

April 24, 2024

The Honorable Brenda Mallory
Chairwoman
Council on Environmental Quality
730 Jackson Pl NW
Washington, D.C. 20006

Dear Chairwoman Mallory:

The undersigned sportsmen, women and other conservationists to urge the Administration to address the loss of our Nation's wetlands through a wetlands net gain pledge. Wetlands are of great importance to hunting, fishing, outdoor recreation and as habitat for wildlife. Hunters know first-hand the importance of wetlands-as bedding and foraging sites for big game animals, breeding areas for waterfowl, and critical wintering habitat for ringneck pheasants just to name a few. Hunters are confronted with the consequences of wetland loss and degradation in a close and proximate way.

Recently the U.S. Fish and Wildlife Service released the "Status and Trends Report 2009-2019" which documents the ongoing and persistent loss of wetlands across the country. These identified losses, in addition to the historic losses, continue to represent a critical concern for all sportsmen and women.

While the challenge of ongoing wetland loss is a crucial one, we perceive opportunities to reverse the trend. Administrations dating back to the Carter Administration noted the concern of wetland loss for wildlife, sportsmen and women, but also the myriad of public benefits they provide in water storage, drought resilience, preserving water quality, and sequestering carbon. The original no-net loss pledge made by George H. W. Bush in 1989 harnessed a whole of government approach to trace wetland trends and commit resources to achieve the no-net loss goal. This approach was sustained by each Administration until 2016.

Our community is asking for a commitment to a net gain pledge to continue wetland conservation, restoration and enhancement as a priority of the Biden Administration and to expand the vision to accomplish even more by pushing beyond "no net loss" to achieve a net gain in wetlands across the country.

Additionally, we also perceive that these gains can be achieved in a non-regulatory manner, harnessing the power of voluntary and incentive-based approaches to engage farmers, ranchers and other private landowners in a way that capitalizes on local problem solving and achieving real and meaningful conservation outcomes. Many federal agencies have the expertise, capability, and existing programming to address this goal including the United States Fish and Wildlife Service, Bureau of Land Management and the Natural Resources Conservation Service amongst others.

While we recognize the lateness in establishing new Administration mandates and creating new initiatives and programming, the undersigned believe the following represent some immediate action that can parallel a net gain pledge and quickly lead to meaningful wetland conservation results.

- 1. Fully Invest in the Migratory Bird Resurgence Initiative** developed and presented to USDA-NRCS. This proposal would provide for a voluntary and incentive based approach to the conservation of small wetlands in the Prairie Pothole Region (PPR) and incentives to producers in key wintering areas for the post-harvest flooding of agricultural lands. Investment in this approach would provide wetland habitat on 500,000 acres of working agricultural land in California, Texas, Louisiana, Arkansas and Mississippi and would conserve more than 50% of the Prairie Pothole Region's small wetlands in cropland. Enhancing small wetlands in the PPR would store 9,475,584 tons of carbon, and annually "digest" 16,354,017 pounds of excess nitrogen and 1,633,594 pounds of phosphorus while also annually storing 276,709-acre feet of water to mitigate the impact of both drought and deluge.
- 2. Utilize Full Funding from the Land and Water Conservation Fund** to purchase wetland and grassland easements in the Prairie Pothole Region from willing farm and ranch owners. These easements reward the conservation stewardship of private landowners while ensuring the land is conserved in perpetuity. These wetlands and grasslands support a diversity of wildlife-from waterfowl to Whooping Cranes and a large array of declining grassland bird species. A \$25 million investment in LWCF would conserve an estimated 26,000 acres annually and store 446,186 tons of carbon while also preserving water quality.
- 3. Utilize the Authority under Wetland Reserve Easement (WRE), Regional Conservation Partnership Program (RCPP), Working Lands for Wildlife (WLFW), Environmental Quality Incentives Program (EQIP), Conservation Stewardship Program (CSP), and IRA Funding** to conserve, restore and enhance wetlands using the full spectrum of USDA conservation programming.
- 4. Target USFWS Deferred Maintenance Investments to High-Value Wetland Projects.** Provisions under Great American Outdoors Act provided for significant (roughly \$95 million/year) to address failing infrastructure on our Nation's refuges. As you know, many of these refuges were acquired because they included nationally or regionally important wetland resources. Unfortunately, much of the infrastructure is in disrepair and must be replaced in order to provide refuge managers the ability to optimize wetland habitat management.
- 5. Request funding for the North American Wetlands Conservation Act (NAWCA) at authorized levels.** Prioritize NAWCA within the President's budget to fully capitalize on the authorized levels provided by Congress. Recent legislation is advancing in the Senate which would reauthorize NAWCA at \$65 million a year while harnessing the power of robust non-federal matching funds.
- 6. Establish a process to ensure USDA Wetland Determinations are Scientifically Sound** so producers and the public can be confident that the best available science is employed to determine the presence or absence of a wetland.

7. **Modernize the National Wetland Inventory (NWI) and other geospatial data** to better monitor and evaluate wetland values and function at the landscape level. The establishment or utilization of an existing interagency working group would improve mapping and the transparency between publicly generated data.

The conservation community has consistently advocated for strong measures to conserve wetlands, as evident by current and previous iterations of the American Wildlife Conservation Partners (AWCP) **Wildlife in the 21st Century** policy recommendations. We appreciate your serious consideration of the net gain pledge and concurrent action as identified above to conserve and enhance the nation's important wetland resources.

Sincerely,

American Woodcock Society
Archery Trade Association
Association of Fish and Wildlife Agencies
Backcountry Hunters & Anglers
Boone & Crockett Club
California Waterfowl
Camp Fire Club of America
Catch-A-Dream Foundation
Congressional Sportsmen's Foundation
Conservation Force
Delta Waterfowl
Ducks Unlimited
Houston Safari Club
Izaak Walton League of America
Masters of Foxhounds Association
National Shooting Sports Foundation
National Wildlife Federation
North American Grouse Partnership
Orion: The Hunter's Institute
Pheasants Forever
Pope & Young Club
Public Lands Foundation
Quail Forever
Ruffed Grouse Society
The Wildlife Society
Theodore Roosevelt Conservation Partnership
Whitetails Unlimited
Wildlife Mississippi

Cc: USDA Secretary Tom Vilsack, DOI Secretary Debbie Haaland and EPA Administrator Michael Regan