

Resource Management Plans, and eligibility for conservation leasing should align with local land use plans and policies. The BLM has an obligation under Section 202(c) of FLPMA to “coordinate the land use inventory, planning, and management activities of the Bureau... with the land use planning and management programs of the State and local governments.” NEPA has a similar mandate to analyze and address inconsistencies with local land use plans and policies. As such, BLM has an obligation to define and inventory which lands will be made available for conservations leasing, and ACECs, and to coordinate those efforts with local land use plans and policies.

- Should the rule clarify what actions conservation leases may allow? Yes, and since there are many existing uses under the multiple use framework that are generally compatible with conservation and restoration, the BLM should be clear and permissive in establishing acceptable actions on conservation leases. For example, grazing is an excellent conservation tool in the prevention of wildfire and other beneficial land management practices. Most outdoor recreation including hunting, fishing, camping, etc. can also be compatible with conservation and restoration, and as such should be included as permissible actions within conservation leasing. Potential conservation lease purchasers should know well in advance the actions and activities to be allowed under a conservation lease. Permissible activities on conservation leases should be widely transparent to the public.
- Should the rule expressly authorize the use of conservation leases to generate carbon offset credits? If a lessee demonstrates clear and convincing evidence that carbon capture or sequestration will be achieved, the generation of offset credits is supportable.
- Should conservation leases be limited to protecting or restoring specific resources, such as wildlife habitat, public water supply watersheds, or cultural resources? Yes, SLUPAC supports clearly identifying the specific resources to protect or restore in order to help mitigate speculative leasing. Conservation leases should be consistent with local land use plans and policies and have clear and measurable objectives towards the restoration of the affected ecosystem and be framed in the context of what is ecologically possible given any specific site’s ecological state. The use of Ecological Site Descriptions and associated State and Transition Models must be used to help guide conservation lease actions and objectives. These objectives should be publicly stated and transparent in the Proposed Rule that seeks to create these conservation lease instruments. Monitoring of conservation leases towards stated and measurable objectives should also be part of the process.

SLUPAC looks forward to continuing to work with the BLM to strengthen a framework to ensure healthy, working landscapes, abundant wildlife habitat, clean water, stable and vibrant socioeconomic conditions, and balanced decision-making on Nevada’s public lands. We appreciate the opportunity to provide these comments on the Proposed Rule and thank the BLM for its consideration of our concerns. If you have any questions or would like additional information concerning SLUPAC, please feel free to contact Scott Carey, State Lands Planner at 775-684-2723 or scarey@lands.nv.gov.

