

APPENDIX D: EXAMPLE COMMENTS ON AGENCY RULEMAKING





THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

7 March 2022

U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

The Wildlife Society
425 Barlow Place
Bethesda, MD 20008

Re: Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas [Docket No. DOI-2021-0016]

Thank you for the opportunity to submit comments that enhance the Administration's efforts to create a database representative of the diverse interests of private and public stakeholders and their efforts to conserve America's wildlife, lands, and waters.

Founded in 1937, The Wildlife Society (TWS; wildlife.org) and our network of affiliated chapters and sections represents over 15,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitat through science-based management and conservation.

The Wildlife Society is [supportive](#) of the core principles of the American the Beautiful Initiative, particularly using science as a guide in implementation. While science informing the conservation of biodiversity must be foundational to any decision making, other core principles, such as pursuing a collaborative and inclusive approach to conservation, will be key in creating an Atlas tool that includes the diversity of conservation stakeholder needs and interests.

Our organization offers the following considerations for the Administration as they work to implement the core principles of the America the Beautiful Initiative through creation of the Conservation Stewardship Atlas:

Science and Data

What data sources should be included in the Atlas, and what technical approaches should be applied to data to create an Atlas that is useful for the public?

The Wildlife Society recommends that an American Conservation and Stewardship Atlas build on previously existing efforts by many public and private partners. By working with partners to link multiple existing GIS coverages and biological datasets, duplicative efforts can be more effectively avoided.

TWS has identified a non-exhaustive list of databases that should be considered when reaching out to partners on existing datasets. The datasets we have identified place priority on richness and biodiversity metrics as well as identified threats to native species as key indicators of the conservation status of landscapes. Other datasets, such as those detailing recreation opportunities and multi-use activities on landscapes, should also be considered in tandem with these indicators.

- **Global:** The use of international datasets should be of primary concern in the creation of the Atlas. The Wildlife Society strongly recommends that geographic datasets in support of the Atlas project not end at the US-Canada and US-Mexico borders. These borderlands are important for conservation, especially considering connectivity for wildlife and fish movements. For a more holistic evaluation of trans-boundary conservation issues, we encourage consideration of mapping at least a 100-200 km buffer that goes into adjoining Canada and Mexico.
 - [United Nations Biodiversity Lab](#)
 - [Global Initiative on Ungulate Migration](#) - A compilation of standardized maps detailing movement of ungulate populations.
- **National:** There are already many databases in the U.S. that provide information on biodiversity and species richness. In any approach, the U.S. Geological Survey, which already manages Biodiversity Information Serving Our Nation (BISON), should play a key role in compiling relevant datasets. Use of citizen science projects, particularly those that track sightings of at-risk and invasive species, should be a core component of the Atlas. In addition to being useful for natural resource professionals, the use of citizen science projects will allow for additional engagement with outdoor recreationists on protected landscapes.
 - [Early Detection and Distribution Mapping System \(EDDMapS\)](#) - Provides timely information on invasive species detections that can play an important role in the conservation of protected areas.
- **Regional:** Existing regional data initiatives often have buy-in from a suite of partners, including state fish and wildlife agencies. These initiatives are drawn from existing, state-based reporting of fish and wildlife species such as State Wildlife Action Plans to inform priority areas for species conservation.
 - [Southeast Conservation Blueprint \(SECAS\)](#)
 - [Northeast Conservation Atlas](#)
 - [Conservation Atlas for Midwest Grasslands](#)
 - [Great Northern Ecological Connectivity Data Atlas](#)

Conservation as a Continuum

How can the Atlas reflect the meaningful conservation work already underway in America?

As an initial step, the American Conservation and Stewardship Atlas should use the standardized International Union for the Conservation of Nature protected areas designations to

denote existing protected areas. This includes designation of areas managed by the federal government and state lands such as wildlife management areas and state parks. As noted above though, biodiversity and richness metrics and associated threats to native species, along with identifiers denoting a lack of information on these metrics, should be clearly identified in any Atlas tool.

Beyond clearly designated state and federal lands, third party outreach will be vital to the success of the Atlas. The Administration must conduct outreach to all possible participants in as broad and inclusive manner as possible. A foundational component of outreach must include sincere and sustained engagement with American Indian, Alaska Native and Native Hawaiian communities to determine current conservation practices and associated values in land and wildlife management.

Smaller entities, such as local municipalities, local advocacy organizations, and private land trust networks also engage in a diversity of land management practices, though not all have the capacity to participate in the solicitation of public input. Outreach should also extend to the engagement of operators of working lands, such as those utilized for timber production and those engaging in Farm Bill Title II conservation programs.

What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America?

The Wildlife Society is fully supportive of the Administration's inclusion of multi-use landscapes in areas that are already under some level of state or federal designation into the atlas. Outdoor recreation activities, such as hiking, hunting, fishing, and wildlife viewing, should be viewed as key components of ensuring equitable access to nature and advancing natural resource conservation.

In addition to lands and waters conserved and managed by non-profit and government entities, conservation activities on private and working lands should be identified and considered for inclusion in the Atlas. With seventy percent of U.S. lands in private hands, it is imperative that private landowners and producers be brought into the process of shaping the Atlas tool. Existing programs that can be evaluated for their efficacy in conserved landscapes and potential inclusion in the Atlas include:

- **Farm Bill Title II Conservation programs.** Programs that set aside sensitive lands from production, such as the Conservation Reserve program and the Agriculture Conservation Easement Program, allow private operators to engage in conservation activities. Working lands programs, such as the Conservation Stewardship Program and the Environmental Quality Incentive Program, may also be appropriate for inclusion based on the habitat type and conservation activities conducted. Prior to inclusion of these lands, the U.S. Department of Agriculture along with state and private partners should make meaningful progress in determining performance and success metrics for these programs, a longstanding issue in Title II implementation.

- **Partners for Fish and Wildlife program.** This program allows voluntary habitat restoration goals aligned with identified federal priorities to be achieved through financial and technical assistance. As a result, federal fish and wildlife professionals are able to interact directly with landowners to conduct management actions of benefit to at-risk species.
- **North American Wetlands Conservation Act program.** This program provides grants to conserve, restore, and protect North America's wetlands. Similar initiatives are being discussed for the country's grasslands through the proposed "North American Grasslands Conservation Act", a potentially vital tool in bringing private stakeholders to the table to conserve grassland landscapes.

Investment in professionals. The programs detailed above are able to be implemented due to their investment in technical assistance programming. Continued investment in natural resource professionals to guide landowner engagement in conservation will be vital to ensuring future success in public-private conservation partnerships. This investment will be foundational to any attempts by the Administration to pursue a collaborative and inclusive approach to conservation. The ability to earn a living wage, particularly for student and early career natural resource professionals, continues to be a major roadblock in recruiting professionals representative of the diverse experiences of Americans. It is imperative that the Administration look to invest in the next generation of professionals by providing adequate job opportunities and wages in promoting the goals of America the Beautiful.

What are the attributes of lands and waters that should be included in the Atlas?

- **Biodiversity metrics.** While the core of the Atlas is focused on land and water designations and conservation, it should not be lost that the bigger picture goal is about ensuring ecological processes and functions on those lands. Biodiversity is a key component of those processes and should be viewed as a key indicator of the success of America the Beautiful. By assessing the biodiversity of a given area, lands and waters in different regions and under different land management and conservation activities may be able to be better compared for their overall contribution to conservation and the long-term outcomes of the America the Beautiful initiative.
- **Adaptation threats and opportunities.** The Atlas should include attributes regarding the contributions lands and waters could provide to fish and wildlife conservation in light of climate change effects that are happening now and that are projected in the future. Climate change will affect landscapes and result in the shifts of ecosystems and biotic communities. Areas should be assessed for their value in resilience to climate change and their potential value as ecosystems and species adapt to the climate of the future.
- **Invasive species populations and associated risks.** Attributes of lands and waters that are valuable for understanding the threats posed by invasive wildlife include information on species distribution, regional presence, and range expansion concerns related to climate change.
- **Analysis of conflicts with conservation.** In concert with the U.S. Geological Survey, TWS recommends that the American Conservation and Stewardship Atlas consider

anticipated areas of future development for resources such as critical minerals, oil and gas, coal, renewable energy solar and wind farms, etc. Providing context for potential uses of landscapes will allow for more open multi stakeholder discussions on appropriate uses of these landscapes.

- **Migration corridors.** The U.S. government does not presently have a centralized, federally managed dataset of species migration corridors. Inclusion of available datasets and associated data deficiencies will allow for a more targeted investment in information needed to fully understand and conserve species migration routes.

How can the Atlas best reflect the contributions of State, local, Tribal, territorial, and private lands?

As the Administration has noted, multi stakeholder partnerships must be foundational to implementation of the America the Beautiful Initiative and creation of the Atlas. Once the Atlas is set for the initial phase of implementation, our organization requests another round of outreach and solicitation of public input to ensure the Atlas will meet the needs of the public and natural resource professionals prior to launch.

Upon implementation of the Atlas, further solicitation of input should be provided through the creation of a federal advisory committee representing the diversity of stakeholder interests. As with the recently reinstated Hunting and Wildlife Conservation Council, state fish and wildlife agency and tribal government representation should be included in the committee's charter.

We thank the Administration for their solicitation of feedback on creation of the Conservation and Stewardship Atlas and broader efforts to ensure multi stakeholder engagement in implementation of America the Beautiful. We look forward to working together on this and other Administration efforts that embrace the invaluable expertise of wildlife and natural resource professionals. Please consider The Wildlife Society as a resource and an ally as the Administration moves towards Atlas implementation.

Please contact Caroline Murphy AWB®, Government Relations Manager at cmurphy@wildlife.org or (301) 968-1903 with any questions on the provided comments.

Sincerely,



Gordon R. Batcheller, CWB®
President, The Wildlife Society