

October 10, 2022

Brenda Mallory
Chair, Council on Environmental Quality
1600 Pennsylvania Ave NW
Washington, DC 20500

Dear Ms. Mallory:

The undersigned hunting, fishing, conservation, professional society, outdoor-industry, and landowner organizations write to encourage the Biden Administration to expeditiously finalize and publicly release the U.S. Fish and Wildlife Service (Service) Service-Wide Mitigation Policy.

Since March 2021, our organizations have consistently urged the Council on Environmental Quality, Department of the Interior, and Service to prioritize prompt release of this policy. Prior to being withdrawn in 2018, the Service had taken public comment on this policy, as well as a policy specific to Endangered Species Act compensatory mitigation. In addition, we understand that these policies now have undergone a robust interagency review process.

Other agencies, such as the Bureau of Land Management and National Oceanic and Atmospheric Administration, have reissued mitigation policies or adopted new policies and we congratulate the Biden Administration on this work. Yet without policies in place at the Service, project proponents and mitigation providers lack predictability and cannot take full advantage of the permitting efficiencies that such policies are able to provide.

It is critical that policies be made available to Service field staff expeditiously to reaffirm and solidify the agency's long-standing support for using mitigation to balance conservation and development. Timely issuance of a Service-wide mitigation policy is also important to help ensure consistency across the agency as it advances multiple rulemakings now (i.e., Migratory Bird Treaty Act and Compensatory Mitigation Mechanisms) and in the future.

Thank you for your consideration, and please know that our organizations stand willing to assist the administration in this important work.

Sincerely,

Backcountry Hunters and Anglers
National Deer Association
National Wildlife Federation
The Conservation Fund
The Nature Conservancy
Theodore Roosevelt Conservation Partnership

CC: Stephenne Harding, Senior Director for Lands