



# SIERRA CLUB

## MONTANA CHAPTER

Montana State Office, Bureau of Land Management  
5001 Southgate Drive, Billings, MT 59101  
John Mehlhoff, State Director, Montana

cc: Mike Philbin, Deputy State Director, Division of Resources, Planning and Fire;  
Jaime Tompkins, Wilderness Lead

*via electronic mail at: [jmehlhoff@blm.gov](mailto:jmehlhoff@blm.gov), [mphilbin@blm.gov](mailto:mphilbin@blm.gov), [jtompkins@blm.gov](mailto:jtompkins@blm.gov)*

November 22, 2021

Dear Mr. Mehlhoff,

President Biden has made the 30x30 initiative the centerpiece of his conservation agenda. It is a wise, actually essential, move. We urge the Bureau of Land Management to proactively adopt and implement the 30 x 30 initiative through protection of BLM lands, ending fossil fuel development, and supporting restoration of native species and their habitat.

30x30 refers to the goal of protecting 30 percent of America's Lands and Waters by the year 2030. This ambitious goal is essential to helping address the twin crises of extinction and climate change.

The climate crisis has become all too familiar. We know the pouring of greenhouse gasses into our atmosphere from the energy and other sectors of our economy must cease if we are to curb runaway warming and its myriad of adverse impacts. The extinction crisis is equally critical— humans are causing such a large loss of species that it's led to Earth's 6<sup>th</sup> mass extinction, undermining the ecological supports humans rely on to thrive and survive. To address these two crises, we need to do more than end the burning of fossil fuels: [scientists are telling us we also need to attain the 30x30 goal.](#)

To succeed we must go big. As the largest land management entity in the United States, the Bureau of Land Management's role is crucial. There are at least three steps you can implement that will significantly advance the 30x30 objectives in Montana.

The first involves designation and protection of recommended Wilderness and Wilderness Study Areas (WSAs), readily available tools. The BLM should restore these designations to all lands within Montana that have been proposed to be or have been reduced in

size or protective status through BLM's land management planning. Resuming the designation of new Wilderness Study Areas is also a must. The sweeping potential and durability of designating new "FLPMA § 202 Wilderness Study Areas" would ensure strong protection and management of BLM lands that can contribute to the 30 x 30 goal. Given that a substantial portion of irretrievable carbon is in protected areas within the United States, we must maximize the amount of land that is protected against carbon-releasing commercial activities or industrialized, mechanized recreation. We ask that you act now to resume the use of this crucial tool of restoring WSA and Recommended Wilderness status and size, and designating new WSAs.

The 30 x 30 initiative respects and relies upon Traditional Ecological Knowledge along with western science. Traditional knowledge, as well as Tribal cultural connections to and uses of BLM lands must also be taken into consideration and guide decisions regarding management and designations. Tribal treaty rights need to be upheld in all such decisions, and we urge BLM to ensure that all permanent protection is complementary to and furthers upholding treaty rights.

The second step is to ban all new fossil fuel development – oil and gas drilling, oil shale development, and coal mining – on BLM lands. Right now, America's public lands are responsible for almost 26 percent of our greenhouse gas emissions. Our public lands need to be part of the solution to the climate crisis, not the problem. Banning new fossil fuel development would also protect species, habitats and lands we need to get to 30 percent by 2030. We hope the pending report on oil and gas drilling will include such a permanent drilling ban.

Third, the BLM has the opportunity to plan for and work alongside other government entities to restore native species, including bison, to BLM lands in Montana, and to restore habitat for all native species. Native species like bison have the potential to themselves help restore soil and native plant conditions and a thriving ecosystem, which is essential to both the climate and extinction crises. We therefore also urge the BLM to work proactively to plan and advocate for the restoration of bison and other native species on BLM lands in Montana.

Thank you for your consideration. We look forward to working with the Biden administration and the BLM to protect at least 30 percent of the United States by the year 2030.

Sincerely,  
Summer Nelson  
Director, Montana Chapter Sierra Club

cc: Stacey Hellekson, Montana Chapter Chair;  
Anne Milbrooke, conservation volunteer