



March 4, 2022

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Office of the Secretary
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RE: Public Land Solutions Comments re Interior Department Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas

Public Land Solutions (PLS) welcomes this opportunity to provide input to inform interagency efforts to develop the American Conservation and Stewardship Atlas. PLS works with communities utilizing outdoor recreation as part of their economic development strategies.

Public Land Solutions (PLS) is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions. For several years, PLS has been involved at the local, regional and national level during Department of the Interior planning, management and other proposals related to oil, gas developments, outdoor recreation management, and a range of conservation initiatives. Our advocacy efforts to protect and enhance recreation assets on public lands include organizing stakeholder workshops, providing detailed comments and proposed maps during comment periods, providing presentations to local and state government, and communicating with a wide range of interested stakeholders. We greatly value our public lands and benefit directly when they are managed with care and thoughtful consideration for how land use decisions affect local outdoor businesses which rely heavily on tourism and outdoor recreation.

Two major economic trends are converging: the growth in remote work and the demand for outdoor access. Lands in their natural state bring high quality of life which attracts both visitors and business investment. The acreage that houses recreation assets like trail systems, climbing areas, and water access, are all part of the America the Beautiful continuum. These places near both rural and urban communities merit specific efforts to increase their protections and invest in their restoration to meet our climate, economic, and equitable access goals. These recreation landscapes also contribute to the goals of the American the Beautiful initiative.

Public Land Solutions is currently conducting round table discussions with a variety of public land communities to explore recreation assets that are functioning well, both in terms of serving as economic drivers and as a healthy eco-systems. We are also looking at places that are being “loved to death” and need more attention and protections. This work has helped us identify both best practices and challenging trends that could be helpful in moving the America the Beautiful

goals forward. We believe that the America the Beautiful initiative should support, recognize, and incentivize all forms of conservation: creating new urban parks, protecting cultural and sacred sites, supporting private land conservation easements on private land, and establishing new national monuments on federal land, for example. Land conservation is a critical strategy to prevent habitat loss, defend the climate, and create more recreation opportunities.

The outdoor recreation community has a long history of advocating for protections that support the goals of American the Beautiful. While many outdoor recreation lands that do not meet the highest standards of permanent land protections, they nonetheless contribute significantly to protecting conservation values including biodiversity and climate mitigation. There is significant value in managing and protecting lands for outdoor recreation relative to other possible uses of public and private lands. Focusing primarily on wilderness designations and national monument protections in the America the Beautiful project, for example, ignores the contributions from many outdoor recreation landscapes. We believe that the American the Beautiful initiative and the American Conservation Atlas should acknowledge these contributions from outdoor recreation landscapes that contribute to biodiversity and climate change goals, but also provide economic benefits to local communities.

Work on the American Conservation and Stewardship Atlas should include a process to identify current and potential recreation assets of all types and explore existing and new protection and restoration tools. As a quick example, consider the Sand Flats Recreation Area in Moab, Utah. This area hosts the world famous Slickrock Trail and the Hells Revenge Jeep Route, and is managed via a partnership between Grand County and the Bureau of Land Management. These trails are major economic drivers for both locals and visitors. The only real protection currently afforded this area is a no-surface occupancy designation via the Moab Master Leasing Plan. While better than nothing, oil and gas development is still a threat as parcels in the region continue to be nominated for oil and gas leasing. However, because of the area's high value recreation the area is and will be managed to that purpose. There are many tools that could be adopted which would increase the protections for this area, from updating the oil and gas leasing system to creating a new tool which recognizes the economic value of this important natural place for outdoor recreation.

By sharing best practices and providing detailed examples to communities facing similar challenges, the administration has the opportunity to support local efforts to protect natural acres of all types. Further, by cataloging current challenges facing multiple communities, there is an opportunity to begin to develop solutions that could work across the country. In this way, natural places important to communities can be expanded, while also improving quality of life and community attractiveness via outdoor access. Creating ways to share best practices across states and regions, while also considering methods to direct resources towards current challenges will assist in achieving the America the Beautiful goals while simultaneously enhancing local economies.

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Thank you for the opportunity to provide input to the American Conservation and Stewardship Atlas. We believe that this work should closely consider the contributions and benefits provided

by outdoor recreation lands that help protect biodiversity, mitigate climate impacts, enjoy broad support from the public, and bring significant economic benefits to communities across the country.

Regards,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith
Managing Director
Public Land Solutions