valley Audubon Society
Grand Junction, Colorado

Grays Harbor Audubon society
Montesano, Washington

Great Salt Lake Audubon
Salt Lake City, Utah

Great South Bay Audubon Society
Sayville, New York

Greater Akron Audubon Society
Akron, Ohio

Greater Ozarks Audubon Society
Springfield, Missouri

Halifax River Audubon
Daytona Beach, Florida

Hawai'i Audubon Society
Honolulu, Hawai'i

Hernando Audubon Society
Brooksville, Florida

High Country Audubon Society
Boone, North Carolina

Hilton Head Audubon
Hilton Head, South Carolina

Hoy Audubon Society
Racine, Wisconsin

Hudson River Audubon Society
Yonkers, New York

Kalmiopsis Audubon Society
Port Orford, Oregon

Kerncrest Audubon Society
Ridgecrest, California

Kitsap Audubon Society
Poulsbo, Washington

Kittitas Audubon Society
Ellensburg, Washington

Klamath Basin Audubon Society
Klamath Falls, Oregon

La Purisima Audubon Society
Lompoc, California

Lahontan Audubon Society
Reno, Nevada

Lane County Audubon
Eugene, Oregon

Laramie Audubon Society
Laramie, Wyoming

Laughing Whitefish Audubon Society
Marquette, Michigan

Lehigh Valley Audubon Society
Emmaus, Pennsylvania

Litchfield Hills Audubon Society
Litchfield, Connecticut

Llano Estacado Audubon Society
Lubbock, Texas

Los Angeles Audubon Society
Los Angeles, California

Marion Audubon Society
Ocala, Florida

Menunkatuck Audubon Society
Guilford, Connecticut

Mesilla Valley Audubon Society
Las Cruces, New Mexico

Minnesota River Valley Audubon
Chapter
Bloomington, Minnesota

Mississippi Headwaters Audubon
Society / Neilson Spearhead Center
Bemidji, Minnesota

Monmouth County Audubon Society
Red Bank, New Jersey

Morro Coast Audubon Society
Morro Bay, California

Mt. Diablo Audubon Society
Walnut Creek, California

New Hope Audubon Society
Chapel Hill, North Carolina

North Cascades Audubon Society
Bellingham, Washington

North Central Washington Audubon
Society
Wenatchee, Washington

Northeastern Wisconsin Audubon
Society
Green Bay, Wisconsin

Northern Arizona Audubon Society
Sedona and Flagstaff, Arizona

Northern Catskills Audubon Society
Palenville, New York

Northern New York Audubon
Saranac Lake, New York

Oakland Audubon Society
Birmingham, Michigan

Ogeechee Audubon Society
Savannah, Georgia

Ohlone Audubon Society
Hayward, California

Oklawaha Valley Audubon Society
Eustis, Florida

Oktibbeha Audubon Society
Starkville, Mississippi

Olympic Peninsula Audubon Society
Sequim, Washington

Onondaga Audubon Society
Syracuse, New York

Orange County Audubon Society
Warwick, New York

Orleans Audubon Society
Pearl River, Louisiana

Palos Verdes / South Bay Audubon
Palos Verdes, California

Pasadena Audubon Society
Pasadena, California

Pelican Island Audubon Society
Vero Beach, Florida

Pennsylvania Audubon Council
Harrisburg, Pennsylvania

Peregrine Audubon Society
Ukiah, California

Pilchuck Audubon Society
Snohomish, Washington

Pomona Valley Audubon Society
Claremont, California

Portland Audubon
Portland, Oregon

Portneuf Valley Audubon Society
Pocatello, Idaho

Prairie & Timbers Audubon Society
McKinney, Texas

Prairie Falcon Audubon Society
Twin Falls, Idaho

Presque Isle Audubon
Erie, Pennsylvania

Prince George's Audubon Society
Bowie, Maryland

Quinnipiac Valley Audubon Society
Wallingford, Connecticut

Rainier Audubon Society
Auburn, Washington

Red Desert Audubon Society
Lander, Wyoming

Red Rock Audubon
Las Vegas, Nevada

Redbud Audubon Society
Clearlake, California

Redwood Region Audubon Society
Eureka, California

Roaring Fork Audubon Society
Carbondale, Colorado

Robert Cooper Audubon Society
Muncie, Indiana

Rogue Valley Audubon Society
Medford, Oregon

Rutland County Audubon Society
Rutland, Vermont

Sacajawea Audubon Society
Bozeman, Montana

Salem Audubon Society
Salem, Oregon

San Bernardino Valley Audubon Society
San Bernardino, California

San Diego Audubon Society
San Diego, California

San Fernando Valley Audubon Society
Van Nuys, California

San Joaquin Audubon Society
Stockton, California

Sangre de Christo Audubon Society
Santa Fe, New Mexico

Santa Barbara Audubon Society
Santa Barbara, California

Santa Clara Valley Audubon Society
Cupertino, California

Sarasota Audubon Society
Sarasota, Florida

Sassafras Audubon Society
Bloomington, Indiana

Saw Mill River Audubon
Chappaqua, New York

Sea & Sage Audubon Society
Irvine, California

Seminole Audubon Society
Sanford, Florida

Sierra Foothills Audubon Society
Grass Valley, California

Sinnissippi Audubon
Rockford, Illinois

Skagit Audubon Society
Mount Vernon, Washington

Snake River Audubon Society
Idaho Falls, Idaho

Sonoran Audubon Society
Glendale, Arizona

South Bend - Elkhart Audubon Society
South Bend, Indiana

South Florida Audubon Society
Tamarac, Florida

South Mountain Audubon Society
Gettysburg, Pennsylvania

South Shore Audubon Society
Freeport, New York

Southern Maryland Audubon
Bryans Road, Maryland

Space Coast Audubon Society
Cocoa, Florida

St. Louis Audubon Society
St. Louis, Missouri

St. Lucie Audubon Society
Fort Pierce, Florida

Sycamore Audubon Society
West Lafayette, Indiana

Tahoma Audubon Society
University Place, Washington

Tiger Audubon
Colorado Springs, Colorado

Tippecanoe Audubon Society
North Manchester, Indiana

Topeka Audubon Society
Topeka, Kansas

Transylvania County Bird Club
Brevard, North Carolina

Tropical Audubon Society
Miami, Florida

Tucson Audubon Society
Tucson, Arizona

Tulare Kings Audubon
Visalia, California

Umpqua Valley Audubon Society
Roseburg, Oregon

Upper Iowa Audubon Society
Fayette, Iowa

Valley Forge Audubon Society
Eagleville, Pennsylvania

Vancouver Audubon Society
Vancouver, Washington

Ventura Audubon Society
Ventura, California

Waccamaw Audubon Society
Myrtle Beach, South Carolina

Wachiska Audubon Society
Lincoln, Nebraska

Wake Audubon Society
Raleigh, North Carolina

Warioto Audubon Society
Clarksville, Tennessee

Wasatch Audubon Society
Ogden, Utah

Weminuche Audubon Society
Pagosa Springs, Colorado

West Pasco Audubon
Elfers, Florida

Western Cuyahoga Audubon Society
Cleveland, Ohio

Whidey Audubon Society
Oak Harbor, Washington

Wichita Audubon Society
Wichita, Kansas

Wintu Audubon Society
Redding, California

Wisconsin Metro Audubon Society
Franklin, Wisconsin

Wyncote Audubon Society
Abington, Pennsylvania

Yellowstone Valley Audubon Society
Billings, Montana

Yolo Audubon Society
Davis, California

CC: Secretary of the Interior Deb Haaland
U.S. Department of the Interior
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