

## Hunting and Wildlife Conservation Council Fall Meeting: December 4, 2023

### *Meeting Agenda*

---

**Meeting venue: Department of the Interior Stewart Udall Building, North Penthouse, 1849 C Street, N.W., Washington, D.C. 20240; and virtually via Microsoft Teams**

#### **Directions for the North Penthouse**

- Please enter the building through the C Street entrance so that you can clear security. Your name will be on the building entry list.

#### Stairwell Directions

- Enter through the C street entrance and process through security. Once through security take the first bank of elevators to the 7th floor. Proceed north on the 7th floor. At the 7500 west corridor you can take the stairwell to the North Penthouse.

#### Elevator Directions

- Enter through the C street entrance and process through security. Once through security take the first bank of elevators to the 7th floor. Proceed north on the 7th floor, take private elevator located between the 7500 and 7600 corridors to the North Penthouse.

*All times are eastern time*

9:00 a.m.        **CONVENE**

Welcome and Council member introductions

Meeting overview

- *Collin O'Mara and John Devney, HWCC Chair & Vice Chair*

- Approval of September 12, 2023 meeting minutes

9:15 a.m.        Comments of Martha Williams, Director – U.S. Fish and Wildlife Service

9:45 a.m.        Public comment session

10:15 a.m.      Council Subcommittee report-outs

▪ Wildlife Health: Land Tawney, Chair

○ Discussion of Subcommittee work regarding possible best practices for considering the future use of lead-based ammunition on lands of the National Wildlife Refuge System

- Hunting & Recreational Shooting: Jeff Crane, Chair
  - Discussion of Subcommittee issues including the National Wildlife Refuge System Strategic Growth Plan and a conservation funding issue related to firearms manufacturing.
- Public Lands: Joel Webster, Chair
- Private Lands: Michael Crowder, Chair
  - Discussion of Subcommittee issues related to USDA wetlands conservation programs and an issue related to net-gain of wetlands habitat.
- Conservation Funding: Joel Pedersen, Chair
- Public Engagement/R3: Keith Tidball, Chair

11:00 a.m. Briefing on 2023 National Survey of Hunting, Fishing, and Wildlife-Associated Recreation  
- Jerry Leonard, Economist – Wildlife & Sport Fish Restoration Program, U.S. Fish & Wildlife Service

11:30 a.m. Briefing on Dingell Act section 4103 open/closure protocols (45 minutes)  
- Kevin Oliver, Chief – Division for Recreation and Visitor Services, Bureau of Land Management  
- Scott Haas, Program Manager - National Dispersed Recreation, U.S. Forest Service

12:00 p.m. **LUNCH (Lunch boxes will be served in the Bison Bistro)**

1:15 p.m. **Federal agency briefings (approximate times)**

Briefing on 2023/2024 National Wildlife Refuge System Refuge Hunt/Fish rule (15 minutes)  
- Cynthia Martinez, Chief – National Wildlife Refuge System, U.S. Fish & Wildlife Service

1:45 p.m. Briefing on land appraisal process for LWCF & easement acquisitions (45 minutes)  
- Brian Bloodsworth, Director - Great American Outdoors Act Program Management Office, U.S. Department of the Interior  
- Jody Holzworth, Acting Director - Lands, Minerals & Geology, U.S. Forest Service

2:15 p.m. **BREAK**

2:30 p.m. **Bureau of Land Management updates**

Status of BLM Aquatic Restoration Categorical Exclusion to expedite riparian and wetland habitat restoration activities on BLM public lands (20 minutes)  
- Melissa Dickard, BLM HQ Senior Riparian Specialist, Bureau of Land Management

Update on the BLM proposal to modernize and streamline how the agency notifies the public of temporary closure and restriction orders  
- *Kevin Oliver, Chief – Division for Recreation and Visitor Services, Bureau of Land Management*

3:15 p.m. Update on Bipartisan Infrastructure Law/Inflation Reduction Act implementation  
- *Chris Nolin, Budget Officer, U.S. Fish & Wildlife Service*

3:45 p.m. Open discussion

4:00 p.m. **ADJOURN**

**\*\*NOTE: Meeting minutes will be available no later than 90 days after the meeting date.**

# **WILDLIFE HEALTH SUBCOMMITTEE**

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council (Council) would like to thank you and the U.S. Fish and Wildlife Service for your commitment to increasing access to public lands to the American public, including sportsmen and women. America's public lands, especially the lands and waters of the National Wildlife Refuge System (NWRS), are increasingly important in providing opportunities for the public to pursue wildlife-dependent recreational endeavors, including hunting. The Council is writing to offer its perspective and recommendations related to an important conservation and wildlife health matter that both the DOI and FWS continue to address; that being the use of lead-based ammunition on the NWRS.

The use of lead ammunition has drawn much attention over the last decade. Some have called for a total ban of the use of lead ammunition on NWRS lands due to potential impacts to wildlife while others claim that the use of lead-based ammunition poses no significant impact and therefore its use should not be restricted. This on-going debate has created confusion and angst among hunters, wildlife managers, and the public. Over the course of the last year, the Council has worked to identify durable solutions for use in creating a path forward for DOI and FWS on this issue. The recommendations we provide emphasize education, voluntary incentives, Refuge unit level science-based decisions and the lifting of current impediments to research and development of alternative, non-lead ammunition. The recommendations are inter-related and build upon one another, therefore, they should be considered together, in total. We believe that together, these recommendations will provide a positive path forward in addressing the issue.

Thank you for your consideration of this matter. The Council stands ready to continue dialog on this matter and helping with implementation of the recommendations. If you have any questions or need more information, please contact Council Designated Federal Officer Doug Hobbs at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov).

CC:

HWCC Members  
Tom Vilsack, Secretary of Agriculture  
Martha Williams, Director - U.S. Fish and Wildlife Service  
Cynthia Martinez, Chief - National Wildlife Refuge System  
Tracy Stone-Manning, Director - Bureau of Land Management

Matt Strickler, Deputy Assistant Secretary – Fish and Wildlife and Parks

DRAFT

1. Public-private partnerships to educate and incentivize voluntary use of non-lead ammunition
  - a. Public-private partnerships to address concerns surrounding use of non-lead ammo, including its availability and affordability
  - b. Education/information sharing with the hunting public on the unintended impacts of lead ammunition; also, what non-lead ammo is, its current availability, and its effectiveness
  - c. Voluntary and incentive-based programs to support hunter choice of non-lead ammunition versus bans or phase-outs
2. Science-based decision making at a management unit level
3. Address research and development impediments for industry

**1. Utilization of public-private partnerships and federal incentives to educate, incentivize, and fund the voluntary use of non-lead ammunition:**

The Council believes that the most effective and least interruptive path forward in positively influencing consumer behavior related to the purchase and use of nonlead alternative ammunition (and away from purchase/use of traditional, lead ammunition) and to minimize negative impacts to wildlife species and their habitats is through the establishment of public-private partnerships and incentive-based programs. These partnerships will work to educate the public on the benefits of selecting non-lead ammunition, share best management practices, and establish programs that will address the issues of availability and affordability of non-lead ammunition throughout the United States. These public-private partnerships will include federal, state, and tribal governments, nongovernmental organizations, and industry, including both manufacturers and retailers.

**a. Public-Private Partnerships:**

Issues around the use of traditional lead ammunition are complex; therefore, no single organization or entity is positioned to effectively address the many aspects of developing effective public-private partnerships among the states, tribes, industry, nongovernmental organizations, and federal government. These public-private partnerships should be established to promote best management practices, including, but not limited to, addressing the availability and affordability of non-lead ammunition.

**b. Education/information sharing regarding use, availability, and affordability:**

Public-private partnerships will utilize multiple communications platforms to share information with the hunting public on the unintended impacts of lead-based ammunition; also, what non-lead ammo is, its current availability, and its effectiveness. In-person workshops, testing opportunities, and hosted hunts that utilize non-lead ammunition can be undertaken to help educate the hunting public about the effectiveness, availability, and affordability of this ammunition.

**Action:** Establish consumer-focused marketing campaigns that highlight the effectiveness, affordability, and availability of non-lead ammunition. Strategies to employ could include:

- a. Use of community influencers, “meet ups” at shooting ranges for consumers to test non-lead ammo, etc.
- b. In person workshops / Federal-state hosted hunts that provide non-lead ammo for the hunt or recreational shooting opportunity.
- c. Utilize social media platforms
- d. Utilize traditional media e.g., magazine, video, television, radio
- e. Utilize pamphlets and other print material available at visitor and education centers

**c. Voluntary/Incentive Based:**

Undertake and pursue voluntary and incentive-based programs to promote and drive consumer adoption/demand for non-lead ammunition.

**Action:** Formation of public-private partnerships to include the federal, state, and tribal governments, nongovernmental organizations, and industry, including both manufacturers and retailers.

**Action:** Specific budget request by agencies to develop and implement non-lead ammunition rebate and subsidy programs. Determination by federal and state governments on the appropriateness of utilizing funds from the Wildlife Restoration Program to fund these programs.

**Action:** Develop framework of program and ask all managers to adopt

**Action:** Identify financial resource needs and submission of budget requests by agencies to secure adequate funds to implement efforts.

**2. Science-based decision making at a unit level:**

The Council believes that current/future regulatory decision-making regarding the use of lead ammunition on NWRS and other federal lands should be made utilizing the best available, species and site specific (e.g., field data) studies. Such information should be utilized to inform future regulatory actions so that any restrictions on the use of traditional, lead ammunition will be targeted to specific and finite geographic areas and over finite and specific time periods. Federal and state governments, in partnership with NGOs, should collaborate to address gaps and shortfalls in information needed to make targeted regulatory decisions with existing legal mandates in mind.

**Action:** Develop a process that includes NGO stakeholders, state agencies, and federal representatives to generate information needed to address significant wildlife and health impacts.

**Action:** Support continued research to better understand the relationship between lead and wildlife and the social science to support adaptive mitigation for the unintended impacts of lead ammunition.

**3. Research Impediments:**

The DOJ Bureau of Alcohol, Tobacco, and Firearms (ATF) interpretation of portions of the Gun Control Act (18 U.S.C. § 921(17)(B)) has negatively impacted the ability of the



firearms industry to develop and bring to market alternative non-lead projectiles designed and intended by the manufactures for the hunting market. America's leading ammunition manufacturers have been working to develop and market new and innovative rifle hunting ammunition projectiles (bullets) made with a wide array of metals and alloys (e.g., brass, bronze) other than lead which is used to make traditional ammunition. Increasingly, however, these alternative rifle hunting ammunition projectiles are being misclassified in a manner as to prevent their development. The Council believes the Departments can play a role in addressing this issue by urging the ATF to undertake needed actions to provide an appropriate policy environment in which the firearms industry can research, develop, and bring to market new effective and affordable non-lead ammunition.

**Action:** Recommend that the Secretary of Agriculture and Secretary of the Interior author a joint letter to the ATF asking its engagement in positively addressing the need for increased use of the "sporting exemption" to enable and increase further development of non-lead alternative ammunition.

DRAFT

**HUNTING & RECREATIONAL SHOOTING  
SUBCOMMITTEE**

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

Dear Secretary Haaland,

The Hunting and Wildlife Conservation Council (Council) would like to thank you for continuing to support the conservation of fish, wildlife, and our public lands and waters. In that same vein, the Council would like to urge the Department of the Interior to issue a statement of position in support of the Tax Stamp Revenue Transfer for Wildlife and Recreation Act (H.R. 6352) to bolster wildlife conservation and recreational access across the country. This bipartisan bill will provide significant investments to Pittman-Robertson funds to conserve wildlife, public lands and waters, and to enhance access for sportsmen and women across the country.

As you know, the Pittman-Robertson fund (P-R), combined with the Dingell-Johnson fund and the sale of hunting and fishing licenses, provides the bulk of funding for state fish and wildlife agencies across the country, which is known as the American System of Conservation Funding (ASCF), a “user pays – public benefits” structure. On average, 80% of state fish and wildlife agencies budgets come from ASCF, though some states still rely nearly 100% on the funding generated by sportsmen and women under the ASCF. Investments made through the ASCF are unmatched in their value to the operation of state fish and wildlife agencies, and therefore are critical to conservation efforts across the country. Last year alone, hunters and recreational target shooters contributed nearly \$1.2 billion for on-the-ground conservation through P-R. Notably, approximately 80% of the funding generated for the Pittman-Robertson fund is directly attributable to recreational target shooters, who collectively spend far more than hunters on firearms, ammunition, and archery equipment.

The Tax Stamp Revenue Transfer for Wildlife and Recreation Act would take 15% (\$30) of the \$200 Form-4 tax stamp required for firearm suppressor purchases and dedicate this money to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) for the processing of suppressor applications. Importantly, the legislation would enhance conservation funding by redirect the remaining 85% (\$170) of the \$200 Form-4 tax stamp and dedicate this revenue to the Pittman-Robertson fund to bolster conservation and access funding across the nation. Specifically, H.R. 6352 would dedicate 15% (\$25.5) of the 85% P-R dedicated funding for the development, maintenance, and operation of recreational target shooting ranges. These dedicated ranges enhance safety, reduce environmental impact, and contribute to the recruitment and retention of ethical hunters and shooters. Recent data shows that a significant portion of Pittman Robertson funds are generated by recreational shooters, indicating that more ranges would further bolster conservation funding. The remaining 70% Pittman-Robertson dedicated funding through H.R. 6352 would be used for other traditional purposes of P-R such as wildlife conservation, law enforcement, hunter recruitment, hunter education courses, and other important related activities.

Suppressors are increasingly popular accessories that improve ballistics, enhance accuracy, reduce recoil, and alleviate hearing impairment while reducing user conflicts. Suppressors are

one of the most vital and effective tools to recruiting and retaining new demographics of hunters and shooters, particularly women and young people, to shooting sports.

Under current law, the revenue generated from Form-4 applications are deposited into the U.S. Treasury without any specific direction or allocation, and provide no benefit for wildlife conservation efforts. In recent years, revenues generated by Form-4 tax stamp have grown 40% annually. With the increase in demand by hunters and target shooters across the country, Form-4 tax stamp revenues are expected to approach \$200 million in 2023, meaning a potential increase of roughly \$170 million to the Pittman-Robertson Fund.

In summary, the Council strongly recommends that the Department of the Interior issue a supportive statement of position on the Tax Stamp Revenue Transfer for Wildlife and Recreation Act to improve wildlife conservation, bolster target shooting opportunities, and to enhance the overall funding level of the Pittman-Robertson fund.

Thank you for your consideration of this recommendation. Should you have any questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov) or (703) 358-2336.

Sincerely,

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council (Council) would like to thank you for your commitment to sportsmen and women and your support of the National Wildlife Refuge System (NWRS) within the U.S. Fish and Wildlife Service (Service). Today, we write to recommend that the Service modernize and enhance the Strategic Growth Policy (policy) for the NWRS.

As you know, the policy, which was finalized in September 2014, serves to direct the Service in future land acquisition and easement decisions for the NWRS. The Council recognizes the important role that the policy has played over the past decade and believes the current policy should be updated to more fully recognize the existing and potential value of the NWRS. With that in mind, the Council recommends the policy be amended to consider the six priority uses, known as the Big Six, that are enumerated by Congress within the National Wildlife Refuge System Improvement Act of 1997 (Improvement Act). We additionally request that the policy be amended to prioritize seasonal habitats for migratory ungulates as well as prioritizing habitat for at-risk species. Importantly, the Council urges the Service and the NWRS to maintain its support for the existing priorities within the policy, especially waterfowl conservation and wetlands acquisition.

The preceding two hunting and wildlife federal advisory councils (Wildlife and Hunting Heritage Conservation Council and the Hunting and Shooting Sports Conservation Council) both made recommendations to the Department of the Interior to integrate the “Big Six” – hunting, fishing, wildlife observation, photography, environmental education, and interpretation into the policy. When Congress passed the Improvement Act, the body recognized the history and value of outdoor recreation and wildlife conservation to the owners of the NWRS – the American people. However, as presently written, the policy does not prioritize or recognize the importance of the Service considering the “Big Six” uses when examining opportunities for easements and fee title acquisitions within the NWRS, despite the complementary relationship that often exists between wildlife dependent recreation and habitat conservation. The Council believes that incorporating the Big Six in the policy will not only enhance public understanding, public support, and public access to the NWRS, it will equip the Service to take full advantage of the three percent minimum of Land and Water Conservation Fund dollars that Congress has determined (Public Law 116–9)<sup>1</sup> must be used annually to provide and enhance recreational access on federal land.

---

<sup>1</sup> (1) IN GENERAL.—Of the amounts made available for expenditure in any fiscal year under section 200303, there shall be made available for recreational public access projects identified on the priority list developed under paragraph (2) not less than the greater of—  
“(A) an amount equal to 3 percent of those amounts; or  
“(B) \$15,000,000.

This funding requirement was not available when the Service developed their policy, and a change is needed now to intentionally utilize recreation access dollars.

As you know, the NWRS provides significant recreational benefits to the American public, creating a unique bond between the NWRS and wildlife conservation while building the public's understanding of and appreciation for the NWRS. As such, it is important to facilitate increased opportunities for the American public to enjoy the NWRS. Furthermore, the Council believes that future recreational opportunities can be maximized while benefiting, rather than jeopardizing, conservation considerations such as near urban NWRS units.

Additionally, the Council recommends that the Service update the policy to prioritize seasonal habitats for migratory ungulates for future acquisitions and easements. As currently written, the policy focuses on acquisitions and easements that benefit waterfowl, migratory birds, and threatened and endangered species, which the Council believes is a worthy endeavor. However, the Council believes that not all NWRS units are created equal in terms of their species-specific benefits. For example, some existing and prospective NWRS units are critical to ungulate habitat connectivity but may be marginal in value for migratory birds and T&E species. Given the significant investments and prioritization that the Department of the Interior has made over the past two Administrations to conserve and enhance migration corridors and habitat connectivity—and given the value of ungulate populations in supporting the broader ecological food web—the Council believes it is important to build upon these efforts by giving increased consideration to seasonal habitats for migratory ungulates.

Finally, the Council believes at-risk species that are in imminent danger of becoming listed as threatened and endangered if further declines occur should be prioritized through the policy. Conservationists, scientists, and agencies have increasingly recognized the importance of keeping fish and wildlife off the endangered species list, yet the policy hinders the Service's ability to strategically purchase easements or fee title where it could help prevent a future listing for species such as the greater sage grouse. An amendment to the policy seems prudent in helping to proactively prevent future listing decisions.

As always, the Council believes decisions by the Service to acquire land and easements should be made in close cooperation with States and Tribes, including fish and wildlife agencies.

Thank you for your consideration of this matter. The Council looks forward to working with the Department of the Interior and the Service to modernize and improve the policy. If you have any questions or need more information, please contact Council Designated Federal Officer Doug Hobbs at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov).

Sincerely,

CC:

HWCC Members

Martha Williams, Director of the U.S. Fish and Wildlife Service

Cynthia Martinez, Chief of the National Wildlife Refuge System

DRAFT

**PRIVATE LANDS SUBCOMMITTEE**



December XX, 2023

The Honorable Robert Bonnie  
Under Secretary - Farm Production and Conservation  
US. Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

Dear Under Secretary Bonnie:

On behalf of the membership of the Hunting and Wildlife Conservation Council, we want to thank the U.S. Department of Agriculture (USDA) and the Natural Resources Conservation Service (NRCS) for establishing the Migratory Bird Resurgence Initiative (MBRI) last fiscal year. The Initiative was a success and illustrated strong demand to conserve small shallow wetlands and enhance migratory bird habitat in key wintering areas. Due to the high demand, the Council recommends increasing the annual investment from \$15 million to \$75 million, and that the increased funding of \$50 million be allocated to the Prairie Pothole Region (PPR) and \$25 million allocated to post-harvest flooding in rice producing states.

As you are aware, the MBRI was developed along two tracks: in 2010 in response to the Deepwater Horizon Oil Spill and in 2015 with the Working Wetlands Pilot Project. The oil spill led to the creation of the Migratory Bird Habitat Initiative, which was focused in eight states to provide valuable wetland habitat for migratory birds, including post-harvest flooding practices, in the Lower Mississippi River Delta and along the Gulf Coast. The Initiative was so popular with agricultural producers that it enrolled more than 470,000 acres in one- to three-year contracts, far exceeding the initial goal of 150,000 acres. The Working Wetlands Pilot Project in North Dakota conserved shallow wetlands and was widely supported by commodity and conservation groups. It was well received, with more than 124 signed producer agreements across key habitat areas in the state, including 9,568 individual wetlands on 4,822 acres. Conservation practices funded through these efforts, conserving small wetlands in crop fields and enhancing post-harvest flooding on rice fields, were included in the Environmental Quality Incentives Program (EQIP) in the 2018 Farm Bill. The MBRI was subsequently created and implemented.

The goal of MBRI is to engage farmers in a voluntary effort that is both good for the environment and farm economics by: conserving small wetlands (less than 2 acres in size) on 366,277 acres in the Prairie Pothole Region<sup>1</sup>; and creating post-harvest flooding on 500,000 acres of cropland in California's Central Valley and in the Mississippi and

Central Flyways to establish temporary habitat and rest areas for migrating birds. The enrollment target in the Prairie Pothole Region represents 56.7 percent of all the remaining small temporary and seasonal wetlands in that area. Overall, the Initiative voluntarily enrolls more than 866,000 acres of working lands, supports 507,524 breeding pairs of ducks<sup>2</sup>, store 9.5 million tons of carbon<sup>3</sup>, annually “digest” 16.4 million pounds of excess nitrogen<sup>4</sup> and 1.63 million pounds of phosphorus<sup>5</sup>, and stores 276,709-acre feet of water annual to mitigate the impacts of drought and deluge.

The Council is a strong supporter of efforts to conserve and enhance wetland habitats. We believe the Migratory Bird Resurgence Initiative would complement the addition of specific wetland provisions within the new and revised USDA Framework for Conservation Action under Working Lands for Wildlife. Therefore, we recommend that USDA increase investments to the Initiative and continue conserving and enhancing critical migratory bird habitat in the Prairie Pothole Region and key wintering areas.

Thank you for your consideration of our recommendations. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council’s Designated Federal Officer, at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov) or (703) 358-2336.

Sincerely,

Collin O’Mara  
Chair

John Devney  
Vice Chair

**1. Total Acres in Small Wetlands is based on data compiled by the Fish and Wildlife Service’s Habitat and Population Evaluation Team (<https://www.fws.gov/mountain-prairie/refuges/hapet.php>).**

2. Data source for small wetland basins, acres, and duck pairs is the Habitat and Population Evaluation Team (HAPET), which is part of the National Wildlife Refuge System of the U.S. Fish and Wildlife Service and is responsible for modeling breeding habitat and duck use in the U.S. portion of the Prairie Pothole Region.

3. Gleason, R.A., Laubhan, M.K., and Euliss, N.H., Jr. 2008. Ecosystem services derived from wetland conservation practices in the United States Prairie Pothole Region with an emphasis on the U.S. Department of Agriculture Conservation Reserve and Wetlands Reserve Programs: U.S. Geological Professional Paper 1745: 58.

4. Yang, W., Wang, X., Gabor, S., Boychuk, L., & Badiou, P. 2008. Water Quantity and Quality Benefits from Wetland Conservation and Restoration in the Broughton’s Creek Watershed. [https://www.pcap-sk.org/rsu\\_docs/documents/Water\\_Quantity\\_etc.pdf](https://www.pcap-sk.org/rsu_docs/documents/Water_Quantity_etc.pdf)

5. Bansal, S., Tangen, B.A., Gleason, R.A., Badiou, P. and Creed, I.F. 2021. Land Management Strategies Influence Soil Organic Carbon Stocks of Prairie Potholes of North America. In Wetland Carbon and Environmental Management (eds K.W. Krauss, Z. Zhu and C.L. Stagg)

December XX, 2023

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

The Honorable Tom Vilsack  
Secretary  
Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

Dear Secretary Haaland and Secretary Vilsack:

We write to you on behalf of the membership of the Hunting and Wildlife Conservation Council. As part of our on-going efforts to recommend conservation actions that support the conservation of wildlife and their habitats, as well as wildlife-based recreational opportunities such as hunting, we recommend that you advocate within the Administration for the establishment of a national “net gain” of wetlands goal. This policy would be fitting given the administration’s strong commitment to the conservation of lands, waters, and wildlife.

Loss of wetlands habitats, such as those in the Prairie Pothole Region and the Mississippi Alluvial Valley, have led declines in wildlife populations and has hindered access to recreational opportunities. Wetlands provide critical habitat for both commercially and recreationally important wildlife and threatened and endangered species. The continental U.S. has already lost over half of our wetlands, 110 million acres, and proactive efforts are needed to combat this wildlife crisis. Wetlands provide critical services for communities such as: water purification, water storage, flood control, resiliency, biodiversity and climate change mitigation to reduce greenhouse gas emissions. With intensifying extreme weather events and volatile landscapes, we should be running towards and not away from solutions that can be derived from conserving and enhancing wetlands.

A “no-net-loss” or administrative-wide mandate to protect wetlands across our country was first adopted by President Jimmy Carter in 1977 and endorsed by presidents like President George H.W. Bush in 1989 at the Sixth International Waterfowl Symposium, in collaboration with conservation organizations at the time. An interagency task force to support this mandate was maintained through all presidential administrations until 2016. The Council recommends that the administration go beyond a no-net-loss and establish a national “net gain” wetlands goal as a complementary effort to the America the Beautiful initiative, which would conserve remaining wetlands and help to regain lost ground.

A new wetlands goal would set the stage for a national strategy to conserve and restore the nation’s wetlands, in partnership with private landowners, conservation experts, sporting and wildlife groups, state and local governments, and Tribal nations. This can be done in a manner that fully respects private property rights, rewards stewardship and provides myriad outcomes for the American public and especially hunters and anglers. The Council is committed to working with the Administration to advance priorities and to work with you to identify voluntary and incentive-based programs conserving and protecting wetlands into the future.

Thank you for your consideration of our recommendations. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov) or (703) 358-2336.

Sincerely,

Collin O'Mara  
Chair

John Devney  
Vice Chair

DRAFT