



# L.I.G.H.T. FOUNDATION

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Leadership  Indigenous  Guardian  Honor  Teach 

Attn: PRA Office, 1004-AE92  
US Department of the Interior, Director (630)  
Bureau of Land Management  
1849 C St NW, Room 5646  
Washington, DC

Sent via email to: [BLM\\_HQ\\_PRA\\_Comments@blm.gov](mailto:BLM_HQ_PRA_Comments@blm.gov)

RE: [OMB Control Number 1004-ONEW and RIN 1004-AE92](#) (Proposed Rulemaking: BLM Conservation and Landscape Health)

Dear Information Collection Clearance Officer,

The L.I.G.H.T. Foundation (LF) is an independent, Indigenous-led, conservation 501(c)(3) nonprofit organization established on the Colville Indian Reservation in the traditional territory of the Nespelem Tribe. We support the restoration and cultivation of native plant species of Pacific Northwest Tribes and the culturally respectful conservation of habitats and ecosystems which are climate resilient and adaptive.

The landscapes and ecosystems throughout the United States (U.S.) which are heralded for their natural beauty, biodiversity, and ecological functions were shaped by the stewardship activities of Indigenous Peoples over thousands of years. A return to those values and perspectives of cultural ecology is necessary to stop the prioritization of resource extraction on “public lands” under the current management of the Bureau of Land Management (BLM). LF identifies “Tribal Nations” throughout this comment letter to include all treaty and non-treaty federally recognized tribes, as well as state-recognized tribes, and those tribes in the process of obtaining recognition.

BLM’s Areas of Critical Environmental Concern (ACECs) proposed rule requires “special management action [...] to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes.” This provides LF with an opportunity via public comment to address the negative impacts BLM

management has had on the water quality, habitat, species, socio-economic and cultural heritage of Tribal Nations throughout the country. This proposed rule is the first step to elevate conservation to help sustain the nation's iconic landscapes, provide refuge for wildlife and pollinators in the face of climate change, and expand co-stewardship and management of BLM lands to Tribal Nations.

Keeping this position in mind, we respectfully ask that you consider these comments and recommendations:

1. The BLM needs to establish a Native American Advisory Board to help guide the BLM's management and consultation with Tribal Nations and Tribal non-governmental organizations..
2. The proposed rule needs to ensure that conservation and restoration of habitats are the first and best use of BLM landscapes; *not* mining, logging, or other extractive and consumptive uses of land which will decrease or adversely impact ecosystem services or functions.
3. Currently, the proposal identifies ACECs and conservation leases as opportunities for co-stewardship and protection of cultural resources. The ACEC section needs to be strengthened to create a duty for BLM to solicit from Tribes ACEC nominations of traditional homelands and clarify that BLM should seek co-management and co-stewardship arrangements for these areas.
4. The proposed rule needs to require BLM to consider ACEC nominations outside of the planning process for interim management. It must also require BLM to disclose all locations and site-specific treatment information of chemical applications to ensure that previous sprays and any of those planned are not affecting threatened or endangered insects, birds, and plants. This may require BLM to strengthen and improve records management and accessibility of public information for pest, invasive, and noxious species management.
5. The rule needs to require the identification and protection of habitat connectivity areas and create a minimum management standard to ensure there is a threshold level of management for protection of the resources and values for which the ACEC is designated.
6. ACEC nominations for waterways and their associated riparian habitats need to be a priority to protect instream flows, water quality, and ensure that water use is not overallocated.
7. Facilitate ecological integrity and climate resilience across all forest-types by conserving old and mature forests from logging and other forms of resource extraction (i.e. mining and water permitting), informed by the best available science and Indigenous Knowledges (IK).
8. Promote ecologically sound rangeland strategies (i.e. rotational grazing) to preserve and maintain biodiversity, informed by the best available science and IK.
9. Scientific research and project design for ecological restoration needs to utilize [Findable, Accessible, Interoperable, and Reusable \(FAIR\) Principles](#) to promote open access to data, while IK should be centered on the [Collective benefit, Authority to control, Responsibility, and Ethics \(CARE\) Principles for Indigenous Data Governance](#) and the

[First Nations Principles of Ownership, Control, Access, and Possession \(OCAP\)](#) to outline how Indigenous Peoples' information and data may be collected, protected, used, or shared.

10. Ensure that **all** eligible areas that meet the criteria are designated as ACECs and are co-managed and co-stewarded with equitable and commensurate parity of resources for Tribal Nations. This includes ensuring Tribal Nations have access to and availability of harvest and cultivation sites for traditional foods and medicines, including native plant and pollinator habitats, and authority in decision-making for BLM permit approvals.. Additionally, the rule needs to clarify that BLM **must** designate as an ACEC any area that possesses relevant and important values or resources and requires special management attention.
11. Require the BLM to consult with Tribes to ensure it fully advances opportunities for co-stewardship, incorporation of IK, aligned with upholding Tribal sovereignty and the federal Trust responsibility, protection of Tribal cultural sites, and carrying out meaningful and good faith consultation with Tribes in ways that honor relationship building and the unique and current conditions of Tribal Nations to public lands.
12. Ensure that, prior to approving any development, the BLM conducts an inventory of intact natural landscapes and pollinator habitats, including lands with wilderness characteristics, and prohibits approved actions from degrading intact natural landscapes. We recommend that strategies are implemented to specifically restore pollinator and native plant habitat. These strategies would need to be time-sensitive and time-bound to ensure that non-genetically modified and neonic-free pollinators and traditional foods and medicine plant species be prioritized for restoration and plantings.

Thank you for this opportunity to review and provide comments on this important proposed rulemaking. LF appreciates your consideration and is committed to working with all government entities, partners, and allies to ensure that our traditional homelands remain resilient and strong in the face of climate change for generations to come.

Sincerely,



Joaquin J. Marchand, B.A.B., M.P.A.  
Executive Director  
L.I.G.H.T. Foundation