

October 13, 2021

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Washington DC 20240

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Washington, DC 20250

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Secretaries Haaland, Raimondo, and Vilsack and Chair Mallory,

The undersigned, representing hundreds of thousands of sportsmen and women in the United States, conservation objectives. We also appreciate the inclusion of many of the priorities shared by hunters and anglers 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, the community looks forward to working with the Administration on other aspects of this initiative in support of pragmatic conservation solutions that pro

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
1 H Z 0 H [L F R 6 S R U W V P D Q ¶ V D Q G
Conservationist Alliance
North American Grouse Partnership
2 U L R Q 7 K H + X Q W H U ¶ V , Q V W L W X
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:

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

Executive Summary

\$ V \$ PHULFD ¶ V RULJLQDO FRQVHUYDWLRQLVWV WKH KXQWL supported strategic science based efforts to conserve our Q DWLRQ ¶ V WHUHHVWULDO I marine ecosystems for more than a century. The ability to connect with our land, water 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 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 U HSRUW DQG WR EXLOG XSRQ RXEOLFR ¶ V FRQ following recommendations related to the development of the American Conservation and Stewardship Atlas

- x Clearly define conservation to support the active management and sustainable use R I RXU QDWLRQ ¶ V SXEOLF WUXVW ILVK DQG ZLOGOLIH U
 - o 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.
- x Collaborate closely with entities devoted to achieving measurable biodiversity conservation objectives. This includes
 - o State fish and wildlife management agencies are arguably the best equipped to make fish and wildlife management decisions. Likewise, state agencies already possess biodiversity conservation maps in the form of State Wildlife Action Plans (SWAPs).
 - o 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 and are Congressionally authorized to achieve specific conservation objectives for migratory birds and marine fisheries that cross jurisdictional boundaries.
 - o 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.
 - o The more than 500 federally recognized tribes are responsible for the conservation efforts on more than 140 million acres.
 - o Private landowners through voluntary incentive based opportunities. With much

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 success 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 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, a partnership between National Geographic and the Wyss Campaign for Nature. This report highlights the ecological and economic benefits associated with increasing SURWHFWHG DUHDV WR FRYHU RIRXU SOD. 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 (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) and land and water conservation programs that provide a higher level of conservati

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&DUHIXOO\ GHILQLQJ WKH WHUP 3FR... LV NH\ W...
stakeholder support. Here, our use of the WHUP UHIOHFW... GHI...
Gifford Pinchot in the early 20th Century⁴. It is this definition, and various
championed by the sporting conservation community for more than a century.
Cambridge DFWLRQDU\ GHILQHV FRQVHUYDWLRQ...
exist in limited amounts in order to make certain that they will be available for...
SRVVLEOH´ ZKLOH WKH 8 6⁵ defines the term as ERQGURHO...
V\ VWHPDWLF SURWHFWLRQ RI QDWXUDO UHVRXUFHV...
FRQVHUYDWLRQ KDV EHHQ UHGILQHG E\ VRPH WR FRQIODV...
:HEVWHU¶V XSGDWHG GHILQLWLRQ HDGG\ SURWHFWLIXPQSRJH...
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 Wor* o q 0.002 Tf 1] TJ ET 2 /F364A001100B4>448>7<0050009f 1 0 0 1 320.9ut, it is

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 collaborate with state or federal agencies, which again aligns closely with the \$ GPLQLVWUDWLRQ¶V FDOO IRU FROODERUDWLRQ RWKHUV many existing programs are modeled after these efforts highlight the effectiveness of collaborative, stakeholder driven conservation while recognizing the importance of engaging with the VSRUWVPHQ¶V FRPPXQLW\ LQ WKH GHYHORSPHQW RI IXWXU

We also encourage the IWG to seek input and leadership from 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 wildlife and fisheries management decisions. Related specifically to biodiversity conservation, state agencies are already required to draft State Wildlife Action Plans⁷ and State Wildlife 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 some 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 threats posed by invasive species and pathogens. The International Union for Conservation of Nature (IUCN) GHILQHV LQYDVLYH VSHFLHV DV³ DQLPDQV SODQWV RU RW outside their natural range, negatively impacting biodiversity, ecosystem services or human well-being. EHLQJ 7KURXJK WKH LQFUHDVHG PRYHPHQW RI JRR the introduction of invasive species has created significant conservation challenges in many regions and is a leading cause of 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/forms/statewildlife-action-plans>

⁸ Invasive Species. International Union for Conservation of Nature. Accessed: June 29, 2021.

<https://www.iucn.org/theme/species/ourwork/invasivespecies>

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

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

Freshwater¹⁴ A 2015 report conducted by the National Fish Habitat Partnership (NFHP), 22% 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 a 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 Marine¹⁵ When considering ocean protections, attention often turns toward-area based designations under various forms of marine protected areas (MPAs). According to the 2014 quarter of U.S. waters¹⁶ however, what should also be considered are 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 restrictions like the seasonal and permit closed pelagic longline zones in the Atlantic and Gulf of Mexico and habitat measures in various 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 undersignatory 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 diminish 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 WCG to continue to communicate with the supporting 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

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- x 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 27 million acres during FY2023.
- x 'H V S L W H L Q F U H D V H G L Q W b r a n s W E Q I Q 3 Z R U N L 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](#)
- f Wetlands Reserve Easement (WRE) is 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 private lands and property owned by ~~ind~~ tribes.
 - x 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.

Appendix 2 ±Freshwater and Marine Examples 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~~ support ~~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~~ ~~to~~ ~~mitigate~~ ~~ecosystem~~ ~~impacts~~, which helps to ensure preservation ~~of~~ ~~ecosystem~~ functions.

- x Gear restricted areas ~~are~~ ~~used~~ ~~to~~ ~~protect~~ ~~habitat~~ ~~and~~ ~~fish~~ ~~stocks~~ ~~in~~ ~~the~~ ~~Atlantic~~ ~~and~~ ~~Gulf~~ ~~regions~~ ~~alone~~. Just a few examples of these management measures include:
 - o East Florida Coast (EFC) PLL Closed Area ~~is~~ ~~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 ~~the~~ ~~area~~ ~~to~~ ~~pelagic~~ ~~longlining~~ ~~to~~ ~~protect~~ ~~the~~ ~~area~~ ~~and~~ ~~its~~ ~~species~~. Swordfish have since recovered, but keeping the area closed to pelagic longlining is critical for conservation of other species vulnerable to the ~~gear~~ ~~used~~ ~~in~~ ~~the~~ ~~area~~ ~~including~~ ~~billfish~~, tunas, sharks, sea turtles and marine mammals
 - o Gulf of Mexico PLL Closed Area ~~is~~ ~~a~~ ~~similarly~~ ~~in~~ ~~2000~~ ~~NMFS~~ ~~closed~~ ~~the~~ ~~36,860~~ ~~square~~ ~~mile~~ ~~DeSoto~~ ~~Canyon~~ ~~in~~ ~~the~~ ~~Gulf~~ ~~of~~ ~~Mexico~~ ~~to~~ ~~pelagic~~ ~~longlining~~ ~~due~~ ~~to~~ ~~the~~ ~~fact~~ ~~that~~ ~~the~~ ~~area~~ ~~is~~ ~~critical~~ ~~for~~ ~~the~~ ~~conservation~~ ~~of~~ ~~many~~ ~~species~~ ~~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~~.
 - o Atlantic Coast Deep Sea Coral Protections ~~is~~ ~~a~~ ~~coordinated~~ ~~effort~~ ~~to~~ ~~protect~~ ~~the~~ ~~Atlantic~~ ~~Coast~~ ~~Deep~~ ~~Sea~~ ~~Coral~~ ~~ecosystems~~ ~~and~~ ~~the~~ ~~species~~ ~~that~~ ~~depend~~ ~~on~~ ~~them~~.

be argued that they are much more effective at truly addressing the underlying tenants of the 30x30 Initiative ±biodiversityconservation. Fortunately, there are many successful programs in place that are restoring habitats, improving water quality, and enhancing species diversity.

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.

- o ~~1 2 \$ \$ ¶ V & R Phase 0 Re~~ ~~At~~ ~~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 90,000 acres of habitat and opened more than 4,300 stream miles for fish migration.
- o ~~National Estuarine Research Reserve System~~ 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 local partners. The research reserves cover 6.2 million acres of estuaries.
- o ~~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 ~~scope~~ their potential to provide maximum benefit for both people and wildlife. The assessments were developed in partnership with NOAA, ~~USC~~ville, 1 DWXUH6HUYH DQG WKH \$UP\ & RUSV RI (QJLQHHUV 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 ~~natural~~ infrastructure.
- o ~~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~~ ~~stream~~ crossings. On average, the Forest Service restores between 600 and 11,000 ~~of~~ aquatic habitat on Forest Service lands and adjacent private lands per year, depending on

