

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Secretary Haaland and Secretary Vilsack:

The undersigned organizations represent a growing partnership among organizations that collectively work with farmers, ranchers and landowners on hundreds of millions of acres across every continental western state. Our diverse organizations find common ground in our recognition that well-managed private and working lands play a pivotal role in sustaining healthy landscapes and thriving rural communities.

Throughout the transition and early months of the Biden-Harris Administration, we appreciated your recognition of the value of working lands and your commitment to hearing our perspectives. We particularly appreciate that the interim report, “Conserving and Restoring America the Beautiful” (henceforth referred to as, the “Initiative”) calls for leadership from local communities and those who steward the nation’s land and natural resources on a daily basis.

*“This report is only the starting point on the path to fulfilling the conservation vision that President Biden has outlined. Where this path leads over the next decade will be determined not by our agencies, but by the ideas and leadership of local communities. It is our job to listen, learn, and provide support along the way to help strengthen economies and pass on healthy lands, waters, and wildlife for generations to come.”*

Individually and collectively, our organizations stand ready to help provide that leadership. We propose a collaborative engagement process with the administration to identify solutions to keeping our working landscapes whole and healthy for the benefit of people, wildlife, and the ecosystems on which we all depend. In addition to our own ongoing discussions and efforts to find common ground with a range of interested organizations, we suggest the following process.

### **Process Recommendations**

- A series of professionally facilitated work sessions, hosted by our organizations and attended by federal officials from relevant agencies, state agency officials, conservation NGOs and other interested organizations.
  - Organizations will be invited to submit recommendations for consideration during the work sessions, with the ultimate goal of identifying actionable, joint recommendations among non-federal participants.
  - To the extent feasible, federal officials could provide guidance on discussion themes and present questions for attendees to consider.
- Resulting recommendations can then inform the U.S. Department of the Interior (DOI) and U.S. Department of Agriculture (USDA) (collectively, “the Departments”) in developing policy on the suggested subjects below and guide implementation of the Initiative.

- Beyond this initial set of work sessions, subsets of attendees could develop ongoing conversations on specific issues to help inform the Departments where there is common ground on issues.
- In addition to facilitated work sessions, this group can serve as the foundation for an ongoing forum for dialogue, information exchange and policy development on working lands conservation stewardship.
- Additionally, as a product of these sessions, a publicly available report could be produced to ensure transparency of the process and inform decision-makers elsewhere.

There are seven topics that merit thoughtful consideration and we invite the administration to work with us through the structured engagement process described above:

### **How do we define conservation and measure success?**

In many places, healthy, resilient landscapes exist in concert with, not in spite of, responsible livestock grazing and other agricultural activities. We are concerned by the rate of biodiversity decline and native habitat, particularly in grassland ecosystems. As you are well aware, the causes for these declines are complex and multi-factored. However, land conversion plays a major factor.

To be successful and enduring, conservation must be considered holistically, taking into account both the human and natural communities that contribute to keeping ecosystems and working landscapes intact and functional. For example, narrow policy proposals that disconnect the role of responsible grazing, or even seek to eliminate this practice, from grassland function will result in cascading impacts to habitat connectivity, soil health, wildlife habitat, and carbon sequestration. These actions will also create added strain on rural communities.

In the Intermountain West, flood-irrigated wet meadows provided by ranchers as part of their agricultural operations comprise the bulk of the wetland habitat in snowpack-driven systems. These hay meadows and irrigated pastures provide important habitat for sandhill cranes, white-faced ibis, northern pintails, and other priority waterbirds, as well as an array of ecosystem benefits. Flood irrigation naturally maintains underlying groundwater that is less vulnerable to a warming climate and key to supporting seasonally flooded wetlands on the surface. Filling these “sponges” through flood irrigation is critical to slowing the movement of water through the system and thus increasing resiliency in the face of drought. Likewise, upland watershed and forest management activities can help increase water quality and quantity, as well as mitigating the risk of catastrophic wildfire.

This is not to suggest that promoting holistic management through policy is simple. We understand the challenge presented by balancing these various factors within the constraints of existing authorities and statutory obligations. We recognize that perfect solutions to complex problems do not often exist. However, through tapping into local capacity, investing in effective and trusted structures, and building in flexibility with retained accountability in land management policy we believe that a balance can be found.

With this in mind, we propose to assist the Administration as you seek to develop the American Conservation and Stewardship Atlas to *“measure the progress of conservation, stewardship, and restoration efforts... in a manner that reflects the goals and principles outlined in this report.”*

**How do we define “community”, what is meant by “locally led”, and how can community-led and/or locally led conservation be better integrated and supported in policy?**

People have different interpretations of the terms “community” and “locally led conservation.” Local governments, local populations, communities of practice, and various stakeholder groups can all be counted as some form of “community”. Geographic scale is also a consideration, among others.

The most successful models of place-based collaborative groups or community-based organizations often have strong and trusted local leadership, intimate knowledge of local challenges and stakeholder dynamics, and deep connections to both the surrounding communities and landscapes. They are often the lead on large landscape conservation projects, conduct educational outreach, provide technical assistance, connect landowners to federal resources such as farm bill funding, and play an essential role in coordinating stakeholders, including local, state, and federal agencies. The collaborative and relationship-based structure of these groups also often leads to more durable conservation outcomes, which ultimately benefits the resource and the community and can lead to innovative multi-partner solutions. However, many of these community-based and locally led organizations lack human, technical, and financial capacity to grow and sustain these efforts over time. Leaders of collaboratives often wear multiple hats and run those efforts in addition to other full-time responsibilities.

While developing new frameworks or initiatives may be necessary in some cases, we wish to discuss how to support and expand the existing network of locally led collaboratives and collectively empower local conservation leadership. providing additional funding and human capacity to support existing local expertise, leadership and collaboration will likely be more important.

**In addition to funding for short-term conservation and restoration work, how do we pay for ongoing ecological stewardship?**

We understand the need for and support near-term investments in conservation, restoration, and community-support. We also support increased investment in programs that support establishment of conservation easements, like the USDA’s Agricultural Conservation Easement Program. This work will provide critical assistance to landscapes impacted by drought, catastrophic wildfire and other challenges. However, as a group we agree that a structural gap in funding support exists for ongoing stewardship of working landscapes.

Beyond cost-share agreements, technical assistance and other short-term funding arrangements, we propose to assist in identifying opportunities to expand collective investment in stewardship. This includes mechanisms like federal and state conservation trust funds or endowments and developing strategies to fund and implement multi-year stewardship contracts, habitat leases, conservation agreements and watershed restoration initiatives. We believe that a dedicated focus to these long-view investments in stewardship are key to stemming biodiversity loss, increasing climate resilience, and improving community well-being in both rural and urban areas.

To ensure the long-term health and resiliency of working landscapes, we request that the Departments use President Biden’s challenge to “*conserve and restore the health and productivity, and connectedness of the lands and waters*

*upon which every community depends”* to consider how to fill this gap and support long-term stewardship in the public interest.

### **How can we improve federal funding programs and delivery, and how can groups with direct experience and local relationships help guide federal funding allocations?**

To increase stakeholder confidence and ensure effective delivery, the Departments should invite outside guidance and clearly state to the maximum extent practical, the intended impact of funds, method of distribution, and other discretionary factors. For example, Title VI, Section (1)(D) of the Infrastructure Investment and Jobs Act provides \$50,000,000 to the U.S. Fish and Wildlife Service (FWS) for sagebrush steppe ecosystem restoration with little further instruction.

We understand that the Departments have limited influence over specific legislative prescriptions and that further direction may be provided as the legislative process unfolds. We also believe that a certain amount of discretion based on agency expertise is necessary to ensure proper allocation of funds. However, we submit that our collective on-the-ground experience can serve as a guide to ensure that such funds broadly dedicated to conservation and restoration are best utilized to the benefit of ecosystem function, local community vitality and working lands health.

To that end, we request as a part of this ongoing process an opportunity to provide guidance on the usage of discretionary funds that would support working lands stewardship under the Initiative and other cross-boundary working lands conservation programs or initiatives. Such guidance might include drawing on our collective networks to provide constructive feedback on current and proposed programs.

### **How can we improve public lands management and agency/landowner relationships?**

Through updating federal land management agency policy and guidance, the Departments have the opportunity to actively manage for both the ecological health of land along with the economic prosperity of neighboring communities. To balance these objectives, our groups believe that land management strategies should be informed and supported by those working closest to the ground, and that agencies must increasingly look to work across jurisdictional boundaries and break down institutional silos both within and across agencies.

Our organizations have firsthand experience facilitating cross-boundary conservation efforts and supporting local conservation leadership. In doing so, we have identified a number of barriers to improved public lands management. Beyond agency management policy, we wish to discuss interagency frameworks for coordination and collaboration with local leaders and institutional bottlenecks to more effective, understandable and inclusive processes. With the Departments’ guidance, expertise and capacity and our positioning as effective conveners, partners and advocates for working lands stewards, we believe that we can collectively begin to address known issues that will hamper effective implementation of the Initiative and other cross-boundary conservation efforts.

## **How can we remove regulatory barriers to conservation?**

From our decades of collective expertise, we are aware of numerous barriers that prevent interested landowners and other entities from participating in programs administered by the Departments and, ultimately, prevent funding from reaching the ground in a meaningful way. Statutory limitations such as program payment caps can create misalignment between program eligibility and conservation objectives. Regulatory hurdles, for example presented through interpretation of the National Environmental Policy Act, can prolong agency action. More obscure administrative barriers in terms of federal agency staff capacity and siloed communication structures also manifest in very tangible hindrances to effective program implementation on the ground and further complicate already complex processes.

For example, Candidate Conservation Agreements with Assurances and Safe Harbor Agreements can serve as useful tools to ensure that landowners efforts to conserve and recover at-risk and listed species do not put them in jeopardy of further regulatory restrictions as a result of their conservation actions. However, these agreements are time consuming and sometimes costly to landowners to develop. Beyond agreement development though, the cost of ongoing implementation, monitoring and reporting is largely unaccounted for and often falls on landowners, the state or other agreement holders. There are certain funds that can provide cost-share assistance in developing these agreements, but ongoing support for implementation, monitoring, management and stewardship remains a gap and presents a hurdle to the long-term success of the Administration's conservation objectives.

## **How can we support working lands stewardship as a strategy to deliver natural climate solutions and improve community and landscape climate resiliency?**

We commend the Administration for committing to use science as a guide in implementing the Initiative. We see promise in the potential for science to serve as the basis for a range of policy and market-based opportunities to adequately recognize, scientifically inform and financially support working lands stewardship. At the same time, we believe that it is essential in designing carbon markets that a range of benefits beyond just carbon sequestration are considered. For example, in some parts of the country, no-till practices and cover cropping may generate marketable benefits in terms of carbon sequestration. However, in arid landscapes dominated by rangeland, carbon benefits from practices may be more difficult to quantify, capture and compensate.

In the West, healthy grasslands and rangelands are already serving as carbon sinks and sequestering additional carbon through management in some cases. They also support biodiversity and agricultural livelihoods and are facing increasing pressure from manmade and natural forces. Beyond possible market-based opportunities, we believe that for science to effectively guide conservation priorities and investment, there must be a two-way information exchange where direction is coming out of communities and supported by regional coordination and science, as opposed to high-level priority setting being pushed down and driving locally led conservation.

## **Conclusion**

We appreciate the opportunity to engage in ongoing discussion around how to effectively support working lands stewardship as a means of achieving the Administration's conservation and community development

objectives. We respectfully submit these recommendations and invite you to an ongoing discussion to further expand on these ideas.

Sincerely,

Altar Valley Conservation Alliance

Chama Peak Land Alliance

Family Farm Alliance

Heart of the Rockies Initiative

Malpai Borderlands Group

Partnerscapes

Partnership of Rangeland Trusts

Rural Voices for Conservation Coalition

Western Landowners Alliance

Cc:

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Tanya Trujillo, Assistant Secretary for Water and Science, U.S. Department of the Interior

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Dr. Homer Wilkes, Under Secretary for Natural Resources and Environment, U.S. Department of Agriculture

Matt Lee-Ashley, Chief of Staff, White House Council on Environmental Quality