March __, 2023

U.S. Global Change Research Program
Office of Science & Technology Policy
Attn: Dr. Chris Avery
cavery@usgcrp.gov

RE: Framing the National Nature Assessment (NNA) – Request for Information

Dear Dr. Avery:

The state of Utah (State) appreciate the opportunity to offer comments and suggestions associated with the Office of Science & Technology Policy's Request for Information (RFI) to help inform the framing, development and eventual use of the *"National Nature Assessment"* (as published in the Federal Register on October 31, 2022 [87 FR 209].

Utah's Public Lands Policy Coordinating Office

While not specifically requested in the RFI, this comment letter begins with a brief description of the commenter's mission and areas of expertise. Here, the commenter, PLPCO, is a State agency, whose broad mission is to coordinate, promote, and implement Utah's public land priorities. In addition to developing and coordinating the State's public lands policy initiatives, PLPCO is also involved in many different facets of public land management policy, including overseeing the State's Resource Development Coordinating Committee ("RDCC") which is responsible for commenting on development and conservation proposals on Utah's public lands as well as assisting in resource management planning at the State and County levels. Because of PLPCO's broad mission and expertise, the agency is involved in various issues and projects that include the exploration for and production of resources that occur naturally within nature, the use of nature to support the livestock grazing and agricultural industry and the maintenance of public access to public lands so Utah's vast natural amenities can be enjoyed by all.

Conservation goals should not be achieved through wilderness designations, monument designations, or any other actions that restrict multiple-use and active management on public lands. Instead of restricting access and multiple use, there should be increased adaptive management aimed at achieving conservation goals. It is vital that farmers and ranchers can adapt to new circumstances and make collaborative decisions with government agencies that result in the maximum sustainable use of the land. Decisions should be made collaboratively between government agencies, and with those whom the decisions will affect. The concept of multiple-use needs to be a priority and focus to both achieve collaboration and conservation goals. The NNA should not detract from this collaborative process and should not be used as a weapon to frustrate multiple use of nature within public lands.

Utah's Vested Interests in Nature

Given the large amount of federally-managed land within the State's boundaries, the State is keenly interested in federal projects that may impact how these lands are managed and made available for multiple use by our citizens in the future. It is critical that the NNA not be used as a weapon to restrict multiple use of public lands by our citizens and visitors in the future.

Utah is second to Nevada as the most arid state in the nation. Much of our water supply originates from federal lands and the NNA should not be used in a way that would impact the quantity of water that flows from watersheds.

Much of our state economy is based on the production of natural resources existing in nature; such as mining. Utah is home to 28 of the 35 identified critical minerals and rare earth elements and more research is being conducted to better identify these resources. Beryllium, helium, fluorspar, magnesium, platinum, palladium, rhenium, aluminum, indium, uranium, vanadium, cobalt, lithium, and potash are among the many critical minerals and REEs that are known to exist within the State. It is not possible to develop a green economy without these critical resources derived from nature. The NNA should not be used in a way that would further increase our dependence on critical minerals from adversarial nations and nations with lax environmental regulations and child labor laws.

Utah's oil and gas industry is important to Utah's economy, especially in rural Utah. The oil and gas industry supports over 32,000 jobs in Utah, many of which are located outside urban areas. Utah is the nation's 10th largest producer of crude oil (https://worldpopulationreview.com/state-rankings/oil-production-by-state) and the nation's 13th largest producer of natural gas (https://www.fool.com/slideshow/these-15-states-produce-94-us-natural-gas/?slide=14). Utah ranks fourth and fifth in the nation for public land production of natural gas and oil respectively. As such, royalty revenues are significant, amounting to millions of dollars annually for the state budget. These royalties directly support jobs, economic vitality, and healthy communities.

While, oil and gas production does occur in nature, the percentage of land disturbed by oil and gas production is minor. For example, of the approximately 108,000 square miles within the Upper Colorado River Basin, only about 500 square miles (0.46%) is anticipated to be disturbed by oil and gas development in 2025 (https://pubs.usgs.gov/sir/2010/5064/pdf/sir20105064.pdf).

Oil and gas usage are expected to increase in the coming decades with an increasing world population. The NNA should not be used as a weapon to hamper our nation's ability to produce oil needed for thousands of products we use everyday and natural gas that is so critical for space heating worldwide.

Recent data (https://www.nass.usda.gov/Statistics_by_State/Utah/Publications/UT-AG-Profile-2022.pdf) indicates that there are about 10.7 million acres of land in Utah in agricultural use. As of January 1, 2022, there are approximately 790,000 cattle and calves, 270,000 sheep and lambs and 940,000 hogs and pigs being raised in Utah. Grazing of cattle, calves, sheep and lambs on public lands is very important to supplement the grazing that occurs on private acreage. The livestock

industry generated over $1.2 billion in farm income during 2020 (just under 70% of the cash receipts from agriculture in the state).
Livestock grazing is not just a permitted use on public lands or a type of agricultural production on private lands, it is an important and effective tool used to create positive environmental outcomes and achieve conservation goals. America was grazed for centuries by native bison. Livestock grazing today emulates those same grazing patterns. Your agency should recognize livestock grazing as an effective management tool and a tool to achieve conservation goals. Conservation goals should not come at the expense of restricting multiple uses on public lands and should not imply the need for the federal government to own more land. There are better and more collaborative approaches that can be taken to encourage conservation. Many successful conservation approaches are already practiced by agricultural producers and these successes should be encouraged. The NNA should not be used as a weapon to reduce grazing that occurs within nature on federal lands.

According to the Utah Division of Outdoor Recreation (https://recreation.utah.gov/), outdoor recreation contributes more than $6.4B to the state's economy, employs more than 83,000 people, and is the primary driver behind the tourism industry. Not only does Utah outdoor recreation create $737 million in state and local tax revenues, but it's also the reason for $3.2B in wages and salaries. Much of the outdoor recreation in Utah occurs on federal lands. The NNA should not be used as a weapon to restrict outdoor recreation by the wide variety of user groups, including hunters, fishermen, skiers, boaters, snowmobilers, OHV users and others who enjoy motorized recreation.

Utah currently has a substantial amount of its total land mass in a natural, conservation or preservation status. Approximately 23% of the state, 12,628,600 acres, receives the highest level of protection available (e.g., national parks, wilderness, national monuments, etc.). Another 48% of Utah, 25,949,790 acres, is public lands managed by the Bureau of Land Management (BLM) and the U.S. Forest Service which administer various restrictive laws, rules, and regulations that govern conservation designations including but not limited to, wilderness study areas, lands with wilderness characteristics, wild and scenic rivers, areas of critical environmental concern, special recreation management areas, research natural areas, inventoried roadless areas and visual resource management classifications. In addition, federal lands in Utah are protected by the National Environmental Policy Act, Federal Land Policy and Management Act, Endangered Species Act, Archaeological Resources Protection Act, Paleontological Resources Preservation Act, National Historic Preservation Act, Native American Graves Protection and Repatriation Act, Federal Cave Resources Protection Act, among others.

Private lands in non-public lands states are not subject to these same restrictions. In total, a conservative estimate of Utah's protected, working landscapes, and conserved natural habitats total over 38,578,390 acres, or 71% of Utah. A separate third-party publication confirms the significant amount of land currently under some protected or conserved status within the state. It is understood that the current U.S. Geological Survey (USGS) Gap Analysis Project, the *Protected Areas Database of the United States* (PAD-US), is the nation's official inventory of public open space and private protected areas. We have determined the current dataset to be incomplete, with significant variations in what qualifies as protected lands. We request the rebuilding of the Conservation and Stewardship Atlas and we stand ready to provide expertise and resources in working with the interagency committee to realize this need. Categorization of "protected areas" within the PAD-US should account for the disparities in public lands

ownership between the eastern and western United States – the standard under which privately-owned working lands in the central and eastern United States are deemed "protected" in the PAD-US should be equitably applied to public working landscapes in the western United States. For example, a BLM parcel in Utah employed for sustainable livestock grazing should be categorized under the same level of protection as private ranch lands in Texas which also employ sustainable livestock grazing practices.

Despite what some may portray, Utah has a long and successful history of managing and improving our lands and waters in partnership with federal agencies, landowners, local governments, and other stakeholders. Healthy, resilient landscapes, ecosystems, and wildlife populations are the result of these efforts. Such success almost always requires hands-on active management of lands and waters to achieve desired outcomes. As you consider framing the National Nature Assessment, it is imperative that you acknowledge Utah's conservation successes and recognize that the state has valuable first-hand experience on how to manage natural landscapes effectively.

State and County Resource Management Plans

Land management planning is most effective when federal, state, local, and tribal partners communicate and cooperate. The Federal Land Policy and Management Act of 1976 (FLPMA) directs the Secretary of Interior to "coordinate the land use inventory, planning, and management activities … with the land use planning and management programs of … the State, Local and Tribal governments within which the lands are located."] Despite this being very clearly outlined in statute, meaningful cooperation is not a standard that is met in a large portion of land management efforts.

Beyond coordination, FLPMA directs the Secretary of Interior to make land use plans "consistent with state and local plans to the maximum extent he finds consistent with federal law and the purposes of this Act." Utah leads the nation in state and local resource management planning. Utah and all 29 of its counties have a resource management plan. These plans are uniquely suited to inform federal decision-making within Utah. The NNA cannot be complete if the agency disregards the state's formal land management policies and previous land planning efforts. Coordination with the state, with the goal of consistency between state and federal plans, is the ideal land management structure. Utahns value our working lands and multiple-use and sustainable yield land management practices that have brought enjoyment and economic stability to Utah's unique communities and cultures for more than 125 years. We need your assistance in ensuring this process is meaningful and productive throughout the framing of the NNA.

The State and Resource Management Plans (RMPs) contain data, objectives and policies pertaining to the management of these lands. The State RMP and those of Utah counties may be accessed at the following website: https://publiclands.utah.gov/resource-planning-coordination/. The data, objectives and policies in these plans should be considered as your agency frames the NNA.

Utah Programs that Manage and Conserve Nature

Utah's Watershed Restoration Initiative (WRI)

Utah's Watershed Restoration Initiative (WRI) focuses on improving three ecosystem values: 1) watershed health and biological diversity, 2) water quality and yield, and 3) opportunities for sustainable uses of natural resources. Significant investments have been made through WRI to improve rangeland health and watershed conditions. Since the program's creation in 2006, WRI has improved nearly 2 million acres of habitat in Utah. In fiscal year 2020, the Utah Legislature contributed $6.2 million to WRI. Eighty-six participating partners completed restoration of 110,041 acres of uplands and 166 miles of stream and riparian areas, leveraging state legislative funds by a factor of 14-to-1.

Sportsman-generated funding plays an important role in WRI. On average, sportsman groups contribute more than $3,500,000 to habitat projects on an annual basis in Utah. Over the 15-year life of WRI, over 1.2 million acres of land and water have been restored to a more natural and resilient state. The long-term results of WRI will be measured in reduced wildfire and associated costs, reduced soil loss from erosion, reduced sedimentation, and loss of storage capacity in reservoirs, improved water quality and yield, improved wildlife populations, reduced listings under the Endangered Species Act, improved agricultural production, and ecosystems that are more resilient to invasive plant species. Utah's WRI has restored nearly 2 million acres of land across the state since 2005 and has been lauded as a huge success by local and regional BLM and Forest Service leadership.

Endangered Species Mitigation Fund

Local wildlife managers and partners constantly work together to improve conditions enough to have wildlife and plant species delisted under the Endangered Species Act (ESA) and to prevent the potential for listing. Efforts to prevent additional ESA listings are outlined and prioritized in the Utah Wildlife Action Plan. The Endangered Species Mitigation Fund, matched with state Wildlife Grant funding, provides the funding cornerstone for these efforts.

Wild Horses and Burros

The state has played a key role in the success of the non-partisan Path Forward Organization which is a collection of diverse stakeholders who have come together to solve the Wild Horse and Burro issue. Through these efforts, funding for implementation of the Path Forward Plan has been secured which will provide BLM the opportunity to make significant gains to reduce the overpopulation of wild horses and burros. Over the past few years significant strides have been made by the Bureau of Land Management (BLM) and other partners to reduce the number of excess free-roaming horses and burros on Utah's Horse Management Areas (HMAs). Recently, excess horses above the Appropriate Management Level (AML) were removed from the Onaqui Mountain HMA. Many of the gathered mares were treated with contraceptives and released back into the wild to allow for healthy and controlled populations. The BLM reports that the statewide AML for all 19 combined HMAs is 1,956 horses. It is only through the combined efforts of the BLM and other partners that these horse populations will be able to be maintained at AML and reduce conflict surrounding horse populations and range habitat degradation. These efforts are appreciated by the state of Utah, wildlife managers, and private landowners. With a stronger partnership with the state and increased funding, wild horse and burro habitat can be conserved through creative strategies such as the recent use of contraceptives and maintaining herds at appropriate management levels.

Shared Stewardship

Shared Stewardship is a cooperative approach to managing Utah's forests. It enables land managers to confront the urgent forest health challenges that no one agency can face by itself. Utah's Shared Stewardship agreement provides a framework for the state of Utah and the U.S. Forest Service to work together to engage partners, identify forest health priorities, and comanage wildfire risks to support forest restoration projects. The primary goals of the projects are protecting communities and watersheds from the threat of large unwanted wildfires. Active conservation efforts provide numerous ecosystem benefits including improving air quality, water quality, and increased water quantity. Through Shared Stewardship we are opening our conversations to include not only the state and the Forest Service, but communities, industry, organizations and users of our national forests. Shared Stewardship is about working with partners to do the right work, in the right place, at the right scale.

Program highlights include, but are not limited to, appropriating over $15,000,000 to projects in all the National Forests within the state since 2019 and the completion of dozens of projects that help accomplish the goals of the program and inform key performance indicators to monitor the progress of Shared Stewardship projects. The program received three times more requests in the past year than it has the funding to complete. This program is currently operating under a four-year agreement with the U.S. Forest Service and has been widely supported by the Utah Legislature, Utah counties, and other partners. It is essential that this program be renewed and that this partnership continues to grow and meet the needs of the resources and communities around the state of Utah.

Reducing the risk of uncharacteristic wildfire should be an essential focus of the Biden administration throughout the country, but especially in western states. Every year wildfire causes devastation throughout numerous states and puts fellow Americans at risk. This situation calls for active management rather than reactive management, or no management due to overly restrictive landscape designations. Many management actions exist to reduce the risk of uncharacteristic wildfire and to help control the fires when they occur. Fuels reduction projects, targeted livestock grazing, vegetation treatment, fuel break projects, and prescribed burns are just a few of the effective management options available to reduce the risk of uncharacteristic wildfire. The Biden administration should support, and explicitly articulate these management policies.

The extreme drought conditions in 2021 that exist throughout Utah have endangered water supplies for both farms and residents and threaten to do serious harm to Utah's economy and way of life. Such drought conditions expedite the need for a more adaptive forest management to improve water quantity and quality and to prevent catastrophic fires across the state, particularly along the densely populated Wasatch Front. The vast majority of Utah's drinking and agricultural water originates in Utah's forested mountains; thus forest conditions have a direct and immediate impact on the lives of Utahns. Close coordination between the state and federal land management agencies is essential to mitigate the impacts of drought as Utah's population continues to grow.

The Utah Migration Initiative

In April 2017, the Utah Division of Wildlife Resources began a statewide initiative to identify, preserve and enhance essential movement corridors for terrestrial and aquatic wildlife species in Utah. The mission is to document, preserve and enhance wildlife movement for species throughout Utah using state-of-the-art tracking and data management technologies, strong collaborative partnerships and compelling outreach. The initiative aims to identify migration and movement patterns, wildlife stopover sites, priority areas that can reconnect fragmented habitat ranges and locations that allow wildlife species to safely move from one large habitat area to another.

Utah is home to some of the country's first wildlife overpasses. The recently completed Parleys Canyon Wildlife overpass now allows a variety of animals to follow their traditional migration patterns while avoiding busy Interstate 80. The state would like to once again encourage the federal government to work with Utah to invest in wildlife conservation, overpasses or underpasses along major roads, and corridors to increase biodiversity and to protect human life. These types of collaborative efforts have proven very successful in Utah, and with adequate funding, greater efforts could be accomplished in a timely manner.

Although the initiative is relatively new, to date there have been over 6,900 animals collared and movement tracked, and 60 wildlife-friendly highway crossings installed. Diverse partnerships have already been established with over 35 different partners with more partnerships coming.

The Grazing Improvement Program

The Grazing Improvement Program (GIP) administered by the Utah Department of Agriculture and Food (UDAF) seeks to improve the productivity, health, and sustainability of our rangelands and watersheds. The state believes that well planned and managed livestock grazing is the most important landscape-scale tool for maintaining healthy rangelands, watersheds, and wildlife habitats. Healthy rangelands contribute to a healthy livestock industry and productive rural economies. The program's goals are to strengthen Utah's livestock industry, improve rural economies, and to enhance the environment.

Measuring the success of the GIP program is achieved by three main processes: 1) Monitoring on the ground results of projects and land management changes, which is done using both onthe-ground and remote sensing techniques; 2) Tracking the economic viability of the livestock industry and rural economies related to ranching in Utah to include tracking federal, state and private forage allocation over time; and 3) Partnering with others to improve resource health and preserve livestock grazing on public lands.

GIP Projects have had a positive effect on management on over 6 million acres of rangeland in Utah since the program began in 2006. Most of these projects have improved water distribution on the landscape which in turn improves livestock distribution and use patterns. In addition, thousands of new watering points have been added to the environment that benefit not only livestock, but wildlife as well. When ranchers are successful in their grazing management, the operations remain viable, and land remains open and undeveloped. The pressure to sell land to developers is reduced and ranching operations continue to support rural economies.

Catastrophic Wildfire

Catastrophic wildfires significantly impact our landscapes, economy, and infrastructure and are considered the most preventable natural disaster facing Utah. Reducing large fires in Utah will protect life, property, communities, economies, and our environment. The goals of the Catastrophic Wildfire Reduction Strategy (CatFire) are resilient landscapes, fire adapted communities, and strong and effective local wildfire responses.

Following the record-breaking 2012 Utah wildfire season, Gov. Gary R. Herbert tasked state land managers with developing "a comprehensive and systematic strategy to reduce the size, intensity and frequency of catastrophic wildland fires in Utah." That mandate, followed by a year-long, interagency planning effort, led to the creation of the governor's Catastrophic Wildfire Reduction Strategy (CatFire or Strategy) and associated Statewide Steering Committee (Committee). The governor accepted the Strategy in December 2013 and implementation responsibility was then given to the Division of Forestry, Fire and State Lands within the Department of Natural Resources. Immediately following, during the 2014 General Session, the Utah Legislature unanimously passed Senate Concurrent Resolution 7 expressing support for CatFire and strongly urging its implementation. Both the Executive and Legislative branches in Utah are committed to reducing the risk of catastrophic wildfire in the state.

In 2021, because of the CatFire efforts and the very proactive Fire Sense campaign, the number and size of human-caused wildfires has decreased during a period of extreme statewide drought. Reducing the extent of catastrophic wildfires not only benefits the environment and communities, but it also reduces the burden of expensive firefighting operations through various funding sources including the federal government.

Unfortunately, the state can't control wildfires in other western states (e.g., California and Oregon). Utah has been inundated with wildfire smoke all summer and Salt Lake City has experienced the worst air quality in recorded history because of smoke from other states. This is a recurring problem that needs to be addressed. For health and environmental reasons, many people were required to stay home to avoid the particulates in the air and the state implemented "Surge Workdays," which when triggered, cause most state employees to telework on days with deteriorated air quality.

Wildlife Management Areas and Easements

Since the first property acquisition in 1909, the Utah Division of Wildlife Resources (DWR) has been acquiring and managing land across Utah for wildlife, habitat, and wildlife-related recreation opportunities. DWR owns approximately 355,000 acres of property, which includes Wildlife Management Areas, Waterfowl Management Areas, and access points for hunting and fishing across 28 of the state's 29 counties. DWR also holds access and conservation easements as well as management agreements on over 150,000 acres across the state. This type of land conservation allows private landowners to maintain ownership and control of their land, while allowing DWR to manage the property for critical habitat and wildlife purposes.

DWR also carries out a successful walk-in access program, consisting of agreements with private landowners to allow their property to be open to hunters, anglers and wildlife recreators. The walk-in access program brings recreational opportunities to over 38,000 land acres and almost 40 miles of stream of access. Additionally, DWR holds an access agreement that keeps 3.4 million

acres of Utah trust lands open to hunters and anglers. Property acquisition and land management efforts are funded by Utah state hunting and fishing license sales, federal excise tax on equipment, wildlife-oriented grants, outside group partnerships, or generous donations. Each year, DWR works on dozens of new land projects, partnering with private landowners, other state agencies and wildlife-focused organizations to acquire or preserve land for wildlife purposes. DWR is committed to the continuous efforts to serve the people of Utah as trustee and guardian of the state's protected wildlife and habitat.

State Partnerships in Current Federal Conservation Programs

Utah currently partners with a variety of federally funded and operated programs intended to promote conservation and ecosystem restoration. These programs are critical to meeting Utah's goal of accomplishing as much environmental restoration as possible.

Emergency Watershed Protection (EWP) Program

The Emergency Watershed Protection (EWP) Program which provides technical assistance and funding to protect life and property from damage created by natural disasters (floods, fires, windstorms, and other natural occurrences). To date EWP has protected 18 communities and has contributed over 57 million dollars in this effort.

Environmental Quality Incentives Program (EQIP)

The Environmental Quality Incentives Program (EQIP) is a voluntary conservation program that helps agricultural producers in a manner that promotes agricultural production and environmental quality as compatible goals. Through EQIP, agricultural producers receive financial and technical assistance to implement structural and management conservation practices that optimize environmental benefits on working agricultural land. To date EQIP has expended nearly 75 million dollars impacting 906,872 acres of land.

Conservation Stewardship Program (CSP)

The Conservation Stewardship Program (CSP) is a voluntary conservation program that encourages producers to address resource concerns in a comprehensive manner by undertaking additional conservation activities and improving, maintaining, and managing existing conservation activities. To date CSP has spent $16 million improving 1,811,437 acres of land.

Agricultural Management Assistance (AMA) Program

The Agricultural Management Assistance (AMA) helps agricultural producers manage financial risk through diversification, marketing or natural resource conservation practices. NRCS administers the conservation provisions while Agricultural Marketing Service and Risk Management Agency implement the production diversification and marketing provisions. AMA has contributed over $700,000 to projects improving 796 acres.

Agricultural Conservation Easement Program (ACEP)

The Agricultural Conservation Easement Program (ACEP) provides financial and technical assistance to help conserve agricultural lands and wetlands and their related benefits. Under the Agricultural Land Easements component, NRCS helps Indian tribes, state and local governments and non-governmental organizations protect working agricultural lands and limit nonagricultural uses of the land. This helps the state retain agriculture lands which in turn keeps spaces open for wildlife thereby reducing habitat fragmentation. This program has contributed $24 million dollars affecting 3,475 acres of land.

Watershed Flood and Prevention Operations Program

The Watershed Flood and Prevention Operations Program provides for cooperation between the federal government and the states and their political subdivisions to work together to prevent erosion; floodwater and sediment damage; to further the conservation development, use and disposal of water; and to further the conservation and proper use of land in authorized watersheds. To date this program has contributed $24 million across 37 watershed projects.

Response to RFI Questions

In response to the questions posed in the Request for Information, the State offers the following responses in bold type:

Questions to Inform Development of a Use-Inspired National Nature Assessment (NNA)

1. Assessments can be tailored to inform a wide range of audiences. For example, assessments can be created for use by the general public, government decision makers (at any scale from Federal to state to local, territorial or Tribal), researchers and practitioners, non-profit organizations, private sector companies, individuals, different generational groups, or other audiences. Who are the key audiences for, or users of, the NNA? Who should find the information that the NNA provides useful? **Private property owners, agencies that own or manage public lands, fish and wildlife management agencies, state and county resource management planning agencies, tribes, state trust land management agencies, state and federal agencies with environmental protection responsibilities.**

2. USGCRP understands that creation of a use-inspired assessment will require ongoing engagement with the potential users of the NNA. This RFI is one of the first ways USGCRP is reaching out to potential users.

> a. What engagement processes should be used so that the audiences identified above are best able to participate in the development process?
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> b. What forms or formats of engagement (e.g., in-person town hall meetings, virtual conversations, community workshops, social media events, calls for stories or art) are likely to help USGCRP meet its principle of inclusivity and best inform the assessment? **The USGCRP should ensure that all potential users of the NNA have an opportunity to engage in the process. This should include virtual meetings that offer opportunities to ask questions and make comments. At identified milestones during**

the process, written comments should be solicited from interested parties. In-person town hall meetings are not recommended due to the associated travel costs and the emissions associated with most forms of travel and transportation.

3. Use-inspired assessments are tailored to their intended use.

a. What decisions should the NNA help inform, and what information is needed for those decisions? **Since the NNA will not have the force of law, it should not be used as a legal basis for decision-making at the site specific or project level.**

b. What needs can the assessment fill, and how should information be provided to fill them? What questions should the NNA answer? What do you wish you knew about nature in the United States? **The body of science associated with the varying components of nature is extensive and growing on a daily basis. The NNA is an unnecessary and wasteful expenditure of federal taxpayer's money (all too common in the current administration, which has led to painful levels of inflation that detrimentally impacts every American citizen).**

4. The scope of the NNA includes assessment of the observed trends and future projections of nature and the benefits it provides to people. Given this:

a. How far back in time should the NNA explore observed trends, and why? **The farther back in time the NNA seeks to research, the more public funds this effort will waste. If the USGCRP insists on exploring trends, one possible place to start from is January 1, 1970; when the National Environmental Policy Act (NEPA) was signed into law.**

b. What kinds of questions about the future should the NNA aim to answer? How far into the future should projections extend, and why? c. What types of future scenarios would best support the recommended uses (e.g. quantitative time series, directional changes, stories)?
Since change is always occurring and no one can predict the future, spending a lot of time, money and effort on projections is not worthwhile and not recommended. If the USGCRP insists on making projections, there should be at least three levels of projections (high-medium-low for example) to establish a range of possibilities given the many unknowns.

5. Assessments can create a wide variety of products that help users access, understand and use the information that is provided. These can include large written reports, a series of shorter reports, online interactive settings, artistic expressions (paintings, poems, etc.), infographics, virtual or augmented reality tools, phone or tablet apps, presentations, data resources, films, podcasts, social media, events, entertainment products, and many others.

a. What kinds of products can best communicate the findings of the NNA? **Web site with story maps.**

b. How would you like to use the findings of the NNA? **Probably would not use the findings but instead rely on the best available and most recent science for a particular aspect of nature.**

6. Past assessments have used various approaches to organizing findings. Some give information for each region of the country (e.g., findings for the southeast, northwest, southwest, the Arctic). Others give information for different types of ecosystems (e.g., kelp forest, desert, temperate forest) or levels of ecological organization (e.g., species, communities, ecosystems). Still others organize findings for specific audiences (e.g., government, businesses, land owners, resource users like fishers, hunters, hikers), or specific decision-making contexts (e.g., NEPA requirements, corporate ESG reporting, financial risk disclosure, research prioritization). The NNA is tasked to assess the connections between nature and the benefits it provides, and so findings could also be organized by benefit (e.g., public health, equity, economy) or by sector (e.g., agriculture, transportation, health, housing, energy).

a. Given that the scope of the NNA is quite broad, how should information in the assessment be organized?

b. What format would best match the ways you think the NNA should be used? **Since aspects of nature do not respect jurisdictional boundaries, information should be organized by the type of ecosystem.**

Questions to Inform a Definition of Nature

7. What does nature mean to you? **The phenomena of the physical world collectively, including vegetation, living creatures, the landscape, and other features and products of the earth.**

8. What should the definition of nature used in the NNA be sure to address or include, and why? **See response to #7 above.**

9. What should the definition of nature used in the NNA be sure to leave out or exclude, and why? **Exclude anything that is the product of human development as such things are not considered part of nature.**

Questions to Inform Identification of Relevant Knowledge Sources

10. Indigenous Knowledge (IK) is an important body of knowledge that contributes to the scientific, technical, social, and economic advancements of the United States and to our collective understanding of the natural world. Responsive to this recognition:

a. How can USGCRP best engage with Tribes and Indigenous Peoples in the development of the NNA? **Via virtual meetings with tribal leadership.**

b. How should IK be woven together with other forms of knowing in the NNA?

We recognize that Tribal members are not only citizens of their own sovereign Tribal Nations, but also citizens of the state. Thus, it is critical for state and Tribal

Nation leaders to openly and honestly discuss issues that affect Utah's Native American population, including issues regarding public lands and waters claimed historically and used currently by Utah's tribal members. As we recognize the sovereignty of the various tribal nations, we encourage the federal government to recognize the sovereignty of the state and Tribal Nations to the maximum extent possible and not elevate one sovereign over the other.

As you embark on the NNE, please understand that the state is committed to working with Tribal governments to conserve and restore the abundant resources in nature that sustain us, as well as the cultural resources that impart meaning to human existence.

However, while IK can provide some insights, it should be given no greater consideration than the knowledge offered by federal, state and county resource management planning agencies with many decades of experience in the management of landscapes, wildlife and vegetation. Farmers and ranchers, with many decades of traditional ecological knowledge since European settlement of the West, understand the importance of conservation goals and have, in many cases, already implemented active management practices that lead to improved and more sustainable use in natural areas. Utah's farmers and ranchers are some of the best land and resource stewards anywhere in the world. When given the opportunity, they will do their utmost to properly tend to and manage the land and natural resources in their care, and from which they have derived their livelihoods for generations.

In some instances, IK will suggest a "hands-off" approach to the management of nature which is contrary to today's best available science, which indicates that active and adaptive management is often the best approach.

11. There are many ongoing assessments, and existing quantitative and qualitative data and knowledge that relate to the many aspects of nature and the wide range of benefits the NNA is charged to assess. These sources may be generated by government agencies, Tribes and Indigenous Peoples, colleges and universities, local communities, non-profit organizations, the international community, the private sector, and others.

a. What existing assessments and knowledge efforts should the NNA draw from to provide a comprehensive view of the status, observed trends and future projections of nature and its benefits in the United States, and why? **This existing body of knowledge is so vast and changing on a daily basis that it would be a daunting and expensive task for the NNA to recognize and analyze all of it. Caution should be taken to avoid assessments funded and prepared by non-profit organizations for the purpose of advancing their often-times radical agendas.**

b. How can USGCRP best engage with local communities to incorporate their lived experiences into the NNA? **Given that there are hundreds of thousands of local communities in the nation, it would be logistically impossible for the USGCRP to effectively assess their lived experiences. Caution should be taken to avoid listening to only the loudest voices, often represented by radical environmental groups who often advocate for nature at the expense of the socio-economic needs of humans.**

c. What existing datasets, knowledge sources, information or stories should USGCRP draw from in creating the NNA, and why? **The Bureau of Land Management and the Department of Agriculture (US Forest Service and NRCS in particular) manage or assist in managing vast amounts of land and would be the best available sources. Caution should be taken in utilizing data from non-governmental sources, which are subject to partiality and political agendas.**

d. How should the NNA be designed to add value beyond what these existing efforts and sources already provide? **The existing efforts and sources already provide sufficient science and knowledge to allow land managers to craft responsible plans and make wise decisions on the ground. The NNA seems to be an ill-advised exercise and a waste of federal resources.**

Conclusions

Comprehensive stakeholder outreach must occur, and in a meaningful way, bringing people together to find locally agreed upon conservation solutions. The National Nature Assessment efforts should not be done in a manner to further divide people and stakeholders.

Cooperation and frequent communication are the best paths forward and we stand ready to participate in this nationwide effort. Alternatively, ignoring the state's input and the adopted State and County Resource Management Plans will unnecessarily create an adversarial relationship, discourage future participation, and hinder the likelihood of achieving the project's goals and objectives.

As Utah continues to foster healthy and resilient landscapes and watersheds across our state, we encourage your administration to explore the contributing factors to Utah's accomplishments. Effective conservation and protection of our lands, waters, and wildlife will require greater support and assistance from the Federal level, not additional roadblocks.

The State appreciates the opportunity to comment and looks forward to continually working together to increase adaptive management and achieve conservation goals in a responsible way.

Sincerely,

Redge Johnson
Executive Director