

Backcountry Hunters & Anglers
Fly Fishers International
Izaak Walton League of America
National Wildlife Federation
Theodore Roosevelt Conservation Partnership
Trout Unlimited
Wild Salmon Center



Sporting Community Wetland and Stream Conservation 2024 Platform

The Theodore Roosevelt Conservation Partnership's Water Resources Working Group consists of hunting, angling, landowner, and conservation organizations focused on conserving and restoring aquatic ecosystems. Conserving wetlands and streams is critical to the hunting and angling community. Wetlands and streams provide crucial public benefits, including supporting fish and wildlife habitat, helping to recharge water supplies, reducing flood impacts, and enhancing water quality.

Yet wetlands and streams are at risk more than ever. The most recent [U.S. Fish and Wildlife Wetlands Status and Trends Report](#) finds that more than half of wetlands in the lower 48 states are gone, and loss rates have increased by 50 percent since 2009. Additionally, the recent loss of federal protections for many wetlands and streams has made it much more difficult for federal agencies to safeguard some of our most vulnerable waters from pollution and destruction. Without additional conservation actions to protect these ecosystems, wetland loss will likely continue, reducing ecosystem benefits for people and habitat for fish and wildlife. Given these challenges, the sporting community acknowledges that lifting up federal wetland and stream conservation efforts will be important. Our platform includes recommendations for action by both Congress and federal agencies. With these recommendations, we intend to unite and amplify the voices of hunters, anglers, and conservationists whose outdoor traditions depend on conserving wetlands and streams.

Overarching, Multi-Agency, Administrative Actions:

- ***Establish and implement a "national gain" wetlands goal.***

President George H. W. Bush established a policy of "no net loss" of wetlands in 1989. This policy was reaffirmed by President George W. Bush in 2002 and again in 2004, when he called for moving beyond 'no net loss' to an expansion of wetlands. This policy means that lost wetland functions must be restored through mitigation, creation, or conservation on a case-by-case basis. Implementing "no-net loss" only maintains the current wetland status with minimal opportunities for an actual gain in wetland resources. It has done little to reverse the [overall decline in wetlands](#). The White House's September 2023 [National Climate Resilience Framework](#) set the stage for an evolution to a "national gain" wetlands goal to implement the Framework. A year later, in April 2024, the White House announced the [America the Beautiful Freshwater Challenge](#), which set out a goal to reconnect, restore, and protect 8 million acres of wetlands and 100,000 miles of streams or rivers nationally by 2030. We support dedicated funding and resources for the implementation of the Freshwater Challenge.

- **CEQ directs NEPA analyses to require mitigation for all losses to aquatic services and functions.**

The CEQ can build on its important leadership towards protecting the nation's streams, rivers, and wetlands (see, e.g., [Biden Administration Post-Sackett vision](#) for clean water) by directing agencies to comprehensively assess the impacts to, and mitigation required to offset, harms to all freshwater resources when carrying out reviews under the National Environmental Policy Act (NEPA), including wetlands that may no longer be covered by the Clean Water Act.

CEQ should also strongly encourage the implementation of such mitigation actions as a fundamental tool for satisfying the mandates established by [Executive Order 11990](#) (42 Fed. Reg. 26961, May 24, 1977). Both NEPA, 42 U.S.C. 4331(b)(3), and E.O. 11990 require agencies to avoid and prevent damage to the nation's freshwater systems, including wetlands, and neither NEPA nor E.O. 11990 are confined to wetlands that are determined to be jurisdictional under the Clean Water Act.

- **Request the USFWS to lead an update of the [National Wetlands Priority Conservation Plan](#)**

The 1986 Emergency Wetlands Resources Act, [16 U.S.C. Section 3921](#), directs the Service to "periodically review and revise" the National Wetlands Priority Conservation Plan, which provided a process by which USFWS worked with other federal agencies to focus wetland acquisition efforts. The USFWS last updated the Plan 33 years ago in 1991. The Plan is important because it identifies priority wetlands to be acquired through the Land and Water Conservation Fund and state or land-trust-facilitated wetland acquisitions. See, [16 U.S.C. Section 3922](#). The update to the National Plan should assess opportunities to conserve wetlands and streams by identifying opportunities to coordinate better diverse federal, state, and Tribal wetland conservation programs and recommendations for strengthening these programs. The plan should also explore opportunities to coordinate other federal wetland conservation efforts and expand private funding and emerging ecosystem markets to better integrate wetland and stream conservation and restoration efforts.

- **Enhance Interagency Wetland Conservation Efforts.**

Although past federal policies (e.g., Executive Order 11990) direct individual agencies to take actions to minimize wetland loss, and ad hoc groups, like the Interagency Coastal Wetlands Workgroup, seek to reduce wetland losses in some geographies, there is currently no holistic national coordination effort in place to conserve the nation's wetlands and streams. We support forming a holistic interagency approach to wetland and stream conservation, similar to the [Interagency Fish Passage Task Force](#), that could be set up to provide ongoing coordination and information sharing on wetland and stream conservation efforts. A key objective of this coordination effort should be to develop and implement more effective conservation and management approaches to meet a new "national gain" wetlands goal. Any such interagency effort should come with the dedication of sufficient staff time and resources.

- **Further invest in on-the-ground capacity and workforce development initiatives to scale wetland and stream conservation efforts.**

On-the-ground capacity to implement wetland and stream restoration and conservation is a key limiting factor to scaling wetland and stream conservation efforts. Several current initiatives and programs show promise in addressing this limitation and could be expanded upon and receive increased funding. Examples include [American Climate Corps](#), [Working Lands Climate Corps](#), [Cooperative Watershed Management Program](#), [Healthy Watersheds Consortium Grants](#), community navigator support, Environmental Finance Centers, and Joint Ventures. We further recommend the development of an interagency funding portal and navigation tool to assist entities seeking funding for wetland and stream conservation and navigating available funding opportunities.

Department of the Interior Administrative Actions:

- ***Increase utilization of the Land and Water Conservation Fund for wetland/stream/water conservation:***
 - Direct relevant federal agencies to reevaluate Land and Water Conservation Fund (LWCF) criteria to assess opportunities to increase the utilization of LWCF funds for conserving wetlands, streams, and instream flows.
 - Increase the utilization of USFWS Conservation Areas, a type of national wildlife refuge consisting primarily or entirely of conservation easements on private lands in key geographies with a high proportion of at-risk wetlands and streams.
 - Direct DOI to issue updated guidance to states and local governments to ensure state and local LWCF funding reflects the need to conserve vulnerable wetlands and streams.
 - Prioritize land and water acquisitions providing stream or wetland habitat benefits, as identified in an updated [National Wetlands Priority Conservation Plan](#) (1991).
- ***Increase funding for USFWS wetland conservation easements.***

The Migratory Bird Treaty Act authorizes the USFWS to acquire or conserve lands and wetlands through conservation easements for use as waterfowl production areas in the Prairie Pothole Region. We support enhanced, diverse funding to increase the pace and scale of USFWS wetland conservation easements and evaluate opportunities to expand this program to include additional migratory bird fly-ways and other nationally important wetlands outside the Prairie Pothole Region while maintaining the conservation investment in this critical region.

- ***Fully Fund and Strengthen the National Wetlands Inventory Program.***

The USFWS National Wetlands Inventory provides critical information for managing wetland habitats and their benefits. We support funding the [National Wetlands Inventory](#) (NWI) at \$10 million to update wetlands data in high priority (rapidly changing environments, development of national landscape scale functional assessment standards, complete the NWI for all 50 states, and more effectively make contemporary NWI data in high priority environments). Further, we support efforts to strengthen the NWI by linking wetland data to setting priorities for federal wetland and stream conservation programs, including identifying priority wetland acquisitions by deploying the Land and Water Conservation Fund.

Environmental Protection Agency Administrative Actions:

- ***Increase funding and expand the scope of the EPA's Wetland Program Development Grants program through agency guidance to support initiatives that build out and increase financing for State and Tribal wetland conservation programs.***

States, Tribes, and local governments play important roles in conserving and managing wetland resources. Currently, the EPA's Wetland Program Development Grants are relatively narrowly focused on the [core elements](#) of traditional wetland conservation programs. The program also focuses on developing state and Tribal wetland plans and programs but not implementation, which is sorely needed. Expanding the scope of the Wetland Program Development Grants program to include support for innovative policies, financing, and their implementation would significantly increase the relevance and impact of the Program. Such examples include greenbanks, nutrient trading, and other conservation finance strategies. Funded annually at less than \$15 million, an increase of at least \$30 million in the Program's overall grant-making capacity and flexibility to support innovative approaches to expanding local wetland conservation efforts would accelerate wetland conservation.

- ***Allocate a portion of IRA funding from the Greenhouse Gas Reduction Fund, Climate Pollution Reduction Grants, and Environmental and Climate Justice Block Grants to further climate objectives through wetland and stream conservation.***

The Inflation Reduction Act authorized billions in funding through the EPA to support efforts to mitigate and adapt to climate change through various programs. While existing criteria do support the potential utilization of funds for nature-based climate solutions such as the conservation of wetlands, we encourage EPA to develop additional guidance and training resources for program applicants on how these unique programs (such as the Greenhouse Gas Reduction Fund, Climate Pollution Reduction Grants, or Environmental and Climate Justice Block Grants), could further support nature-based climate solutions along with more traditional climate mitigation approaches.

- ***Advocate for the EPA to direct a funding allocation of the Section 319 nonpoint source pollution-reduction grants to states specifically for wetland and stream restoration.***

The EPA's formula for allocating Section 319 nonpoint source pollution-reduction funding to states relies most heavily on a state's population and amount of land in row-crop production. See, [68 Fed. Reg. 60653 at 60673 \(2003\)](#). A state's demonstration of effectiveness in restoring critical freshwater habitats through its Section 319 program is not currently a factor. Creating a specific allocation of Section 319 funding to reward and foster such excellence in a state program would help drive more wetland and stream restoration, providing an exemplary pathway for reducing non-point source pollution at the local level through voluntary actions.

Army Corps of Engineers Administrative Actions:

- Recommend specific changes to Nationwide Permit 27 (NWP27) text in consultation with the Army Corps to facilitate effective aquatic ecosystem restoration.
- Work to ensure that Army Corps civil works project studies, designs, and/or operations do not sever Clean Water Act jurisdiction of affected wetlands and other aquatic resources but instead facilitate and restore the conditions that will ensure jurisdiction.
- Ensure Corps planners prioritize avoiding impacts in vulnerable waters and wetlands as required by law and encourage greater utilization of natural infrastructure in implementing the Principles, Requirements, and Guidelines (PR&Gs).

Federal Emergency Management Agency Administrative Actions:

- Advocate for a final FEMA rule implementing the Federal Flood Risk Management Standard that provides a separate "no-rise" permitting pathway for floodplain restoration projects with more flexible supporting analyses than for built development in the floodplain.
- Direct/encourage FEMA to set aside funding and technical resources through the Flood Mitigation Assistance Program, Hazard Mitigation Grant Program, STORM revolving funds, and Building Resilient Infrastructure and Communities Program to promote the greater utilization of nature-based climate solutions, including conserving wetlands and source watersheds.

Federal Legislative Initiatives:

- **Appropriations:** Maintain and strategically increase discretionary funding for key federal wetland conservation programs, including the North American Wetlands Conservation Act and Wetland Program Development Grants. We will work with partners to develop an annual wetlands budget to coordinate appropriations efforts.
- **Recovering America's Wildlife Act:** Support the Passage of Recovering America's Wildlife Act, which would enhance Pittman–Robertson funding for State and Tribal wildlife/conservation funding to increase resources for wetland and stream conservation and restoration, among other priorities identified in wildlife action plans and other conservation planning efforts.
- **EPA Geographic Programs/USFWS Conservation Areas:** Advocate for new EPA Geographic Programs and/or USFWS Conservation Areas to voluntarily provide resources to conserve vulnerable wetlands and smaller streams. Maintaining funding for existing regional programming will be important to avoid pulling resources from existing conservation efforts. Rep. McCollum's [Mississippi River Restoration and Resilience Initiative](#) exemplifies a current legislative effort modeled on the popular Great Lakes Restoration Initiative.
- **National Flood Insurance Program:** Advocate for a definition of floodplain restoration separate from floodplain development in Congress' update of the National Flood Insurance Program, which should also be included within the minimum floodplain standards.
- **Oppose Efforts to Weaken the Clean Water Act:** Oppose proposals to undermine the Clean Water Act's protections and enhancement of water quality and watershed health.
- **Farm Bill:** The Farm Bill includes several important programs and provisions designed to support the conservation of wetlands and streams. We support wetland recommendations identified in the [Agriculture and Wildlife Working Group 2023 Farm Bill platform](#), including increasing funding for Wetland Reserve Easements and defending against efforts to weaken Swampbuster provisions.

The above recommendations will help conserve, protect, and restore our nation's waters, including vulnerable wetlands and streams across the country. These waters provide habitat for more than half of North American waterfowl, critical spawning grounds for salmon and trout, and drinking water for millions of people. Our groups look forward to working with Congress and federal agencies to advance these recommendations to safeguard fish and wildlife habitat and the future of hunting, fishing, and outdoor recreation.

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