



March 5, 2022

Thank you for the opportunity to provide input regarding the American Conservation and Stewardship Atlas. Great Old Broads for Wilderness (Broads) is a national organization dedicated to the preservation of Wilderness as well as wild lands and waters with an emphasis on protecting biodiversity and unfragmented habitat and advocating for our public lands as part of our nation's solution to climate change. I write, from the traditional homelands of the Nuche (aka Ute) in western Colorado, as a volunteer leader of one of our 40 local chapters. Our members engage in stewardship, education and advocacy.

### **Science & Data**

1. Hopefully every state wildlife agency (like our Colorado Parks & Wildlife) maintains a robust database of wildlife corridors; critical summer, winter and production areas for specific species; and a list of endangered, threatened and sensitive species and their occurrence on the landscape/seascape. Such agencies typically maintain a list of Species of Conservation Concern or high priority species for protection (lots of different nomenclature across agencies) with management plans for each and management practices to ensure viability and sustainability of populations. This is one excellent resource across all 50 states.
2. In addition, many national, regional and local non-profits maintain databases and enjoy access to mapping tools. Some examples include The Wilderness Society & Defenders of Wildlife (national,) Woodwell Climate Research Center, Colorado Natural Heritage Program, and Rocky Mountain Wild (Colorado-based.)
3. Of course all federal agencies (USFS, BLM, FWS, NPS) have a plethora of data relevant to these public lands, which need to be integrated into the Atlas.
4. NOAA, National Marine Fisheries, Woods Hole Oceanographic Institute, Marine Biological Laboratory, and Scripps Institute of Oceanography possess an abundance of data related to our oceans and climate.
5. State Parks maintain data and often conduct their own monitoring for environmental quality and species conservation.
6. Similarly State Forests can provide a wealth of information especially regarding forest health and carbon sequestration capacity.
7. Tribal governments, Tribal environmental departments and Indigenous-led advocacy organizations hold a wealth of knowledge – not just about reservation and treaty lands, but also about traditional lands and waters and sacred sites

from which Indigenous peoples have been forcibly removed. Traditional ecological knowledge must be a quintessential component of the Atlas.

8. Academic institutions across the country possess a wealth of research data and often specific departments/programs dedicated to the focus of the Atlas
9. The Atlas must accommodate input from private landowners and land trust organizations. Here in western Colorado, large ranches (both conserved and not) are critical winter habitat and production areas for species while also conserving unfragmented landscapes that permit migration of species between elevations and across latitudes. State and regional cattlemen's associations are a resource. Do organic farms qualify as conservation?
10. Data monitoring of Focal Species that indicate the health of different ecosystems would be invaluable data to demonstrate affects of climate change and identify potential refugia.
11. Obviously, such data must be verifiable & scientifically based. Locally compiled data from community scientists is invaluable. For example several Broads chapters in Colorado are engaged in a community science monitoring project for bighorn sheep, raptors and pika to name a few. If conservationists (and agencies) can agree on a program or mobile application for such monitoring, the compilation of data would be facilitated.
12. The standards and technology for managing and compiling such data is beyond my scope of knowledge. However, hopefully the platform will be user-friendly and interactive with opportunities to input data that then will need to be reviewed prior to being integrated into the Atlas.

### **Conservation as a Continuum**

Indeed there is much meaningful **conservation work underway** in America. How to capture that is no doubt a mammoth task. Some possibilities include engagement of:

1. Tribal governments, environmental departments, water quality programs, Tribal Heritage (or Cultural) Preservation Offices
2. Local, regional and state-level conservation land trusts
3. National and regional stewardship organizations such as Society for Wilderness Stewardship, Trust for Public Lands, Volunteers for Outdoor Colorado, Grand Canyon Trust (UT.) A quick Google search reveals a plethora of stewardship focused organizations as well as this one related to marine environments <https://www.marinebio.org/conservation/marine-conservation-biology/organizations/>
4. As for fresh waters, Trout Unlimited, Alliance for Freshwater Life, Western Watershed Project and many more found online.

### **Stewardship actions to be considered:**

- reforestation projects
- native seed restoration
- noxious weed management
- watershed protection and enhancement/water quality improvement efforts
- wildlife habitat restoration
- coral reef trans/planting
- native aquatic species stewardship

- dam removal
- livestock grazing restoration
- projects on tribal lands and waters applying traditional knowledge
- protection of migration flyways

**Attributes of lands & waters to be included** – your Request for Information provided a great list, which I won't repeat! Other ideas include:

- taking a large landscape/waterscape/seascape approach such as protecting an entire watershed, pristine coastline, old growth forest, biologically diverse marine environment, unique fen or sensitive riparian habitat
- Indigenous sacred sites
- inclusion of any lands or waters designated in USFS Forest Plans or BLM Resource Management Plans (RMP) as possessing wilderness characteristics or Wild & Scenic River eligibility
- habitats of rare, threatened or endangered species of any kind –plant, animal, fungi
- habitats possessing Focal species as indicators of ecological health and/or changing conditions (the latter particularly beneficial as a measure of impacts of climate change.)
- Lands and waters considered as potential climate refugia for displaced species
- Important migration corridors and avian flyways

### **Contributions of State, local, Tribal, territorial & private lands**

All these parties possess data and knowledge that is essential to the 30 X 30 effort.

Efforts could be made to:

- Engage every state's Department of Natural Resources, Wildlife agency & State Parks,
- Incorporate traditional knowledge from every recognized and unrecognized Tribe as well as Indigenous people at large
- Compile a registry of private conserved lands/waters (in some kind of conservation trust)
- Invite national, regional & local conservation organizations to participate

### **Outcomes**

If I understand this question to mean methods of storing, representing and sharing data, I would suggest:

- Maps (and a variety of them) with options of overlays
- Easily searchable databases of places, projects, needs
- Interactive story maps

In addition to addressing your questions, Great Old Broads for Wilderness is engaged in many initiatives that could advance our nation's 30 X 30 goals.

- The Colorado Outdoor Recreation & Economy (CORE) Act would offer some level of protection (Wilderness, Special Management Area, Mineral Withdrawal) to 400,000 acres of Colorado's wild lands and watersheds, yet this piece of legislation has stalled in the Senate for consecutive years. [coreact.org](http://coreact.org)
- Two community initiatives with diverse stakeholder support have been proposed to the Grand Mesa-Uncompahgre-Gunnison (GMUG) National Forest during their

plan revision process (currently engaged in the NEPA process.) The Gunnison Public Lands Initiative [gunnisonpubliclands.org](http://gunnisonpubliclands.org) and the Community Conservation Proposal [gmugrevision.com](http://gmugrevision.com) separately and collectively recommend vast acreage including watersheds for protection as recommended wilderness, Special Management Areas or Wild & Scenic River eligible. Sadly the draft GMUG plan released in the late summer of 2021 only incorporated a small fraction of our proposed designations. We continue to advocate for the final draft (expected to be released in late 2022) to reflect more of the management designations recommended in these proposals by stakeholders who know these landscapes intimately.

- The approved BLM Uncompahgre Field Office RMP released in April 2020, which heavily favored extractive use of public lands over conservation, was even more disappointing than the preferred alternative in the draft RMP presented to the public in May of 2016. Two laws suits have been filed. We see this RMP as a failure to contribute to the 30 X 30 initiative.

Our Northern San Juan chapter of Great Old Broads for Wilderness hopes we have provided the feedback you requested and would welcome the opportunity to continue to engage in this process as federal agencies and departments develop the Conservation and Stewardship Atlas.