

**The Case for a  
National Wildlife Refuge Service**



*Blue Goose Alliance*

**The mission of the  
Blue Goose  
Alliance is to  
promote the  
establishment of  
the National  
Wildlife Refuge  
System as a  
separate agency  
within the U.S.  
Department of the  
Interior.**

Our nation's National Wildlife Refuge System (NWRS) dates its origin back to 1903 when Theodore Roosevelt's Executive Order established the 5.5-acre Pelican Island Refuge near Sebastian, Florida. From this humble beginning, the Refuge System (System) has grown to more than 150 million acres with 550 plus refuges and more than 3,000 waterfowl production areas. It protects an impressive array of ecosystems that provide essential life components for thousands of wildlife, fish, and plant species, many of them rare or endangered.

### **THE PROBLEM**

The System of today encompasses Federal lands and waters that are unquestionably equal, in scope and national importance, to those cared for by the National Park Service, the US Forest Service, and the Bureau of Land Management. Unlike these sister agencies, however, the NWRS is not an independent agency. Instead, it is only one of several complex programs administered by a parent agency, the U.S. Fish and Wildlife Service (FWS). It is an agency with so many demanding and diverse responsibilities that its leaders cannot adequately administer the NWRS.

### **THE SOLUTION**

Numerous attempts have been made to correct this administrative shortcoming, all to no avail. All have been directed at symptoms of the problem, rather than its cause. The solution is a simple one. It is a clarion call for change, a change that will establish a new and separate agency within the Department of the Interior -- a National Wildlife Refuge Service whose sole responsibility will be management of the NWRS.

### **WHY A NATIONAL WILDLIFE REFUGE SERVICE?**

When Pelican Island and other refuges were established in the early 20th Century, they were administered by the U.S. Biological Survey, a small Department of Agriculture agency that dealt with the nation's biological concerns. In 1939 that agency was transferred to the Department of the Interior and eventually became the U.S. Fish and Wildlife Service. Since then, the size and scope of both the FWS and the NWRS have grown dramatically. Today the FWS manages 18 separate programs and a variety of administrative divisions.

The proposal to establish a separate agency for the Refuge System is not new. Deficiencies clearly evident today have been repeatedly identified. For



decades, studies and reports have recommended organizational restructuring to better support refuges. In 1968, the Leopold Commission Report recommended, "...Refuges be given far more centralized authority." In 1978 an Assistant Secretary's Task Force concluded, "...the Service must reconstruct its organization to give the (Refuge Division) clear, identifiable status within the FWS." In 1992, a Defenders of Wildlife report suggested one option for reforming the Refuge System was "to remove refuges from the Fish and Wildlife Service, establishing a new Wildlife Refuge Service." In 1994, a Harvard Environmental Law Review concluded that: "The FWS has not operated Refuges as a system for at least the past twenty-five years, and there is an urgent need for their unified administration." Most recently, National Audubon Society's 1999 "America's Hidden Lands" publication urged separate agency status.

Despite problems facing the Refuge System, it would be unfair not to acknowledge that progress has been made, much of it due to individuals and forces outside the Service. For many years The Nature Conservancy, Trust for Public Lands, The Conservation Fund and other non-government organizations have supported refuge land acquisition using the Land and Water Conservation Funds and donated funds. Their efforts have continued to bring newly threatened habitats under protection of the Refuge System. In 1997, the Refuge Improvement Act gave the Refuge System a foundation of "organic" legislation, which defined how the System should function. A backlog of refuge maintenance needs has received some attention in recent years, largely through budget increases resulting from efforts of the non-profit CARE (Cooperative Alliance for Refuge Enhancement) coalition. Though well meaning, the effort has failed to keep abreast of inflation and addition of key habitats to the degree that more than 200 individual units do not have personnel assigned on a permanent basis. An important planning document titled "Fulfilling the Promise" was compiled and published by the Service in 1999, providing an excellent blueprint for the future.

The new plan and additional funding have not, however, solved the refuge dilemma. A long history of renewed commitments, successive new planning efforts, broken promises, disappointing lack of progress, and increasing competition from other programs is continuing. All have caused Refuge Managers and their supporters to remain skeptical about any lasting improvement. Beyond the increasingly complex and diverse responsibilities of the FWS, there are inherent organizational flaws that block meaningful change.

## **LEADERSHIP:**

During the planning effort "Fulfilling the Promise," the inadequacy of Refuge System leadership emerged as a major concern of Refuge Managers. Foremost on their minds was the absence of individuals with refuge field experience in upper management. Despite the fact that the NWRS comprised nearly half of Service operations at that time, not one of the top 18 leadership positions comprising the FWS "Directorate" was filled by a person with refuge field experience. With few exceptions this has been the case for years. Unfortunately, this critical issue and its implications were neither acknowledged nor directly addressed in the final planning document. The disparity remains today.

Sadly, Refuge Managers with interest and potential for upper level management have not been mentored or encouraged to pursue these higher positions. An unofficial policy (not uniformly applied) requires "cross-program" experience in other Service disciplines for these positions. Refuge personnel would have to spend several years working in disciplines such as Fisheries, Ecological Services, or Endangered Species. Most refuge professionals have chosen their careers to be close to land-based resources, and they are reluctant to move to positions where duties would focus on regulatory issues or other responsibilities not related to refuges.

Unless System leadership includes individuals who (1) truly understand the many-faceted responsibilities of a Refuge Manager from a field perspective, (2) know the Refuge System's troubled past, (3) understand the nuances of political issues that continuously challenge all levels of management, (4) know the evolution of current policies and understand why some problem solutions will not work, and (5) recognize the System's undeveloped potential for excellence, the prospects for "Fulfilling the Promise" will continue to be an illusive ideal.

## **ORGANIZATIONAL INSTABILITY:**

The administrative structure of the Service has been in perpetual flux for decades. The daunting number of programs and associated responsibilities of the Service could frustrate any Director. This alone might explain why so many new Directors have tried their own ideas for an improved organization. Frequent reorganization comes at tremendous cost--disruption in lines of supervision, confusion and uncertainty about new responsibilities, lost progress while new operating procedures are learned, interrupted activities while new systems are implemented, wasted funds

used for relocating offices and personnel, and sinking employee morale. For the Refuge System, these internal reorganization attempts to cure what is inherently incurable (without an independent Refuge Service) have only eroded experienced Refuge administrators and disillusioned Refuge field personnel. Refuge Managers are reluctant to leave field positions where they are insulated from such frustrations.

The most recent Service reorganization has restored a more traditional supervisory structure. But fatal flaws still remain. Position titles were changed to give the appearance of real change, but the current organization still does not have an NWRS leader with line authority in a direct chain of command.

#### **ADVOCACY:**

Perhaps the greatest problem related to advocacy is the fact that the NWRS has only a part time advocate at the agency head. The Service Director is compelled to represent all Service programs and consequently cannot be a full time advocate for the nation's third largest land base. Leadership that is spread between several competing resource management disciplines of the FWS can never provide the focused advocacy that the NWRS deserves. A lack of refuge experience in the FWS leadership is a further disadvantage when competing resource interests must be considered. For example, scarce water resources in Western states are allocated according to state laws, and the FWS must compete with other interests for water needed to protect fish and wildlife resources. When water needs for endangered species protection must also compete, they are usually given the highest priority while the poorly understood needs of migratory bird refuges can get less than fair advocacy and consideration. The same disadvantage of priority is apparent when scarce funds and manpower are allocated. Refuge priorities and needs are too often subordinated to the urgency and legal requirements of other resource management programs.

It is sad but true that the very public image of the NWRS is affected by its position in FWS. The Ecological Services and Endangered Species programs promulgate controversial and unpopular regulations that protect wetlands and endangered species. The land use restrictions and adverse economic effects these can bring are blamed on the FWS. Deep resentment toward the FWS is often carried over to nearby refuges because they are a part of the same agency.

#### **SYSTEM INTEGRITY:**

The Refuge System does not currently operate as the true system envisioned by the Refuge Improvement Act and other legislation. An objective visitor to several different refuges in different parts of the country would soon learn they are administered in different ways. Hunting and fishing rules, law enforcement methods, public use regulations, refuge signs, environmental education programs, public use facilities, wildlife inventory methods, and invasive plant management are but a few areas where one would observe widely varying policies and procedures.

In a true system, strong, clear operating guidelines are developed, issued through a chain of command to all supervisory levels, and then monitored for conformance. Each management level is loyal and committed to the other levels, either above or below. This kind of system operation is clearly evident in the Park Service and the Forest Service. It cannot exist within the Refuge System because there is no line management.

Uniform operating procedures must come from an authoritative national source and be consistently applied on all refuges. Without clear lines of authority, the interpretation and execution of national guidance now varies between regions and even between refuges within a region. The differences are due to individual leadership preferences, lack of needed guidance, inexperienced leaders, and even disagreement. There is little concern about uniformity and no appreciable effort to achieve it.

Refuge policy must be developed and implemented by those with working knowledge of refuges and the NWRS. It must be executed by leaders knowledgeable, experienced and supportive of the Refuge System. It should be consistently applied throughout the System, especially in the context of comprehensive planning as called for by the Refuge Improvement Act. It must inspire and foster a loyalty and esprit de corps among refuge employees who take pride in the tradition and mission of their organization.

#### **FUNDING:**

Much of the inconsistency between refuges can be attributed to a Service budget process that is not working. The lengthy process for generating a refuge's annual budget request begins at the field station, is adjusted at several levels of the Regional Office, and is further adjusted at several levels of the Washington Office before finally finding its way to the

Department. Two years later, when Congressional appropriations are received, budget allocations are again filtered through several layers of non-refuge bureaucracy before eventually arriving at a refuge. Administrators have been known to use "discretionary latitude" to divert refuge funding to other uses. Each of these organizational levels exercises priorities and preferences. At the end of this process, national priorities are often missing, and funding allocations between Regions and individual refuges are haphazard. Thus, the budget process itself causes many of the inconsistencies that are rampant within the Refuge System.

While funding for refuges has increased over the past few years, it still falls far short of meeting actual needs. In fact, the backlog of funding needs has continued to increase. Many of the funding increases did not originate through the usual budget process, but almost solely through the efforts of CARE (a coalition of national conservation organizations) and their work with Congress. Many successive years of budget shortfalls indicate that chances for deficits ever being met within the current budget process are virtually non-existent.

Ill-advised budget cuts as well as badly allocated increases are affecting the Refuge System. When several levels of non-refuge decision-makers control both cuts and increases, the outcome for an individual refuge can be devastating.

In reality, the Service cannot become a strong advocate for improved refuge funding as long as it must weigh priorities for other operating programs. With its full array of other programs, it cannot be a strong advocate for one without neglecting the others. It is a simple matter of too many priorities chasing too few dollars. With the absence of budget visibility at the Congressional level, the Refuge System has not fared well when budget dollars are requested or allocated.

#### **COUNTERPOINTS:**

Opponents of a separate refuge agency argue that it would increase costs. This does not have to be the case. The change would merely transfer existing refuge personnel, facilities, and appropriations to a newly established National Wildlife Refuge Service. It can be argued that improved efficiencies in both the Service and the Refuge System might actually result in savings. There will no doubt be certain one-time costs and interruptions from the actual change process. These temporary disruptions will, however, be a small cost for long-term operational improvements. A new,

streamlined and simplified organization will be more efficient, and will be freed from unnecessary costs of multi-program overhead. A more efficient organization that provides good guidance, improved funding equity, and appropriate oversight will have a better chance of eliminating wasted costs of multi-layered leadership that does not understand refuge operations.

Critics have also suggested that the FWS might not survive without the Refuge System, and that it could even be dismantled. That outcome might have been conceivable decades ago, but the current assemblage of other important programs included in the agency make such a result unlikely. Today, the Service plays many different and important roles in fish and wildlife conservation. Programs such as endangered species, wetlands protection, fishery resource management, Federal Aid to states, migratory bird management, law enforcement, and International Affairs, will continue to require a strong agency administration and oversight. A valid case can be made that these programs could be better managed without the competing complexities of Refuge land management. The result can be a strong National Wildlife Refuge Service and a strengthened U. S. Fish and Wildlife Service.

#### **IN SUMMARY:**

The FWS leadership truly believes it is capable of managing the Refuge System. There is deep affection for refuges and an appreciation for the public goodwill generated by the System and its grassroots support. Satisfaction and pride are derived from the important role that refuges play in the conservation of our nation's fish and wildlife. But there is also a disturbing complacency of a leadership that continues to believe the System is thriving. The stark reality of history has shown, however, the refuge dilemma cannot be resolved simply through more planning, more money, more reorganization, more studies, or more good intentions. The fact remains, and is very clear, the Refuge System has outgrown its parent agency. It is time for independence.

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