Dr. John D. Graham, Ph.D. 
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

Dear Mr. Graham:

Thank you for your letter encouraging the Department of the Interior to integrate the U.S. Fish and Wildlife Service (Service) critical habitat mapping data into the Geospatial One-Stop Initiative. We support the overall goals of Geospatial One-Stop and believe that there is significant benefit to citizens by making this data available via the internet.

In addition to making data available to Geospatial One-Stop, we propose sharing the critical habitat mapping data with the U.S. Geological Survey (USGS) so that they can incorporate critical habitat mapping into the NationalAtlas.gov. As you know, Geospatial One-Stop makes the data available so citizens can create their own maps if they have the appropriate software and expertise. The U.S. Geological Survey also has an internet map server called NationalAtlas.gov that actually allows the public to create their own maps online by incorporating various layers of data of their own choosing onto a discrete part of the United States. In short, Geospatial One-Stop is a raw data source and NationalAtlas.gov is an internet mapping server.

The Service has developed a prototype mapping tool using existing GIS technologies to allow for mapping and display of endangered species critical habitats. This tool has just recently completed in house Beta testing and is to be made available to the public on a limited basis by the end of the calendar year.

The Service is dedicated to the concept of Geospatial One-Stop and the value of making critical habitat GIS data available via the GOS Portal. However, there are a number of programmatic and resource challenges that must be faced in order to make this an effective and useful library of information that is both available and useful to the general public. Currently, there is only a small percentage of critical habitat designations in a GIS format. Most critical habitat designations, especially those designated prior to 2001, are described in the classic meets and bounds legal definitions of parcels or lists of coordinate pairs (e.g., Latitude and Longitude). We are committed to the eventual conversion of these older designations that would need to be re-mapped using a Geographic Information System format, but it may take considerable time.

We will work with the USGS to insure that, when we post critical habitat GIS data, it will be of sufficient detail and accuracy that citizens to be able to rely upon the information for decisions they must make regarding endangered species on their lands.
We also want to insure that when we provide GIS critical habitat data we will be able to include adequate ancillary data that supports the species designation of critical habitat. There is significant ancillary information that is not portrayed on a map, but is provided in the Federal Register publication. This information (constituent element descriptions, Recovery Plan pdfs, office contact points, etc) must be provided by other means, without which the critical habitat designation maps would be of minimal use.

The Service is also interested in pursuing the option that having the critical habitat data accessible on Geospatial One-Stop is a legally sufficient form of “publication” in order to allow us to discontinue publishing the data in the Federal Register. This would ensure that Service resources being used for more valuable species conservation efforts.

The Service is committed to the following short term and long-term actions to address these issues and make critical habitat data available to Geospatial One-Stop and NationalAtlas.gov:

**Short term (3-6 months)**
1. Continue discussions with Geospatial One-Stop staff on technical issues, limitations of data, etc.
2. Modify existing GIS critical habitat designations to a consistent format, with consistent attributes and FGDC Metadata.
3. Modify our current mapping tool and publish a map service that is available through the GOS portal. Insure that the public understands the limits of the data.

**Long Term**
1. Develop a schedule for assessing resource needs and time frame to evaluate and implement necessary programmatic changes to ensure proper format and consistency and metadata for all new critical habitat designations.
2. Evaluate programmatic needs to develop GIS coverage of currently published critical habitats.
3. Based upon resource and programmatic review, develop timeline for a national critical habitat digital library within open GIS and FGDC Metadata standards, which contains coverage and links to the necessary supporting information.
4. Develop a proposed rule that would modify the existing critical habitat regulations that require publication of the critical habitat maps and data in the Federal Register.

We look forward to working with USGS and other members of Geospatial One-Stop as well as working on the NationalAtlas.gov initiative with USGS in order to provide better service to citizens through E-Government.

Sincerely,

Craig Manson
Assistant Secretary
for Fish and Wildlife and Parks