

July 5, 2023



Tracy Stone-Manning  
Bureau of Land Management  
Submitted electronically

Agency/Docket Number: LLHQ230000.23X.L117000000.PN0000  
RIN Number: 1004-AE92

### **Taxpayers for Common Sense Comments to Bureau of Land Management on Conservation and Landscape Health**

Dear Director Stone-Manning:

Taxpayers for Common Sense (TCS) appreciates the opportunity to provide comments to the Bureau of Land Management (BLM) on the proposed rule, "Conservation and Landscape Health." TCS is an independent, nonpartisan budget watchdog that has been working on behalf of the nation's taxpayers since 1995. Over our nearly 30-year history, TCS has advocated for responsible management of federal lands and waters to ensure taxpayers receive a fair return for the resources we own and are not forced to shoulder the costs and liabilities of industry operations.

For decades, outdated and ineffective policies have failed to value federal natural resource assets appropriately, costing taxpayers billions of dollars in foregone revenue and adding billions of dollars in liabilities. Below market rate royalties, rents, and fees for natural resources like coal, oil and gas, timber, hardrock minerals, and renewables are essentially subsidizing the respective industries that benefit from these publicly owned resources. Inadequate bonding requirements also leave cleanup liabilities incurred by these industries with taxpayers. We are pleased to see the BLM taking steps to reform and update management policies and practices to better obtain fair market value and pursue the greatest and best use of our natural resources.

Under the current system, BLM offers public lands for mining, grazing, timber, and other extractive development, which can bring great value for taxpayers; but conservation of our resources can also bring significant present and future value for taxpayers. At the end of fiscal year 2022, 11.3 million acres of public lands had been leased for oil and gas development but have yet to enter production. Countless more acres of public lands have been subject to reckless development practices due to obsolete lease conditions. As a result, taxpayers are burdened with enormous cleanup costs. An effective rule could help alleviate some of these problems by considering the monetized value of intact wilderness, landscapes, and the benefits of public use.

BLM is mandated to "manage the public lands under principles of multiple use and sustained yield,"<sup>1</sup> in which multiple use is a "combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources . . ." <sup>2</sup>, and sustained

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<sup>1</sup> 43 U.S. Code § 1732

<sup>2</sup> 43 U.S. Code § 1702

yield means “the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use.”<sup>3</sup>

The proposed rule focuses on conservation as a use on par with other uses under the multiple use framework. It establishes regulations to promote conservation efforts for all resources and requires the BLM to plan for and consider conservation as an essential aspect of managing public lands. Designating conservation as one of the uses to help restore and sustain the health, diversity, and productivity of public lands can be beneficial to federal taxpayers and help address the long-term taxpayer costs and liabilities.

The proposed rule also recognizes the importance of collaboration with stakeholders, including local communities, tribes, industry representatives, and conservation organizations. Engaging diverse perspectives and incorporating local knowledge can improve land management decisions, while fostering a sense of ownership and shared responsibility among stakeholders. By explicitly addressing climate change considerations in the proposed rule, including mitigation and adaptation measures, the agency demonstrates its commitment to ensuring the resilience and sustainability of our landscapes in the face of a changing climate.

Taxpayers are already shouldering the costs of climate change, and therefore TCS supports all efforts to plan, prepare, and decrease these costs. The proposed rule, if implemented in a transparent and effective manner, could help BLM foster increased climate resilience and smarter use of taxpayer-owned resources including, for example, management and conservation of mature and old-growth forests which can lead to decreased wildfire risk.

We appreciate the chance to offer our preliminary feedback on the proposed rule aimed at addressing conservation and landscape health. TCS firmly endorses the notion of prioritizing the conservation of our public lands and resources, even as we acknowledge the importance of accommodating more conventional uses, such as oil, gas, coal, and other forms of natural resource development. We believe that the preservation and responsible management of our resources can deliver significant benefits to taxpayers and prove to be the optimal utilization of those resources in specific circumstances.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Ellis".

Steve Ellis  
President

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<sup>3</sup> Ibid.