



Director (630)  
Bureau of Land Management,  
U.S. Department of the Interior,  
1849 C Street, N.W., Room 2134LM  
Washington, DC 20240,  
Attention: 1004-AE39

May 26, 2016

Submitted via: [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov)

RE: BLM Proposed Rule

We would like to take the opportunity to comment on the Proposed Rule from the perspective of a local friends group working on the ground with field office staff and members of the public. Friends of the Inyo is a locally-based nonprofit conservation organization dedicated to the stewardship, exploration and preservation of the Eastern Sierra's public lands and wildlife. Friends of the Inyo's comments represent a local and regional membership of over 700 and thousands of supporters and volunteers who care about the landscapes and values of the Eastern Sierra. Over our 30-year history, Friends of the Inyo has become an active partner with the Bishop and Ridgecrest Field Offices, the National Park Service and other public lands agencies in the California Desert. Friends of the Inyo is actively engaged in management of BLM lands in the Eastern Sierra and submits comments on proposed projects ranging from vegetation management to the DRECP. We have seen first hand the dramatic increase in recreation on our public lands, especially BLM managed lands. At the same time, there are unprecedented cuts in budget to respond to this increase in use.

We are pleased to see the Proposed Rule provides a rare opportunity to build stronger conservation language into Resource Land Management Plans. The Rule provides an opportunity to emphasize existing, proposed and potential National Conservation Lands (NCLs). Because our organization works on many of these NCLs, we hope the new Rule will allow the agency to consider the impacts of leasing lands near or adjacent to current and future NCLs and provide the agency the ability to better respond to modern land management challenges. We are also pleased to see an emphasis on addressing and responding to climate change on federal lands with an adaptive management approach. The addition of Wildlife Movement Corridors

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and the creation of Multiple Species Management Areas is an innovative planning tool that could enhance conservation of resources on public lands.

A landscape level approach to management allows the agency to adapt more quickly to changes in climate, recreation and industry use. One tool will be the ease to amend RMPs more quickly and efficiently. Friends of the Inyo still wants to see adequate public comment periods associated with RMP revisions and their future amendments. We also support the desire to shift more control from the state office to the local field offices, as long as there are appropriate resources and capacity for field office's to administer this control. The Washington and state offices should remain as a partner in decisions regarding wildlife designations and other landscape level planning decisions, while projects have the potential to be across field office and state lines and will require facilitation.

Additionally, the proposed changes to decision making structure in RMPs (plan components and implementation strategies) needs further defining and explanation so that the public can understand what these tiers mean and how they differ. From our perspective and past experience with land management rules, there needs to be more content in plan components than in implementation strategies because while strategies can be lofty goals or broad objectives, plan components hold the most weight as to what can or cannot occur on the ground. There is the potential for another tier of decision making in the RMPs that would help fill this gap. In the Planning Assessment phase where the agency will gather "high quality" data, we recommend a further definition and criteria for "high quality".

We appreciate the desire to increase efficiency of planning while at the same time furthering public participation. We are concerned about the proposal to reduce comment periods for RMPs from 90 to 60 days and amendments from 90 to 45 days. One approach could be to add language to the Rule that allows for extensions in comment periods on a case-by-case basis. While the new Rule will still contain special management prescriptions for ACECs, it also proposes to do away with the additional ACEC comment period required under FLPMA. We believe the additional ACEC comment period is still needed, but perhaps the notice could be posted online to achieve the desired goal of increased efficiency.

In conclusion, Planning 2.0 has the potential to move the BLM in the direction of effective management of our natural resources on public lands by determining the best places for multiple use development, creating wildlife designations and migration corridors to protect the diverse species that live on BLM lands, manage and encourage recreation in a sustainable way, and provide resiliency and adaptation to changes in climate.

Thank you for considering the comments of a local Friends group and we look forward to the ongoing development of Planning 2.0 and updates to the existing Rule and planning handbook.

Respectfully Submitted,

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