

October 13, 2021

Martha Williams
U.S. Fish and Wildlife Service
1849 C Street NW
Washington, DC 20240

RE: The Wilderness Society's 30x30 Recommendations

Dear Principal Deputy Director Williams:

The Wilderness Society strongly supports the Biden Administration's goal of conserving at least 30 percent of the lands and waters in the United States by 2030 ("30x30"), as set forth in Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*. We wish to work constructively with the USFWS and others towards achieving that goal.

We want to thank the USFWS for its leadership in administering a national network of lands and waters for the conservation, management, and restoration of the fish, wildlife, and plant resources and their habitats for the benefit of present and future generations of Americans. We hope that the USFWS continues to enhance the National Wildlife Refuge System by taking the following steps.

1. The USFWS should enhance the Refuge System by expanding existing, or designating new, national wildlife refuges.

The USFWS' 2012 Strategic Growth Policy is an excellent first step towards ensuring the continued success and conservation impact of the Refuge System. With passage of the Great American Outdoors Act, the USFWS should direct refuge managers and regional refuge chiefs to identify strong opportunities for expansion and designation of refuges. Identification of refuges should include a robust consideration of climate change, environmental justice, and equitable access to nature in refuge planning, management, and expansion.

The USFWS should work with communities to strategically choose sites to meet conservation and equity goals. Selections should be informed by climate change predictions and should focus on sites that are rich in biodiversity; expand nature opportunities for communities lacking in nature access; help fulfill the conservation and cultural resource stewardship priorities of tribal nations; conserve wildlife corridors; enhance climate and disaster resilience, particularly for vulnerable communities; and expand access for hunters and anglers, other outdoor recreation, and environmental education.

The USFWS should consider new and expanded refuge opportunities across all geographies and across all scales, and the USFWS should pursue all possible avenues for refuge expansion and designation, including, but not limited to, fee title acquisition, conservation easement, donation, and overlay. In order to jumpstart this process, we encourage the USFWS to support funding requests for land protection through the Land and Water Conservation Fund and other funding mechanisms and programs.

2. The USFWS must ground conservation actions in principles of social justice, equity, and inclusion, particularly through growth of the Urban Wildlife Conservation Program.

In furtherance of President Biden's *Executive Order on Advancing Racial Equity and Support for Underserved Communities*, The Wilderness Society encourages the USFWS to take a community-based, equity-for-all approach toward 30x30 conservation. To the extent possible, 30x30 conservation should be conceived, or led, by the community itself to use and manage the place in a way that protects and sustains its ecosystem function and allows the whole community to enjoy its benefits equitably. This approach may include co-creation, consultation, shared decision-making, and collaborative management of refuges. The USFWS must make a concerted effort to engage Black, Indigenous, and People of Color (BIPOC) communities and those most directly linked to proposed 30x30 actions. Community-led conservation has the potential to bring people together to transform policy and practice for all public lands.

The USFWS Urban Wildlife Conservation Program is one excellent way to advance equitable access to nature. As such, the USFWS should seek additional, and strengthen existing, partnerships through this Program to continue to deliver nature access and educational programming to urban audiences. Evaluation of sites for new and expanded refuges should include a robust consideration of new urban national wildlife refuges. Lastly, the USFWS should continue to highlight environmental and economic justice through this Program.

3. The USFWS should advocate for full funding—at least \$900 million—for the National Wildlife Refuge System.

In order to achieve the above goals for the Refuge System, it is critical that the Refuge System receive increased funding to support operations, maintenance, and planning of refuges. The USFWS should advocate for at least \$900 million per year for the Refuge System, the amount needed to properly manage the Refuge System and allow it to reach its full potential. Specifically, the USFWS should direct funding towards planning capacity within each region, in order to facilitate good management and future conservation planning.

4. The USFWS should reinvigorate and continue to support regional and landscape-level partnerships.

Landscape Conservation Cooperatives are an important way to engage many stakeholders and agencies and support Landscape Conservation Designs. The USFWS should reinvigorate these cooperatives as a way to ensure landscape-scale conservation. Similarly, the USFWS should continue to invest in, and support, Joint Venture Programs as a way to ensure collaborative conservation.

In conclusion, we urge the USFWS to be a leader in the Biden Administration's 30x30 conservation initiative. Please give serious consideration to The Wilderness Society's recommendations. We welcome the opportunity to continue discussing these recommendations with you.

Sincerely,



Melyssa Watson

cc: Cynthia Martinez, Chief of the National Wildlife Refuge System
Shannon Estenoz, Assistant Secretary for Fish and Wildlife and Parks