

Karen Mouritsen, State Director Bureau of Land Management (BLM) California State Office 2800 Cottage Way Suite W1623 Sacramento, CA 95825

Dear State Director Mouritsen,

As California elected officials, we write to express our support for protecting the millions of acres of wildlands managed by the Bureau of Land Management in our state. We commend BLM on its recent guidance and <u>draft public lands rule</u> that prioritizes the conservation of wildlife, natural and cultural resources, and encourages tribal co-stewardship. The State of California and the Biden Administration have made bold conservation commitments to aggressively address the climate and nature crisis and the California state office must play a significant role in helping meet these goals. We encourage you to do all you can to address climate change and protect our remaining wild public lands.

California offers an incredible diversity of natural landscapes and ecosystems that need to be protected for future generations. Encompassing rangelands, high mountains, expansive deserts, and rocky shores, many of these places fall within the boundaries of the 15 million acres managed by the BLM within the state. These scenic landscapes help drive California's outdoor recreation economy, which contributes over 500,000 jobs and over \$50 billion to the state economy. They provide essential ecological benefits, and support the state's economy and culture.

The Federal Land Policy and Management Act requires the BLM to "give priority" to the designation and protection of Areas of Critical Environmental Concern (ACECs), which are areas of public lands that contain outstanding ecological, cultural, natural, or other values. The designation of such areas is key to protecting vulnerable California public lands. The proposed rule strengthens existing agency policy by including new ACEC regulations and the final rule should further specify how ACECs will be prioritized, as required by FLPMA. The rule should ensure that all eligible areas are designated as ACECs, and provide standardized protective management for all existing and future ACECs. The final rule should also ensure that ACECs nominated outside of a planning process receive timely review and action.

In November 2022, BLM released an <u>interim policy</u> prioritizing the identification and protection of areas that provide habitat connectivity for wildlife. Such connectivity is essential to allow wildlife to adapt to a changing climate. The proposed public lands rule is does not mention habitat connectivity and the final rule should require the identification and protection of habitat connectivity areas in accordance with the BLM interim policy.

Protecting intact landscapes is essential to maintaining California's ecological health and economy, and the BLM must ensure that, prior to approving any development action, the agency conducts a comprehensive inventory of intact natural landscapes, including <u>lands with wilderness characteristics</u>, and ensures that the action will not degrade any such lands. The BLM must also safeguard our valuable older forests by ensuring that they are properly protected and restored.

We also encourage the BLM to <u>facilitate co-stewardship</u> with tribal nations for the management of <u>public lands</u>. In California, co-stewardship is already being implemented with the <u>Twenty-Nine Palms Band of Mission Indians</u> in Joshua Tree National Park, and between the <u>Washoe Tribe</u> and the Sierra District of California State Parks. More partnerships like this will be needed to ensure the viability of our public lands. BLM should consult with Tribes to advance opportunities for co-stewardship, incorporation of Indigenous Knowledge, respect for Tribal sovereignty and treaty rights, protection of

Tribal cultural sites, and carrying out Tribal consultation in ways that honor the unique historic and current connections of Indian Tribes to public lands.

Despite the existential threat posed by climate change, and the <u>outsized role public lands play in producing greenhouse</u> gas emissions, the proposed public lands rule is largely silent on greenhouse gas emissions from public lands. We urge the BLM to address the greenhouse gas emissions from public lands by analyzing the lifecycle greenhouse gas emissions from proposed actions and avoiding, minimizing, and mitigating such emissions.

Finally, in addition to the conservation efforts we've highlighted above, we also strongly encourage the BLM to use other existing tools to protect public lands across the state. In particular, we call your attention to designating new Wilderness Study Areas (WSAs). The BLM has the authority to ensure that lands with wilderness character are administratively protected as WSAs. These areas are often the first to be identified by our congressional leaders for legislative designation as wilderness and for many of our communities these are the iconic landscapes that define our state. Here again are great opportunities that the BLM can take action on immediately including English Ridge proposed wilderness and the Elkhorn Ridge, South Fork Eel River, and the Trinity Alps proposed wilderness. All of these areas have been championed by local citizens as well as members of congress and could be protected by the BLM as WSAs.

We need the BLM to be a strong partner in conservation efforts across the state of California and we look forward to working with you on these critical issues.

Sincerely,

- Mayor Lindsay Romack, Town of Truckee, California
- Vice Mayor Dave Polivy, Town of Truckee, California
- Council Member Courtney Henderson, Town of Truckee, California
- Council Member Jan Zabriskie, Town of Truckee, California
- Council Member Anna Klovstad, Town of Truckee, California