March 7, 2022

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

RE: Federal Register Docket No. 2021-28548

Secretary Haaland,

The undersigned, representing millions of sportsmen and women in the United States, express our optimism for the Administration's interest in recognizing the continuum of science-based conservation actions already underway across the nation as it develops the American

Bonefish and Tarpon Trust
Boone and Crockett Club
California Waterfowl Association
Center for Sportfishing Policy
Coastal Conservation Association
Congressional Sportsmen's Foundation
ConservAmerica
Council to Advance Hunting and the Shooting Sports
Dallas Safari Club
Fishing Education Foundation - National Fishing in Schools Program
Fly Fishers International
Houston Safari Club
International Game Fish Foundation
Izaak Walton League of America
Marine Retailers Association of the Americas
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
North American Grouse Partnership
Orion: The Hunter's Institute
Pheasants Forever
Quail Forever
Rocky Mountain Elk Foundation
Safari Club International
Sportsmen for the Boundary Waters
Sportsmen's Alliance
Tennessee Wildlife Federation
Wildlife Forever
Wildlife Management Institute
Wild Sheep Foundation
Wildlife Mississippi

Attached Supporting Documents:

America the Beautiful: Detailed Recommendations

Appendix 1: Criteria and Implementation Strategies for the American Conservation and Stewardship Atlas

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, to once again lead the efforts to address these current challenges

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

stamps, and permits, clearly demonstrates the long-standing commitment of members of the United States' sporting-conservation

officials at the federal and state level to assist in the development and implementation of

threatening human health, native ecosystems, food security, and multiple industries depending on the sustainable use of natural resources. Each of these invasive threats can only be addressed through proactive spread prevention programs and active management.

Federal, state, and tribal 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[8] 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[9] (FSCP). While these investments are critical for successful prevention and eradication efforts, 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 invasive 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, and habitat quality 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

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

Freshwater ±According to “Through a Fish’s Eye: The Status of Fish Habitats in the United States”[13], a 2015 report conducted by the National Fish Habitat Partnership (NFHP)[14], 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

opportunity, particularly as it relates to hunting, angling, and other important recreational opportunities, without sound scientific justification. Such designations are particularly troublesome when implemented in areas where hunting and angling are critical to the culture of sovereign Tribal nations or historically underrepresented demographics. In addition to our ongoing support for conservation through the American System of Conservation Funding, the hunting and angling communities have long championed efforts to welcome new participants and have sought to increase access and opportunities for all who share an interest in our time-honored traditions. As such, we urge the Administration to continue seeking opportunities to advance collaborative and inclusive approaches to conservation. This includes the avoidance of overly restrictive land and water designations, instead focusing on efforts to maintain and enhance equitable access and opportunities for activities such as hunting and angling that inherently support conservation efforts.

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 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.

Appendix 1: Criteria and Implementation Strategies for the American Conservation and Stewardship Atlas

America's lands and waters are subject to the authority of a wide array of stakeholders with diverse missions. This diversity inherently prevents the implementation of highly detailed and consistent criteria for determining whether a piece of land or body of water should be included in the American Conservation and Stewardship Atlas. However, this diversity is also illustrative of the opportunities to advance pragmatic conservation solutions that exist among and throughout the lands and waters that comprise this nation.

Rather than trying to simplify conservation and restoration efforts to satisfy ill-fit and arbitrary criteria for inclusion, we recommend that the Administration defer to largely localized entities that are better equipped to recognize existing challenges and design and implement successful conservation programs and practices. Such a localized, and often state-led approach is consistent with the North American Model of Wildlife Conservation. Likewise, it highlights the individuality that defines the union that is the United States of America.

Below, lands and waters are broken down into several unique categories. This breakdown is designed to recognize the unique considerations associated with each classification, but our recommendations remain consistent in their reference to entities such as state fish and wildlife management agencies, regional fish and wildlife management authorities, tribes, and conservation focused NGOs as the entities who are most knowledgeable and best equipped to advance pragmatic and successful conservation efforts throughout the U.S.

Public Lands

When being considered for inclusion in the American Conservation and Stewardship Atlas, publicly owned lands should be evaluated based on their contributions to biodiversity and wildlife conservation goals while maintaining the primary function for which those lands are currently utilized. The below criteria can be applied to federal and state lands, as well as local municipal properties that are contributing to conservation or restoration efforts.

Criteria

To ensure that requirements for inclusion are not overly prescriptive, criteria should be flexible enough to allow partnering agencies and the appropriate federal entities to advance effective wildlife habitat and ecosystem restoration and conservation efforts. Attributes for these lands should include:

1. A management plan developed by state fish and wildlife agencies through consultation with the appropriate federal agencies detailing how habitat restoration and conservation objectives will be met and monitored.
    a. Plans that incorporate multiple restoration or conservation objectives should be evaluated on the cumulative merit of relevant objectives.
    b. Restoration and conservation objectives include, but are not limited to:
        i. Wildlife habitat restoration and management.
        ii. Invasive species eradication and prevention.

iii.

and adaptive use of existing conservation programs that could otherwise be quickly deployed to meet evolving resource management needs.

2. Avoid disqualifying lands based on arbitrary acreage limits that fail to account for habitat needs for species in need of specific conservation and restoration practices.
    a. Refer to SWAPs.

Implementation

1. To the maximum extent possible, empower state fish and wildlife agencies, tribes, and regional fish and wildlife management councils to serve as the primary leads in determining qualifying conservation efforts and implementation of management objectives in each state/region.
    a. Through SWAPs and existing regional management plans, these entities are best equipped to recognize and evaluate efforts and determine their qualifications for inclusion in the American Conservation and Stewardship Atlas.
2. Increase support for existing voluntary private lands conservation programs by providing needed resources to increase the availability of program funding and technical assistance providers.
3. Provide resources and support needed by state fish and wildlife agencies and regional fish and wildlife management authorities to successfully evaluate, regularly update, and implement management plans.
4. Defer to state fish and wildlife management agencies, regional fish and wildlife management authorities, tribes, and federal agencies to maintain records of conservation accomplishments while maintaining the privacy of landowners who are voluntarily participating in relevant programs.

Existing Models

1. Federally funded private land conservation programs, such as:
    a. Farm Bill Conservation Programs.
        i. Conservation Reserve Program.
        ii. Environmental Quality Incentives Program.
        iii. Conservation Stewardship Program.
        iv. Agricultural Conservation Easement Program.
    b. North American Wetlands Conservation Act projects.
    c. Working Lands for Wildlife.
2. Federal-State Collaboration
    a. Voluntary Public Access – Habitat Incentives Program.
    b. Conservation Reserve Enhancement Program.
3. Federal-NGO Collaboration
    a. Regional Conservation Partnership Program.
    b. Conservation Reserve Enhancement Program.
4. State Programs
    a. Private land conservation assistance provided at little or no cost to the landowner by state fish and wildlife management agencies.

        i. Consistent with needs outlined in SWAPs.
5. NGO Programs
    a. Pheasants Forever's Soil Health and Habitat Program.
    b. National Wild Turkey Federation's National Forestry Initiative.

Rivers and Streams

The most recent report by the NFHP indicated that 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 comprehensive report should serve as the baseline for rivers and streams in the Atlas, as well as guide future flowing water conservation priorities in partnership with the NFHP.

Most rivers and streams flow across privately owned land at some or most of the water's course. Like terrestrial conservation measures on private lands above, riparian landowners should be offered an array of flexible, user-defined, voluntary opportunities to implement conservation-minded programs and practices in a manner that both benefits the privately held river or stream reach and downstream needs of the watershed. Such programs may include:

Criteria

1. A riparian management plan that outlines the conservation objectives to be met by the landowner.
    a. Program contracts entered into voluntarily by a private landowner and an appropriate entity in charge of program implementation should be considered satisfactory for the purposes of this criteria.
2. A mechanism for evaluation to ensure the program compliance is maintained.
    a. Incentives for continued compliance and the completion of management objectives are highly recommended.
3. Restoration and conservation objectives include, but are not limited to:
    a. Streambank stabilization and sediment capture.
    b. Fish and wildlife habitat restoration.
    c. Invasive species eradication and prevention.
    d. Achieving habitat connectivity between stream reaches.
    e. Efforts to enhance climate resilience.

As outlined in reference to public lands and private lands above, the following actions should be avoided:

1. Avoid setting overly stringent temporal requirements that could unintentionally impair the implementation of temporally sensitive management practices or reduce the flexible and adaptive use of existing conservation programs that could otherwise be quickly deployed to meet evolving resource management needs.
2. Avoid disqualifying riparian lands based on arbitrary linear stream reach limits that would fail to account for habitat protections for species in need of specific conservation measures or overall water quality health of the stream.

a.

        i. Consistent with needs outlined in SWAPs, National Fish Habitat Action Plans[15], or state water quality improvement plans.
5. NGO programs
    a. National Wild Turkey Federation Waterways for Wildlife.
    b. National Wild Turkey Federation National Forestry Initiative.

Lakes, Ponds, and Impounded Waters

In addition to the Great Lakes, natural lakes, ponds, oxbows, and impounded waters dot the nation's landscape and represent important habitats for fish and wildlife, as well as public recreation opportunities. The most recent EPA National Lakes Assessment (2012) evaluated 111,119 "lakes", which included both natural lakes and manmade reservoirs. The study found that nutrient pollution was the number one cause of lake "disturbance", with about 1 in 3 lakes (35%) having excess nitrogen and 2 out of 5 lakes (40%) having excess phosphorus. Excessive nutrients provide favorable conditions for habitat degradation in the form of algal blooms, invasive species proliferation, anoxic conditions, methylmercury accumulation, etc.

Ownership and management authority over lakes and reservoirs vary greatly, creating a challenge for defining qualification criteria for which should be included in the American Conservation and Stewardship Atlas. The use of narrowly defined metrics to determine a lake's qualification for inclusion is not suitable and would often overlook locally led conservation efforts that are already underway by states, NFHPs, shoreline and riparian tributary property owners.

Criteria

To ensure that requirements for inclusion are not overly prescriptive, criteria should be flexible enough to allow partnering agencies and the appropriate federal entities to advance lake habitat and ecosystem restoration and conservation efforts while allowing for public access and recreation.

1. The lake or reservoir has a management plan detailing how habitat restoration and conservation objectives will be met and monitored.
    a. Plans that incorporate multiple restoration or conservation objectives should be evaluated on the cumulative merit of relevant objectives.
    b. Restoration and conservation objectives include, but are not limited to:
        i. Fish and wildlife habitat restoration and management.

i..

    d. National Coastal Resilience Fund.
    e. Army Corps of Engineers Ecosystem Restoration.
4. State-Based and Regional Conservation and Restoration Programs (examples)
    a. Louisiana Coastal Protection and Restoration Authority.
    b. Florida Aquatic Preserves network.
    c. South Atlantic Salt Marsh Initiative.
    d. Massachusetts Coastal Zone Management Program.
    e. Oregon Coastal Management Program.