

Dear Secretary Countryman:

As a botanist for 15 years, I have worked for several organizations (Department of Fish and Game (DFG) in California and California Native Plant Society (CNPS)) of which I do not represent nor am affiliated with currently and these views are my own.

I do not support the creation of our natural public lands into Natural Asset Companies (NAC's).

I am opposed to this proposal because as stated, this proposal violates the Constitution because only elected officials in Congress have the authority to transfer rights for public lands. It is clear the SEC and the NYSE are trying to implement a radical "environmental" agenda outside of the legislative process.

Please ensure that this project will in fact abide by the rule of law and go through the current legal process that public lands should go through and let the people be represented by the elected officials involved in this process. The lands that are currently proposed to become NAC are currently under a congressional mandate, enacted in 1976, to generally retain public lands in public ownership.

The creation of NAC's is not in the public interest as NAC's are private in nature and not regulated by elected and local individuals. There is no clear pathway stated in this proposal to ensure that there would be no future (unforeseen) habitat loss or damage and that the local environmental regulations would be followed for any "sustainable improvements" on the properties.

This proposal is a clear violation of the public interest and should be abandoned because it will not, under any circumstance or provisions, be able to benefit the public interest or the thousands of species that currently exist on these affected lands or parcels.

I was previously a botanist for renewable energy projects and I have seen much habitat destruction in the name of "renewable and sustainable". RENEWABLE and SUSTAINABLE are fancy words for HABITAT DESTRUCTION and PRIVATE PROFIT at the TAXPAYERS EXPENSE.

Please define "environmental benefit" and how privatizing public lands has any future to benefit the public? It is not in the best environmental benefit for the land managers to simply change to an NAC as the current laws of the land are ensuring the best and most efficient status of the environmental benefit to the plants and animals.

What are the proposed measures for public lands to *remain* in the governance and ownership of the local parks and properties mentioned in this proposal? How can we be sure any and all future activities on these lands will be in the best interest of the public? Any environmental oversight would be lost by local officials and neighbors of these lands, not to mention monitoring, and adherence to local state laws for species that exist on these lands. Would the management that is currently operating on these lands change? What are the impacts of that? What about the access and land use? Once NAC's are formed how do we ensure these lands will have an ongoing and never ending public benefit. This must be clearly stated and outlined because if the future of these created NAC's take away public authority then the proposal would not be benefiting the public and therefore this proposal should be abandoned as a violation of the intended purpose of these lands. These questions have been proposed and that makes them no longer "unforeseen consequences" but real issues that must be addressed in this proposal.

Be warned that this project is funded by the Rockefellers and the Rockefellers are intent on taking any and all land owned by the public for their own personal control and future profit. History will show they have had no desire to RESTORE or PRESERVE anything but they are intent on destruction and control.

This “environmental” agenda would have no regulatory limits and could have significant ecological and environmental IMPACTS as per the local State and Federal laws for critical habitat of any and all species currently living on these protected lands that the public currently owns and pays for the government to manage.

What are the impacts for the current contracts with BLM and local private farmers and ranchers? These are not unforeseen consequences but must be thoroughly addressed in this proposal and a clear pathway must be made to address fairness and local public benefit of these public lands to the grazing contracts and other small private contracts that aid in management of the public lands.

What will the land use changes be in the future? These are not unforeseen impacts as the change in ownership will allow many land use changes unless spelled out, how can we the public ensure adherence to the land use if we have no oversight?

Please define the current ambiguous and broad land use or farming/ranching activities being “unsustainable” and spell out how exactly the proposed land use changes that would be taken place would result in “sustainable” to be accomplished and maintained. These words should not be used if there are not proper definitions as they are ambiguous and unsubstantiated and not proposed as an activity that can be quantified.

Our public lands are not for sale. We need to continue to ensure these protect these lands stay protected by maintaining them as they are. We must be able to manage them locally and publicly holding the regulators accountable using the current environmental laws and ownership as their source of protection.

Regards,

Danielle Roach, MS

Botanist, Conservationist