



July 5, 2023

Tracy Stone-Manning, Director
Bureau of Land Management
U.S. Department of the Interior
1849 C St. NW, Room 5646
Washington, DC 20240

Attention: 1004-AE92

Submitted via Federal eRulemaking Portal at [regulations.gov](https://www.regulations.gov), Docket BLM-2023-0001

RE: Comments on the BLM Proposed Conservation and Landscape Health Rule

Dear Director Stone-Manning,

On behalf of Western Leaders Network, a nonpartisan nonprofit organization of more than 450 local, tribal, and state elected officials across the Interior West, I'm writing in support of the Bureau of Land Management's (BLM's) Proposed Conservation and Landscape Health Rule, to "establish a framework to ensure healthy landscapes, abundant wildlife habitat, clean water and balanced decision-making on our nation's public lands."

Western Leaders Network believes that conservation is a Western value and a principle that should unite rather than divide the West, as our shared public lands help sustain our livelihoods and outdoor recreation economies, the biodiversity that supports a healthy climate, and our quality of life across the West. By placing conservation on an equal footing with other uses of BLM's 245 million acres of public lands – without compromising BLM's "multiple use" mission – the agency will be in a better position to effectively manage different interests and ensure we conserve wildlife habitat, protect cultural integrity, and restore the delicate landscapes that are increasingly compromised by climate change.

We urge the BLM to strengthen the proposed public lands rule to improve the agency's management of our nation's public lands and resources in various ways, including providing guidance on how the new rule will be implemented, defining intact landscapes as those that are connected to other ecosystems, encouraging cooperative management agreements with relevant Tribal and state agencies, mitigating greenhouse gas emissions, establishing new Wilderness Study Areas (WSAs), prohibiting watershed degradation, recovering threatened and endangered species, and restoring forests.

In recent years, states have taken legislative and administrative action to redefine how we manage and use our public lands and finite natural resources. In Colorado, for instance, Senate Bill 181 mandated the state's oil and gas governing entity to prioritize public health, safety, and the environment when considering leasing proposals. New Mexico's Oil and Gas Justice and Reform Act, proposed last legislative session, would accomplish the same for its Oil Conservation Commission. Ecological degradation due to climate change has helped spur an ideological shift in our approach to managing natural resources, and this federal rulemaking is another critical step in ensuring conservation and climate health are meaningfully considered in decisions that affect our shared public lands.

Public lands are inextricably attached to the cultural heritage of indigenous tribes, the health of local economies, and our way of life in the West. We need policies in which conservation is a fundamental aspect of public land agencies' approach to management and decision-making and that will responsibly guide consumptive interests like agriculture and extractive resource development.

This proposal can help direct how BLM balances the different uses of our public lands, as well as advance national climate objectives through the protection of biodiversity. We support specific measures within the proposal that will help protect wildlife, cultural sites, and climate health, including a directive that BLM land managers develop plans to restore lands and waters based on environmental health and benefits to communities; clarification on designating Areas of Critical Environmental Concern; and a requirement to establish consistent frameworks for restoring public lands, including through conservation leasing.

So many of the policies that govern our public lands were created at a time when settling the West and extracting its resources were the most important priorities. Our policies today must reflect modern values, acknowledge climate change as a global emergency, and consider how today's decisions can affect generations to come. This rulemaking is an opportunity to lay important groundwork for our public lands' future stewardship and health. We ask that BLM's final rule prioritizes conservation and our climate future and provides clear direction on how this will be achieved.

Sincerely,

A handwritten signature in cursive script that reads "Gwen Lachelt".

Gwen Lachelt
Executive Director