

March 31, 2023

Arati Prabhakar  
OSTP Director  
Office of Science and Technology Policy  
Executive Office of the President  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue  
Washington, D.C. 20504

Re: Framing the National Nature Assessment Non-Governmental Organizations Coalition  
Comment Letter; Document Number 2022-23593

Dear Arati Prabhakar,

Our planet and nation are facing an alarming biodiversity crisis, largely driven by human activity and closely tied to nature's collapse. We are thankful that the Biden administration has begun to build a foundation for addressing this crisis and recognizes one of the key obstacles: we do not currently have a clear and consistent picture of where America's biodiversity stands today. We see the National Nature Assessment as an important opportunity to set us on track for more effectively protecting and restoring America's biodiversity by first deepening our knowledge of its status, trends, and challenges. As beneficiaries of biodiversity and potential users of the first National Nature Assessment, we write to express some commonly held perspectives on its intended use.

The global status and trends of biodiversity are abundantly clear. Today, about a million species are at risk of extinction globally, the majority of land and seas have been significantly modified by human activity, and populations of wild species continue to decline. While there is a lack of synthesized information on what is happening in the U.S., current science indicates that the nation is not exempt from this pattern in biodiversity loss. Hundreds of imperiled species continue to slide towards extinction, and 23 species have been proposed for delisting from the ESA because they are likely extinct — listed too late to prevent their disappearance. Others continue to decline rapidly while awaiting protections. The loss of biodiversity presents a direct threat to the security, health, and well-being of people in the United States by reducing valuable ecosystem services like water filtration and pollination. Additionally, biodiversity loss disproportionately impacts communities of color, low-income and Tribal communities, and other populations that have been excluded from decision-making.

In a moment of mounting extinctions, the Assessment presents an opportunity to better understand U.S. biodiversity loss and prepare society for addressing and remedying the crisis facing nature and its benefits to humankind. The Assessment should provide a stronger

foundation for additional and urgently needed policy action by the federal, state and tribal governments to mitigate the leading drivers of species loss. These actions include the development of a National Biodiversity Strategy which would strengthen the nation's commitment to stemming the biodiversity crisis, promote a more coordinated response, and provide governments, corporations, and non-profits with a roadmap for actions needed to address the crisis' major drivers.

Specifically, we ask the U.S. Global Change Research Program to consider the following as it develops the National Nature Assessment:

***'Nature' and Purpose.*** One essential purpose of the Assessment is to provide the best available scientific evidence for informing decisions and action to protect and restore the integrity of U.S. ecological systems, with special concern for biological diversity. In accomplishing this purpose, we fully support a rigorous effort to include tribal and indigenous knowledge. The overall scope of the assessment should be to assess the status and trends in U.S. biodiversity and the impact of biodiversity on America's well-being. As such, 'Nature' is biodiversity and the systems that are necessary to help to sustain it.

***Analyze the Threats.*** To inform effective conservation decisions for biodiversity, we need to focus on the root of the crisis. The Assessment should use the latest data and science to analyze direct and indirect drivers of biodiversity loss, and pathways for their mitigation. It should include analysis of the following questions:

1. The 2019 Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services Global Assessment identified five leading drivers of worldwide biodiversity loss. What are the leading drivers of U.S. biodiversity loss?
2. What are the main elements of each of the leading drivers of U.S. biodiversity loss?
3. What is the current status and trend of each leading driver?
4. What is the relative contribution of each of the leading drivers to U.S. biodiversity loss?

***Assess Social Implications.*** There is no greater common interest than healthy, natural systems. Biodiversity impacts us all. The Assessment should communicate the social implications of biodiversity trends, inclusive of all sectors of American society and the wide range of stakeholders. In addition to providing an overall national scale-assessment of biodiversity loss, the Assessment should include detailed information about the status of trends of biodiversity loss, and the factors driving its decline, at a geographic scale useful to inform state and regional conservation action by states and tribes. It should include analysis of the following questions:

1. What are the major economic, public health, ecosystem and wildlife impacts of U.S. biodiversity loss?

2. What is the current rate of U.S. biodiversity loss? What are the long-term consequences to the economy, public health, and wildlife if U.S. biodiversity loss continues?
3. The 2018 National Climate Assessment includes important analysis of climate change impacts for key sectors and “national topics” including agriculture and rural communities, human health and tribes and indigenous people, and for various regions of the U.S. How is biodiversity loss impacting these and other sectors, “national topics” and geographic areas?

The U.S. must make substantial progress in ensuring the conservation of the nation’s biodiversity for its own sake, for our immediate well-being, and for future generations. The Assessment should provide information sufficient for policymakers at all levels of government to understand the dimensions of the U.S. biodiversity loss and take policy action to mitigate its systemic causes. If framed to accomplish these purposes and to answer the specific questions we propose, the National Nature Assessment should be an important catalyst for urgently needed and long overdue policy action to address the biodiversity crisis.

Sincerely,

Advocates for Snake Preservation  
American Bird Conservancy  
Appalachian Trail Conservancy  
Buffalo Field Campaign  
Californians for Western Wilderness  
Center for Large Landscape Conservation  
Chesapeake Conservancy  
Christian Council of Delmarva  
Coalition on the Environment and Jewish Life  
Coalition to Protect America’s National Parks  
Coast Range Association  
Colorado Native Plant Society  
Colorado Wild  
Conservation Northwest  
Creation Justice Ministries  
Defenders of Wildlife  
Earthjustice  
Endangered Habitats League  
Endangered Species Coalition  
EPIC – Environmental Protection Information Center  
Extinction Rebellion Vermont  
Farmer Frog - Foundation for Sustainable Community  
FOUR PAWS USA  
Friends of Nevada Wilderness

Friends of the Earth  
Friends of the Earth US  
Great Old Broads for Wilderness  
Great Old Broads for Wilderness PNW Wildlife Interest Team  
Great Old Broads for Wilderness Tucson Region  
Health in Harmony  
Healthy Ocean Coalition  
Howling for Wolves  
Humane Action Pittsburgh  
Humane Society Legislative Fund  
Inland Ocean Coalition  
International Marine Mammal Project of Earth Island Institute  
Juniata Valley Audubon Society  
Kentucky Heartwood  
Kettle Range Conservation Group  
Klamath Forest Alliance  
Klamath Siskiyou Wildlands Center  
Madrean Archipelago Wildlife Center  
Mid-Atlantic Invasive Species Council  
National Aquarium  
National Parks Conservation Association  
Natural Resources Defense Council  
New Mexico Wild  
NH Wildlife Coalition  
North Central Washington Audubon Society  
Northern California Council, Fly Fishers International  
NY4WHALES  
Oceanic Preservation Society  
OneNature  
Oregon Wild  
Pennsylvania Society for Ornithology  
Point Defiance Zoo & Aquarium  
Predator Defense  
#RelistWolves  
Resource Renewal Institute  
RESTORE: The North Woods  
Roaring Fork Audubon  
Rocky Mountain Recreation and Wildlife Initiative  
Rocky Mountain Wild  
San Luis Valley Ecosystem Council  
Save Animals Facing Extinction  
Save the Manatee Club  
Seattle Aquarium  
Sierra Club

Soda Mountain Wilderness Council  
Southern Environmental Law Center  
Standing Trees  
The Conservation Cooperative  
The Cougar Fund  
The Humane Society of the United States  
The Urban Wildlands Group  
The Xerces Society for Invertebrate Conservation  
Trap Free Montana  
United Plant Savers  
Upper Valley Affinity Group  
Voice for Animals  
Voices of Wildlife in NH  
Western Watersheds Project  
Western Wildlife Outreach  
Wild Farm Alliance  
WildEarth Guardians  
Wildlife Conservation Society  
Wildlife for All  
Wolf Conservation Center  
World Wildlife Fund  
Wyoming Untrapped  
Zoo New England