

Public Comments Processing  
Attn: FWS–R4–ES–2021–0007  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041–3803.



June 7, 2021

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

**Re: *Threatened Species Status with Section 4(d) Rule for Suwannee Alligator Snapping Turtle*, 86 Fed. Reg. 18014 (April 7, 2021) (Docket No. FWS– R4–ES– 2021–0007)**

To Whom It May Concern,

On April 7, 2021, the U.S. Fish and Wildlife Service (Service) published a proposed rule for the *Threatened Species Status with Section 4(d) Rule for Suwannee Alligator Snapping Turtle*, 86 Fed. Reg. 18014 (April 7, 2021) (Docket No. FWS– R4–ES–2021–0007) (Proposed Rule). The Forest Landowners Association appreciates the opportunity to submit the following comments.

The Forest Landowners Association (FLA) is an association of landowners who are the stewards of America’s private forests. FLA represents over 5,000 private forestland stakeholders, owning and managing over 50 million acres of forest in 45 states. Our members manage their land with a sustainable approach, ensuring the prosperity of their forests for future generations. Our constituents range from large forest businesses whose land has been in their families for generations to those who have become forest landowners because they view forests as a long-term investment. FLA is committed to preserving America’s tradition of private forest ownership, promoting the importance of forest resources, and securing a legacy that can be passed to the next generation.

### **Role of Private Working Forests**

Private forest landowners have a long and successful track record of managing forests for long-term productivity and benefits such as clean air, clean water, healthy wildlife habitat, and a strong rural economy. In recent years, FLA has worked to bring diverse stakeholders together to build a model of collaborative conservation that relies on open communication, transparency, and trust. This collaboration allows the Service to see the stewardship of private landowners on the ground and encourages landowners to play an active role in species status assessments, sharing data from their land, and participating in voluntary programs to help preclude listings based on incomplete information about species and their habitat.

### **Comments on the Proposed 4(d) Rule**

We applaud the Service for crafting a 4(d) rule for the Suwannee Alligator Snapping Turtle that acknowledges the use of best management practices (BMPs) for activities in freshwater wetlands and riparian areas. Forestry BMPs are developed at the state level using the best

available science to ensure that forestry practices protect water quality and habitat for aquatic species. These BMPs are developed by a diverse technical advisory committee – including hydrologists, soil scientists, biologists, academics, the environmental community, landowners, and foresters – to ensure that water quality is protected across the state.

Forest landowners use best management practices as a tool to protect the quality of their water resources while still conducting vital management activities on their land. Of all FLA members nationwide, over 90 percent currently implement forest management plans that include BMPs. By making exceptions in the 4(d) rule for forest management activities such as construction, maintenance, pesticide and herbicide use, and other silviculture and forestry best management practices, landowners can simultaneously protect habitat for the Suwannee Alligator Snapping Turtle and conduct the management activities needed to keep their forests healthy and remain economically viable while providing raw materials to the wood using marketplace.

We adopt and strongly support the comments submitted by the National Council of Air and Stream Improvement (NCASI), demonstrating the current scientific consensus that state BMPs are protective of aquatic species. As demonstrated in NCASI's thorough comments, science shows that responsible forest management through BMPs does not present a threat to the Suwannee Alligator Snapping Turtle and is in fact beneficial in maintaining water quality and habitat for aquatic species. Moreover, landowners across the Southeast specifically use BMPs as a cornerstone land management tool and both Florida and Georgia (states that the Suwannee Alligator Snapping Turtle currently inhabits) have BMP compliance rates exceeding 94 percent among forest landowners.

### **Conclusion**

FLA appreciates the opportunity to provide comments to this Proposed Rule. By acknowledging the use of state-approved BMPs, the Service can implement a scientifically sound conservation plan for the Suwannee Alligator Snapping Turtle that not only protects the species but recognizes the good stewardship of private landowners and their working forests.

Thank you in advance for your consideration of these comments. We look forward to continuing our work with the Service to help conserve species across the forest landscape.

Sincerely,

A handwritten signature in cursive script that reads "Katie Moss".

Katie Moss  
Policy and Legislative Assistant  
Forest Landowners Association