



October 31, 2023

The Honorable Deb Haaland
Secretary
United States Department of the Interior
Washington, D.C. 20240

Dear Secretary Haaland:

As Governors of Western states we understand the importance of our public lands for sustaining quality of life; they support local economies, biodiversity of fish, wildlife, and plants, healthy watersheds and provide vast outdoor recreation and agricultural opportunities and where appropriate access to natural resources. It is essential that our public lands continue to support thriving economies and healthy ecosystems for the future of the West. Yet the pressures on our public lands are greater than ever and only increasing - as demonstrated by the impacts of climate change including drought and wildfire, record visitation levels and associated impacts, and significant levels of biodiversity strain and loss. While these pressures continue to increase, the management tools and budgets public land managers have to meet those challenges remain stuck in the paradigms of the past.

The Bureau of Land Management's (BLM's) proposed conservation and land health regulation presents a timely opportunity to recalibrate the agency's ability to address these pressing challenges. Outdated policies have constrained the agency's ability to balance competing public land uses and respond effectively to twenty-first century pressures. BLM's proposed public lands conservation and landscape health regulation seeks to correct this misalignment and improve agency decision-making by clarifying and making consistent management standards and requirements, and improve the tools and opportunities available to land managers and stakeholders, to better address the current challenges and needs of our immensely valuable public lands. The proposed regulations do this by establishing a framework that will enable the agency to better respond to climate change impacts, conserve intact landscapes, restore degraded habitat through sound stewardship practices, and seize opportunities to sequester carbon.

The regulations also present an opportunity to promote restoration of lands and waters in a new and innovative way by providing a tool to help federal land managers and state partners to leverage landscape restoration funding from the Bipartisan Infrastructure Law and the Inflation Reduction Act. Taken in concert with several related initiatives underway by the BLM, the regulation also holds great promise for increasing the development of clean renewable energy through not only expanding opportunities for renewable energy development on public lands but also creating new opportunities for companies to meet mitigation and restoration needs via the proposed conservation leasing component.

Collectively, our states are home to over 53 million acres of surface lands managed by the BLM. These lands provide innumerable benefits to our citizens and our economies. They support critical infrastructure and provide habitat for wildlife, places for people to hike, hunt, camp, fish, and connect with nature, and tangible economic benefits from these endeavors. It is also clear that many of these lands are degraded, and the BLM lacks management direction and tools to adequately restore these lands at the necessary scale or timelines.

Historically, BLM regulations and policies have been developed to promote the extraction and development of natural resources, born of a time before the challenges we face with respect to biodiversity loss, climate impacts, and the pressures of a growing population. While extractive uses are an important component of our region, the BLM needs the tools and processes to better manage the lands in a long-term, comprehensive, proactive, and forward-looking manner consistent with the challenges our public lands and western states face. To that end, it is appropriate and necessary for the BLM to specifically address conservation, restoration, and ecosystem health in its guiding regulations in addition to the historical industrial uses that are currently the focus. The regulation can ensure BLM's decisions more accurately reflect the multiple use and sustained yield direction provided by the Federal Land Policy and Management Act (FLPMA), which in turn will help conserve and restore BLM's vast landholdings to support wildlife habitat, public access, sound stewardship practices, protection of cultural resources, and an outdoor recreation economy. By taking a more comprehensive approach, and expanding the tools in the tool box, the BLM will be on better footing to serve the full range of uses and ensure our public lands are healthy and sustainable for those uses for generations to come, while continuing to provide robust support for our economies.

With the close of the comment period behind us, we look forward to your and the BLM's work to refine the proposed regulation in response to feedback you have received. Each of our detailed comments included opportunities for the regulation to be further improved to provide clarity around the purpose and intent and to add detail to individual sections. Specifically, we raised recommendations that the proposed regulation:

- Recognize landscape restoration can help mitigate greenhouse gas emissions in addition to helping prevent degradation and permanent impairment of key landscapes.
- Expressly recognize the important role of habitat connectivity and wildlife corridors and stopover sites, habitats for Species of Greatest Conservation Need, and aquatic resources on public lands.
- Allow states or local government entities to apply for conservation leases.
- Facilitate ongoing conservation and restoration activities, and create new innovative opportunities that support biodiversity, healthy ecosystems, climate resilience, and bolster ecosystem services.

- Maintain sustainable grazing and agriculture practices and incentivize new tools to advance long-term land stewardship and western economies.
- Ensure the BLM's ability to advance responsible siting of clean energy to address the climate crisis.
- Promote a robust outdoor recreation economy for hunting, fishing, and other recreational pursuits.

We trust the BLM will reflect our recommendations, and those of key stakeholders, in a final regulation.

BLM-managed lands are a critical economic driver for the West, contribute to our quality of life, and contribute to the larger effort to conserve biodiversity and reduce the effects of climate change. These lands are struggling in many parts of the region. The BLM needs regulations that guide staff to properly manage, conserve and restore these lands to ensure continued support for future generations.

Sincerely,



Governor Gavin Newsom
State of California



Governor Michelle Lujan Grisham
State of New Mexico



Governor Jay Inslee
State of Washington



Governor Jared Polis
State of Colorado



Governor Tina Kotek
State of Oregon