



March 3, 2022

The Honorable Deb Haaland
Secretary
United States Department of the Interior
1849 C St, NW
Washington, DC 20240

RE: Doc. No. 2021-28548

Dear Secretary Haaland,

On behalf of the National Association of Counties (NACo), the only organization representing the nation's 3,069 counties, parishes and boroughs, I write to you regarding the interagency request for information on the America the Beautiful Initiative's American Conservation and Stewardship Atlas (the Atlas). Counties appreciate the opportunity to offer these written comments. We also thank the administration for holding an in-person discussion session with county officials at the 2022 NACo Legislative Conference in addition to meeting numerous times on this issue over the past year.

County governments meet the needs of local residents and visitors by providing critical infrastructure maintenance and construction, emergency response services, education, public health, environmental cleanup and drinking water systems. As intergovernmental partners, co-regulators and environmental stewards, counties also play an integral role in conservation policy. We support active forest management projects on and off federal lands, science-based wildlife management practices, the reclamation of abandoned mines and wells, and a focused effort to remove invasive species as key components of conservation policy. While pristine lands, such as wilderness areas designated by Congress, can meet important ecological needs, conservation reflects a broad array of practices based on the best and wisest use of our natural resources.

County officials still believe the administration must define key terms and goals before implementing the America the Beautiful Initiative. The Atlas can only be created once the administration sets specific terms and places benchmarks for what qualifies as conserved. In multiple meetings with county officials, the administration stated that the definition of conservation should be "flexible." Counties agree that conservation is a broad, collaborative set of principles, but we must have clarity on how the administration plans to catalog what is considered "conserved" to effectively assist our federal partners with collecting reliable data and other relevant information.

Therefore, last month at the NACo Legislative Conference, we adopted an interim policy resolution¹ urging the administration and Congress to adopt the Congressional and Senate Western Caucus' *Western Conservation Principles* white paper² as the definition of conservation under the America the Beautiful Initiative. The policy prescriptions outlined in *Western Conservation Principles* provide a robust roadmap for how federal agencies

¹ https://www.naco.org/sites/default/files/documents/2022-Adopted-Interim-Resolutions-Packet_2-15-22.pdf

² https://westerncaucus.house.gov/uploadedfiles/10.5.2021_western_conservation_principles_final.pdf

can best understand the variation in conservation practices around the nation to meet the unique environmental needs of each community.

The principles of this document reflect how counties define conservation to include all of the multiple-use tools available to federal agencies to conserve and restore landscapes, including: active management projects on and off federal forests and grasslands (including mechanical thinning, controlled burns and timber harvests), cleanup of abandoned hazardous sites, wildlife habitat restoration, recovering species populations through collaborative agreements with governing partners and local private stakeholders, combatting invasive species, reducing duplicative and burdensome federal regulations that limit or delay essential conservation work on federal lands, expanding access and recreational opportunities on public lands, maintaining water supply and delivery infrastructure and working with the private sector to better implement existing voluntary conservation programs. The *Western Conservation Principles* embraces this approach to conservation, which can guide the administration to develop the Atlas in a cooperative manner that reflects the reality on the ground of how all levels of government and private landowners are partnering to ensure our resources are conserved for future generations.

Finally, the Atlas and the overall America the Beautiful Initiative should not be a mechanism to procure more lands and waters for the federal government, which currently owns approximately 28% of the land mass of the United States. Much of this land is preserved as wilderness, wilderness study areas, national parks, national monuments, or under other restrictive designations. Counties are proud of our nation's public lands conservation legacy and work closely with agencies on land and resource management plans for these protected areas. However, increased federal land and water ownership can negatively impact our local tax base and limit economic potential. We ask the administration to focus the Atlas and the entire America the Beautiful Initiative on better conservation of the land and resources the federal government currently owns.

Conservation practices are best implemented collaboratively at the local level between federal agencies and impacted intergovernmental partners and private landowners. We ask that the Atlas reflect these principles as laid out in *Western Conservation Principles* and look forward to continued dialogue as the Atlas is developed and implemented. Should your staff have any questions or concerns, please do not hesitate to contact Jonathan Shuffield, Legislative Director for Public Lands and Liaison to the Western Interstate Region at jshuffield@naco.org or 512.965.7268.

Sincerely,

A handwritten signature in black ink that reads "Matt Chase". The signature is written in a cursive, flowing style with a large loop at the beginning of the name.

Matt Chase
Executive Director/CEO
National Association of Counties

Cc: The Hon. Brenda Mallory, Chair, Council on Environmental Quality
The Hon. Gina Raimondo, Secretary, U.S. Department of Commerce
The Hon. Tom Vilsack, Secretary, U.S. Department of Agriculture