

March 7, 2022

The Honorable Deb Haaland  
Secretary of Interior  
Office of Secretary, Department of the Interior  
Washington, DC

Re: Docket #: DOI-2021-0016  
(submitted electronically)

Dear Madam Secretary:

Thank you for the opportunity to inform how the *American Conservation and Stewardship Atlas* (*Atlas*) can best serve as a useful tool for the public and how it should reflect a continuum of environmental conservation actions in the America the Beautiful initiative. We, members of the [People, Public Lands, and Climate Collaborative](#), are supportive of the Department of Interior's commitment to soliciting and incorporating stakeholder input into the development of the *Atlas*.

The People, Public Lands, and Climate Collaborative is an informal network of U.S.-based NGOs who believe in the importance of a climate plan for public lands. Our common goal is ensuring that public lands are part of a just and equitable climate solution by:

- Promoting sustainability, climate resiliency, and healthy communities and economies;
- Protecting, connecting, and restoring critical landscapes and lands; and
- Reducing emissions from energy produced on public lands.

We encourage the Department of Interior to borrow from and be inspired by the values and guiding principles outlined in the Collaborative's [Shared Framework: A Climate Plan for Public Lands](#) in developing the *Atlas*. It has been attached separately for the Department's use and viewing.

**Science and Data:**

- We believe the Department should ensure that it is meeting the needs and expectations of communities in determining the kinds of science and data that should inform the development of the *Atlas*. We appreciate the opportunity to comment in listening sessions and in writing. The PPLCC echoes comments from the listening sessions that have called for more robust and proactive engagement of stakeholders who may not be tracking opportunities such as this one. The engagement and participation of communities of color, tribal governments, native-led and serving organizations, and low-income communities must be an integral part in every aspect of the *Atlas* tool development if it is to be successful. The Department must prioritize engaging with the communities that are most affected by the climate crisis and inequitable access to green space and natural resources and it also must center their voices.
- The *Atlas* should be developed in a manner that honors traditional ecological knowledge and values a variety of ways of knowing. From time immemorial, the Indigenous inhabitants of North America have been conscientious stewards of its lands and waters. "Public lands" were created from the forced removal of native communities, and management of these lands has often prioritized extraction. Given that Indigenous peoples are proven caretakers of the natural world, this *Atlas* should recognize and prioritize Indigenous expertise and ways of knowing.

- In developing the *Atlas*, the Department should strive to be thorough but efficient by building on existing tools. Stakeholders in the listening sessions pointed to existing tools that are very similar to the Atlas, like Conservation Land Foundation’s Climate Atlas and environmental and climate justice maps and tools developed by a variety of public, private, and nonprofit stakeholders. The *Atlas* needn’t start from scratch; it can instead aggregate existing data and frame it in a manner that is useful for the public, local organizations, and decision makers.
- To identify lands that are contributing to national goals, we urge the Department to be rigorous and avoid watering down what “protected” means in order to reach a 30% conservation goal. It should utilize Gap Analysis Project-based methodologies with an emphasis on GAP 1 and GAP 2.
- With regard to Bureau of Land Management-administered lands (BLM), we strongly encourage the *Atlas* to include BLM-identified lands with wilderness characteristics as part of its baseline of information. These are lands BLM itself acknowledges are largely undisturbed and thus provide critical ecological functions such as fixing carbon, retaining moisture, and providing habitat to native species. In many instances these lands are not being managed to protect those values and as a result they may be degraded and lost, so much so that those services are no longer being provided. Identifying BLM-identified lands with wilderness characteristics in the *Atlas* will allow the government to better determine whether its land management decisions are conserving and enhancing these values. BLM is also aware that community groups across the west have identified additional lands as having these same wilderness values and offering these same ecological services. We encourage BLM to incorporate this currently known information into the Atlas and over the course of the next several months to actively solicit such information from the public.
- We request the *Atlas* link to resources like resource management plans (RMPs) for specific spaces. Many districts and regions are beginning or restarting RMP processes, and this Atlas should be up to date with the state of the RMPs to make it easier for the public to track and engage on land conservation via these Biden-Harris Administrative processes.
- Finally, we urge the Department to undertake the rulemaking called for by the Affiliated Tribes of Northwest Indians to create regulations for the designation and management of Areas of Critical Environmental Concern. If ACECs are to be counted as protected by the *Atlas*, these regulatory structures must be in place to ensure durability of those designations.

#### **Conservation as a Continuum:**

- Conservation goals intersect with a variety of the Collaborative’s interests: honoring Indigenous knowledge and history, faith and spirituality-based stewardship of the earth, environmental justice, preservation of culture and heritage, access to clean water and air, safeguarding public health, amplifying local leadership, increasing access to public spaces, recreation, sustainable economies, protecting wildlife, building climate resilience, and healthy food systems. The *Atlas* should capture how public lands are contributing to these intersectional goals, in addition to capturing the degree to which management of public lands is leading to deterioration of these interests (e.g., by contributing to the climate crisis and fueling climate change, bypassing local leadership and community interests, failing to preserve culture and heritage, etc.). The *Atlas* should build a full picture of lands and waters by not just documenting and celebrating “protected” lands, but also noting superfund sites, active reclamation, and mining/extraction areas (i.e., the areas that are off the table for inclusion in the 30x30 effort and why).

#### **Outcomes:**

- To address the inequitable benefits of nature crisis, we recommend that the Interagency Task Force establish goals for investing a percentage of total federal funding for land and water

conservation into frontline and BIPOC communities and related efforts. Communities of color are three times more likely to live in nature deprivation than white communities in the United States. The Interagency Task Force should consider models such as applying a Justice40 metric to the America the Beautiful initiative or following the model currently under consideration by the California Natural Resources Agency to invest 50% of land and water conservation funding into climate-vulnerable communities to ensure that communities who have historically seen little to no conservation investment have access to funding for acquisition and/or restoration of lands and waters for conservation purposes.

- To drive more equitable access to nature and its benefits, the *Atlas* must be accessible to all who call this nation home. It should be mobile and reader-friendly, accessible in different languages, and free of government jargon. It should be a living resource for people who are interested in learning more about the public lands around them, how to visit, and how to be good stewards.
- We envision the *Atlas* being designed to drive action, not only capturing the current state of conservation and stewardship, but also by driving additional contributions to biodiversity, climate change mitigation and resilience, and equitable access to nature and its benefits.
- Through the *Atlas*, we encourage the Department to identify existing locally-driven conservation efforts like those led by Collaborative members, invest in them, and prioritize additional efforts, particularly in areas and communities that have borne the brunt of biodiversity losses, climate change, and inequitable access to nature.

Thank you again for the opportunity to submit comments.

Respectfully,

The following members of the People, Public Lands, and Climate Collaborative

**Creation Justice Ministries**

**Wilderness Workshop**

**Defiende Nuestra Tierra**

**Daniella Gonzalez**

Energy & Climate Fellow

**Friends of Organ Mountains-Desert Peaks**

The Wilderness Society

**Great Old Broads for Wilderness**

**Amelia Howe**

Advocacy and Government Affairs Manager

**Hispanics Enjoying Camping, Hunting, and the Outdoors (HECHO)**

American Alpine Club

**Southern Utah Wilderness Alliance**

**Beatriz Soto**

Director, Protége

Conservation Colorado

**Wild Montana**