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**Western State Land Commissioners Association (WSLCA) files comments to BLM
Proposed Land-Use Planning Rule - "Planning 2.0"
*Concern Expressed for Apparent Drift from Collaborative Planning and
Shift in Land Management Decisions from Local Officials to
Centralized Planning in Washington, D.C.***

(May 24, 2016) – Western state trust land managers submitted written comments expressing concern about land-use planning amendments, "BLM Planning 2.0", that could negatively impact the constitutional ability of states to maximize revenue for beneficiaries such as K-12 public education.

The checkerboard nature of state trust land ownership across the West intertwines trust assets with federal public lands. The BLM's proposed rule fails to emphasize the important mandate of consideration, coordination, and consistency with State, local, and Tribal land use plans. The land use planning activities of the BLM greatly impacts a state's ability to generate income from their trust assets. Management experience demonstrates that generation of income from isolated state parcels when surrounded by BLM lands that are off limits to most economic uses is very difficult—negating the grant and its purpose to the states.

WSLCA association president, Brent Goodrum (AK), believes "The proposed rule should emphasize the importance of coordinating with its Member states to insure federal planning decisions are consistent with state plans since State trust assets bear the greatest impact from public land management decisions." Goodrum goes on to say in written comments, "the final rule should insure that the BLM coordinates with State trust managers at the earliest stages of the proposed planning effort and that meaningful consultation with state trust managers continues beyond the planning process."

The BLM preference for landscape level planning that could encompass multi-state, tribal and local jurisdictional boundaries is also a concern. WSLCA sees the proposed rule as a wholesale movement to the land use plan amendments recently put in place for Greater sage-grouse (GSG). This highly controversial top down approach to landscape level plans and management of public lands for GSG has been opposed by nearly every sector on the

public lands. Large swaths of landscape planning that encompass multiple states will not streamline the planning process and WSLCA opposes such contemplated action or implementation.

WSLCA is led by the land commissioners of 23 states, which together manage over 440 million acres of land, mineral properties, submerged lands, and water resources. Collectively, WSLCA's membership represents the nation's second largest landowner. Under state constitutional and statutory mandates, WSLCA members manage lands and natural resources to generate income for the benefit of K-12 public education and to support other public purposes provided by state law. WSLCA also consists of affiliate members representing businesses, industries, and organizations that support WSLCA's mission and help to conserve, develop, and maximize the value of the lands and natural resources within the western states. This sound land management stimulates the local economy with expenditures and jobs and results in financial resources that total hundreds of billions of dollars for shareholders & beneficiary institutions.

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