DUCHESNE COUNTY COMMISSION

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December 5, 2022

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

RE: Framing the National Nature Assessment – Request for Information

Dear Dr. Avery:

The elected County Commissioners of Duchesne County, Utah 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].

Duchesne County, Utah contains approximately 2.093 million acres of land, which makes our county larger than the states of Rhode Island and Delaware combined. Approximately 64.49% of this land area is managed by federal agencies including the Bureau of Land Management, the Bureau of Indian Affairs, the U.S. Forest Service, the Bureau of Reclamation and the Utah Reclamation, Mitigation and Conservation Commission.

Given the large amount of federally-managed land within our boundaries, the County 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. Much of our local economy is based on the use of natural resources existing in nature; including oil and gas production, grazing to support the agricultural industry and many forms of recreation in nature on these federal lands. It is critical that this National Nature Assessment (NNA) not be used as a weapon to restrict multiple use of public lands by our citizens and visitors in the future.

Because our county and most of the other counties in Utah have high percentages of public land ownership, each county has adopted a County Resource Management Plan that contains data, objectives and policies pertaining to the management of these lands. Our CRMP and those of the other Utah counties may be accessed at the following website: https://utah-resource-management-planning-plpco.hub.arcgis.com/pages/county-management-plans. The data in these plans should be considered in the NNA.

In response to the questions posed in the RFI, Duchesne County offers the following responses in red 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? 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.
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> 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.
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> 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? While IK can provide some insights, it should be given no greater consideration than the knowledge offered by federal and state agencies with many years of experience in the management of landscapes, wildlife and vegetation and county resource management planning agencies. 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.

We appreciate the opportunity to comment and ask that we be kept informed as the NNA moves forward.

Sincerely,

DUCHESNE COUNTY COMMISSIONERS

Mike Hyde, AICP
Community Development Director