

# Blue Goose Alliance Bulletin

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## **Important Questions Regarding The National Wildlife Refuge Service**

The questions and answers below were prepared in anticipation of questions arising from a proposal to create a new National Wildlife Refuge Service within the Department of the Interior.

### *Does the National Wildlife Refuge System (NWRS) merit separate agency status?*

Early in the past Century, the National Park Service was created to protect the scenic, historical, cultural and other wonders of America and to provide for their enjoyment by the public. Similarly, the U. S. Forest Service was given responsibility for the forested estate, so those lands and resources would provide on-going benefits of timber, clean water, recreation, and more. At that time, wildlife refuges were a small component of lands, the vision for them was incomplete and the profession of wildlife management itself was in its infancy. That has changed markedly as we prepare to celebrate the 100th anniversary of the first unit of the Refuge System and begin planning for the conservation of America's beautiful, appealing, and beneficial wildlife into this new century.

The Refuge System ranks third in size of all federal land management systems, and it continues to grow at a rapid pace due to public support and the need to protect sensitive or under represented habitats within the System. Units of the System are found in every State and throughout U.S. possessions in the Atlantic, Caribbean, and Pacific. It is the largest system of lands devoted primarily to conserving wildlife in the World. The complexities of its management as a system, required range of professional expertise, planning (individual units and the System overall), coordination, training, leadership, baseline information and monitoring needs, research (decision-making, gap-filling and long-term), and other needs are enormous and generally specialized.

The developed physical plant is substantial and its maintenance has continuously lagged for decades. Needed major rehabilitation projects will soon reach monumental proportions as the facilities at many units reach their maximum design life span (50-60 years). The passage of the Refuge System Improvement Act in 1997 offers, for the first time, Congressional mandates and guidelines for the System; it alone is a challenge of the highest order.

Yes, America's National Wildlife Refuge System merits full agency status; and it requires it in order to achieve its fullest potential for benefitting mankind through its conservation of fish, wildlife, plants, and their habitats.

### *Is creating a new bureau necessary to address long standing issues facing the Refuge System?*

The long standing issues, or problems, facing the Refuge System are certainly no secret. They have been well documented, described, and publicized in numerous studies and reports over the past 32 years. Theoretically, the Fish and Wildlife Service (FWS) could have addressed these issues. However, due to many competing priorities, the FWS is constrained in its ability to respond. The ineffectiveness of the FWS in

dealing with these issues over the years has sent a signal that the FWS either does not recognize their existence or believes they are not worthy of significant management attention.

Neither signal is accurate. In truth, the Refuge System has simply outgrown the capability of the FWS to deal with a program as demanding of organizational support and management as the Refuge System. The Refuge System needs the visibility and focused attention that a bureau-level organization provides. At that level, the Refuge System would have the authority to present and argue for its staffing and funding needs directly with Interior Department officials, the Office of Management and Budget, and Congressional committees. The constraints inherent to the FWS would be removed. Wildlife Refuges could then develop the capability to reach their full potential. It would be recognized as a major land management system similar in organizational stature to the U.S. Forest Service (USFS), the National Park Service (NPS), and the Bureau of Land Management (BLM).

*Will refuges get increased funding as a separate bureau?*

One can only speculate about future budgets. But elevating the Refuge System to a bureau level would remove a significant layer of budget control -- that of the FWS. The Interior Department each year provides budget allocation guidance to all agencies in the Department based upon its allocations from the Office of Management and Budget. The FWS then reallocates based upon its priorities, i.e., endangered species, contaminants, migratory bird management, law enforcement, refuges, etc. The Refuge System generally fares poorly in this reallocation process. Even in the quarter billion dollar budget increase allocated to FWS in the FY2001 budget request, the NWRS operations and maintenance activities only received about \$20 million. This is only 8% of the increase, even though the NWRS accounts for almost one-half of the FWS budget, and almost one-half of its personnel. The result, of course, is that backlogs in operations and maintenance grow larger and new refuge start-ups come at the expense of existing refuges.

Another factor contributing to increased funding is public visibility. The decision to propose a separate agency is based on the need for increased visibility for refuges, which will provide increased public recognition of the System and its public benefits, and ultimately lead to increased public support. With refuges in all 50 states, increased public support for refuges will, in the long term, translate effectively into increased funding for refuge programs.

Finally, refuge funding will benefit from consistent, knowledgeable advocacy by the leadership of a refuge bureau.

Some have suggested that the NPS, USFS, and BLM, with full-time advocates and higher profiles, still have difficulty getting fully funded. While this may well be true, even the most casual comparative analysis reveals that funding levels of those three bureaus is far more commensurate with their programmatic responsibilities than that of the Refuge System.

*Things seem to have improved in the past two years. Why act now?*

These "improvements" are marginal, at best. They are analogous to sending flowers to a patient with a life-threatening illness. The flowers may cheer the patient temporarily, but the illness still pervades the body.

The recent improvements in the Refuge System were due primarily to the successful efforts of the Cooperative Alliance for Refuge Enhancement (C.A.R.E.) in obtaining increased appropriations. In addition, passage of the Refuge System Improvement Act, and new initiatives for planning and for consistent application of compatibility standards, have set the stage for a stronger Refuge System.

However, the systemic problems of inadequate organizational stature, lack of focused leadership, and absence of public visibility continue to plague the Refuge System. A separate bureau would lead to the resolution of those problems which, in the long term, is critical to the future protection and management of the Refuge System.

*Is it wise to separate the Refuge System from a bureau that manages other important wildlife conservation programs?*

Many FWS functions are broadly applicable to all federal land management agencies. FWS already works closely with other agencies such as the National Park Service and the Bureau of Land Management, providing a variety of services, such as Endangered Species Act consultations.

The land management activities associated with the Refuge System are generically similar to those of other federal land systems. One might well ask, "Why is it necessary that the Refuge System be included within the FWS?" The restructuring would provide FWS with an opportunity to focus on its role of providing services to the other federal land management agencies unencumbered by the responsibility for also managing the land base of the NWRs. The FWS would be streamlined and well positioned to coordinate its activities more broadly across ecosystems and among all federal land management agencies.

*Will greater visibility for the Refuge System mean more and more visitation, with demands continuing to outstrip resources?*

Increased visibility for the Refuge System may well lead to increased visitation and public use. However, under the National Wildlife Refuge System Improvement Act of 1997, Refuge Managers must manage wildlife refuges for wildlife first. The concern about too much public use on National Wildlife Refuges is well founded, but it is a concern that must be addressed regardless of where the System is positioned organizationally. Dealing with this important issue can be done more effectively within an agency concerned only with land management than within an agency which deals with so many other controversial matters.

The Refuge System currently accommodates about 34 million visitors. Yet, relatively few refuge visitor facilities are operating at full capacity. Refuge managers are acutely aware of the risks of increased visitation. They will use their management expertise and the Improvement Act to limit visitation to appropriate levels on the appropriate sites. The ability to limit visitation to levels appropriate to lands dedicated primarily to wildlife conservation will be an ongoing challenge. These issues must be addressed on a case-by-case basis in the Comprehensive Conservation Plans as required by the Improvement Act.

*Will this effort to create a new Refuge Service conflict with implementation of the Refuge System Improvement Act?*

Implementation of the Improvement Act and elevation of the System to agency status are not in conflict. The former is applied to the long-term planning and daily activities in refuges. The latter is a restructuring of national and regional administration of refuges. Efforts to enact legislation creating a separate bureau occur primarily outside of the daily or annual events affecting implementation of the Improvement Act. To a major extent, different people and different levels of government are involved. It is likely that any short-term inconveniences or increased workload associated with implementing organizational change will be insignificant in comparison to the long-term benefits of elevating the status of the Refuge System in the eyes of the Department of the Interior, the Congress, the conservation community, and the American people.

*Would the new bureau lead to less protection for wildlife?*

It has been suggested that since Ecological Services, within FWS, has played a key role in ensuring increased levels of protection for refuge resources that such help may be lost in the creation of a new bureau. It is true that some refuges have benefited by involvement of Ecological Services in refuge programs. But, it is also true that these benefits tend to be sporadic and that most refuges do not receive direct benefits from Ecological Services offices at all.

Cooperation between FWS and an independent refuge bureau on a variety of wildlife protection issues would be expected to occur just as FWS currently cooperates with the National Park Service, the U.S. Forest Service, Department of Energy, Environmental Protection Agency, Department of Defense, and others to implement wetlands protection, contaminant surveys, wildlife law enforcement, the Endangered Species Act, etc.

*Will there be a loss of cooperation between refuges and other FWS Programs?*

Cooperation is not dependant upon organizational arrangements; it occurs because of common goals and commitments to a cause. Those elements are not changed by creating a new NWR Service. In fact, because of the likely increased capabilities of the Refuge Service, participation in cooperative ventures by refuge personnel would be expected to increase.

For Refuge Managers, cooperation with other offices, agencies, and neighboring landowners is what land management is all about. The success of cross-program cooperation is dependent on the attitude of bureau leadership and staff, and is facilitated by a common focus on what is best for the wildlife, plants, and habitat resources.

The mechanisms needed to ensure cooperation between FWS programs and the programs of the Refuge Service are no different than those now required between Refuges and other entities. Such intergovernmental mechanisms have been in existence for decades. Whenever the common focus exists, there will be strong cooperation.

*If separated, could the Refuge System become subsumed into the Park Service?*

The National Wildlife Refuge System and the National Park System operate under fundamentally different legislative mandates that confer on each a substantially different mission. Any effort to combine the two land systems would require major federal legislation. It is unclear who would be proponents of such a subsuming. It is

clear, on the other hand, that a large, diverse, and powerful coalition of groups such as the International Association of Fish and Wildlife Agencies, National Wildlife Federation, The Wildlife Society, National Rifle Association, Ducks Unlimited, The Wilderness Society, Defenders of Wildlife, National Audubon Society, and American Fisheries Society, would undoubtedly strenuously oppose such a move.

*Won't the FWS vision document Fulfilling The Promise address a lot of these issues? Would a new bureau abandon this document?*

Fulfilling the Promise was not intended to address, nor does it address, issues of organizational restructuring. The scope of the document excludes budget issues, and it does not address organizational issues beyond the needs for regional consistency and ensuring that senior NWRS leaders have refuge field experience.

Most of the important goals expressed in Fulfilling the Promise can be achieved more effectively by a focused effort from an independent bureau. Further, independence, in and of itself, will allow the Refuge System to better achieve many of the goals in Fulfilling the Promise.

*Would problems similar to those caused by the separation of the Biological Resources Division (BRD) from FWS occur?*

A major reason the BRD separation has been viewed as unsuccessful was the loss of control FWS experienced with regard to future needed research projects. The BRD separation was done administratively and with little congressional consultation. That resulted in considerable after-the-fact oversight by several committees. In contrast, the Refuge Service proposal will result from a congressional process, with full opportunities to identify important interrelationships and future needs. The separation of refuges will give refuge staffs more control over what occurs on refuges, rather than less control. Unlike BRD, the Refuge System has a broad and knowledgeable constituency to guard its interests.

*Won't the loss of refuges worsen the public image of FWS?*

Because the regulatory functions of FWS are often controversial, the Refuge System is sometimes viewed as a means to put a more positive face on the FWS. However, FWS has historically devoted a large amount of its leadership attention and public relations resources to controlling the damage to its image caused by controversial regulatory decisions. Parties angered by controversial Endangered Species Act decisions are not consoled by a mention of the existence of the Refuge System.

The FWS must learn to walk the fine line between regulatory force, cooperation, and public relations. It can, and should, temper the negative effect of its controversial decisions with effective public-relations efforts. Using the Refuge System for this purpose masks the real need within the FWS to focus public relations planning on those regulatory functions where such planning is most needed.