

Mr. Eric Werwa
Deputy Assistant Secretary
Office of Policy and Environmental Management
Department of the Interior
1849 C Street, NW
Washington, DC 20240

March 7, 2022

**Re: Docket Number: DOI–2021–0016/ American Conservation and Stewardship Atlas
Recommendations**

Dear Mr. Werwa,

On behalf of the 31 undersigned organizations, representing millions of people across our nation who love and rely on a healthy ocean, thank you for the opportunity to offer recommendations as to how the American Conservation and Stewardship Atlas (Atlas) should measure and track the progress of the *America the Beautiful* initiative.

In brief, *America the Beautiful* provides the opportunity to advance equitable and just protections that are based in science, ambitious in scope, and durable in their outcomes. Our world is facing a climate crisis and a biodiversity crisis, with stark disparities in access to nature observed across our nation. Now is not the time for business as usual. Now is the time for action. We urge the administration to meet the urgency of this moment and protect at least 30 percent of the U.S. ocean by 2030 (30x30) by adding new fully and highly protected designations across the full range of U.S. regions and habitats toward the goal of achieving a fully sustainable ocean.

We also applaud and support the broad range of approaches encompassed in *America the Beautiful* and recognize the valuable role they can play in ensuring complementary conservation and climate outcomes. Protection and conservation efforts in concert can help deliver benefits across a diverse array of habitats and human communities. The time is now to advance the type of bold, significant, and enduring conservation actions that will be tracked in the Atlas. The Atlas can serve as a visionary living map with ambitious goals for the future that can be measured, adapted, and achieved in the years to come.¹

We support the *America the Beautiful* initiative's three goals to protect biodiversity, foster climate mitigation and resilience, and ensure more equitable access to nature. We believe the Atlas should track progress to date in achieving these goals and be a tool to evaluate gaps and identify priorities for future conservation efforts.

1. The Atlas should separately analyze and track progress towards *America the Beautiful's* biodiversity, climate, and equitable access to nature goals.

¹ See, for example, the letter from 44 U.S. marine scientists to Secretary Raimondo, Secretary Haaland, Chair Mallory, Ms. McCarthy, and Administrator Spinrad on October 7, 2021 regarding *Conserving and Restoring America the Beautiful* and on the American Conservation and Stewardship Atlas.
<https://willmcclintock.s3.us-west-2.amazonaws.com/Scientist+Letter+-+MPAs+and+America+the+Beautiful.pdf>.

The Atlas should separately evaluate, measure progress, and set ambitious goals towards each of the *America the Beautiful* initiative's three overarching goals. Each one is distinct and important, and may require different solutions and tracking. For example, a lightly protected ocean area near a coastal city may be designed to achieve equitable access to nature, while a highly protected offshore ocean area may be primarily designed to safeguard biodiversity and ocean health. Both are valuable and important to capture in the Atlas for their contributions to the specific goals of biodiversity, climate and equitable access to nature. Some conservation actions may advance multiple priorities, yet every action may not meet every goal.

2. To assess progress in meeting the campaign's goals, the Atlas should evaluate and track actions that result in significant and lasting benefits for biodiversity protection, climate mitigation and resilience, and equitable access to nature.

Decades of research has shown that marine protected areas (MPAs) – places set aside for the long-term conservation of nature – are one of our best strategies for addressing the campaign's goals. Among the various MPA types, fully and highly protected MPAs—areas where no destructive activities or only very limited extraction (e.g. cultural or subsistence use or fishing with certain low impact gears) may occur—are known to be significantly more effective than areas with fewer protections at restoring and preserving biodiversity, increasing yields in adjacent fisheries, and enhancing ecosystem resilience in the face of climate change.² Fully and highly protected MPAs also provide cultural benefits such as physical and mental health, sense of belonging, and identity formation,³ and economic benefits by enhancing fisheries, increasing tourism revenue, and generating jobs.⁴ One economic study showed that every \$1 invested in an MPA returns approximately \$20 in benefits.⁵ To assess the nation's progress in fulfilling the biodiversity and climate resilience goals, the Atlas should be inclusive of relevant spatial designations with appropriate evaluation of each area based on benefits to biodiversity, climate and equitable access. It should also highlight areas that are highly and fully protected, because studies have shown they provide the greatest benefit to biodiversity.

The Atlas should also assess the geographic and ecological representativeness of existing MPAs. Currently, more than 99% of U.S. highly or fully protected MPAs are located in the Central and Western Pacific Ocean.⁶ The Atlas should categorize and be searchable for a variety of geographic and ecological factors, such as geographic region (Tribal & Indigenous, Territorial, State and County), large marine ecosystems, and management regions that represent the diversity of ocean habitats and the full range of the United States' marine ecosystems. This will allow evaluation and reporting on a wide range of conservation areas, and can be used as a tool to evaluate the need for additional types and areas for protections to ensure ecological representation across lands and waters.

² Sala and Giakoumi 2018, No-take marine reserves are the most effective protected areas in the ocean, *ICES Journal of Marine Science*, <https://academic.oup.com/icesjms/article/75/3/1166/4098821>

³ Erskine et al. 2021, Marine protected areas provide more cultural ecosystem services than other adjacent ocean areas, *One Earth*, <https://www.sciencedirect.com/science/article/abs/pii/S2590332221004152>

⁴ Brander et al. 2015, The benefits to people of expanding Marine Protected Areas, *IVM Institute for Environmental Studies*, https://www.issuelab.org/resources/25951/25951.pdf?download=true&_ga=2.227198557.1167454837.1558640107-1857028723.1558640107

⁵ Brander et al. 2015

⁶ Marine Conservation Institute. (2021). *SeaStates 2021: Marine Protection in America's Ocean Areas*. <http://marine-conservation.org/seastates>.

Where measuring and tracking progress towards increasing equitable access to our ocean and coasts, the Atlas should include metrics related to all forms of access— including physical access (e.g. availability of public transportation, beach access, etc.), language and cultural access (e.g. access to multi-language signage, culturally-appropriate storytelling and programming, diverse demographics of staff on site, etc.) and educational access (e.g. availability of outreach and education opportunities designed for historically-excluded communities). We further recommend the administration include data and mapping to track where significant numbers of underserved communities are vulnerable to the impacts of climate change and lack the access to nature and the resources and benefits natural areas provide.

3. Atlas criteria must align with science-based and international standards for biodiversity and climate conservation, and should set stringent standards to measure access to nature.

The Atlas should adopt the International Union for Conservation of Nature (IUCN)'s globally-accepted marine protected area definition,⁷ already in use by U.S. MPA Inventory,⁸ and then apply the MPA Guide⁹ to evaluate the level of protection and stage of implementation for each area. The MPA Guide is a peer-reviewed scientific framework based on the work of hundreds of scientists and stakeholders from around the world, which reflects a collective ambition to create unified language and consistent approaches to measuring ocean conservation. It provides criteria for assessing level of protection and stage of establishment, which, when considered along with enabling conditions unique to every MPA, can allow government managers and communities to predict conservation outcomes. Using the MPA Guide to evaluate existing MPAs will allow the Atlas to track the degree to which each protected area is achieving the goals and expected outcomes.¹⁰ Given the importance of achieving meaningful, on-the-water conservation outcomes, this additional step ensures the Atlas reflects the level of conservation progress and success, not just paper parks. This advanced analysis will ensure accountability for meaningful conservation actions.

There may also be areas in the U.S. that provide strong, durable protections to biodiversity even though they were not established with conservation as the primary goal. Known internationally as “other effective area based conservation measures,” or OECMs, this approach represents a powerful opportunity to recognize the contribution of areas—such as privately owned areas or Tribally-managed lands and waters—that contribute to nature conservation and climate resilience goals. A thoughtful approach is needed to ensure that before an OECM is recognized, the area is evaluated and demonstrates a contribution to the long-term conservation of biodiversity. If these types of areas are to be included in the Atlas, they should be evaluated using the internationally recognized IUCN and the Convention on Biological Diversity (CBD) criteria.¹¹ We recommend the administration establish a clear national position on OECMs based on these specific criteria.¹² These criteria must be met before recognizing an area as an OECM, and evaluations must be done on a case-by-case basis. Failure to adhere to the global OECM criteria could result in the proliferation of substandard OECM designations

⁷ Day, J., Dudley, N., Hockings, M., Holmes, G., Laffoley, D., Stolton, S., Wells, S. and Wenzel, L. (2019). Guidelines for applying the IUCN protected area management categories to marine protected areas. Second edition. Gland, Switzerland: IUCN. <https://portals.iucn.org/library/node/48887>

⁸ NOAA MPA Center, MPA Inventory <https://marineprotectedareas.noaa.gov/dataanalysis/mpainventory/>

⁹ Grorud-Colvert et al. 2021, The MPA Guide: A framework to achieve global goals for the ocean, Science. <https://www.science.org/doi/10.1126/science.abf0861>

¹⁰ For detailed guidance visit <https://mpa-guide.protectedplanet.net/>

¹¹ IUCN-WCPA Task Force on OECMs, Recognising and reporting other effective area-based conservation measures, IUCN, Gland, Switzerland, 2019. <https://doi.org/10.2305/iucn.ch.2019.patrs.3.en>

¹² See letter from 20 NGOs to NOAA submitted on Dec 14, 2021 to Docket #NOAA-HQ-2021-0109-0001. Comment ID: NOAA-HQ-2021-0109-0153

that bring minimal, if any, protections to biodiversity and would undermine global efforts to protect biodiversity.

The administration should aim to prioritize and measure the creation of protected areas within, adjacent to, or benefitting underserved communities with inequitable access to nature. To measure progress toward increasing equitable access, we recommend that the administration consult with environmental and ocean justice leaders and create a national plan with timelines and measurable metrics that uses all existing authorities, including the Coastal Zone Management Program. The plan should include a specific focus on serving communities that have historically not had equitable access to nature and outdoor spaces. The Administration should pay special attention to all forms of equitable access, including physical access, language access, ensuring staff on site reflect the demographics of the local community and public users, and culturally-appropriate education and outreach programming.

We further recommend that the administration work in partnership with Tribal Nations, Territorial governments, and Indigenous communities to identify and use criteria to determine how best to capture the ecological integrity and value of Tribally-managed landscapes and seascapes in the Atlas. Areas should be incorporated in a manner that respects Tribal sovereignty and the right to Tribal self-determination.

To advance the Atlas effort, we recommend establishment of a diverse and representative Atlas advisory board to review agencies' application of the standards and assessment of areas to ensure consistent and scientifically supported application of criteria/standards across the government and different agency programs. There should also be an interagency process for regular review of sites in the Atlas and making changes as management and regulations change for an area. Any data relied on to identify areas for inclusion (or non-inclusion) in the Atlas should be made publicly available. The Atlas map should not remain a snapshot in time, but establish a living document and the advisory board and agencies should be responsible for revisiting and adapting determinations over time, so that environmental or policy changes and goals are accurately reflected.

4. The Atlas should be designed to engage stakeholders and sovereigns and support conservation decision-making.

The Atlas can help convey potential conservation contributions at the Tribal, private ownership, and federal, territorial, state, and local government levels by serving as a go-to site to elevate actions and engage a wide range of stakeholders and sovereigns in decisions about how to protect important habitats for the future. The Atlas website could, for example, provide viewers with different ways to view and understand existing ocean protections in terms of ecological representativeness, high biodiversity, and equity. We therefore recommend building the Atlas such that it enables sorting conservation work by geographic region, established management regions, large marine ecosystems, and habitat type to reflect the meaningful work already underway and identify where more is needed. Identifying gaps in coverage helps to chart an informed path forward to achieve conservation goals, and direct attention where it is most needed.

We suggest looking toward the Northeast Ocean Data Portal¹³ (portal) as an example of what the Atlas could provide. The portal offers theme maps with select data sets on key topics of interest; and allows portal users to view the data in a map viewer to advise their own work. By setting goals and allowing

¹³ Available at <https://www.northeastoceandata.org/>.

access to the necessary detail, the Atlas can become an interactive and trusted tool for evaluating and informing conservation progress in America.

We are excited about the opportunities presented by *America the Beautiful*, and we stress the importance of the Atlas in achieving the three critical goals of this bold and ambitious vision, through providing a trusted, equitable and just, and science-based mechanism by which to track progress and define the meaningful and durable protections required to truly achieve 30x30. The administration has no time to lose in meeting head-on the challenges of nature loss, climate change, and disparities in access to nature. Our community stands ready to help the administration achieve these goals.

Sincerely,

National Ocean Protection Coalition
California National Marine Sanctuary Foundation
Columbus Zoo and Aquarium
Conservation Law Foundation
Creation Justice Ministries
EarthEcho International
Environment America
Friends of the Mariana Trench
Greenpeace USA
Healthy Ocean Coalition
Hispanic Access Foundation
Inland Ocean Coalition
Jenkinson's Aquarium
Kansas City Zoo
League of Conservation Voters
Marine Conservation Institute
National Aquarium
National Marine Sanctuary Foundation
National Parks Conservation Association
Natural Resources Defense Council
New England Aquarium
Oceana
Patagonia
Sachamama
Seattle Aquarium
Shedd Aquarium
Surfrider Foundation
The Ocean Project
The Pew Charitable Trusts
Virginia Zoo
WILDCOAST