



An FY 22 Budget to Bring Back the Birds

To help bolster programs needed to reverse bird declines and the loss of three billion birds since 1970, American Bird Conservancy respectfully requests significant funding increases for bird conservation programs in the Final FY 2022 Interior Appropriations bill. These include the Neotropical Migratory Bird Conservation Act (NMBCA), Migratory Bird Joint Ventures, State of the Birds Activities, and mosquito control on Hawaii.

Funds are also urgently needed to research solar energy producing glass products that reduce bird collisions, to mitigate wildlife impacts from the rapid expansion of renewable energy development, and the early detection and control of invasive species. In addition, policy changes are needed to support science based decision making to conserve the Greater Sage Grouse, to fight climate change by protecting carbon-dense old growth forests, and to emphasize low-impact distributed solar for renewable energy development. Thank you for considering these requests.

FY 22 Bird Conservation Recommendations (all figures in millions)

| Program | FY 2021 | FY 22 President’s Budget | FY 22 House-Passed Bill | FY 22 Senate Proposed | FY 22 to Bring Birds Back |
|--|---------|--------------------------|-------------------------|-----------------------|----------------------------------|
| Neotropical Migratory Bird Conservation Act | \$4.9 | \$7.9 | \$6.5 | \$6.0 | \$7.9 |
| Migratory Bird Joint Ventures | \$15.1 | \$17.6 | \$18.8 | --- | \$25 |
| State of the Birds Hawaii + Mosquito Control Project | \$3.5 | \$3.5 | \$4 | \$4.25 | \$10 |

- Please Increase Funding for Urban Bird Conservation by \$1 million**
- Increase Funding for Endangered Species Recovery by another \$5 million.**
- Provide \$10 Million to Make Federal Visitor Centers Bird Safe and Reduce Collisions.**
- Provide \$10 Million to Research and Develop Bird-Safe Solar Collecting Glass.**
- Provide \$10 Million to Mitigate Wildlife Impacts from Renewable Energy Development.**
- Provide \$2 Million to Establish Baseline Distribution Data for Birds in the Great Lakes.**
- Please Increase Funding for DOI Invasive Species Control by another \$5 million.**

Migratory Birds - NMBCA: Please increase funding for migratory bird conservation including wintering grounds in Latin America and the Caribbean by providing \$7.9 million for the Neotropical Migratory Bird Conservation Act as requested by the administration. This program is essential to the conservation capacity of our Latin American and Caribbean partners, providing greater access to conservation resources in a region where it is urgently needed.

Migratory Bird Joint Ventures (JVs) are essential to address the conservation needs of migratory birds, and they leverage significant matching contributions from partner organizations and foundations. The House FY 2022 budget proposes a \$3.7 million increase, and we recommend that to help reverse bird declines the Joint Ventures need to begin implementing a significantly larger program at \$25 million.

Hawaii and Mosquito Control: We greatly appreciate the \$3.5 million in funding provided in the FY 2021 spending agreement for State of the Birds Activities dedicated to arresting the bird extinction crisis in Hawaii. The House has proposed a further increase to \$4 million, and the Senate \$4.25 million. For FY 22, please allocate \$10 million for State of the Birds activities and the mosquito control project in Hawaii needed to save endangered forest birds and prevent multiple imminent climate-induced extinctions.

Eradicating Invasive Species: FWS Early Detection seeks to identify non-native species before the founding population becomes established or spreads so widely that eradication is no longer feasible. Rapid Response is then employed to eradicate the founding population. We appreciate the supportive Senate FY 22 report language and proposed increases for these activities. Given the high cost of outbreaks, we recommend an additional \$5 million.

Reducing Window Collisions: Provide \$10 million to continue work by the National Park Service and other agencies to retrofit Department of the Interior buildings and visitor centers to make them bird-safe. To build on the significant progress underway to retrofit National Park Service structures to reduce bird collisions, we recommend \$10 million in funding, and we greatly appreciate the following commendable FY 22 House Interior bill report language:

All agencies under the jurisdiction of this Act are directed to consider bird-safe building design and materials for the structures they manage, build, or retrofit. In addition, agencies are directed to take low cost or no cost action, such as identifying problem windows and buildings that routinely cause collision, turning off interior lights in those buildings at night, and applying films or other adhesives to glass windows in those buildings to reduce bird collisions.

Bird-Safe Solar Glass – A Win-Win for Climate and Wildlife: Provide \$10 million in annual funding to research and develop bird-safe glass products, particularly solar-collecting windows. Research on both bird-safe and solar collecting glass products can be combined to create a valuable and desirable product for both commercial buildings and homes that can generate renewable energy while also reducing bird deaths from window collisions.

Renewable Energy Wildlife Mitigation Fund: Establish and provide \$10 million in annual funding to mitigate environmental impacts from wind and other renewable energy development. Given the accelerating pace of renewable energy development, and current lack of MBTA permitting or adequate federal mitigation policies, a \$10 million mitigation fund is a reasonable beginning. A renewable energy mitigation fund could be administered by the National Fish and Wildlife Foundation for projects with a federal nexus, such as where Bald and Golden Eagles are affected, or in federal waters where permits are required.

Offshore Wind Planning in the Great Lakes: Provide \$2 million for research to establish an environmental baseline for bird distribution in the Great Lakes. This will better inform offshore wind energy development, which is now proceeding without this necessary information. This is of concern to ABC, as the Great Lakes are an area of huge importance for migratory and wintering birds. Baseline survey research could vastly improve the process and outcomes, and minimize conflict associated with project permitting.

Endangered Species Recovery: Increase funding for avian recovery programs, particularly in Hawaii as mentioned above, and for critically endangered birds such as the California Condor, Spectacled Eider, and Florida Grasshopper Sparrow. [A 2016 ABC report](#) found that since their date of listing, most avian species have seen progress towards recovery. Additional ESA recovery activities can help continue this success while creating jobs and restoring habitats which will provide multiple additional benefits.

An additional \$5 million for recovery activities is needed for these and other listed birds with declining populations such as the Marbled Murrelet which was recently listed as endangered by the State of Oregon. Additional funding could enable FWS to conduct at-sea surveys in all Marbled Murrelet conservation zones in the same year providing decision makers with a complete and accurate population status assessment.

Urban Bird Conservation: Increase funding for the FWS Urban Bird Treaty program and partner programs such as Bird City by \$1 million. Focusing on bird conservation in municipal settings where existing urban planning initiatives can incorporate the needs of birds and their habitats to address a complex array of threats to biodiversity while also improving climate resiliency, human health, the economy, and a myriad of ecosystem services.

Migratory Bird Conservation

We urge the Committee to:

1. Continue expressing support for Biden administration rulemakings to restore protections for birds under the Migratory Bird Treaty Act and to further conserve birds through the establishment of an incidental take permitting system reducing preventable losses for industrial sectors known to cause significant bird mortality.
2. Encourage the Fish and Wildlife Service to utilize authority under the Fish and Wildlife Conservation Act to identify and report to Congress on lands and waters needed to conserve migratory birds.
3. Support the Urban Bird Treaty Program, authorize increased staff capacity and

funding for partner grants, and explore new vehicles to engage the public and raise funds for conservation such as the creation of a Songbird Stamp.

Greater Sage-Grouse Conservation

We appreciate that the House-passed Interior bill, Senate proposed bill, and President's budget all exclude the Greater Sage-Grouse ESA listing rider. We strongly urge that it be kept out of the final FY 22 spending agreement.

Please support reinstating the Presidential Memorandum, "Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment," or establishment of commensurate policies that provide a net conservation benefit mitigation standard and the identification of irreplaceable resources, and request that the FWS, BLM, and Forest Service develop agency mitigation policies.

Support updating the Greater Sage-Grouse conservation plans based on the best available science, as well as the Presidential Mitigation Memorandum referenced above. And encourage reinstatement of other key agency policies and internal memoranda critical to the 2015 conservation strategy, including the proposed mineral withdrawal, other measures to retain grouse strongholds, and adaptive management requirements.

Climate Change and Renewable Energy Development

We appreciate the report language included in the FY 22 Senate bill encouraging reduction of wind energy development impacts and application of available best practices, and urge this thoughtful guidance continue as the pace of renewable development increases.

Renewable Energy.—The Committee supports the acceleration of renewable energy development on public lands. The Bureau must also ensure that approved projects minimize their impacts on the environment and wildlife, with particular attention to novel methods to protect birds and bats from wind turbine collisions.

BOEM: When new offshore facilities are approved and constructed, they should be required to use the best available technology to monitor and mitigate avian impacts, especially for migratory bird populations.

We recommend minimizing wildlife impacts of renewable energy facility development by encouraging federal agencies to avoid ecologically important areas on public lands and federal waters, and develop a compensatory mitigation fund to offset unavoidable impacts.

Please support minimizing wildlife impacts of renewable energy through the proposed development of MBTA general incidental take permits. A wind energy permit, for example, could be established by making the FWS Land-Based Wind Energy Guidelines mandatory.

These guidelines provide well-vetted best practices for this industry, and can provide baseline protections for wildlife as renewable energy development accelerates. This would provide for better project siting and thus better outcomes, particularly in tandem with a compensatory mitigation fund to offset unavoidable environmental impacts.

Please include language specifying an emphasis on environmentally appropriate siting as well as identification of novel methods to protect wildlife. Few such novel methods yet exist, whereas appropriate siting is the foundation of environmentally-responsible renewable energy development.

We urge you to encourage federal agencies to aggressively incentivize and subsidize energy efficiency measures, and deployment of distributed solar. A recent study by The Nature Conservancy and Defenders of Wildlife found that distributed solar energy could power all of Long Island, New York, with capacity to spare. Distributed solar has a much greater role to play in combating climate changes, and is a powerful job creator with no substantial impacts to wildlife.

Direct the BLM to modify federal coal, oil and gas, leasing and drilling policies to reflect best available science. We are concerned that the expansion of oil and gas drilling on public lands over the past two decades ignored available evidence of the devastating consequences of climate change, and has yet to be properly mitigated. Past development impacts should be addressed and impacted wildlife habitats restored before another new round of industrial-scale developments are considered.

Better renewable energy solutions are available to address the climate change, such as the expansion of distributed solar in the already-developed landscape which will not further harm public lands, and the protection of old growth forests.

Public Lands Protection and Forest Carbon

We are concerned that federal forest policy fails to consider the climate impacts of logging older forests. Most carbon (80%+) is released into the atmosphere soon after logging. This makes the cutting of mature and old growth forests particularly harmful because of the decades or centuries-long carbon debt that is then incurred. ABC and conservation partners have been asking for sound science-based policies to enlist forests into the fight against climate change by conserving mature and old growth forests in the Pacific Northwest since 2009, but this important policy change has yet to be implemented.

Addressing the dual climate and biodiversity crises will require land use changes to protect existing carbon stores held in standing forests, as well as adoption of new conservation measures to maintain or restore biodiversity hotspots. Please include language recommending:

1. The protection of existing carbon stores in mature and old growth forests that provide habitat for the Marbled Murrelet and Northern Spotted Owl.
2. That the Interior and Agriculture Departments initiate a joint study to identify and map lands and waters of highest priority for maintaining biodiversity and climate resilience.

3. Creation of new landowner payment mechanisms, such as a national carbon credit system, to incentivize good forest management practices such as longer rotation forestry, and reforestation in appropriate areas.

Oceans and Seabirds

Action on the Agreement for the Conservation of Albatrosses and Petrels (ACAP) has been stalled for many years, which has allowed many Pacific fishing nations to continue causing high-levels of seabird bycatch by failing to use the available best practices used by U.S. fisheries. Meanwhile, increasing levels of seabird bycatch by U.S. fisheries indicate that additional effort and resources are needed to reduce this preventable mortality. Plastic pollution is a growing and major threat to the oceans that causes seabird mortality from ingestion. Please include language recommending:

1. The Senate vote to accede to the, and enact the Albatross and Petrel Conservation Act to implement the agreement.
2. Amend U.S. fisheries law to conserve seabirds by minimizing bycatch to the extent practicable and providing funds for restoration to compensate for unavoidable bycatch, and
2. Urge federal agencies develop and support policies to reduce plastic pollution that is filling up the oceans and being ingested by seabirds.

Pesticides

We are concerned by the slow response to scientific studies indicating neonicotinoid pesticides are causing significant environmental harm including the contamination of waterways and soils, and insect and bird declines. Please include report language encouraging EPA to:

1. Restrict the pre-emptive use of all currently registered neonicotinoid products, and
2. Conduct a scientific review of their impacts to birds, insects, and the overall environment and report these findings to Congress, and,
3. Complete the pending ban on chlorpyrifos.
4. In addition, request that FWS ban the use of neonicotinoids on National Wildlife Refuges and other important bird habitats.

Lead Ammunition and Fishing Tackle

As many as 16 million birds die each year from ingesting lead, with significant impacts to Bald and Golden Eagles. Worst of all, recovery of the endangered California Condor is currently being limited by ongoing lead poisonings. To address this threat, we urge the Committee to please recommend that FWS:

1. Move to phase out lead ammunition and fishing tackle within a reasonable time period.
2. Provide interim protection from lead for National Wildlife Refuges and important bird areas.

3. Provide funds for hunter education, outreach, and acquisition of nontoxic products to facilitate a smooth transition away from lead.

Thank you for considering these requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Holmer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Holmer
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