



[footloosemontana.org](https://www.footloosemontana.org)

June 18, 2023

Tracy Stone-Manning  
Director of the Bureau of Land Management (BLM)

***RE. Comments on the Conservation and Landscape Health rule (Docket BLM-2023-0001)***

Submitted via: <https://www.regulations.gov/commenton/BLM-2023-0001-0001>

Dear Director Stone-Manning:

Thank you for the opportunity to submit a comment on behalf of Footloose Montana and our thousands of supporters in Montana. Footloose Montana is a nonprofit organization dedicated to the protection of all wildlife, including predators, with a special focus on ending trapping on Montana's public lands.

After more than four decades of BLM's bias in prioritizing resource extraction—oil, gas, fracking, mining, and livestock grazing—over the protection of public lands and non-consumptive users, it is urgent for the BLM to rebalance their approach, elevate conservation, and prioritize ecosystem health and resilience.

Our nation's public lands provide clean drinking water and fresh air, offer refuge for wildlife, provide public access to nature, encompass iconic landscapes that drive our tourism and outdoor recreation economy, and safeguard innumerable cultural landscapes and sites.

By shifting its focus to elevate conservation, BLM can take bold action to protect wild animals and their habitat, waterways, and carbon-rich old-growth forests—all critical steps in the era of climate change and essential parts of an effective, national U.S. climate policy.

While we appreciate the BLM's initial plan toward a new framework of a more balanced management approach, we urge the BLM to prioritize the following before finalizing the Conservation and Landscape Health Rule,

- Employ co-stewardship with indigenous tribes and facilitate climate resiliency, informed by the best available science and Indigenous knowledge.
- Protect all types of forests, in particular the carbon-rich, mature trees and old-growth forests, from logging, drought, and wildfires to mitigate climate change and ensure a viable future for wild animals and humans.
- Ensure ecosystem health and resiliency by increasing and protecting plant and animal diversity.
- Require the identification and protection of habitat connectivity areas and wildlife corridors.
- Prior to considering any development, require that the BLM has conducted an inventory of intact natural landscapes, including lands with wilderness characteristics, and determined that the action will not degrade any intact natural landscape.
- Designate as an ACEC and provide special management attention to any area that possesses relevant and important values or resources.
- Restore degraded habitat and waterways.
- Ban recreational trapping and snaring on all BLM lands.

Finally, we support the proposed rule in Section 6102.4, providing for conservation leases for the purposes of mitigation, restoration, or protection and the eligibility of state wildlife agencies under the condition that none of these activities would threaten or lead to the exploitation of the lives of any wild animals.

Just as trees have value and are more important standing, so do wild animals have more value alive.

Please strengthen the Public Lands Rule and thank you for your efforts to bring a better balance to BLM-managed landscapes.

Sincerely,

Anja Heister, PhD on behalf of the Footloose Montana Board

PO Box 8884  
Missoula, MT 59807  
406-282-1482  
info@footloosemontana.org