

Blue Goose Alliance Bulletin

#3 - June 29, 2000

Testimony on Refuge Needs Submitted to House Resources Committee

We had planned to submit testimony to the Subcommittee on Fisheries Conservation, Wildlife & Oceans on the current status and future needs of the National Wildlife Refuge System. Then, we learned that the Subcommittee had already reported out the Refuge Centennial Bill to the full Committee. So, we completed the testimony and submitted it to each member of the full Resources Committee on June 22nd. It was also submitted to the Subcommittee for inclusion in the hearing record of HR4442.

Thirty one individuals signed this testimony. The text is included below.

Testimony Submitted to the
Subcommittee on Fisheries Conservation, Wildlife and Oceans
of the
House Committee on Resources
Regarding the Current Status and Future Needs of
America's National Wildlife Refuge System

Mr. Chairman, members of the Committee, we, the undersigned, respectfully request that this testimony be considered and printed in its entirety in the record of the June 15, 2000, Hearing on H.R.4442, regarding The National Wildlife Refuge System Centennial Commemoration Act. Mr. Chairman, the people who endorse this testimony have extensive, lengthy experience with the National Wildlife Refuge System (NWRS). They have managed refuges during long and rewarding careers, or have been intimately associated with one or more refuges through volunteer efforts or in other supporting roles. Some held mid and upper level administrative positions in Regional and/or National offices of the Fish and Wildlife Service with major duties and responsibilities associated with the NWRS. In recognition of H.R. 4442, we submitted previous testimony dealing exclusively with that legislation and its goals. This testimony deals with the present status and future needs of our NWRS.

We urge creation of a National Wildlife Refuge Service

Mr. Chairman, we strongly urge this Committee, as it moves to enact the Refuge System centennial legislation, to establish a new agency within the Department of the Interior - a National Wildlife Refuge Service and to place within this new agency the NWRS and the supporting functions existing within the Fish and Wildlife Service. This testimony explains why we make such a recommendation.

Ailing Refuge System needs attention

In our testimony in support of H.R.4442, we described the humble beginnings, the magnificent growth, and the tremendous potential for delivering wildlife and public benefits of the NWRS. While those statements are true, we must report to you that the

NWRS is ailing and urgently needs the attention of this Committee. In spite of its enormous potential for protecting and enhancing natural resources and fostering public recreation and education, the NWRS remains largely unknown to the average citizen and operates from a position of profound weakness within the Fish and Wildlife Service.

A paradox: perception vs. reality

A paradox exists with the NWRS. Part of that paradox stems from the difference between perception and reality. The perception that a System that has grown from less than ten acres in 1903 to nearly ninety-four million acres this year means the System is fully successful. The perception that a System that has so many spectacular attributes must be a healthy and vibrant success within the world of bureaucracies. The reality is, however, that the growth in dimension, and in the attributes (that largely grow with the dimension and location), are primarily a result of several mighty, and ultimately successful efforts by many private citizens, supporting organizations, and the Congress, and not from the plans and vision of the FWS. While these dimensions and attributes have grown, the complexities and difficulties have also enlarged, sometimes exponentially. Today, the National Wildlife Refuge System is so severely underfunded and understaffed that it operates far below its potential for delivering fish, wildlife, and plant conservation and wildlife-dependent recreational uses to the American people. Without the constant innovation and personal dedication of the mere two thousand field employees of the NWRS, the System would hardly function at all.

Examples of reality: severe shortages and unmet needs

To illustrate the realities of the NWRS, we offer the following examples:

Funds for Refuge System lag far behind other Federal land programs In the 30 years from 1964 to 1994, the NWRS was expanded by 64.8 million acres, with 135 new units requiring administration. During that time, Bureau of Land Management responsibilities diminished by 197.2 million acres, the Forest System grew by 5.3 million acres (with 7 new units), and the Park System grew by 49.1 million acres (with 39 new units). Yet, an analysis, done in 1995, found, on a per-acre basis, that operational funding for Park units was \$13.23, the Forests received \$6.83, BLM lands \$2.54, and Refuges received only \$1.81. To someone with even the most rudimentary understanding of the management programs and needs of these four land management programs, this discrepancy between Refuges and the other three is categorically absurd.

A frustrating dilemma - adding lands without adequate funds to properly administer A common and long-standing dilemma within the NWRS is the practice of adding land areas to the Refuge System knowing full well that sufficient funds to properly manage them will not be available. Granted, in many instances, minimal funding to begin management of new acquisitions accompanied funding for acquisition. But, in many instances it did not. The result is that funds desperately needed at an existing refuge are diverted to a new refuge to at least provide some measure of protection and initial services. This scenario has been repeated over and over and over for years throughout the System. The alternative of simply stopping land acquisition is not acceptable. Opportunities to protect outstanding and vital habitats may exist only once. Without acquisition, the habitats could be lost forever. Hence the dilemma, and the frustration felt by many in the Refuge System. Some ramifications of the dilemma are illustrated in the following two examples.

Too Many Refuges Without Any Staff or Budget As of 1999, according to Table 1 of the Report of Land Under Control of the USFWS as of September 30, 1999, the Refuge System contained 521 designated refuges and 200 management districts for the Waterfowl Production Areas. Yet only 259, or 36%, of those stations received funding and staff. All other field units were assigned to one of the funded and staffed units as a "satellite" and have to rely upon periodic visits by already meager and heavily committed staffs on those distant stations for infrequent patrol, maintenance and operational activities, and any visitor services.

Desert NWR, Nevada: Stretched to the Breaking Point The Desert NWR complex near Las Vegas, Nevada must administer and support operations for the Ash Meadows NWR located nearly 100 miles northwest of headquarters, the Pahrangat NWR, located 85 miles north of headquarters, and the Moapa Valley NWR located 60 miles northeast of headquarters. In addition, this refuge complex administers several easements protecting the remaining populations of several endangered or threatened fish species, located at considerable distances from headquarters. Meanwhile, the basic refuge unit, the Desert National Wildlife Range, whose southern boundary is 26 miles north of headquarters, contains 1.5 million acres harboring most of the Nelson's desert bighorn sheep in Nevada, plus many other important species and features of the Mojave Desert ecosystem. Administration of the Desert Range is complicated by the presence of a major overlay by a U.S. Air Force bombing and training range covering the western half of the Refuge. Yet, that complex must accomplish all those missions with 12 FTEs and less than \$900,000 (1997 Actual Expenditures). There is hardly any sight more inspiring, or more serene and lovely than the desert-mountain landscapes of the basin and range country at sunrise and at sunset. But that alluring vision fails to reveal the enormous unfulfilled potentials at the Desert Refuge Complex for benefiting the fish and wildlife and for delivering outstanding educational and recreational benefits to visitors. It also fails to perceive the awesome sense of responsibility resting on the shoulders of those refuge employees that must day after day find a way to accomplish even the very minimum needed to just keep the refuges and easements protected and operational and, when appropriate, open to the public. That is reality.

Malheur NWR, Oregon: a Worn-out System to Deliver the Life's Blood--Water The Malheur NWR, in Oregon, with its 60 year old, dilapidated water delivery and dispersion system must try to provide a variety of habitats for hundreds of species, including dozens of important migratory bird nesting populations. Yet the needed engineering plans for a complete rehabilitation of that ancient system have yet to be undertaken because the probable total cost of the overhaul would be so much that no FWS administrator will even approve doing the planning. Or, it might be Lacassine NWR in Louisiana, or the Klamath Basin Complex in northern California and southern Oregon. Examples abound, Mr. Chairman, but we doubt that members of this Committee, or the Appropriations Committee know about them.

Upper Mississippi River Refuge: Missed Opportunities, Missed Public Benefits The Upper Mississippi River Wildlife and Fish Refuge, established in 1924, extends along 200 miles of the Mississippi River in four States. It comprises some of the most beautiful river valley scenery and wildlife resources in the world. It already has the most visitors of any unit of the Refuge System. Yet, it remains virtually unknown in America. If this refuge's responsibilities were to be compared to a similar unit managed by the National Park Service, the differences would be staggering. What is missing? Money and staffing and an opportunity for thousands of additional Americans to enjoy a full array of wildlife-related benefits which is their heritage.

Pelican Island NWR, Florida: America's First, the Saddest Case of All As a final example, let us look at the birthplace of the Refuge System, Pelican Island in Florida. It is among the saddest examples of neglect in the NWRS. For years, field and regional staffs have recommended actions to protect, enhance, and interpret this historic place. Land acquisition to shield the three acre island from the threatening onslaught of commercial development has been a compelling, but still uncompleted need. Until the 1990s, the refuge had been without on-site staff for many years, administered as a distant satellite of the Merritt Island NWR, 75 difficult miles to the north. Finally, a staff of one person was added, but almost immediately was also given responsibilities for the nearby Archie Carr NWR, a severely threatened turtle nesting beach that requires frequent patrols and diligent interaction with adjacent landowners. Thus, as we approach the 100 year celebration of its protective reservation by a caring President, that birthplace is seriously threatened by imminent, incompatible development and has no visitor interpretive facilities to describe the historical significance of the Refuge. And, it still has a staff of one person whose time is divided with another severely threatened Refuge unit. This intolerable situation exemplifies that a Fish and Wildlife Service, forced to select among many competing immediacies, has consistently failed to give priority to this very special, nationally significant birthplace of America's Wildlife Refuge System.

We know American's care, so why the crisis?

Mr. Chairman, one who understands these realities must immediately ask, how can that be? Americans, in every poll taken, place the highest of priorities on fish and wildlife conservation and the full range of recreational opportunities associated with animals and their living spaces. Surely, one not familiar with bureaucracy might be puzzled by the examples described above. One might conclude that these are isolated cases. Unfortunately, that conclusion would be wrong. There are many examples such as these throughout the System and across the country.

The NWRS is a key wildlife conservation program, but it is not alone

Recently, the Director of the Fish and Wildlife Service stated that the Service was opposed to the creation of a separate agency for the Refuge System because it would "shatter" the national fish and wildlife conservation program of the Fish and Wildlife Service. With all due respect to the Service Director, that is a very narrow and self-centered view of reality. In fact, the "national" fish and wildlife conservation program encompasses many agencies and activities. The U.S. Forest Service, the Bureau of Land Management, the National Park Service, the National Resource Conservation Service, the Native American Tribal Reservations, the military lands of the Department of Defense, and the federally assisted programs of the several State Wildlife Agencies also play important roles in national fish and wildlife conservation. To say that elevating the Refuge System to full agency status would shatter this program hints at a lack of understanding of the true nature of the program -- a perception, not reality.

Full agency status would facilitate, not disrupt accomplishments

It has been said that the regulatory and policy formulation functions of endangered species recovery in the Fish and Wildlife Service should not be separated from the on-the-ground operational aspects of endangered species management in the Refuge System. Here again, the paradox arises. The reality is that most of the agencies listed above are involved with on-the-ground actions directed toward endangered species recovery. In addition, appropriately designed land use practices on private lands can have a major, beneficial impact on the recovery of certain endangered species. To imply

that the Refuge System must be retained within the Fish and Wildlife Service in order for the System to properly carry out its endangered species responsibilities is an unfounded criticism of professional refuge personnel and a misguided assumption that somehow the Endangered Species Act will cease to apply to a new Refuge Service. Either supposition is ludicrous.

Will separate agency status immediately solve all of the Refuge System's problems? Of course not. Only the most naive would think so. Competing and conflicting demands for the use of Refuge lands would continue to exist. Distinctions between compatible and non-compatible uses would continue to be required. Pressures for economic developments would continue. Critical funding needs would require attention, while competition between agencies for such funding would continue. Priorities would still need to be established. It isn't an easy job to reconcile the needs of a deserving public with the priority needs of wildlife. But, it is a challenge upon which Refuge personnel have historically thrived.

Undivided attention and improved decision-making is but one benefit

The difference made by a National Wildlife Refuge Service is that as a refuge manager grapples with those challenges, he or she knows that throughout the chain of command to the Chief of the Refuge Service, he or she has the full, knowledgeable, and undivided attention and support of his or her superiors. The refuge manager knows that every decision made throughout the agency is made by people experienced in the Refuge System and in the best interest of the on-the-ground delivery of refuge programs. The manager can place greater trust in the judgment of superiors and respect normal differences of opinion knowing that all involved share a common value system, common experiences, and a common interest in the Refuge System. Such cannot be said today.

When the Chief of the National Wildlife Refuge Service sits at a hearing room table facing a committee, the Members will know that they are talking with someone who understands the Refuge System, can speak to its needs, and will defend its priorities, unencumbered by two dozen other competing programmatic priorities.

The three elements of a successful public service program

Mr. Chairman, we believe that there are three essential elements which, working together, form the foundation for a successful public service program such as the Refuge System. One is a legislative mandate; a clear definition by the Congress of the purposes of the program. We believe that Congress has, with recent important legislative actions such as the 1997 Refuge Improvement Act, provided that mandate and legislative guidance.

The second element is funding; the resources by which the program obtains the personnel and materiel necessary to carry out the legislative mandate and guidance. Much has been written by individuals and organizations over the years about the critical need for funding for the Refuge System. It is true that the need for funding is critical and must be vigorously addressed. But, it is only part of the problem with the Refuge System.

The third element is organizational integrity; the arrangement of personnel and funding in a way which promotes the efficient accomplishment of program objectives. This arrangement refers not only to the horizontal arrangement of staff and funding among refuge field stations, but also the vertical arrangement of management personnel whose

responsibilities are confined to and focused upon the needs of the Refuge System. Given the number, diversity, and scope of its other programmatic responsibilities, such an arrangement is impossible within the Fish and Wildlife Service. To expect the Fish and Wildlife Service to accommodate such an arrangement for the Refuge System is fruitless and unfair, both to the Fish and Wildlife Service and the Refuge System.

Recovering lost ground is not "streamlining"

It has been suggested that the current reorganization plan of the Fish and Wildlife Service will "streamline" the management of the Refuge System thereby addressing the failures of the previous organizational structure. We would like to respectfully point out that little is being "streamlined". The current plan merely returns the Fish and Wildlife Service to a structure which existed in the recent past. Those of us with a long history within the Refuge System understand that returning to a previous organization structure doesn't really fix what is fundamentally wrong. It does not introduce the type of vertical management responsibility so desperately needed by the Refuge System. It has been implied that naming an Assistant Director position as "Chief of National Wildlife Refuges" will somehow elevate the stature of the Refuge System within FWS. Again, we see the paradox. That elevation is an illusion. The reality is that the "Refuge Chief" will have responsibility only for Refuge policy formulation. That's nothing new. Except for brief periods in history, that Assistant Director position and the Division of Wildlife Refuges have always exercised policy formulation responsibilities for the Refuge System. Policy formulation is not where the problems lie. They lie in policy execution and direction. And that is specifically not the responsibility of the new Chief of National Wildlife Refuges. That responsibility remains exclusively with the Director and seven Regional Directors who have never worked on a refuge and have only their "perceptions" of the complexities and responsibilities of land management.

Visibility of the NWRS: a key need that must be backed by new resources

Mr. Chairman, much has been written and spoken about the need to increase the visibility of the Refuge System in the public's eye. We do not disagree with that need. Certainly the Refuge System centennial legislation under consideration by this committee will be of immense benefit in increasing that visibility. However, increasing public visibility and expectations without concomitant improvements in resources to permit the NWRS to meet those expectations would be a serious frustration for both parties. The Refuge System must be prepared and able to meet legitimate expectations by a concerned citizenry. It is our opinion that such preparation will be greatly facilitated by a System operating within the context of a separate agency.

Seeking legislative creation of a separate NWR Service is a sound approach

Recent testimony before this committee made reference to difficulties encountered with the creation of a National Biological Survey within the Department of Interior. The implication was that the creation of a National Wildlife Refuge Service would generate comparable difficulties and should be avoided. While we admit to some unfamiliarity with all of the details surrounding the National Biological Survey odyssey, we see no comparability with the circumstances facing the Refuge System. The National Biological Service was created abruptly, and with little or no consultation with Congress or with key stakeholders. That Congress stepped in to assert its interests should not surprise anyone. The proposals being made for the Refuge System are for Congressional legislative action to create a new agency. That is hardly comparable with the National Biological Survey incident.

Now is the right time, the best time, to initiate this action

As our Nation readies itself for a new century, and a new millennium, it is appropriate that we examine existing government agencies to ensure that they deliver the products and services called for in their mandates in a timely and efficient manner. When an agency is not performing its tasks completely, or delivering the services it should, we should not hesitate to correct the problems. While the problems with the NWRS are not a topic of daily conversation, they are real and nearing the crisis stage. As we prepare to celebrate the 100th Anniversary of the Refuge System, it is wholly appropriate that we take this moment to look closely and take actions to correct its problems and deficiencies. Our recommendations will do that Mr. Chairman.

It is time for the National Wildlife Refuge System to take its place beside its sister Federal natural resource land management agencies and prepare itself for the challenges of the new century. We urgently recommend that this Committee take the needed legislative actions to make that happen.