

Applying a Behavioral Lens to Public Comments on the Public Lands Rule

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Executive Summary

This brief uses a behavioral lens to analyze public comments submitted in response to the Bureau of Land Management's (BLM) proposed Conservation and Landscape Health Rule, known as the Public Lands Rule. It explores how risks, rewards, and liabilities associated with collaborative landscape planning, restoration, and mitigation can be effectively communicated to grazing permittees, mining and renewable energy sectors, and rural communities—groups whose behaviors will directly determine the future of the PLR.

By applying Behavior-Centered Design (BCD, See Appendix 1 for more information) and the Rare Center for Behavior and the Environment's levers of behavior change, the analysis highlights motivational drivers and barriers within each group. The brief then offers message framing and communication strategies that align the rule's implementation with stakeholder values and identities. Our findings suggest that trust-building, emotional resonance, and context-aware messaging are critical to advancing sustainable land use practices through collaborative governance.

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Introduction

Environmental conservation efforts, including those like the Public Lands Rule, ultimately succeed or fail based on human behavior. The Public Lands Rule sought to embed conservation as a co-equal use of public lands alongside traditional activities such as grazing and mining. However, this shift raised concerns about access, control, and economic stability for many existing land users.

Conservation, therefore, is not only an ecological or regulatory challenge, but also a behavioral one. Understanding how people perceive risks, define rewards, and respond to uncertainty is vital for designing policies and messages that invite participation rather than provoke resistance.

Methods

The analysis employed a four-stage process that blended qualitative review with AI-supported tools and behavioral design expertise:

1. **Segmentation of Comments**

We reviewed 471 public comments from identifiable organizations, categorizing them by sector (e.g., grazing, mining, rural development). Uncategorized comments were reviewed for patterns or affiliations, though many remained unaligned.

2. **Document Processing**

Many organizations submitted attached letters. These were automatically downloaded and categorized using R, enabling efficient analysis of comment content and tone.

3. **Thematic Analysis via NotebookLM**

Comments and letters were uploaded into NotebookLM to extract insights about motivations, barriers, and positions on the Public Lands Rule, which were then sorted by stakeholder type and stance. Representative quotes from public comments are featured below to demonstrate these motivations and barriers.

4. **Message Framing with Behavior Centered Design Levers**

Using a custom, Design-Centered GPT trained on behavior.rare.org, we generated messaging tailored to each group. This included applying BCD principles to map out emotional, social, and contextual drivers of behavior.

Key Findings by Stakeholder Group

Grazing Permittees

"These producers are the conservationists of these landscapes, having managed lands, waters, wildlife, and adverse conditions with the most accurate record-keeping in history to ensure the resources remain healthy and resilient." – Public comment

Motivations

Grazing permittees are strongly motivated by their connection to the land and identity as stewards. Their livelihoods depend on continued access to public lands, and they often see themselves as the original conservationists, managing landscapes for generations with deep knowledge and commitment. They value regulatory certainty and want assurance that their grazing rights will be respected.

Barriers

Despite this stewardship mindset, they perceive the Public Lands Rule as a threat to grazing. Many are concerned that the rule places too much emphasis on conservation at the expense of ranching. They also fear increased costs from compliance. Finally, they feel that they were not meaningfully included in the rulemaking process, leading to feelings of marginalization and mistrust.

Recommended strategies to align communication with stakeholder group values

1. Frame the rule, or restoration and mitigation leasing, as an **enabler of long-term land health**.
2. Emphasize that **grazing remains a vital part of BLM land management**.
3. Reframe conservation as **compatible with grazing** and aligned with protecting rural economies and traditions.
4. **Feature success stories** from peer ranchers who have adopted sustainable practices.
5. **Host local workshops or listening sessions** to provide space for ranchers to voice concerns and feel part of a broader community.

Mining Sector

"As mining professionals, SME members are keenly aware of our Nation's dangerous reliance on imported minerals...we are exceptionally well qualified to understand the importance of preserving access to the Nation's mineral resources on our public lands so that new mineral deposits can be discovered and developed to reduce our reliance on foreign minerals." – Public comment

Motivations

Mining stakeholders are motivated by the need for resource access, regulatory clarity, and economic viability. They emphasize the importance of domestic mineral production for national security and economic growth. The industry values predictability in regulation to support long-term planning and reduce legal risk.

Barriers

The mining sector fears that the rule will increase project costs and delays. There's uncertainty about how the rule defines key concepts and how restrictive it might become in implementation. Some stakeholders also point to a lack of transparency and engagement, worrying that decisions affecting their operations are being made without adequate consultation.

Recommended strategies to align communication with stakeholder group values

- Emphasize that the rule **supports mining where it aligns with sustainability goals**.
- Highlight that **compliance can lead to more streamlined approvals**.
- Show that adherence to conservation guidelines can **protect the industry from reputational risks and litigation**.
- Show that mitigation leasing on BLM land may make **compensatory mitigation requirements easier to fulfill**, thereby facilitating natural resource development
- Clarify that restoration and mitigation leasing **is meant to be applied on small scales and for limited periods of time**, so it shouldn't withdraw large areas from potential extraction indefinitely.

Renewable Energy Sector

"To mitigate the worst impacts of climate change, the Biden Administration announced a goal to 'create a carbon pollution-free power sector by 2035 and net zero emissions economy by no later than 2050.' Rapid expansion and deployment of renewable energy infrastructure will be vital if the United States is to meet these goals." – Public comment

Motivations

Stakeholders in the renewable energy sector are motivated by their commitment to clean energy development, job creation, and the advancement of national climate goals. They see alignment between their projects and broader environmental values, and they are particularly drawn to a regulatory environment that is predictable and efficient. The expansion of solar, wind, and transmission infrastructure is seen as essential to achieving a carbon pollution-free power sector by 2035 and net-zero emissions by 2050.

Barriers

Despite their alignment with sustainability goals, renewable developers are concerned that the rule's conservation provisions may restrict access to viable project sites. They also express uncertainty about how the permitting process will work under the new framework and fear it could slow or block approvals due to regulatory complexity or litigation risks. These concerns reflect a broader worry that conservation prioritization may inadvertently undermine the urgency required to meet national energy targets.

Recommended strategies to align communication with stakeholder group values

- **Emphasize that the rule supports renewable projects** when they align with conservation standards.
- **Address fears about limited site access** by clarifying how conservation goals will be balanced with energy siting.
- **Highlight or create incentives**, such as streamlined approvals for projects that meet environmental criteria, to appeal to efficiency-focused developers.
- **Reduce concerns over delays** by clearly communicating the specific steps and timelines for project approvals.

- Reinforce that the rule **supports national climate objectives**, positioning renewable development within sustainable land-use strategies.
- Emphasize that the rule includes **mechanisms for efficient conflict resolution**, fostering a stable and productive regulatory environment for energy projects.

Rural Communities

“NRECA urges BLM to withdraw this Proposed Rule, as it could have disproportionate impacts on rural co-ops and the communities that they serve, including 92 percent of the nation’s persistent poverty counties. Increased planning, permitting, access, mitigation, fuel supply, and vegetation management requirements and costs that result from this proposal could jeopardize the reliability and affordability of electric service throughout NRECA members’ territories.” – Public comment

Motivations

Rural communities are motivated by a desire to protect local economies and cultural traditions. Public lands are often deeply woven into these communities’ identities, supporting not just economic activity but also recreation, heritage, and a sense of place. There is also a strong desire for greater control and involvement in land use decisions that affect their lives.

Barriers

There is widespread concern that the rule reduces local control and imposes new mandates from outside, potentially disrupting local livelihoods. Economic vulnerability amplifies these concerns, with fears that access to public lands will be reduced. Confusion over complex or technical language in the rule also creates uncertainty and mistrust.

Recommended strategies to align communication with stakeholder group values

- Position the rule as a **supporter of local planning** and a tool for shared stewardship.
- **Highlight examples of community-led conservation** that have benefited both people and nature.
- Use **trusted messengers from within the community** to deliver messages in plain language.
- Provide **clear, easy-to-understand explanations** of what the rule does and does not do, and how it supports long-term sustainability.

Insights from Behavior-Centered Design

Levers of Behavior Change

Behavior change is most effective when messaging aligns with how people feel, what they observe others doing, and the context in which they decide. Rare's behavioral levers offer a roadmap for strategic engagement:

- **Emotions drive us to act:** Tap into the emotional connection stakeholders have with the land and their livelihoods. Frame the Public Lands Rule as a source of pride in protecting land for future generations. Use hope and legacy, not fear, as motivators.
- **People take the lead from others:** Leverage social influences by highlighting success stories and creating a sense of community. Make collaboration and conservation visible, normalized, and rewarded. Highlight peers and local leaders who support the rule.
- **The context in which we make decisions matters:** Frame information in a way that resonates with the specific context and values of each stakeholder group.

Communication Channels & Strategies

To resonate with stakeholders, messages should be:

- **Delivered by Trusted Messengers:** Utilize local government like conservation districts and county commissioners, other public officials, expert specialists, organizational leaders, community or religious leaders, professional performers, ordinary real people, specially experienced people, and unique characters to convey messages.
- **Simplified and Clear:** Use a 6th-grade reading level for public materials. Avoid jargon like "conservation lease"; explain what it means in practice.
- **Personalized:** Connect to everyday livelihoods—how the rule affects water quality, forage, project permitting, or community fire safety.

Example Messages:

- Facebook/Instagram Post: "Public lands are so important for ranchers and our communities. The new Public Lands Rule Leasing land for conservation purposes helps keep grazing strong while making the land healthier for everyone. By caring for the land, we can grow better grass, stop wildfires, and protect grazing for years to come. Learn how this rule supports ranchers and conservation: [Insert Link] #RancherStrong #HealthyLands #SustainableGrazing"
- Twitter/X Post: "The Public Lands Rule keeps grazing rights safe and makes rangelands healthier. Let's protect grazing for the future! Learn more: [Insert Link] #SustainableGrazing #HealthyLands"

Additional Communication Best Practices

1. **Enhance Stakeholder Engagement:** Implement more inclusive and meaningful engagement processes to better inform and gain support for the proposed rule. Use local workshops, ongoing consultation, and feedback loops to build trust.
2. **Tailor Communication:** Customize messages for each stakeholder group, addressing their specific motivations, barriers, and concerns. Test framing before full rollout.
3. **Leverage Social Norms:** Highlight success stories and promote collaborative initiatives to create a sense of shared responsibility and community.
4. **Simplify Regulatory Language:** Use clear and accessible language to reduce confusion and perceived complexity of the rule. Provide plain-language fact sheets and infographics.
5. **Provide Incentives:** Offer financial and technical support for transitioning to conservation-compatible practices, rewarding early adopters and those already engaged in sustainable land management.
6. **Monitor and Adapt:** Continuously monitor the impact of communication strategies and adapt them based on feedback and evolving circumstances.

Conclusion

The Public Lands Rule and other similar initiatives present an opportunity to shift toward more sustainable and equitable land use, but only if people believe in it, see themselves in it, and know how to act. By applying a behavioral lens, we can create messages that do more than inform; they inspire collaboration, build community, and drive long-term stewardship.

Appendix 1: About Behavior-Centered Design (BCD)

Behavior-Centered Design (BCD) is a practical approach to solving environmental challenges by understanding and influencing human behavior. Developed by Rare's Center for Behavior & the Environment, BCD blends insights from behavioral science and design thinking to create innovative, human-centered solutions that drive lasting change.

At the heart of BCD is the idea that people don't act based solely on knowledge or intent, they act based on emotion, social influence, and the context in which decisions are made. By applying BCD, practitioners move beyond simply raising awareness or offering incentives to shaping the conditions that truly drive behavior.

BCD follows an eight-step journey:

1. **Frame** – Define the environmental challenge and target behaviors.
2. **Empathize** – Understand the lived experience of the people whose behaviors you want to influence.
3. **Map** – Identify behavioral drivers and barriers.
4. **Ideate** – Generate creative, behaviorally informed solutions.
5. **Prototype** – Build early versions of your ideas to test their feasibility.
6. **Test** – Collect feedback from real users.
7. **Launch** – Implement the full-scale solution.
8. **Assess** – Monitor impact and adapt over time.

By grounding communication strategies in this framework, the Public Lands Rule or future similar initiatives can more effectively connect with diverse stakeholders, build trust, and foster collaborative stewardship.

Learn more at behavior.rare.org

Appendix 2: Additional Stakeholder Perspectives

Climate Change Organizations

Motivations

These organizations support the rule for its potential to advance climate mitigation and adaptation goals, increase carbon sequestration, and protect ecosystem services. They advocate for science-based land management and intergenerational equity.

Barriers

While explicit barriers were not identified, these groups may share concerns with conservation allies—particularly the need for clear definitions, effective implementation, and robust monitoring frameworks.

Recommended Strategies

- Frame the rule as a **climate policy tool** that enhances resilience and ecosystem function.
- Include **scientific references** in implementation guidance to align with their evidence-driven values.
- Collaborate on **climate outcome monitoring**, positioning these groups as technical partners.
- Use **forward-looking, generational language** in messaging to tap into legacy and equity values.

Conservation Groups

Motivations

Conservation organizations aim to restore and protect public lands for biodiversity, ecosystem resilience, and long-term sustainability. They view the rule as a mechanism for preserving critical habitats and ensuring responsible land use.

Barriers

Their main concerns include vague definitions, lack of measurable outcomes, weak mitigation standards, and insufficient monitoring and adaptive management. They also advocate for more meaningful public engagement.

Recommended Strategies

- Refine and clearly define terms like **“intact landscapes”** and **“resilience”** in public materials.
- Build capacity for **transparent monitoring and adaptive management**.
- Encourage collaborative development of **mitigation standards with conservation groups**.
- Provide **open comment periods and participatory design** for lease and standard-setting processes.

Energy Sector

Motivations

Energy companies are motivated by access to public land for resource development, predictability in permitting, and balanced land management under the Federal Land Policy and Management Act. They seek efficient project approvals to maintain energy supply and economic performance.

Barriers

They worry the rule prioritizes conservation over development, introducing vague terminology and additional regulatory hurdles that may delay projects and raise costs. Limited engagement and transparency during rule development compound these concerns.

Recommended Strategies

- Clarify how **energy development can proceed under conservation-compatible standards**.
- Offer **pre-permitting guidance or checklists** to streamline compliance.
- Provide **neutral third-party summaries** to reduce interpretation gaps.
- Facilitate **structured dialogue sessions** between the BLM, energy developers, and local communities to rebuild trust and shared understanding.

Heritage Organizations

Motivations

Heritage organizations are motivated by the need to preserve access to public lands for archaeological research, cultural heritage work, and historical interpretation. They also prioritize proper management and protection of cultural resources, including meaningful engagement with Tribes and heritage professionals.

Barriers

These groups are concerned that conservation leases or other land designations could restrict access to culturally significant areas. They also fear misuse or misinterpretation of cultural data and highlight a lack of consultation with Tribes and heritage experts in land use decisions.

Recommended Strategies

- Clearly define **how heritage activities will be preserved under conservation leases**.
- Include heritage professionals and **Tribal representatives in co-management roles**.
- Use BLM guidance to emphasize **protections for sensitive cultural sites** and traditional knowledge.
- Highlight successful examples of **archaeological work or cultural preservation** coexisting with conservation goals.
- Establish transparent **data protection policies** for cultural information shared in planning processes

Hunters and Anglers

Motivations

Hunters and anglers are driven by a desire to protect public access for traditional activities like hunting and fishing. These experiences are seen as vital for recreation, food security, and cultural connection. They also support healthy wildlife populations and habitat through sustainable management.

Barriers

There is concern that the rule could limit access to traditional hunting and fishing areas, especially through conservation leases. These stakeholders also fear that mismanagement could harm wildlife habitat or that their needs are not fully considered in implementation.

Recommended Strategies

- Emphasize that the rule **supports healthy ecosystems that sustain game species**.
- Use messages that link **conservation to better hunting and fishing outcomes**.
- Offer **maps or tools** to clarify where public access for recreation remains unchanged.
- Highlight input from **hunter/angler organizations that support conservation planning**.
- Involve these groups in **adaptive wildlife management processes** to maintain trust and credibility.

Recreation Groups

Motivations

Recreation groups are motivated by a desire to maintain access to public lands for diverse outdoor activities like hiking, off-roading, and camping. They value the physical, mental, and economic benefits that recreation provides to individuals and rural economies.

Barriers

They are concerned that the rule could lead to restrictions on motorized and non-motorized access, especially through conservation leases. The lack of clarity on how recreation fits into conservation planning and limited engagement during the rulemaking process has led to frustration.

Recommended Strategies

- Clearly define how **recreation will be accommodated** under conservation leases.
- Create visuals or maps showing **continued recreational access zones**.
- Involve recreation user groups in **planning and monitoring access policies**.
- Highlight **positive examples** where conservation has improved trail quality or habitat.
- Host dedicated **stakeholder roundtables with off-road and trail organizations**.

Water Utilities

Motivations

Water utilities are primarily focused on ensuring reliable access to water resources and maintaining the ability to develop and manage infrastructure projects that support growing populations.

Barriers

Utilities fear the rule could delay or restrict permits for water infrastructure due to conservation restrictions. They also cite limited coordination with BLM in planning processes, which may lead to avoidable conflicts or project inefficiencies.

Recommended Strategies

- Clarify how **critical infrastructure projects** will be evaluated under conservation provisions.
- Establish early engagement protocols with utilities during **land use planning stages**.
- Develop **case studies of successful infrastructure + conservation co-planning**.
- Provide guidance on **low-impact development options** that align with conservation goals.
- Include utilities in **regional or basin-level resilience planning efforts**.

Wildlife Protection Organizations

Motivations

Wildlife organizations support the rule's goals of habitat conservation, ecosystem connectivity, and species protection, especially for threatened and endangered wildlife. They see it as a tool to promote ecosystem resilience in the face of growing threats.

Barriers

These groups want to ensure the rule includes stronger protections for sensitive habitats and explicit support for wildlife corridors and connectivity. They also advocate for greater Tribal consultation in wildlife-related decisions, emphasizing Indigenous leadership and traditional knowledge.

Recommended Strategies

- Strengthen messaging around **corridor protection and habitat prioritization** in implementation materials.
- Collaborate with wildlife groups on **defining key biodiversity zones** and monitoring indicators.
- Highlight how conservation leases can **protect riparian zones and old-growth habitats**.
- Elevate **Tribal partnerships** in wildlife management planning and policy execution.
- Include species-focused metrics in **ecosystem health definitions** and adaptive management plans.