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Bill Kempf

Fishing Guide

Paul Cleary

Resident

Andy Suenram

Resident and Sportsman

Mark Raffety

Rancher- Lower Big Hole

3/3/2022

Re: Working Lands Collaborative Perspective for 30x30 Initiative

Dear leaders of 30x30 Initiative,

The Big Hole Watershed Committee (BHWC) is a collaborative conservation organization in Southwest Montana that has, since 1995, embodied and enacted the principles to which the American the Beautiful initiative aspires.

Over two decades ago, the Big Hole watershed saw the impacts of prolonged drought, including water shortages, river closures and major impacts to fish populations. Local ranchers and a diversity of stakeholders came together, with the support of state agencies, to develop a model for locally led resource management issues in the Big Hole watershed. In 1999 we released the state's first completely voluntary Drought Management Plan, which we still operate today. This plan is a model the State of Montana increasingly points to as they plan for a future in which climate has changed and precipitation patterns are less predictable. At its foundation, our plan recognizes the sovereignty of water rights as private property (Principle 6) that must be respected, and that only through voluntary conservation by irrigators under the principle of Shared Sacrifice, will we be able to manage our water resources for all users.

Our current Board of Directors is comprised of 21 members representing diverse regional interests, including ranchers, sportsmen, business owners, conservationists, and community members who work by consensus to move conservation initiatives forward (Principle 1). For two decades, BHWC has partnered with federal and state resource management agencies to develop projects that enhance the vitality of the Big Hole River, the surrounding watershed and communities, and the diverse and rare wildlife that inhabits the Big Hole Valley (Principle 2). The Big Hole River is the lifeblood for the surrounding area's agricultural and recreation-based economies. By proactively working to conserve this precious resource, BHWC is enriching one of Montana's last, best places for local residents and anyone who visits (Principle 3).

Over a quarter century, we commissioned dozens of scientific studies to understand the natural and ecological processes at play in our watershed, basing our direction and priorities on sound science (Principle 6). With a small staff of 3 full time employees, we secure grant dollars to design and implement restoration projects that improve water quality and natural stream functions, leading to a landscape that naturally holds more water in its soils and floodplains. We've delivered over \$8 million in on-the-ground projects in our history, improving 26 miles of stream length. With added capacity since 2016, we've implemented over \$3 million of restoration projects in this short time. Most of those funds paid local contractors and engineers (Principle 5), and came from the types of grant sources that would be boosted by the 30x30 initiative.

Our organization raises the priority of local resource needs and fills the gaps at under-staffed resource agencies to secure letters of support, write proposals and permits, contract and oversee construction projects and deliver conservation. We have contracted with the Bureau of Reclamation's WaterSMART grant program, held subcontracts under National Fish and Wildlife Foundation grants and NRCS Conservation Innovation Grants programs, EPA's 319 Clean Water Act, and are currently working with the US Forest Service and Bureau of Land Management through Partnership Agreements (Principle 8). The America the Beautiful Act, if truly executed according to its guiding principles, could supercharge the implementation of meaningful conservation, but only if the following measures are taken:

- The continued viability of working lands must be seen as paramount, and be supported through all conservation initiatives on public and private land. Public and private land ranchers play a vital part in the stewardship of our lands. Land conversions that break up large landscapes or remove active stewards from the land will have negative consequences for water quality and quantity and wildlife habitat of all kinds. Native people of this country managed our landscapes for thousands of years, so notions of locking land up and "preserving" it flies in the face of our human history on our landscapes and defies basic ecological principles like the need for disturbance for regeneration. Increasing incentives for voluntary conservation measures could support ranchers to implement practices on their lands that sequester carbon, protect stream health, promote fish habitat and connectivity, and enrich biodiversity, as well as satisfy their bottom lines.
- Local watershed groups should be supported with a baseline of capacity funding as the foundation for the delivery of conservation in our country. Landowners tend to hold a high degree of trust in locally-organized watershed groups, and are much more willing to participate in conservation programs when partnered with groups such as ours. Small NGOs spend an inordinate amount of time and resources simply securing funds for their continued existence. A floor of capacity funding for groups such as ours in the range of \$50,000 - \$100,000 annually would exponentially increase the amount of conservation we can accomplish, and would speed the efficiency of delivering Federal conservation dollars.
- Our landscapes need to be managed for improving habitat conditions, not the viability of a single species. Single-species conservation has led to the weaponization of the Endangered Species Act, which has been used by a small handful of organizations to delay and destroy well-intentioned efforts to manage our public land resources. The same organizations using litigation (disguised as conservation) as their business model, are the same ones who choose to not sit at collaborative tables like BHWCS. Measures should be taken to disincentivize serial litigation under the ESA and remove a major external obstacle to stewardship and conservation. Internally, the NEPA process should be streamlined in order for projects to not get bottlenecked due to insufficient agency staffing.



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We thank the Administration for their efforts to increase conservation across the country. We are encouraged that, if the program truly adheres to its core principles as described, we can leave our land and water in a better condition for future generations.

Sincerely,

Pedro Marques
Executive Director
Big Hole Watershed Committee
pmarques@bhwc.org