

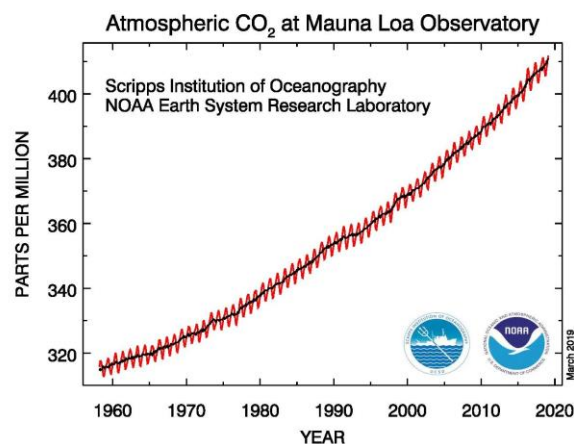
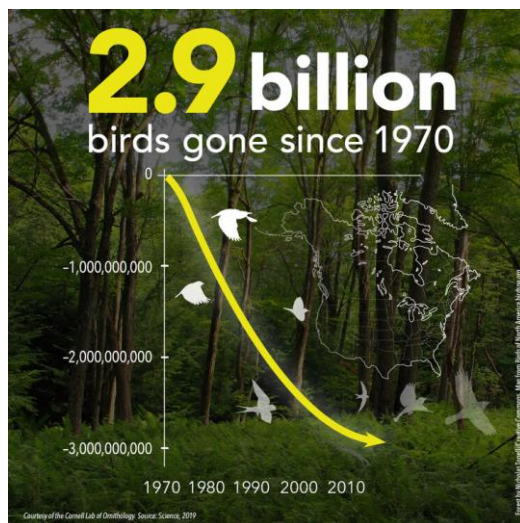


The Honorable Deb Haaland  
 Secretary  
 U.S. Department of the Interior  
 Washington D.C. 20240  
 Docket No. DOI-2021-0016

Dear Secretary Haaland:

Thank you for this opportunity to comment in support of the President's America the Beautiful initiative and to offer our suggestions on how the proposed atlas can be most helpful to advance conservation. The [most recent IPCC climate report](#) has again highlighted the urgent need to protect the health of the planet and people alike. President Biden's historic commitment to [conserve 30 percent of U.S.](#) lands and waters by 2030 is a crucial mechanism for meeting that imperative.

### America the Beautiful Can Help Us Tackle the Climate and Biodiversity Crisis



[We face a dual climate and biodiversity crisis](#) that America the Beautiful can help solve. The conservation of lands and waters are important for both addressing climate change and conserving biodiversity, birds and other wildlife, and their habitats. Like climate, the wildlife crisis is urgent, a [study](#) published in 2019 documented the loss of nearly three billion birds from North America in just the last fifty years.

The benefits of conserving birds extend beyond the environment because a healthy environment is also necessary for people – this includes clean water, clean air, biodiversity, and access to nature-

based recreation. Birds have strong public appeal and are enjoyed by millions of Americans at home, in local natural areas, and on public lands.

As the number of birdwatchers continues to grow, so too do the associated expenditures for travel and birdwatching equipment, which generate billions of dollars for the economy each year. In this way, protecting bird habitat is consistent with improving equitable access to nature and expanding parks and green spaces, especially in historically underserved communities.

Priority areas for bird conservation deliver a broad array of social and environmental benefits, including fish and wildlife habitats, recreation areas, and ecosystem services. For example, the same habitat needed to conserve threatened birds like the Marbled Murrelet also protects valuable carbon sinks and stocks that address the climate crisis. Achieving these co-benefits requires that we strategically direct our efforts to inventory, monitor, and map the most important places, as recommended in a [June letter](#) from the House Natural Resources Committee.

This scientific approach can identify land- and seascapes most important as biodiversity and climate refuges, as well as needed restoration areas. These data can then support a public stakeholder process that further engages local, State, Tribal and regional constituents in a dialogue about how best to achieve conservation and restoration of these priority areas. Important ecological areas in the marine environment should be considered along with a variety of precautionary conservation measures ranging from ecosystem management of fisheries to designation of protected areas.



Photo by Jason Yoder

We commend the Department for developing the stewardship atlas and proposing an inclusive approach to ensure that conservation efforts on private and state lands are properly recognized and considered. The Migratory Bird Joint Venture partnerships offer numerous examples of how habitats can be conserved and restored to benefit wildlife and ecosystem function essential to maintaining climate resilience.

The Lower Mississippi Valley Joint Venture partnership has been focused on hardwood forest restoration and conservation in the Mississippi Alluvial Valley since the mid-1990s. During this time over 1 million acres of flood-prone agricultural land have been restored to bottomland hardwood forest benefitting high priority bird species such as Prothonotary Warbler, Northern Parula, Wood Thrush, Yellow-throated Warbler, and Red-shouldered Hawk.

We ask that layers be included within the atlas to help the public understand and assess which lands and waters are of highest importance to maintaining climate resilience, and of high biodiversity. We recommend that these data sets be the basis for further analysis and a public stakeholder process to identify strategies to protect or restore areas that are not yet permanently protected.



Substantial new data is available such as: [Areas of Unprotected Biodiversity Importance](#) (AUBIs) for species in the lower 48 United States that are protected by the Endangered Species Act and/or considered to be in danger of extinction.

This map, developed by NatureServe and others, displays areas of unprotected biodiversity importance for species in the lower 48 United States that are protected by the Endangered Species Act and/or considered to be in danger of extinction.

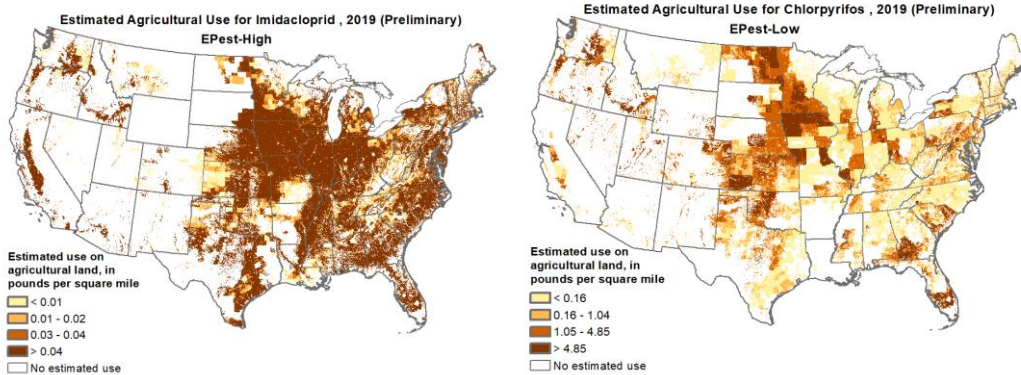
In addition, there are significant acreages of public lands already being managed for conservation purposes that require added protection. We recommend that these lands, which could include designated roadless areas, late-successional reserves in the Pacific Northwest, and priority sagebrush habitat, and other already-designated conservation lands that are not permanently protected, also be analyzed and considered for added protection as climate and biodiversity refuges.

It is essential that added conservation measures be deployed for these areas because numerous attempts have been made to weaken existing protections, and/or to promote development that has resulted in their loss, diminishment, or severe degradation. For example, the reversal of conservation measures for sagebrush habitat in federal management lands, 14,000 miles of new rights of way being permitted, and over one million acres of priority sagebrush habitat being leased for oil and gas drilling has all occurred since 2015.

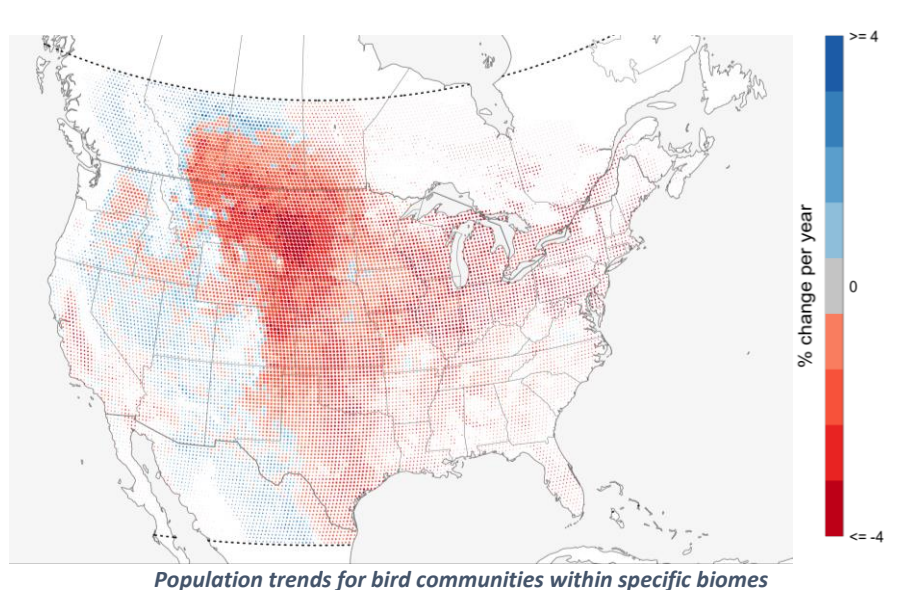
Critical conservation measures such as the [Presidential Memorandum on Mitigation](#), intended to help balance conservation with development and better protect public lands with a net-conservation benefit mitigation standard and the identification and protection of irreplaceable resources, was rescinded by the last administration. We are concerned that this essential framework for balanced and sustainable management and protection of public lands, and a key part of President Obama's conservation legacy has yet to be restored or replaced with any meaningful new protections.

Moreover, as scientists have documented a severe decline in birds, particularly grassland birds, pesticide regulation and protective measures by the Environmental Protection Agency have lagged far behind the available research. National Wildlife Refuges also continue to allow widespread use of systemic pesticides that are harmful to birds, insects, and aquatic life.

Though many agricultural pesticides appear to be well tested and thoroughly reviewed, this is rarely the case. These pesticides and their metabolites easily travel into non-target soil, groundwater, and pollinator habitat, triggering devastating ripples of lethal and sublethal effects. Understanding where pesticides are used and which critical areas of habitat would be affected are key to the sustainable preservation of biodiversity.



We appreciate that EPA has banned chlorpyrifos for US consumers, but agricultural areas where food is grown for export can still use this dangerous pesticide. Closing this loophole is needed protect human lives overseas, and to fully eliminate the environmental harms being caused by chlorpyrifos in the US.



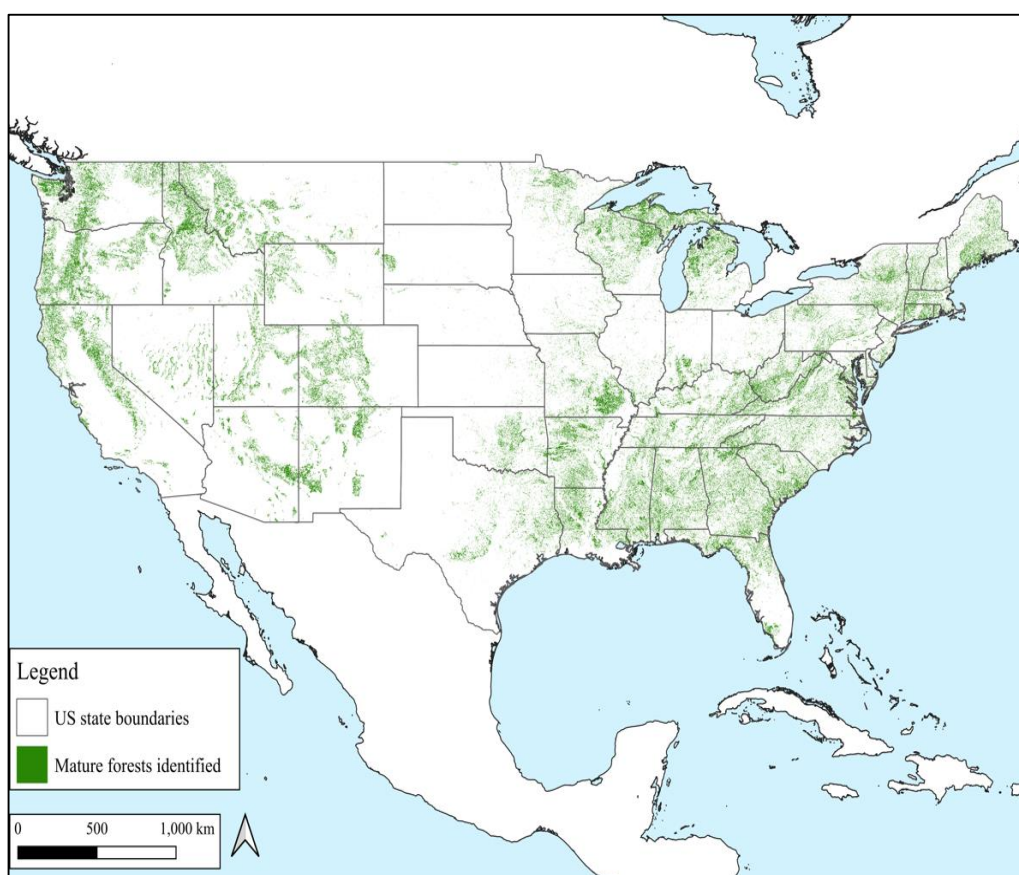
Contamination from lead ammunition from hunting on public conservation lands is causing severe harm to Bald Eagles, Golden Eagles, and other raptors. New protective measures from toxic pesticides and lead for National Wildlife Refuges and other public lands are urgently needed to ensure that these lands actually fulfill their mission to conserve and provide for wildlife habitat and other ecosystem services.

With renewable energy production on the rise, it is important that new facilities are planned and implemented in a way that minimizes their impact to birds and habitats. One key climate solution benefiting birds is to further incentivize solar installations in the already developed landscape, including on rooftops and in parking lots and brownfield sites. Installations at these sites will speed the growth in renewable energy and lower the risks to birds and habitats posed by other sources of energy production, associated new power lines, and climate change.



It is important to have regulations that ensure impacts are mitigated and that available best management practices are used as the energy infrastructure is transformed to accommodate renewables. This can be accomplished through use of the National Environmental Policy Act, incidental take permitting under the Migratory Bird Treaty Act, and mitigation and adaptive management requirements.

Another key climate solution comes from reforestation and [protecting existing carbon stores](#). Currently, 11 percent of U.S. emissions are absorbed by forests, but projected loss of forests to urbanization could see this natural carbon reduction cease sometime during the 2020s. Keeping these forests as forests, protecting high carbon areas, sustainably managing forests to build carbon stores over time, planting extensive new forests, and increasing urban forest cover — all of these actions benefit the climate *and* provide increased habitat for birds.



Old growth and mature forests hold significant carbon stores, sequester more carbon than younger forests, and provide important habitat conditions and structures needed by many species of birds and other wildlife. The mature forests mapped above by NatureServe, DellaSala et. al., are excellent candidates for further analysis to determine where additional protection, and in some cases restoration to provide suitable structures for wildlife would be appropriate.

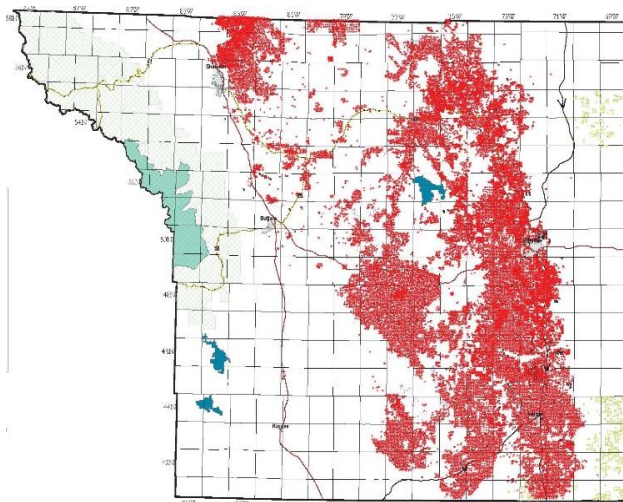
## Recommendations

The notice's key question about outcome reflects the emphasis on the positive contributions being made by many different stakeholders. We support including all of the numerous positive contributions being made and agree with the inclusive and positive messages being delivered by the administration in support of the America the Beautiful.

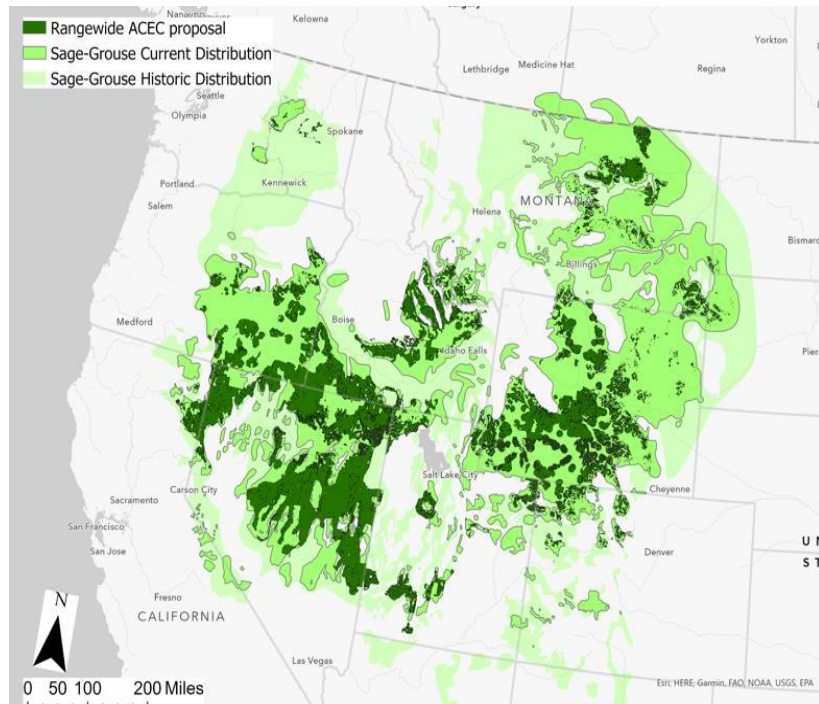
In addition, to help meet the thirty percent goal, the atlas should also account for ongoing negative changes to the landscape, as well as to inform the public on what the potential next steps will be to achieve the goal of conserving thirty percent of America's Lands and Waters. Therefore, we recommend:

1. **Maintaining and protecting the current conservation lands.** Given recent and already approved development impacts, rollbacks of important environmental protections, and mandates to expand energy development on federal public lands, added protections as outlined are above are necessary to keep the current level of conservation in place.
2. **Offering a complete and accurate picture.** We recommend that the atlas identify and provide a time-lapse view of the public land's conservation status. For example, public lands have been developed for oil and gas drilling over the past thirty years -- after the world's scientists had already proven that this would cause catastrophic damage to the atmosphere. In addition to harming the climate, these drilling decisions have degraded the public lands, and in the case of Greater Sage-Grouse, eliminated populations from former strongholds like the Powder River Basin.

**These substantial conservation losses should be accounted for, and be included in the atlas to provide a complete and balanced view to the public about whether we are reaching the 30 percent goal, or moving further away from it as may now be the case.**



*Gas wells in the Buffalo Resource Planning of Wyoming where new oil and gas wells from 1999-2008 tallied 27,122 with another 10,343 projected through 2028.*



*Nominated ACECs in the context of current and historic sage grouse distribution.*

3. **Identifying new areas for protection and restoration.** To reach the 30 percent goal will also require designating a considerable amount of new areas emphasizing conservation and restoration. According to the [U.S. Geological Survey](#), the U.S. has conserved about 26 percent of its coastal waters and 12 percent of its land. Outlined above is a scientific and public engagement process to identify and conserve at risk federal public lands and waters, that would provide a major down payment to achieve the goal. A similar initiative could engage stakeholders to assess how to further expand and incentivize successful conservation efforts on private and state lands to make another substantial new contribution.

Thank you for announcing America the Beautiful. We appreciate this opportunity to comment in support of this bold and needed vision to address the dual climate and biodiversity crisis. Please let us know how we can be of assistance.

Sincerely,

**Steve Holmer**  
 Vice President of Policy  
 American Bird Conservancy  
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[sholmer@abcbirds.org](mailto:sholmer@abcbirds.org)

## **Additional Resources**

**Identifying key federal, state, and private lands strategies for achieving 30 × 30 in the United States**

<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12849>

<https://defenders-cci.org/publication/identifying-key-strategies-for-achieving-30x30/>

**IPBES-IPCC CO-SPONSORED WORKSHOP BIODIVERSITY AND CLIMATE CHANGE - WORKSHOP REPORT**

[https://ipbes.net/sites/default/files/2021-](https://ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf)

[06/20210609\\_workshop\\_report\\_embargo\\_3pm\\_CEST\\_10\\_june\\_0.pdf](https://ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf)

**Areas of Unprotected Biodiversity Importance** for species in the lower 48 United States that are protected by the Endangered Species Act and/or considered to be in danger of extinction.

**Strategic Forest Reserves can protect biodiversity in the western United States and mitigate climate change**

<https://www.nature.com/articles/s43247-021-00326-0>

**The importance of U.S. national forest roadless areas for vulnerable wildlife species.**

[https://www.sciencedirect.com/science/article/pii/S2351989421004935#:~:text=Inventoried%20roadless%20areas%20\(IRAs\)%20in,of%20the%20Earth%20by%202030.](https://www.sciencedirect.com/science/article/pii/S2351989421004935#:~:text=Inventoried%20roadless%20areas%20(IRAs)%20in,of%20the%20Earth%20by%202030.)

**Solutions for Conserving Birds and Halting Climate Change**

<https://abcbirds.org/wp-content/uploads/2019/05/ABC-Energy-and-Climate-Solutions.pdf>

Kerr, Andy. 2022. [Forty-Four Conservation Recipes for 30x30: A Cookbook of 22 Administrative and 22 Legislative Opportunities for Government Action to Protect 30 Percent of US Lands by 2030](#). The Larch Company, Ashland, OR, and Washington, DC.