



July 12, 2021

To: The Honorable Deb Haaland
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

The Honorable Gina Raimondo
Secretary of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Early America the Beautiful conservation action to support Indigenous and resource-dependent communities

Dear Secretary Haaland and Secretary Raimondo,

We write to express our gratitude for your bold conservation vision and to rise to the challenge you have issued to Americans to participate in that vision. Our collective survival and prosperity in a climate-impacted future is wholly dependent on enhanced conservation of resources and new approaches to sustainability. The America the Beautiful Report lays out in stark terms the historical legacy of injustice, inequity, and colonialism that we must overcome as we work together to conserve this spectacular continent; it also makes clear the challenges and opportunities of this moment. Climate change and the environment are at a tipping point. You've issued a call to action, and we are ready to mobilize.

Our coalition, called Businesses for Conservation and Climate Action (BCCA), was created this year in order to 'convene the conveners' and bring ideas grounded in lessons from the front lines of climate change to the halls of power. BCCA is a group of Indigenous and non-Indigenous community-based, resource-dependent small-scale business leaders from across the country. BCCA is formed around the collective vision that solutions between humans and nature are rooted in rediscovering our place within the global ecosystem. Our mission is to establish national policies that recognize sustainable small businesses as compatible with healthy lands and oceans, and to enhance rather than exclude these sustainable businesses from conversations about resource access at every step of the decision-making process. Our work is guided by a firm commitment to social equity, local and traditional wisdom, and triple bottom line solutions that restore social, ecological and economic health.

Our productive and enthusiastic conversations with your staff this year have reflected our shared vision of supporting resource-dependent businesses and enhancing Indigenous and community-led conservation measures as the key path towards sustainable use. During these conversations we have been asked to share approaches to achieving early 30x30 goals, with an emphasis on the use of existing authorities, that are championed and supported by the members of BCCA.

The policy recommendations respectfully offered below represent our first internal canvass on 30x30-driven policy action. They are organized into three sections: empowering Indigenous communities, developing equitable ocean policy, and embracing resilience and stewardship on public lands.

We believe that the concepts highlighted here could be adopted using the statutory authorities and regulatory opportunities available to you right now. We are certain that their implementation would set your agencies on an ambitious path towards achieving meaningful, durable, community-supported conservation. BCCA and our membership are standing by to be of assistance in further developing these policy concepts and facilitating dialog with our communities in order to ground your administration's initiatives in rich bilateral exchanges with the sustainable business community. Thank you for your consideration.

Sincerely,

The BCCA Steering Committee

Amos Philemonoff, Sr.
President
Aleut Community of St. Paul Island Tribal
Government

Joana "JJ" Orloff
Tribal Administrator
Native Village of Afognak

Wizipan Little Elk
Chief Executive Officer
Rosebud Economic Development Corporation

David Levine
Cofounder & President
American Sustainable Business Council

Rosanna Marie Neil
Policy Counsel
North American Marine Alliance

Linda Behnken
Executive Director
Alaska Longline Fishermen's Association

Eric Bill
Chief Economist
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Sarah Schumann
Principal
Shining Sea Fisheries Consulting

Tim Bristol
Executive Director
Salmon State

Frank Knapp, Jr.
President & Chief Executive Officer
South Carolina Small Business Chamber
of Commerce

Bob Rossi
Director
New York Sustainable Business Council

Steve Klass
Executive Director
P3 Utah

Vicki Lee Parker-High
Executive Director
North Carolina Business Council

Thomas Barr
Vice President, Business Development
Local First Arizona

cc:

The Honorable Thomas Vilsack, Secretary, U.S. Department of Agriculture

The Honorable Brenda Mallory, Chair, Council on Environmental Quality

The Honorable Regina McCarthy, Chair, National Climate Task Force

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Policy area 1: Establishing equitable conservation with Black, Indigenous and People of Color leadership at the core

- Recognizing the critical importance of a community-driven process as a key path towards equitable conservation policy, we recommend that you initiate the America the Beautiful stakeholder engagement process as a first priority, with emphasis on engagement with Black, Indigenous and people of color communities and community-based businesses. As a matter of immediate priority, establish a robust grassroots and stakeholder-driven process to identify key conservation areas and ecosystems, delineate specific threats to those areas and ecosystems, and determine the public processes that will be used to achieve the minimization and mitigation of those threats through regulatory action. Establish regional task forces to structure these discussions with nongovernmental stakeholders, and engage in enhanced government-to-government consultations with federally recognized Tribes.
- Adopt formal policies across the entire Administration to aggressively pursue co-management of federal lands, waters, and public resources by federally recognized Tribes as a pathway to the return of federal lands and waters to Indigenous Nations. We also urge the incorporation of rigorous Justice40 policies incorporated into the 30x30 initiative, utilizing the Clyburn 10-20-30 definition of communities of persistent poverty.
- Direct agencies to incorporate the community justice and equity values described in the America the Beautiful report into the National Environmental Policy Act (NEPA) process. Specifically, we urge you to promulgate NEPA policies with a focus on federal actions that better reflect these Indigenous and community-focused values. In particular, order agencies to prioritize federal actions and alternatives that enhance the “...ecological, aesthetic, historic, cultural, economic, social or health” attributes according to the values in the America the Beautiful report. Prioritize the establishment of preferred alternatives that maximize delivery on these values and prioritizes the benefits of sustainable use to Indigenous and resource-dependent communities.
- Increase funding request levels by \$200 million for the Office of Trust Service within the Bureau of Indian Affairs (BIA). We further recommend the allocation of \$50 million to support fish restoration; \$50 million for bison restoration for specific herd expansion and new herd development; \$50 million for regenerative agriculture expansion and conversion; and \$50 million for rangeland and farmland monitoring and metric setting. Likewise, increase the BIA Loan Guarantee from 80% to 100% for activities supporting the 30x30 initiative.
- Establish a Conservation Corps set aside for American Indian and Alaska Native Tribes to administer their own conservation corps job programs in order to create a new generation of land and climate stewards.

- Embrace and champion the Pribilof Islands Marine Ecosystem (PRIME) Initiative for Indigenous co-management and ecosystem resilience. PRIME is a critically important cultural, ecological and economic area that is experiencing dramatic negative impacts due to the compounding effects of concentrated human activities and climatic changes. The PRIME Initiative is a proposed Indigenous led, locally based effort to establish a co-management framework for an ecosystem of importance with the federal government. The PRIME Initiative is a multi-pronged approach that seeks to implement equitable co-management of the PRIME for the long-term sustainability of culturally and economically important wildlife (e.g., marine mammals, seabirds, groundfish, shellfish) while preserving local and regional economies.
- Triple funding levels for the Economic Development Administration within the Department of Commerce for Native American planning programs, which will greatly enhance tribal communities' ability to engage and overall support the aims of 30x30.
- Develop an Alaska Native Tribal Fisheries Monitoring/Observer Program for all Gulf of Alaska federal trawl fisheries. The Gulf of Alaska groundfish fleet currently receives partial observer coverage, leaving approximately 80% of those fishing activities unobserved. Establishing this program would create economic development opportunities and provide an entry into fisheries management that doesn't currently exist for the region's Indigenous Peoples.
- Work with Congress to enable federally recognized Tribes to participate in the Coastal Zone Management Program and develop Coastal Management Plans
- Require or strongly encourage and fiscally support Regional Fishery Management Councils' hiring full time Tribal liaisons on staff and encourage the appointment of Indigenous Peoples to all advisory panels, committees, and other working bodies.
- Increase the Department of Commerce minority business purchasing goals from 25% to 50%, noting that investments in equity are investments in combating climate change.
- Increase Buy Indian Act acquisitions to 100% within the Bureau of Indian Affairs and Bureau of Indian Education, and double Department of Interior wide minority set aside purchasing goals, noting that investments in equity are investments in combating climate change.
- Throughout the Department of the Interior's operation of Indian Programs, significantly increase funding to create contract purchasing opportunities for regeneratively raised and harvested goods, such as wild rice, salmon, and buffalo for Bureau of Indian Education operated schools and Bureau of Indian Affairs detention facilities.
- Provide support under Department of Commerce grant and support programs to fully fund Alaska Native and national Indigenous Co-Management organizations, Indigenous-led research and monitoring, and marketing and supply chain integration of Indigenous

Peoples' arts, crafts, and goods created with traditional resources, including fish and marine mammals.

Policy area 2: Ocean and coastal policy that puts people *and* nature first

- Take a bold approach towards the conservation of Essential Fish Habitat (EFH) by requiring agencies to adopt EFH Conservation Recommendations from NOAA EFH Consultations into all preferred alternatives under NEPA whenever allowed by law. For too long, EFH Conservation Recommendations have been flouted or ignored by many agencies. Establishing such a policy via Executive Order, followed by formal regulatory implementation, would ensure that the “quiet conservation” provided by EFH designations has the reach necessary to conserve habitat across the federal government. We also urge you to expand stakeholder engagement within the Habitat Vulnerability Assessment and Regional Fish Habitat Assessment processes as well as other similar initiatives.
- Initiate and prioritize a comprehensive update of MSA National Standard 8 and 9 guidance to establish and support robust frameworks for ensuring Fishery Management Council actions are prioritizing communities and community-based fishermen, and requiring reductions in bycatch across the board as well as, in particular, bycatch impacts to directed fisheries.
- As a matter of high priority, designate the Southeast Alaska ecosystem as an America the Beautiful Climate Conservation Area and build on decades of community-supported ocean and forest conservation as a model for the nation. This Climate Conservation Area should include: Roadless Rule protection for the Tongass, 200,000 acres of mature forest protected to sequester carbon, a billion dollar endowment to the State of Alaska for the Alaska Marine Highway ferry system to create effective transportation in the un-roaded Tongass, salmon prioritization on Tongass rivers and streams, permanence to the Southeast Alaska Trawl closure, and \$40 million to the Southeast Alaska Indigenous Guardians program for the co-production of environmental, fish and wildlife monitoring data collection.
- Encourage the establishment of a Marine Fisheries Advisory Committee (MAFAC) task force on habitat conservation and focus on strengthening EFH conservation under Fishery Management Council action and those of other action agencies. We also encourage you to appoint MAFAC members with diverse perspectives, including Indigenous Peoples and coastal community representatives. Such an initiative would enhance collaboration and stakeholder buy-in to programs under the NOAA Office of Habitat Conservation.
- Prioritize Saltonstall-Kennedy grant awards to projects that include a component targeting the objectives/values found in the America the Beautiful report, and those projects that highlight Indigenous leadership, co-management and equitable participatory science/governance.
- Incorporate America the Beautiful conservation values into a National Sea Grant strategic plan update, including prioritization of community-supported habitat conservation efforts,

seafood supply projects that are coupled with climate resilience priorities, and projects that advance the incorporation of Indigenous and stakeholder knowledge into the management process.

- Work with states and stakeholders to create plans and milestones for regional food system initiatives (e.g., the New England Food Vision and its 50x60 goal). In existing programs, explore associations between carbon emissions, food waste, and seafood production and identify measures to reduce negative environmental impacts within the supply chain. Promote purchase of local seafood for regional consumption and distribution to enhance food security and circular economies.
- Measuring progress towards more just and equitable ocean and Great Lakes policy will require new metrics. BCCA firmly believes that outcomes-based approaches to conservation will deliver superior and more equitable results than prescription-based approaches. Federal agencies should develop stakeholder processes working directly with BIPOC and coastal community leaders to identify the issues that matter most to people living near and/or impacted by the ocean and Great Lakes, and then partner with them to build the metrics to best measure progress on those issues.
- Improve NOAA's cooperative research capabilities and make cooperative research and Indigenous/stakeholder knowledge the default pathway to collecting new data used to manage our nation's fisheries and coastal resources. Provide agency guidance and encouragement to science centers and Science and Statistical Committees to incorporate fishermen's ecological knowledge and Indigenous knowledge into fisheries science. Ultimately, implementation of these efforts will require co-production and co-management between governments (in the case of Tribes) and communities (in the case of people of color and coastal resource-dependent stakeholder communities throughout the US). Non-governmental organizations can employ their existing research capabilities to demonstrate the efficacy of building information and knowledge through traditional and Western scientific means. NOAA and other federal agencies should receive resources to adequately staff outreach and engagement efforts.
- Recognizing that the demographics of seafood eaters are largely lacking in diversity, prioritize racial and social equity and justice in seafood consumption efforts. This trend is strongly tied to economic inequality, as seafood is often considered a luxury good or is otherwise inaccessible in disadvantaged communities. However, dietary guidelines suggest that all Americans should eat seafood at least twice a week because of its essential nutritional benefits. We recommend that NOAA incorporate programmatic approaches to addressing socioeconomic and racial equity gaps in seafood consumption. We also recommend short and medium-term measures to determine where seafood is least available and support governmental and nongovernmental programs that are able to help fill gaps identified with sustainably harvested seafood.
- As a matter of high importance, end fossil fuel leases in the US EEZ and reform the BOEM leasing process to ensure that environmental and stakeholder impacts of all

offshore energy leasing processes are cumulatively assessed *prior* to leasing or the establishment of call areas.

Policy area 3: Land management and stewardship for a resilient future

- Prioritize the inclusion of grasslands as part of the 30x30 initiative, with an emphasis on bison (as the salmon of the prairie) as the preferred animal to be prioritized when considering prairie ecosystem restoration for rewilding and creating carbon sinks. Prioritize land management decisions and programs that enhance holistically managed, pasture-based livestock systems, and prioritize grant funding for projects and programs that focus on carbon sequestration, water security, ecosystem restoration, and risk mitigation on managed federal lands.
- Work with partners in the USDA Rural Development Loan Program to increase funding amounts from \$1 million to \$50 million for activities supporting 30x30 and this initiative.
- Establish and support biochar soil amendment programs at DOI agencies including BLM and work with partner agencies including USDA to support existing biochar and other soil amendment programs. As current biochar amendment research programs mature, develop an integrated strategy to maximize programmatic coverage across agencies to provide maximum regenerative agricultural and carbon sequestration benefits.
- Make soil health a multi-agency priority as an essential tool to address: rural prosperity, risk mitigation (against increased flood, drought, wildfires related to climate change), carbon sequestration, biodiversity loss and ecological restoration. Establish policies and approaches for whole-government integration healthy soil management and conservation with downstream and coastal/estuarine (e.g. 'blue carbon') conservation initiatives.
- Work with partners at the EPA to permanently deny development of the Pebble Mine project through Section 404(c) of the Clean Water Act.
- Establish an interagency workgroup, partnering with DOT, USDA, EPA, the Army Corps of Engineers, and States to repair culverts in important salmon streams. Prioritize the Tongass National Forest for early action, where 260 miles of salmon spawning streams are currently blocked by failed culverts.
- End fossil fuel leasing and renewals on federal lands and triple fiscal support for Just Transition programs in the President's budget.
- Expand existing federal Native Nation consultation policies to include Free and Prior Informed Consent of Native Nation as the standard for the planning, development, and construction of infrastructure projects traversing or impacting any and all lands located within the treaty boundaries of one or more Native Nations.

- Support, implement, and fund existing federal and tribal regulatory authorities to take fee simple land into trust on behalf of tribal nations, grant individual use rights or create tribal regulated conservation easements/projects.