October 13, 2021

Secretary Deb Haaland
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Secretary Thomas J. Vilsack
Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Secretary Gina M. Raimondo
Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Chair Brenda Mallory
Council on Environmental Quality
730 Jackson Place, NW
Washington, D.C. 20503

Secretaries Haaland, Raimondo, and Vilsack and Chair Mallory,

The undersigned, representing hundreds of thousands of sportsmen and women in the United States, express our optimism for the Administration's interest in advancing measurable conservation objectives. We also appreciate the inclusion of many of the priorities shared by hunters and anglers in the "Conserving and Restoring America the Beautiful 2021" report released in May. In response to the report, we provide the attached recommendations and encourage the Administration to continue to work closely with stakeholders, including the sporting-conservation community, in support of enhanced conservation delivery in the United States.

These recommendations focus largely on the development of the forthcoming American Conservation and Stewardship Atlas, specifically calling for the recognition and consideration of existing conservation programs and practices. Whether conducted on public lands or through voluntary partnerships with private landowners, we assert that all existing efforts to promote conservation benefits should be considered. Likewise, our community looks forward to working with the Administration on other aspects of this initiative in support of pragmatic conservation solutions that promote increased access for sportsmen and women, our nation's original conservationists.

Sincerely:

American Sportfishing Association
American Woodcock Society
Angler Action Foundation
Archery Trade Association
Arizona Sportsmen for Wildlife Conservation
Arizona Wildlife Federation
Backcountry Hunters & Anglers
Bass Angler Sportsman Society
The Billfish Foundation
BoatUS
Boone and Crockett Club
California Waterfowl Association
Center for Sportfishing Policy
Coastal Conservation Association
Coastside Fishing Club
Congressional Sportsmen's Foundation
ConservAmerica

Conservation Force
Corps of Engineers Natural Resources Education Foundation
Council to Advance Hunting and the Shooting Sports
Dallas Safari Club
Fishing Education Foundation/National Fishing in Schools Program
Fly Fishers International
Georgia Wildlife Federation
Houston Safari Club
International Game Fish Association
Izaak Walton League of America
Land Conservation Assistance Network
Marine Retailers Association of the Americas
Masters of Foxhounds Association
Mule Deer Foundation
National Bobwhite Conservation Initiative
National Deer Association
National Marine Manufacturers Association
National Professional Anglers Association
National Rifle Association
National Wild Turkey Federation
New Mexico Sportsman's and Conservationist Alliance
North American Grouse Partnership
Orion: The Hunter's Institute
Pheasants Forever
Pope and Young Club
Quail forever
Recreational Fishing Alliance
Rocky Mountain Elk Foundation
Ruffed Grouse Society
Tennessee Wildlife Federation
Theodore Roosevelt Conservation Partnership
Safari Club International
Southern Conservation Trust
Sportsmen for the Boundary Waters
Wildlife Forever
Wildlife Management Institute
Wildlife Mississippi
Wild Sheep Foundation

Attached Supporting Documents:

- Executive Summary
- America the Beautiful: Detailed Recommendations
- Appendix 1: Terrestrial Examples: Area-based conservation measures that should be evaluated and considered for inclusion in the American Conservation and Stewardship Atlas
- Appendix 2: Freshwater and Marine Examples: Successful Fish and aquatic organism conservation measures that should be included in the American Conservation and Stewardship Atlas

Executive Summary

As America's original conservationists, the hunting and fishing community has proactively supported strategic, science-based efforts to conserve our nation's terrestrial, freshwater, and marine ecosystems for more than a century. The ability to connect with our land, water, and fish and wildlife through our outdoor pursuits continues to result in a deep appreciation and understanding of the link between healthy habitats and thriving fish and wildlife populations.

The United States has been a global leader in biodiversity conservation for many generations, and it was hunters and anglers who long ago recognized the value of protecting and restoring fish and wildlife habitat and who served as the catalyst for the conservation movement in this country. We were encouraged by the findings of the Conserving and Restoring America the Beautiful 2021 report, and to build upon our nation's conservation successes, we offer the following recommendations related to the development of the American Conservation and Stewardship Atlas.

- **Clearly define conservation to support the active management and sustainable use of our nation's public trust fish and wildlife resources.**
    - Such definition is consistent with the use of the term by members of the sporting-conservation community who, for decades, have supported and funded science-based fish and wildlife conservation.
- **Collaborate closely with entities devoted to achieving measurable biodiversity conservation objectives. This includes**:
    - State fish and wildlife management agencies who are arguably the best equipped to make fish and wildlife management decisions. Likewise, state agencies already possess biodiversity conservation roadmaps in the form of State Wildlife Action Plans (SWAPs).
    - Regional Fish and Wildlife Management Bodies, such as the Migratory Bird Joint Ventures and the Regional Fishery Management Councils, each of which are made up of a broad cross section of stakeholders Congressionally authorized to achieve specific conservation objectives for migratory birds and marine fisheries that cross jurisdictional boundaries.
    - Members of the sporting-conservation community, including the many organizations who are represented here as signatories. These organizations work tirelessly to enact and support various conservation programs and projects across the country.
    - The more than 500 federally recognized tribes, who are responsible for the conservation efforts on more than 140 million acres.
    - Private landowners through voluntary, incentive-based opportunities. With much of the United States held in private ownership, voluntary engagement by private landowners, including interested ranchers, farmers, forest landowners, and others, is critical to advancing impactful biodiversity conservation efforts.
- **Recognize and include all efforts directly contributing to biodiversity conservation in the forthcoming American Conservation and Stewardship Atlas.**

- Recent reports indicate that 12% of lands in the United States are currently considered “protected.” However, we argue that this limited scope omits many lands that are directly contributing to biodiversity conservation, consistent with the objectives outlined in the America the Beautiful report (Appendix 1).
- Similarly, we encourage the Administration to recognize and consider the numerous conservation programs and management actions currently benefiting our coastal, inland, and marine aquatic ecosystems (Appendix 2) and the fish and wildlife species they support.
- Design a process to update the American Conservation and Stewardship Atlas on a regular basis to ensure that 30x30 efforts have measurable outcomes and are being directed to areas in need of active conservation programs and projects.

America the Beautiful: Detailed Recommendations

As evidence of declining biodiversity – along with the associated effects on ecosystem health and function – continues to accumulate, it is clear that strategic efforts are needed at the global and national scales to reverse these trends. The 30x30 initiative has emerged as an international response to what is often termed a biodiversity crisis that is further fueled by the effects of ecosystem stressors such as climate change. By recognizing the "threats" we face today as conservation challenges, rather than crises, we can build upon our 100-year legacy of conservation successes in the United States, ensuring that our nation can be well positioned to continue to serve as the global model for conservation. Furthermore, by treating this as a conservation challenge, we can once again turn to key stakeholders, including state fish and wildlife management agencies, the sporting-conservation community, Native American tribes, and conservation-minded private landowners who have historically taken the lead in successfully addressing previous challenges that have threatened our fish, wildlife, and natural resources.

Widely cited in relation to the global 30x30 initiative is a 2020 report published by The Campaign for Nature[1], a partnership between National Geographic and the Wyss Campaign for Nature. This report highlights the ecological and economic benefits associated with increasing protected areas to cover 30% of our planet's lands and waters within the next decade. While informative, the global perspective presented by this report inherently omits several key characteristics that separate the United States from many other nations around the world. The United States has a wide range of laws (e.g., the Endangered Species Act, the Clean Water Act, the Clean Air Act, the Fishery Conservation and Management Act, the Marine Mammal Protection Act, and the Migratory Bird Treaty Act, etc.) and land and water conservation programs that provide a higher level of conservation than many other parts of the world. In addition, the United States has developed a unique stakeholder-driven system by which state-based conservation efforts are funded. This wildly successful American System of Conservation Funding (ASCF)[2], a "user pays – public benefits" structure through which sportsmen and women provide the bulk of funding for the state fish and wildlife agencies that are charged with managing our fish and wildlife resources for the benefit of all Americans. It is through this system that more than $13.48 billion in excise tax revenue has been collected via the 1937 Pittman-Robertson Act[3] while another $10.54 billion has been collected through the 1950 Dingell-Johnson Act and 1984 Wallop-Breaux Amendments. These self-imposed excise taxes on firearms, ammunition, fishing tackle, and motorboat fuel, combined with the millions generated annually through the purchase of hunting and fishing licenses, stamps, and permits, clearly demonstrates the long-standing commitment of members of the United States' sporting-conservation community to invest in science-based conservation efforts.

[1] Waldron et al. 2020. Protecting 30% of the planet for nature: costs, benefits and economic implications. Campaign for Nature. Accessed: May 24, 2021. https://www.conservation.cam.ac.uk/files/waldron_report_30_by_30_publish.pdf

[2] 2021. American System of Conservation Funding. Congressional Sportsmen's Foundation. Accessed: May 24, 2021. https://congressionalsportsmen.org/policies/state/ascf

[3] United State Fish and Wildlife Service. Wildlife and Sport Fish Restoration Program. Accessed: July 16, 2021. https://www.fws.gov/wsfrprograms/home.html.

What is "Conservation?"

Carefully defining the term "conservation" is key to measuring success while ensuring broad stakeholder support. Here, our use of the term reflects the "wise use" definition coined by Gifford Pinchot in the early 20th Century[4]. It is this definition, and varieties thereof, that has been championed by the sporting-conservation community for more than a century. Currently, the Cambridge Dictionary defines conservation as "carefully using valuable natural substances that exist in limited amounts in order to make certain that they will be available for as long a time as possible" while the U.S. Fish and Wildlife Service[5] defines the term as "controlled use and systematic protection of natural resources (fish, wildlife, and their habitats)." Unfortunately, conservation has been redefined by some to conflate with "preservation." For example, Webster's updated definition reads, "a careful preservation and protection of something." Not only is this redefinition misleading in its conflation between the concepts of conservation and preservation, but, outside of the context of natural resource management, it is often illogical (e.g., energy conservation). It is for these reasons that we encourage the America the Beautiful Interagency Working Group – and other officials exploring efforts related to 30x30 – to carefully define conservation using the historic definition of the term which focuses on the wise, sustainable, and equitable use of our nation's natural resources.

In addition to our ongoing willingness to support conservation funding through the ASCF, sportsmen and women, and the various organizations that represent them, continue to support conservation efforts above and beyond those funded through the ASCF. This includes various partnerships with state and federal agencies to support conservation efforts on public lands and waters, partnerships with private landowners that facilitate the investment of local, state, and federal funds on private lands and waters, and several unique programs hosted by sporting-conservation organizations that provide their members a chance to contribute to conservation efforts in their region. It is a combination of these programs and projects that are among those best suited to complement existing state and federal conservation efforts in the pursuit of the 30x30 initiative's objective to conserve biodiversity. To fully capture the depth and breadth of these efforts on our nation's public and private lands and waters, and to truly benefit conservation efforts in the United States and around the world, the undersigned sporting-conservation organizations make the following recommendations:

Collaboration: Engaging Key Stakeholders

The "Conserving and Restoring America the Beautiful 2021" report[6] repeatedly called for locally led, science-based, and stakeholder-driven conservation efforts. The sporting-conservation community wholeheartedly agrees with this approach and remains ready to engage with agency officials at the federal and state level to assist in the development and implementation of

[4] Deckret, V. Gifford Pinchot 1865-1946: The First Conservationist. Maryland Department of Natural Resources. Accessed: June 28, 2021. https://dnr.maryland.gov/centennial/Pages/Centennial-Notes/GiffordPinchot.aspx
[5] Definitions. U.S Fish and Wildlife Service: Fisheries Resources. Pacific Region. Accessed: June 28, 2021. https://www.fws.gov/pacific/fisheries/Definitions.htm
[6] 2021. Conserving and Restoring America the Beautiful. U.S. Department of the Interior, U.S. Department of Agriculture, U.S. Department of Commerce, and Council on Environmental Quality. Accessed: June 29, 2021. https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf.

conservation efforts designed to maximize biodiversity, climate resiliency, and the overall health of the ecosystems with which we are so closely linked through our outdoor heritage. While the 30x30 initiative has highlighted the importance of conservation efforts for the general public, our community has, for generations, worked tirelessly to promote conservation efforts throughout the country for the benefit of game and fish species and a variety of species that rely on these same ecosystems for their survival and success.

First, we encourage the Interagency Working Group to collaborate closely with members of the sporting-conservation community. Many member-based NGOs regularly utilize their available funding and membership base for voluntary efforts to enact remarkable science driven conservation programs and projects across the country. While many of these programs are collaborative efforts with state or federal agencies, which again aligns closely with the Administration's call for collaboration, others have actually served as the template by which many existing programs are modeled. Such efforts highlight the effectiveness of collaborative, stakeholder driven conservation while recognizing the importance of engaging with the sportsmen's community in the development of future conservation programs and projects.

We also encourage the IWG to seek input and leadership of state fish and wildlife management agencies and regional fishery management councils. Given the professional training and intimate understanding of their local and regional ecosystems, state agency officials and regional fishery management council staff and members are among those best equipped to make science-based wildlife and fisheries management decisions. Related specifically to biodiversity conservation, state agencies are already required to draft State Wildlife Action Plans[7] (SWAP's) that serve as management guides for the successful conservation of species identified as Species of Greatest Conservation Need (SGCN). These biodiversity conservation roadmaps, which inherently include sections related to topics such as climate resiliency, represent one of the most effective tools in the fight against declining biodiversity.

As biodiversity roadmaps, SWAPs also contain important information related to conservation challenges beyond habitat availability, including strategies designed to mitigate the threats posed by invasive species and pathogens. The International Union for Conservation of Nature[8] (IUCN) defines invasive species as "animals, plants or other organisms that are introduced into places outside their natural range, negatively impacting native biodiversity, ecosystem services or human well-being." Through the increased movement of goods and services around the world, the introduction of invasive species has created significant conservation challenges in many regions and is a leading cause for threatened and endangered species listings. The United States has been no exception, where over $140 billion is lost due to the impacts of high profile species like silver and bighead carp, feral swine, zebra/quagga mussels, and emerald ash borer threatening human health, native ecosystems, food security, and multiple industries depending on

[7] State Wildlife Action Plan. U.S. Fish and Wildlife Service. Accessed: May 24, 2021. https://www.fishwildlife.org/afwa-informs/state-wildlife-action-plans

[8] Invasive Species. International Union for Conservation of Nature. Accessed: June 29, 2021. https://www.iucn.org/theme/species/our-work/invasive-species.

the sustainable use of natural resources. Each of these invasive threats can only be addressed through proactive spread prevention programs and active management.

State and federal fish and wildlife management agencies have invested considerable resources toward the management of invasive species, though they often lack funding capacity for appropriate prevention and control efforts. For example, the U.S. Army Corps of Engineers has partnered with the state of Illinois to design and engineer measures at the Brandon Road Lock and Dam[9] to prevent the movement of Asian carp into the Great Lakes. Likewise, the 2018 Farm Bill directed $75 million over five years toward the Feral Swine Eradication and Control Pilot Program[10] (FSCP). While these investments are critical for successful prevention and eradication efforts, it is clear that a more comprehensive and robust investment strategy is needed. This is especially true as the risks associated with transportation and species introduction are compounded by the effects of climate change.

Similarly, invasive plant species threaten the structure, function, and accessibility of our landscape and native ecosystems, directly impacting biodiversity conservation efforts. While examples of invasives species can vary from the intrusion of cheatgrass and other annual grasses across the west to common teasel throughout much of the Midwest to Chinese privet in the southeast, invasive plants threaten native plant communities, and in turn, create major implications for access, fish and wildlife health, habitat quality, and species availability in some of our nation's most vulnerable ecosystems. Nonnative plants are also a major contributing factor to the increased prevalence of wildfire risk and severity, compromising human health and exacerbating the need for increased fire mitigation and control efforts. Fortunately, SWAPs, coupled with the professional training and intimate knowledge possessed by state agency officials, provide an avenue for addressing many of these conservation challenges when encouraged to collaborate with NGO stakeholders and invest in efforts to adequately address conservation priorities.

Finally, and of increasing importance given the growing calls for equitable opportunities for all Americans to enjoy our nation's public trust resources, state fish and wildlife agencies are charged with providing public access opportunities for wildlife-dependent outdoor recreation. In addition to their management of state-owned lands maintained for an array of access, state agencies have developed additional opportunities to provide public access to private lands. For example, the Farm Bill's Voluntary Public Access – Habitat Incentives Program (VPA-HIP) was modeled after voluntary public access programs successfully initiated by state fish and wildlife management agencies (e.g., Kansas' Walk-in Hunting Access, North Dakota's Private Lands Open to Sportsmen, etc.). Recognizing the experience and ingenuity contained within these state agencies, coupled with the management tools they have created, it is clear their engagement is a

[9] Brandon Road Interbasin Project. United States Army Corps of Engineers. Accessed: June 29, 2021. **https://www.mvr.usace.army.mil/Missions/Environmental-Stewardship/BR-Interbasin-Project/**.
[10] Feral Swine Eradication and Control Pilot Program. Natural Resources Conservation Service, United States Department of Agriculture. Accessed: June 29, 2021. https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/farmbill/?cid=NRCSEPRD1461219.

critical component to the successful development and implementation of biodiversity conservation plans that also assist in the provision of equitable outdoor access for all Americans.

American Conservation and Stewardship Atlas: Recognizing meaningful biodiversity conservation

With respect to the development of the American Conservation and Stewardship Atlas, the undersigned encourage the Interagency Working Group to evaluate and consider all efforts that are directly contributing to biodiversity conservation across the nation, as supported by the best available science, in the definition of lands and waters considered to be "conserved." As acknowledged by the Administration in the "America the Beautiful" report, the undersigned strongly encourage the adoption of efforts that contribute to biodiversity conservation while maintaining or increasing access for sportsmen and women and respecting private property rights. Further, the diversity of stakeholder priorities across the United States precludes the use of a single metric to determine which lands should be counted as "conserved" as it relates to the 30x30 initiative. The sportsmen's community offers the recommendations below to ensure that the forthcoming Atlas fully considers all lands currently contributing to science-based biodiversity conservation efforts and continue to encourage these efforts, where appropriate, to further achieve the objectives of this initiative. Furthermore, we encourage the IWG to develop a system by which this Atlas may be updated on a regular basis to ensure that ongoing conservation benefits are recognized while additional opportunities for improvement may be identified.

Terrestrial Conservation Efforts (Additional information included in Appendix 1):

While many have cited that 12% of the United States is currently "protected" according to the U.S. Geological Survey's (USGS) Protected Areas Database (PAD-US), this narrow definition omits many of the existing efforts that are already taking place. In their reference to this definition as it relates to the Gap Analysis Project (GAP) and the PAD-US[11], the USGS acknowledges that, within those lands currently classified as GAP Status 1 and 2, "many protected areas have little significance in terms of biodiversity. . ." Further, the habitat functionality of lands within GAP Status 1 and 2 categories is not clearly captured in the existing database, with large expanses of the nation's conserved landscapes threatened with degraded status and in need of active, science-based management or restoration. While the GAP and PAD-US can be useful in some respects, it is clear that this database should be combined with other information to fully capture the existing conservation efforts across the landscape.

Lands recognized in GAP Status 1 and 2 represent some of the most highly regulated lands in the nation in terms of limits placed on their use. However, there are many acres included in GAP Status 3 that are being actively managed to benefit biodiversity, access, and climate change mitigation efforts. For example, many federally owned lands managed across the country by the U.S. Forest Service are actively managed to deliver considerable biodiversity benefits, provide

[11] PAD-US Data Overview. U.S. Geological Survey. Accessed: May 24, 2021. https://www.usgs.gov/core-science-systems/science-analytics-and-synthesis/gap/science/pad-us-data-overview?qt-science_center_objects=0#qt-science_center_objects

tremendous access opportunities for sportsmen and women, and, when managed properly, contribute to both carbon sequestration and carbon storage efforts while generating a renewable supply of wood-based products. Similar statements can be made for federally owned lands managed by the Bureau of Land Management to support multiple uses while maintaining compatibility with existing conservation objectives identified on those lands. While maintenance backlogs have accumulated for both agencies, investments, including those authorized by Congress in 2020 as part of the Great American Outdoors Act [12,13] have provided much needed resources that are sure to benefit the 30x30 initiative.

In addition to these federally owned and managed lands, properties managed by state and local agencies and organizations, including those managed specifically for public access hunting and fishing opportunities, should be recognized and evaluated for consideration as part of the American Conservation and Stewardship Atlas. For many state fish and wildlife management agencies, particularly those in the eastern and Midwest regions where land is primarily held in private ownership, these state-managed properties represent the best opportunities to manage ecosystems in a manner designed to maximize biodiversity. Likewise, it is often these properties that, in many cases, directly benefit the most from the training and experience possessed by state and local natural resource professionals (e.g., foresters, biologists, range specialists, etc.) who are the best equipped to make locally led, science-based wildlife management decisions.

Finally – and in many cases most importantly – the IWG must consider the critical role of conservation efforts conducted voluntarily on private lands for inclusion in the Atlas. Naturally, the undersigned understand the importance of programs, such as properly arranged conservation easements, that permanently protect lands from conversion in an effort to protect some conservation value. However, there are many other voluntary programs that, while not permanent, are directly contributing to the successful conservation of biodiversity across the landscape. Examples can include Farm Bill conservation programs like the Conservation Reserve Program (CRP), Regional Conservation Partnership Program (RCPP), Environmental Quality Incentives Program (EQIP), and more; state partnerships that facilitate conservation practices on private lands; and programs initiated by sporting-conservation organizations, when the practices installed through these programs provide a clear benefit to biodiversity conservation. We appreciate the "America the Beautiful" report's acknowledgement of the importance of private lands conservation, and we encourage the Biden Administration and the IWG to continue to work with partners to identify opportunities to strengthen existing programs and develop new options that strategically engage private landowners on a voluntary basis while maintaining the health and profitability of their properties.

Aquatic Conservation Efforts (Additional information included in Appendix 2):

[12] 2020. Great American Outdoors Act PL 116–152. United States Congress. Accessed: May 24, 2021. https://www.congress.gov/116/plaws/publ152/PLAW-116publ152.pdf

[13] Great American Outdoors Act. Congressional Sportsmen's Foundation. Accessed: May 24, 2021. https://congressionalsportsmen.org/policies/the-great-american-outdoors-act

Freshwater – According to "Through a Fish's Eye: The Status of Fish Habitats in the United States"[14], a 2015 report conducted by the National Fish Habitat Partnership (NFHP), 22 percent of inland stream mileages in the lower 48 states are at high or very high risk of current habitat degradation, while 62 percent are at low or very low risk. This assessment was the first of its kind, clearly identifies priority stream reaches that need conservation measures, and should serve as the baseline for the nation's streams and rivers included in the American Conservation and Stewardship Atlas. Additional strategic measures to conserve those stream reaches that are healthy, as well as to work with landowners to improve habitat on high-risk streams, are already the goals of the various fish habitat partnerships under the NFHP umbrella. Additional funding for NFHP projects, as well as periodic updates to the assessment, including expanding to more detailed analysis of the Great Lakes, other natural lakes and reservoirs, will improve upon the existing freshwater habitat baseline and identify and address areas that would benefit from focused conservation efforts.

Coastal and Marine – When considering ocean protections, attention often turns toward area-based designations under various forms of marine protected areas (MPAs). According to the "America the Beautiful" report, the U.S. has already established MPAs in approximately one quarter of U.S. waters. However, what should also be considered are the science-based biodiversity conservation measures already in place through the regulatory process established by the Magnuson-Stevens Fishery Conservation and Management Act and the eight regional fishery management councils. There are numerous examples of management measures that achieve improved conservation outcomes that benefit the health of fisheries as well as other marine species and habitats, such as gear-based restrictions like the seasonal and permanent closed pelagic longline zones in the Atlantic and Gulf of Mexico and habitat-based measures such as Habitat Areas of Particular Concern (HAPC's) found in all eight regional council jurisdictions. It can be argued these science-based measures that identify and address specific concerns have already effectively exceeded the 30x30 biodiversity conservation goals in our marine waters while still allowing for sustainable uses and public access. Similar to NFHP serving as the lead on determining both the existing baseline and identifying conservation opportunities for inland and state coastal waters, the regional councils under the Magnuson-Stevens Act should serve as the lead for determining what is already conserved, as well as additional areas or networks of areas where their fisheries management efforts would support long-term conservation goals.

Conclusion

As outlined above, the undersigned sporting-conservation organizations are largely supportive of collaborative, locally led, science-based management designed to enhance conservation efforts, including voluntary conservation opportunities on private lands. Our community has championed these concepts for generations. However, we strongly caution against narrowly focused categories and definitions that omit important conservation efforts already being completed around the country and off our coastline. Likewise, we oppose efforts that seek to limit access

[14] Crawford et al. 2015. Through a fish's eye: The status of fish habitats in the United States. United States Geological Survey. Accessed: June 29, 2021. https://pubs.er.usgs.gov/publication/70200345.

and opportunities for sportsmen and women who have significantly supported conservation efforts through the American System of Conservation Funding for nearly a century. Current challenges to biodiversity in the United States require active management actions within the guidelines established by state agencies through their SWAPs. It is through active management that we can address biodiversity needs, maintain equitable access and opportunities for all Americans to reconnect with the natural worlds around them, and ensure that the United States remains an active leader in conservation for generations to come.

Ultimately, we encourage the IWG to continue to communicate with the sporting-conservation community, state fish and wildlife management agencies, and fishery management councils, by maintaining a seat at the table for the community who, for decades, has led the way in the conservation of America's fish, wildlife, and natural resources for the benefits of all Americans.

<u>Appendix 1 – Terrestrial Examples</u>: Area-based conservation measures that should be evaluated and considered for inclusion in the American Conservation and Stewardship Atlas

- **Background on the Gap Analysis Project and Protected Areas Database of the United States**

The Gap Analysis Project's (GAP) Protected Areas Database of the United States (PAD-US) defines four unique categories (status codes) that represent the level of protection afforded to certain lands and waters. The Database, developed and maintained by the United States Geological Survey (USGS), is designed, in part, to provide information about the conservation status of common species and provide important information to decision makers. However, when referring to the agency's role in assessing biodiversity conservation efforts and compiling the database, USGS specifically acknowledges that, "Protected areas (parks, preserves, etc.) have often been set aside without full understanding of their value to species conservation. As a result, many protected areas have little significance in terms of biodiversity, while many biodiversity-rich areas lack [protection as defined in GAP Status 1 or 2]. Information provided by the PAD-US can help land conservation decision makers better match biodiversity goals to land protection programs and activities."

Despite this acknowledgement, conversations regarding the use of the PAD-US in the development of the American Conservation and Stewardship Atlas have been largely limited to the inclusion of lands classified as GAP Status 1 or 2. The areas, which comprise some of the most heavily regulated lands and waters in the U.S. maintained in a natural state, differ only in their management of natural disturbance. Because of the limited allowance of active management designed to specifically benefit biodiversity conservation and USGS's own acknowledgement that many of these areas are of little significance for biodiversity conservation efforts, relying solely on their use and making additional arbitrary land designations that increase their abundance would be ineffective and counterproductive.

It is clear that active conservation efforts, which can be aided by some extractive uses that are permitted in GAP Status 3 (i.e., timber harvest, grazing), is often necessary to truly benefit biodiversity conservation efforts in the United States and around the world. Likewise, our ever-changing landscape and the vagility of many species, particularly in a changing climate, inherently supports the inclusion of lands that contribute to conservation efforts despite the lack of "permanent protection" (GAP Status 4). While we agree that lands included in GAP Status 1 and 2 should be evaluated thoroughly for inclusion in the American Conservation and Stewardship Atlas, we caution the Administration against adding to these categories through arbitrary land designations. Instead, we

encourage the Administration to expand the scope of the Atlas to include appropriate lands that are currently classified in GAP Status 3 or 4.

- **Example of lands in GAP Status 3 that should be evaluated and considered for inclusion in the American Conservation and Stewardship Atlas.**

    - **National Forests and Grasslands**
        - The National Forest System, currently included in Gap Status 3, was originally developed to provide a sustainable source of timber and timber products for the United States following lessons learned from timber famines throughout Europe in the 19th and early-20th centuries. Since their development, the United States' National Forests and Grasslands have expanded in purpose to represent critical wildlife habitat, important access opportunities for those who seek to experience our nation's public lands, and growing potential to contribute to climate change mitigation efforts. Given each of these critical functions while recognizing the important role of active forest management practices to promote diversity (in terms of both age class and species composition), reduce wildfire risk, sequester and store carbon, and enhance public access, among other purposes, it is clear that the many of the **193 million acres of National Forests and Grasslands** across the Unites States should be considered for inclusion in the Atlas. For example:
            - Portions of Mark Twain National Forest in Missouri are home to a recently reintroduced population of the brown-headed nuthatch, a species dependent on pine woodlands that historically persisted throughout the Ozark Mountains region. Following intensive habitat restoration efforts conducted by U.S. Forest Service staff, this species, and many others, are benefiting from the increase in quality habitat availability created by these efforts throughout the Show-Me State.
    - **Lands administered by the Bureau of Land Management**
        - Like our nation's National Forests and Grasslands, many portions of the **245 million acres administered by the Department of the Interior's Bureau of Land Management (BLM)** represent a significant amount of Gap Status 3 land which warrant consideration as the American Conservation and Stewardship Atlas is developed. While maintaining the opportunity to conduct multiple land use practices, including mineral extraction, critical grazing opportunities for western farmers, and other opportunities, as appropriate, for necessary resource utilization, many of these acres encompass important habitat for some of our most vulnerable wildlife species. Additionally, BLM lands represent critical access opportunities for sportsmen and women and others who seek to connect with our nation's abundant outdoor resources.

        - The Bureau of Land Management partners with state wildlife agencies and several non-government organizations to support wildlife habitat conservation and restoration on lands that fall under the BLM's purview. More information on these partnerships can be found here.
    - **Appropriate conservation easements**
        - Conservation easements are voluntary legal agreements between a landowner and another government or nongovernment entity that either permanently or temporarily (GAP Status 4) limits the uses of land to certain agreed-upon uses. While there are examples of highly restrictive conservation easements that, through their permanent status and allowable land uses, would qualify under GAP Status 1 or 2, others allow for much more flexibility to meet the needs and wants of the landowner. Regardless of their GAP State designation, easements providing conservation benefits should be considered for inclusion in the Atlas.

- **Examples of lands in GAP Status 4 that should be evaluated and considered for inclusion in the American Conservation and Stewardship Atlas.**

  Unlike the other GAP Statuses, lands classified as GAP Status 4 lack permanent protection from conversion. However, this lack of permanent protection should not overshadow the conservation value that many of these lands, particularly those on which active conservation practices occur, provide for the benefit of our nation's natural resources. Below are examples of lands that, though lacking in permanent protection, play a critical role in supporting biodiversity conservation efforts.

    - **State Game Management Areas/Conservation Areas/Wildlife Management Areas**
        - Owned by the state and managed by state fish and wildlife agencies, the entities often best equipped to support biodiversity conservation efforts, these properties represent some of the most well-managed habitat throughout the state. This is particularly true throughout much of the Eastern United States where land is primarily held in private ownership for purposes other than conservation.

    - **Voluntary Private Land Conservation Programs through the Farm Bill**

        - *Conservation Reserve Program (CRP)* – As one of the largest and most effective voluntary private land conservation programs in the world, the Administration has already recognized CRP's potential to contribute to the goal of conserving 30% of lands and waters by 2030 by improving soil health, water quality, providing wildlife habitat, and contributing to the sequestration and storage of greenhouse gases.

- Currently, **22.9 million acres of private lands are enrolled** in the program. However, this is significantly below the current acreage cap of 25.5 million acres. As authorized in the 2018 Farm Bill, the acreage cap will increase to 27 million acres during FY 2023.
- Despite increased interest in "working lands" programs like EQIP and CSP, CRP remains among the most effective and beneficial voluntary private lands conservation programs that benefits millions of vulnerable acres across the country. For more information on the ecological advantages provided through CRP, click here.

- *Wetlands Reserve Easement (WRE)* – As part of the Agricultural Conservation Easement Program, WRE (formerly Wetlands Reserve Program or WRP) offers landowners term easements, 30-year easements, or permanent easements (which would be characterized by a higher GAP Status Code) to restore, protect, and enhance wetlands on both private lands and property owned by Indian tribes.
  - In the program's first 20 years, USDA reported that **more than 11,000 landowners** had **voluntarily enrolled more than 2.3 million acres** into WRE.
- *Environmental Quality Incentives Program (EQIP)* – EQIP pairs NRCS investments with contributions made voluntarily by private landowners who agree to implement conservation practices on their agricultural or non-industrial forest land.
  - While EQIP includes a variety of conservation practices which provide important benefits, practices that, either directly or indirectly, result in restored, created, or improved wildlife habitat will contribute most effectively to the priorities of the American Conservation and Stewardship Atlas.
  - In Fiscal Year 2020, NRCS obligated more than **$1.8 billion in EQIP funding** across the United States.
- *Conservation Stewardship Program (CSP)* – Similar to EQIP, CSP is a voluntary program designed to strengthening existing conservation programs on private lands.
  - In Fiscal Year 2020, NRCS obligated more than **$2.2 billion in CSP funding** across the United States.

<u>Appendix 2 – Freshwater and Marine Examples</u>: Successful Fish and aquatic organism conservation measures that should be included in the American Conservation and Stewardship Atlas

Marine

There are many forms of area-based designations already employed by states, commissions, regional fishery management councils, and NOAA that afford habitat or species protections and that are driven by science with broad stakeholder support. We generally do not support "no take" marine reserves that are unnecessarily restrictive unless the best scientific information determines they are the last tool available to achieve a specific conservation goal. In most cases, conservation goals can be achieved through regulatory measures under state authority or through the provisions of the Magnuson-Stevens Fishery Conservation and Management Act, while still allowing for public access for wildlife-dependent activities like recreational fishing. According to the U.S. Regional Fishery Management Councils, more than 1,000 individual spatial habitat and fisheries conservation measures have been implemented, protecting more than 72 percent of the nation's ocean waters from fishing impacts, which helps to ensure preservation of ecosystem functions.

- **Gear restricted areas**: The regional fishery management councils (RFMC's) and the National Marine Fisheries Service (NMFS) have already made significant progress in fisheries and habitat conservation using a number of tools under their authority granted by the Magnuson-Stevens Fisheries Conservation and Management Act. There are over 100,000 square miles of gear restricted areas to protect habitat and fish stocks in the Atlantic and Gulf regions alone. Just a few examples of these management measures include:
    - *East Florida Coast (EFC) PLL Closed Area* – A major contributor to overfishing of Atlantic swordfish in U.S. waters was the fact that 80% of swordfish dead discards, mostly juveniles, came from the U.S. pelagic longline fleet because the vessels were fishing in swordfish nursery grounds. In 2000, NMFS closed approximately 39,828 square miles in waters off Florida's East Coast to pelagic longlining to reduce the gear's bycatch mortality of protected and overfished species. Swordfish have since recovered, but keeping the area closed to pelagic longlining is critical for conservation of other species vulnerable to the gear, like billfish, tunas, sharks, sea turtles and marine mammals.
    - *Gulf of Mexico PLL Closed Area* – Similarly, in 2000 NMFS closed the 36,860 square mile DeSoto Canyon in the Gulf of Mexico to pelagic longlining due to the need to reduce the gear's bycatch of overfished highly migratory species (HMS), including swordfish, Western Atlantic bluefin tuna, blue marlin, white marlin, sailfish, and some sharks. This science-based strategy has facilitated better conservation of these species and should be maintained and included in the baseline assessment of existing marine conservation measures.
    - *Atlantic Coast Deep Sea Coral Protections* – In a coordinated effort to protect deep sea coral, the New England (Amendment 2 to the Omnibus Essential Fish Habitat Plan), Mid Atlantic (Amendment 16 to the Squid, Mackerel, Butterfish Fishery Management Plan) and South Atlantic (Amendment 1 to the

Comprehensive Ecosystem Based Plan) Regional Fishery Management Councils implemented habitat management areas to protect vulnerable habitat from fishing gear impacts and to establish dedicated habitat research areas. Measures designed for these gear restricted areas prohibit destructive fishing practices that negatively impact deep sea coral. The areas allow activities that are not detrimental to essential habitat such as recreational fishing and boating to continue in the protected areas. The protected areas which span from the Gulf of Maine to the east coast of Florida account for 86,000 square miles of protected marine habitat. The areas were designated through a deliberate and collaborative public process initiated at the local and regional level and supported by scientific information. These protected areas built upon exist gear restricted areas that aim to protect spawning and nursery grounds for juvenile fish. In their development, objective and application, the deep sea coral protected areas are consistent with six of the eight core principles outlined for the Conserving and Restoring America the Beautiful report.

  - *Gulf of Mexico Deep Water Coral HAPC's* – The Gulf of Mexico Fishery Management Council recently implemented Coral Amendment 9, which established 13 new habitat areas of particular concern (HAPC) with fishing regulations that prohibit deployment of bottom-tending gear and anchoring by fishing vessels. The new regulated areas protect a total of 405 additional square miles of deep-water coral habitats in the Gulf.
  - *West Coast Groundfish Closures* – In the Pacific region, the West Coast groundfish fisheries and fisheries that may take groundfish incidentally are managed with a variety of closed areas intended to either minimize the bycatch of overfished groundfish species or to protect groundfish and benthic habitats. Combined, the Rockfish Conservation Areas, Cowcod Conservation Areas, Yelloweye Rockfish Conservation Areas, Cordell Banks Closed Areas, and the Deep-Sea Ecosystem Conservation Areas already provide critical, science-based conservation measures spanning hundreds of thousands of square miles.

- **Seasonal closures**: While temporary in nature, seasonal spawning closures can be an effective tool for ensuring population abundance and sustainability while still allowing public access to the resource at other times of the year. Area-based seasonal closures can be an important conservation measure, and when population benefits have been documented, should be included in the existing baseline of the American Conservation and Stewardship Atlas.
  - *Permit Spawning Season Closure at Western Dry Rocks* – An area known as the Western Dry Rocks in the Florida Keys serves as a critical spawning aggregation site for multiple fish species that are important both recreationally and for reef ecosystem health. The recently implemented four-month closure to fishing will reduce predation mortality and improve spawning success for permit, as well as gray, mutton and yellowtail snapper.

Coastal and Freshwater

Coastal and freshwater habitat restoration efforts present both challenges and opportunities. While these efforts are generally not achieved through area-based designations, it can easily

be argued that they are much more effective at truly addressing the underlying tenants of the 30x30 Initiative – biodiversity conservation. Fortunately, there are many successful programs in place that are restoring habitats, improving water quality, and enhancing species diversity. From the 20 National Fish Habitat Partnerships to the coastal restoration programs of individual states to U.S. Fish and Wildlife Service and NOAA programs, we have the mechanisms already in place to address aquatic habitat needs. A few examples include:

- **National Fish Habitat Partnerships** – (currently authorized to receive only $7.2 million in federal funding for all 20 partnerships)
    - *Atlantic Coastal Fish Habitat Partnership* – Just one of several partnerships under the National Fish Habitat Partnership, the ACFHP mission is, "To accelerate the conservation, protection, restoration, and enhancement of habitat for native Atlantic coastal, estuarine-dependent, and diadromous fishes through partnerships between federal, tribal, state, local, and other entities." Since 2010, projects funded through ACFHP's efforts have conserved over 70 acres of riverine, estuarine, and coastal habitat (riverine bottom, oyster reefs, tidal vegetation, submerged aquatic vegetation, and coral/live hard bottom). In addition, the ACFHP has opened over 240 river miles for diadromous species, providing access to over 5,500 acres of spawning habitat.
    - *Pacific Marine and Estuarine Fish Habitat Partnership* – Similar to ACFHP, the PMEP mission is to protect, enhance, and restore ecological habitats within estuaries and nearshore marine environments to sustain healthy native fish communities and support sustainable human uses that depend on healthy fish populations. The PMEP originated in 2009 when representatives from Oregon, Washington and California agencies and non-governmental entities met to discuss the need to protect and restore habitat for fish species that use estuaries and nearshore marine areas.
    - *Fishers and Farmers* – Another partnership under the National Fish Habitat Partnership umbrella, Fishers & Farmers Partnership For the Upper Mississippi River Basin is a self-directed group of non-government organizations, tribal organizations, and state and federal agencies united to add value to farms while protecting, restoring, and enhancing the 30,700 miles of rivers and streams of the Upper Mississippi River Basin.

- **Federal Coastal and Aquatic Habitat Restoration Programs**
    - *US Fish and Wildlife Service Coastal Program* – The Coastal Program works with communities to voluntarily restore and protect habitats that benefit fish, wildlife, and people. Since 1985, the program has protected or restored more than 2.6 million acres and 2,600 miles of streams, supporting 4,100 jobs annually.
        - The National Coastal Wetlands Conservation Grant Program annually provides grants of up to $1 million to coastal and Great Lakes states, as well as U.S. territories to protect, restore and enhance coastal wetland ecosystems and associated uplands. The grants are funded by taxes or import duties collected from the sale of recreational fishing equipment, boats, electric motors, and motorboat and small engine fuels under the

authority of the Dingell-Johnson Sport Fish Restoration Act of 1950. In 2021, this grant program provided $27 million to 33 projects in 14 states.

- *NOAA's Community-based Restoration Program* – Since its start in 1996, the Community-based Restoration Program has contributed technical assistance and nearly $217 million to more than 2,200 coastal habitat restoration projects. Projects range from improving access to habitat by removing dams and other barriers, to restoring coral and oyster reefs, to rebuilding coastal wetlands. These projects have restored more than 93,000 acres of habitat and opened more than 4,300 stream miles for fish migration.
- *National Estuarine Research Reserve System* – A network of 29 coastal sites designated to protect and study estuarine systems. Established through the Coastal Zone Management Act, the reserves represent a partnership program between NOAA and the coastal states. NOAA provides funding and national guidance, and each site is managed by a lead states agency or university with input from local partners. The research reserves cover over 1.3 million acres of estuaries.
- *National Coastal Resilience Fund* – The National Coastal Resilience Fund, authorized in 2018, utilizes Regional Coastal Resilience Assessments to identify public and private lands ideal for restoration and analyzes projects for their potential to provide maximum benefit for both people and wildlife. The assessments were developed in partnership with NOAA, UNC-Asheville, NatureServe, and the Army Corps of Engineers. Since the program's inception, the fund has awarded $90 million to enhance, build, or restore almost 17,800 acres of coastal habitat, with enhanced protection provided to over 100,000 properties and 2,500 critical facilities or pieces of nature-based infrastructure.
- *U.S. Forest Service Aquatic Organism Passage Program* – For over 20 years the Forest Service has improved the technology and methods applied to provide unimpeded passage for fish and other aquatic species at road-stream crossings. On average, the Forest Service restores between 600 and 1,000 miles of aquatic habitat on Forest Service lands and adjacent private lands per year, depending on funding.
- *Army Corps of Engineers Ecosystem Restoration* – Ecosystem restoration is one of the primary missions of the Corps of Engineers. The purpose of these authorities (Section 206 – Aquatic Ecosystem Restoration; Section 1135 – Project Modifications for Improvement of the Environment; Section 204 – Beneficial Use of Dredged Materials; and the Estuary Restoration Act) is to restore significant ecosystem function, structure and dynamic processes that have been degraded. In FY2019, over 104,000 acres were restored, created, improved or protected through this ACOE business line and annual average funding to this suite of programs is $500+ million.
- *Comprehensive Everglades Restoration Plan* --- Three of Florida's southern estuaries have been affected by harmful algal blooms, fish kills and seagrass die offs. The fix for all three estuaries (FL Bay, Caloosahatchee, and St. Lucie) lies in properly implementing the Comprehensive Everglades Restoration plan. Federal funding is needed to fund this plan, which will restore historic sheet flow of fresh water to the southern Everglades and Florida Bay, while also reducing

harmful discharges from Lake Okeechobee to the Caloosahatchee and St. Lucie estuaries.

- **State Coastal and Aquatic Habitat Restoration Program Examples**
    - *Louisiana Coastal Protection and Restoration Authority* – The CPRA was created in 2005 as the single state entity with authority to articulate a clear statement of priorities to develop, implement, and enforce a comprehensive protection and restoration Coastal Master Plan for Louisiana. Since 2007, the CPRA has secured $21.4 billion for projects in 21 parishes to restore or enhance more than 46,000 acres of coastal marsh and lands, in addition to 60 miles of barrier islands and berms.
    - *Michigan Department of Natural Resources* – The Michigan DNR's Priority Habitat Conservation Projects list is a new proactive effort by DNR Fisheries to encourage projects that address priorities for sustaining healthy habitats, fisheries, and aquatic communities across the state. Developed in 2019 and expanded in 2020, the Priority Habitat Conservation Project lists identified 27 projects across the state that would likely satisfy the 30x30 objectives for biodiversity conservation.
    - *Arkansas Game and Fish Commission Stream Team* – The Arkansas Stream Team enables concerned citizens to become involved in stream and watershed conservation throughout the state. The Stream Team program helps landowners and stream users plan and carry out projects, including matching them with the appropriate agency or ongoing organizational efforts for restoration funding and technical assistance. Working with landowners and volunteers, the Stream Team program has restored more than 1,500 miles of Arkansas streams and rivers and planted more than 1 million trees in riparian zones.
    - *Florida Aquatic Preserves* --- The Florida Department of Environmental Protection has established 42 Aquatic Preserves (APs) in coastal Florida encompassing 2.2 million acres. APs safeguard water quality, habitat, recreation and cultural heritage. APs also receive an Outstanding Florida Water Designation, which is the highest level of state protection with the goal of maintaining good water quality. Most importantly, it supports traditional public use such as recreational and commercial fishing, boating and swimming.
    - The South Atlantic Salt Marsh Initiative is currently in the process of developing a plan to address issues related to salt marsh restoration/preservation and climate change over nearly a million acres of salt marsh habitat from North Carolina to Florida. This is being done through The Southeast Regional Partnership for Planning and Sustainability (SERPPAS) which is a six-state partnership comprised of state and federal agencies that promotes collaboration in making resource-use decisions supporting national defense, conservation of natural resources, and sustainable working lands and communities in the Southeast US.
        - Upland areas near salt marsh have been and are being developed at a rapid pace, leaving little room for marsh migration. This salt marsh habitat is critical to water quality, fish stocks and marine biodiversity, as well as terrestrial wildlife habitat and human recreation and communities. For this

reason, this habitat should be included in both the marine and terrestrial 30x30 discussion.