

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 Conservation and Stewardship Atlas. 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 2021, and we look forward to working with the Administration to advance these priorities as part of the America the Beautiful Initiative. In response to Docket No. DOI-2021-0016, 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.

Per the request for comment published in the Federal Register, 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 and waters 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
Angler Action Foundation
Archery Trade Association
Arizona Sportsmen for Wildlife Conservation
Arizona Wildlife Federation
Austin Fly Fishers
Backcountry Hunters & Anglers
Bass Anglers Sportsman Society (B.A.S.S.)
The Billfish Foundation
Boat Owners Association of the United States

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 Nature¹, 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 federal 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.), numerous state statutes and various state and federal land and water conservation programs that provide a higher level of conservation than many other nations. 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 Act³ 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,

¹ Waldron et al. 2020. Protecting 30% of the planet for nature: costs, benefits, and economic implications. Campaign for Nature. Accessed: March 2, 2022.

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: March 2, 2022. <https://congressionalsportsmen.org/policies/state/ascf>

³ United States Fish and Wildlife Service. Wildlife and Sport Fish Restoration Program. Accessed: March 2, 2022. <https://www.fws.gov/program/wildlife-and-sport-fish-restoration>.

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.

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 Century⁴. 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 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 the concept of “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 that 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” report⁵ 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

⁴ Deckret, V. Gifford Pinchot 1865-1946: The First Conservationist. Maryland Department of Natural Resources. Accessed: March 2, 2022. <https://dnr.maryland.gov/centennial/Pages/Centennial-Notes/GiffordPinchot.aspx>

⁵ 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: March 2, 2022. <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>.

officials at the federal and state level to assist in the development and implementation of 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 not only game and fish species but 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 and tribal 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, often in close consultation with tribal fish and wildlife agencies, are already required to draft State Wildlife Action Plans⁶ (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 Nature⁷ (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

⁶ State Wildlife Action Plan. U.S. Fish and Wildlife Service. Accessed: March 2, 2022.
<https://www.fishwildlife.org/afwa-informs/state-wildlife-action-plans>

⁷ Invasive Species. International Union for Conservation of Nature. Accessed: March 2, 2022.
<https://www.iucn.org/theme/species/our-work/invasive-species>.

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 Dam⁸ 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 Program⁹ (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 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, Michigan Hunting Access Program, 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 critical component to the successful development

⁸ Brandon Road Interbasin Project. United States Army Corps of Engineers. Accessed: March 2, 2022. <https://www.mvr.usace.army.mil/Missions/Environmental-Stewardship/BR-Interbasin-Project/>.

⁹ Feral Swine Eradication and Control Pilot Program. Natural Resources Conservation Service, United States Department of Agriculture. Accessed: March 2, 2022. <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/farmbill/?cid=NRCSEPRD1461219>.

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” (Appendix 1). 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 goals 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:

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-US¹⁰, 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 tremendous access opportunities for sportsmen and women, and, when managed properly,

¹⁰ PAD-US Data Overview. U.S. Geological Survey. Accessed: March 2, 2022. 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

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 ^{11,12} 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:

¹¹ 2020. Great American Outdoors Act PL 116–152. United States Congress. Accessed: March 2, 2022. <https://www.congress.gov/116/plaws/publ152/PLAW-116publ152.pdf>

¹² Great American Outdoors Act. Congressional Sportsmen’s Foundation. Accessed: March 2, 2022. <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”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 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.

Equity in Conservation:

Finally, we encourage the Administration to consider the diverse cultures and communities that will be impacted by decisions related to the development and implementation of the American Conservation and Stewardship Atlas. Further, we encourage the Administration to avoid the implementation of land and water designations that may unintentionally restrict access and

¹³ Crawford et al. 2015. Through a fish's eye: The status of fish habitats in the United States. United States Geological Survey. Accessed: March 2, 2022. <https://pubs.er.usgs.gov/publication/70200345>.

¹⁴ The Partnerships. National Fish Habitat Partnership. Accessed: March 2, 2022. <https://www.fishhabitat.org/the-partnerships/>.

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. Efforts to promote habitat connectivity.
 - iv. Efforts to enhance climate resilience.
 - v. Enhance public outdoor recreation opportunities.
- 2. An area suitable for the implementation of a management plan that incorporates wildlife or climate-based objectives.
 - a. Area-based requirements should be determined on a case-by-case basis by state fish and wildlife management agencies, tribal governments or the appropriate federal entity and should consider the specific wildlife conservation objectives and the area needed to meet such objectives.
- 3. An area suitable for the advancement of restoration and conservation objectives established by existing state, tribal, and federal efforts.
 - a. This includes SWAPs, management strategies developed by regional fish and wildlife management authorities (e.g., Migratory Bird Joint Ventures), Endangered Species Act, North American Wetlands Conservation Act, U.S. Farm Bill's Conservation Title, etc.

Furthermore, the Administration should avoid the following criteria to prevent the omission of lands that are subject to conservation and restoration activities consistent with the America the Beautiful Initiative.

- 1. Avoid overly relying on existing databases, such as the U.S. Geological Survey's Protected Areas Database of the United States, which provided an oversimplified view and unintentionally omit the inclusion of lands that otherwise meet the criteria listed above (i.e., lands classified in GAP Status 3 and 4).
- 2. 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.
- 3. Avoid disqualifying lands simply based on the presence of activities related to resource extraction or utilization in the area.
 - a. Resource extraction or utilization on public lands should not preclude lands from being included in the American and Conservation Stewardship Atlas unless the extraction activities hinder the accomplishment of the restoration and conservation objectives outlined above. At such point, only the immediate area in which this hindrance is present should be disqualified if conservation objectives are not otherwise disrupted.

Implementation

- 1. Utilize existing authorities to increase investments in wildlife habitat restoration and conservation efforts that are consistent with the criteria above while accomplishing other objectives, such as increased public access, that are consistent with the Administration's May 2021 Conserving and Restoring America the Beautiful report.
 - a. Land and Water Conservation Fund.
 - b. Great American Outdoors Act.

- c. American Conservation Enhancement Act.
 - d. Infrastructure Investment and Jobs Act.
 - e. State and Tribal Wildlife Grants Program.
 - f. Wildlife Conservation and Restoration sub-account of the Federal Aid in Wildlife Restoration Program.
 - g. North American Wetlands Conservation Act.
2. Utilize existing public-private partnerships to promote land-use activities that are beneficial to restoration and conservation efforts at various scales.
 3. Defer to appropriate agencies who are best equipped to make local, resource-specific restoration and conservation determinations and recommendations.
 - a. State Fish and Wildlife Agencies.
 - b. Regional Fish and Wildlife Management Authorities (e.g., Joint Ventures).
 - c. Tribal organizations.

Private Lands

Given the diversity and individuality among American landowners and their motivations, the use of narrowly defined metrics to determine a property's qualification for inclusion in the American Conservation and Stewardship Atlas is not only futile but would run counter to the America the Beautiful Initiative's goal to recognize the valuable, locally led conservation efforts that are already underway across much of the United States.

Criteria

Private 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 local and regional ecosystem needs and supports the overall health and productivity of these properties. Such programs may include:

1. A 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. Wildlife habitat restoration and management.
 - b. Invasive species eradication and prevention.
 - c. Efforts to promote habitat connectivity.
 - d. Efforts to enhance climate resilience.

As outlined in reference to public lands, 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 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. Refer to local NFHP partnership priority restoration plans and goals.
- b. Refer to SWAPs.

Implementation

1. To the maximum extent possible, empower state fish and wildlife agencies, NFHP partnerships, tribes, and regional fish and wildlife management authorities to serve as the primary leads in determining qualifying conservation efforts and implementation of management objectives in each state/region.
 - a. Through SWAPs and NFHP action plans, these entities are best equipped to recognize and evaluate efforts and determine their qualifications for inclusion in the American Conservation and Stewardship Atlas.
 - b. Increase support for existing voluntary private riparian lands conservation programs by providing needed resources to increase the availability of program funding and technical assistance providers.
 - c. 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.
 - d. Defer to state fish and wildlife management agencies, NFHP, 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 public-private riparian and wetland conservation programs, such as:
 - a. National Fish Habitat Partnerships.
 - b. Farm Bill Conservation Programs.
 - i. Conservation Reserve Program.
 - ii. Environmental Quality Incentives Program.
 - iii. Conservation Stewardship Program.
 - iv. Agricultural Conservation Easement Program.
 - c. Working Lands for Wildlife.
2. Federal-State Collaboration
 - a. Conservation Reserve Enhancement Program.
 - b. NOAA's Community-Based Restoration Program.
 - c. U.S. Forest Service Aquatic Organism Passage Program.
 - d. U.S. Fish and Wildlife Service National Fish Passage Program.
3. Federal-NGO Collaboration
 - a. Regional Conservation Partnership Program.
 - c. Conservation Reserve Enhancement Program.
4. State Programs
 - a. "Stream Teams" or other state-based stream restoration programs that offer private land conservation assistance to the landowner by state fish and wildlife management agencies.

- i. Consistent with needs outlined in SWAPs, National Fish Habitat Action Plans¹⁵, 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.
 - ii. Invasive species eradication and prevention.
 - iii. Efforts to reduce nutrient loading in the lake or reservoir headwaters.
 - iv. Efforts to enhance climate resilience.
2. A lake or reservoir suitable for the development and implementation of a management or restoration plan that incorporates fish and wildlife or climate-based objectives.

¹⁵ 2017. National Fish Habitat Action Plans. National Fish Habitat Partnership. Accessed: February 24, 2022. <https://www.fishhabitat.org/about/national-fish-habitat-action-plans/>.

- a. Suitable management plans should be determined by state fish and wildlife management agencies, tribal governments, local governments, or the appropriate federal entity and should consider specific fish and wildlife conservation objectives.

Furthermore, the administration should 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.

Implementation

1. Utilize existing authorities to increase investments in fish and wildlife habitat restoration and conservation efforts that are consistent with the criteria above while accomplishing other objectives, such as increased public access.
 - a. State fish and wildlife management agencies.
 - b. Tribal fish and wildlife management agencies.
 - c. Regional fishery management commissions
2. Utilize existing partnerships to promote lake and reservoir restoration and conservation efforts at various scales.
 - a. National Fish Habitat Partnerships.
 - b. NGO's.

Existing Model

1. Federally funded public-private lake and reservoir conservation programs, such as:
 - a. National Fish Habitat Partnerships.
 - i. Midwest Glacial Lakes Partnership.
 - ii. Great Lakes Basin Fish Habitat Partnership.
 - iii. Southeast Aquatic Resources Partnership.
 - iv. Reservoir Fish Habitat Partnership.
2. Federal-State Collaboration
 - a. EPA's Clean Water State Revolving Fund.
 - b. U.S. Army Corps of Engineers Environmental Restoration (Section 1135).
 - c. U.S. Army Corps of Engineers Aquatic Ecosystem Restoration (Section 206).
3. NGO Lake and Reservoir Conservation Efforts
 - a. B.A.S.S. Nation habitat improvement efforts.
 - b. Friends of Reservoirs.
4. State Programs Examples
 - a. Michigan Natural Shoreline Partnership.
 - b. Minnesota DNR's Restore Your Shore Program.
 - c. New Hampshire's Shoreland Water Quality Protection Act.
 - d. Wisconsin's Shoreland Protection Program.

Coastal and Marine

Federal, state, and estuarine waters should be evaluated for their inclusion in the American Conservation and Stewardship Atlas based on their contributions to fisheries and aquatic habitat conservation outcomes rather than the level of restricted use or activities within the area.

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 estuarine and marine habitat and ecosystem restoration and conservation efforts while allowing for public access and recreation, including recreational angling, spearfishing, and other recreational activities that are compatible with conservation goals.

1. Existing area-based designations employed by states, commissions, regional fishery management councils, U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration (NOAA) that meet the habitat or species protection goals for which they were established.
 - a. Such areas should include a management plan with clearly defined conservation goals.
 - b. Periodic evaluations should be administered to ensure conservation goals are being met and the best available science is integrated.
 - c. Designated areas should remain open for citizen science initiatives and restoration activities to promote healthy ecosystems and to ensure the region's adaptability to real-time threats such as those wrought by invasive species or the effects of climate change.
 - d. On an ongoing basis, such areas must be evaluated relative to the achievement of their intended conservation goals, and once achieved, explore opportunities to provide for greater access for recreational angling in those marine conservation areas if previously restricted.
2. Regional fishery management council plans that cumulatively address species and/or habitat conservation and sustainability for multiple species in an area.
 - a. For example, the overlap of coral, reef fish, and coastal migratory pelagic species management plans.
3. State coastal management programs that include:
 - a. A management plan outlining the conservation objectives to be met by a landowner or governmental entity.
 - b. A mechanism for evaluation to ensure the program compliance is maintained.
 - c. Restoration and conservation objectives may include, but are not limited to:
 - i. Fish and wildlife habitat restoration and management.
 - ii. Invasive species eradication and prevention.
 - iii. Promoting habitat connectivity.
 - iv. Enhancing climate resiliency.

Furthermore, the administration should avoid criteria that sets overly stringent temporal or spatial area requirements that devalues important conservation gains or discourages the use of

flexible and adaptive management measures to effectively address immediate or changing conservation needs.

Implementation

To the maximum extent possible, empower state fish and wildlife agencies, NFHP partnerships, tribes, federal agencies, State Marine Fisheries Commissions, and regional fishery management councils to serve as the primary leads in determining qualifying conservation efforts and implementation of management objectives in each state or region.

1. Through regional fishery management council plans, which are developed using the best available science to address conservation needs and monitor success.
2. Through management plans, including SWAP's, developed by state fish and wildlife and coastal land management agencies for estuarine and marine waters under their jurisdiction.
3. Coastal NFHP action plans that identify and prioritize conservation needs.
4. U.S. Fish and Wildlife Service Coastal Program strategic plan.
5. U.S. Fish and Wildlife Service Invasive Species programs.
6. NOAA Coastal Zone Management Program.
7. NOAA National Marine Sanctuaries management plans.

Existing Models

1. Regional Fishery Management Councils
 - a. Gear restricted areas.
 - b. Extensive system of fishery management plans.
 - c. Essential Fish Habitat designations.
 - d. Habitat Areas of Particular Concern.
2. National Fish Habitat Partnerships
 - a. Atlantic Coast Fish Habitat Partnership.
 - b. Great Lakes Fish Habitat Partnership.
 - c. Southeast Aquatic Resources Partnership.
 - d. California Fish Passage Program.
 - e. Pacific Lamprey Conservation Initiative.
 - f. Pacific Marine and Estuarine Fish Habitat Partnership.
 - g. Southeast Alaska Fish Habitat Partnership.
 - h. Kenai Peninsula Fish Habitat Partnership.
 - i. Southwest Alaska Salmon Habitat Partnership.
 - j. Matanuska-Susitna Basin Salmon Habitat Partnership.
 - k. Hawaii Fish Habitat Partnership.
3. Federal Coastal Restoration and Protection Programs
 - a. US Fish and Wildlife Service Coastal Program.
 - i. The National Coastal Wetlands Conservation Grant Program.
 - b. NOAA's Community-based Restoration Program.
 - c. National Estuarine Research Reserve System.

- 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.