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April 22, 2011

Rowan Gould
Acting Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: Comments on the Draft Vision Document for the National Wildlife Refuge System

Dear Mr. Gould:

We appreciate the opportunity to provide input on the draft vision for the National Wildlife Refuge System. Defenders of Wildlife (“Defenders”) is a national, nonprofit, public interest conservation organization with more than one million members and supporters. Defenders is dedicated to the protection of all native animals and plants in their natural communities, and we have been substantively involved in Refuge System policy and individual refuge issues for decades.

To assist the U.S. Fish and Wildlife Service (“Service”) in finalizing the vision document, Defenders offers the following comments and recommendations.

I. THE SERVICE MUST DEVELOP A UNIFYING VISION STATEMENT

According to the Service’s policy on refuge planning, a vision statement is a “concise statement of what the planning unit should be, or what we hope to do.”¹ Similar definitions abound in strategic planning literature. Yet nowhere in the draft vision document is there a “concise statement” of what the Service hopes the Refuge System to be.

Because the draft vision document results from the work of five distinct “core teams,” it includes five different visions for the Refuge System. Although it is important to chart a course for each of these core issues – planning, delivery, science, relevance to a changing America, and leadership – they are all components of a single system. As such, they should all be guided by a single, overarching vision statement – one that summarizes the desired future condition of the Refuge System and that encompasses all the “step-down” visions and recommendations that follow in the rest of the document.

Fulfilling the Promise partially achieved this by outlining concise statements for six overarching components of their vision, but it also lacked a unifying vision pulling them together. Still, these six

¹ U.S. Fish and Wildlife Service, *602 FW 1 Refuge Planning Overview* (2000).

mini-visions from *Fulfilling the Promise* provided useful guideposts to the agency in managing the Refuge System. This draft vision document lacks such clarity of purpose.

Based on the principles outlined in the current draft, as well as our own expertise, Defenders recommends beginning the final document with the following vision statement: The Refuge System reaches across institutional, cultural, and generational boundaries to conserve biodiversity in nationally significant ecosystems. This vision can be implemented by all Refuge System staff, whether they restore habitat on the ground or maintain the necessary equipment to do so, and whether they educate the next generation about nature or hire the people who can. As this process enters the implementation phase, employees can use it as a simple test, asking themselves whether their actions are moving the System toward this outcome.

II. THE SERVICE SHOULD PRIORITIZE AND STRENGTHEN KEY ELEMENTS OF THE DRAFT

A. Emphasize Conservation of Biodiversity over “Trust Resources”

The Refuge System’s authority to conserve wildlife goes beyond migratory birds, threatened and endangered species, and other “trust resources.” It has a responsibility to conserve the full spectrum of biological diversity within its lands and waters. The Chapter 2 section on *Managing Refuges to Support Ecological Resilience and Climate Adaptation* proposes restoring altered landscapes to support trust species. Unfortunately, trust species may not be the best indicators of ecological resilience in the face of climate change, and they may not be the most accurate measures of biological integrity, diversity, and environmental health, which the System is mandated to protect in the National Wildlife Refuge System Improvement Act of 1997 (“Improvement Act”).² It is, therefore, inappropriate to prescribe management actions targeted at a narrow list of species as an effective strategy for maintaining these qualities.

Instead, the concepts of ecological resilience and integrity require us to look much more broadly. In order to maximize species’ adaptive capacity to climate change and the many other threats they face, the Service must work with experts to identify those species that best indicate and contribute to biodiversity and ecosystem health. Defenders urges the Service to use these as the basis for its management decisions.

B. Acquire Land Strategically

Throughout most of the Refuge System’s history, refuges have been established opportunistically, with little thought to how each refuge would contribute to the larger System. However, as development, climate change, and other threats have increasingly put ecosystems under stress, it has become apparent that we need a more deliberate approach to the System’s growth. Indeed, the Improvement Act instructs the Secretary of the Interior to “plan and direct the continued growth of the System in a manner that is best designed to accomplish the mission of the System, to contribute to the conservation of the ecosystems of the United States, to complement efforts of States and other Federal agencies to conserve fish and wildlife and their habitats, and to increase support for the System and participation from conservation partners and the public.”³ Defenders, therefore,

² 16 U.S.C. § 668dd(a)(4)(B).

³ 16 U.S.C. § 668dd(a)(4)(C).

supports development of an integrated strategic growth policy to guide land protection initiatives for the Refuge System – one that prioritizes lands and waters that best maintain biodiversity and ecological integrity, provide corridors for migrating wildlife, and protect new habitats for range-shifting species.

Strategic growth also requires a method for prioritizing acquisition opportunities. Recommendation 2.9 of the draft calls for revising the Land Acquisition Prioritization System (“LAPS”) to include climate change adaptation criteria. Defenders supports this recommendation, which reflects one of our comments on the Service’s 2010 *Rising to the Urgent Challenge: Strategic Plan for Responding to Accelerating Climate Change* (“strategic plan”), and we encourage a full review of LAPS criteria to ensure that they reflect the priorities of a new strategic growth policy.

C. Ensure Broad and Comprehensive Actions for Climate Change Adaptation

The draft document recognizes the substantial effects climate change will have on wildlife and habitats, emphasizing:

- § the importance of Landscape Conservation Cooperatives in providing science-based approaches to understanding and ameliorating the threat of climate change and other landscape-level conservation challenges (p.9);
- § the need to manage national wildlife refuges in the context of the surrounding landscape, and to work with nearby landowners to reduce external threats, provide buffer zones, and increase habitat connectivity (p.9);
- § managing refuges to support ecological resilience in the face of climate change (p.13-15); and
- § addressing the relationship between wilderness character and climate change.

The Service’s 2010 strategic plan laid out strategies and actions for responding to the threat of climate change to the nation’s fish and wildlife, arrayed along three broad themes: adaptation, mitigation, and engagement. Defenders strongly supports the plan, but we commented at the time that the actions within the plan were too small and piecemeal to meet the urgent challenges ahead for the Refuge System, which is one of the nation’s most important tools to assist species in surviving the impacts of climate change. We believe that Recommendation 2.6 to develop step-down goals for the Refuge System must incorporate climate change adaptation for wildlife, fish, and their habitats in a broad and comprehensive fashion, which will entail working in every region and at virtually every refuge, and on a greatly accelerated timeline compared to that envisioned in the strategic plan and associated action plan.

Defenders urges the Service to undertake a comprehensive assessment of the challenges that climate change poses for the Refuge System, and of the opportunities that the System offers for meeting the needs of the nation’s fish and wildlife resources threatened by global warming. Each refuge should assess the vulnerability of its habitats and species to climate change, incorporating: *exposure*, or the degree to which a system or species is exposed to climate change and variability (e.g., the amount of warming temperatures, sea-level rise, or changes in hydrology); the species’ or systems’ *sensitivity* to these changes (based on their ecological, genetic, and physiological traits such as dependence on sensitive habitats, dietary flexibility, population growth rates, and interactions with other species); and the species’ or ecosystems’ *adaptive capacity* to respond to these changes, as well as the management response to help the species or system adapt. To the maximum extent practicable, the

Service should assess and implement actions to enhance the adaptive capacity of species or ecosystems; however, if managing for historic conditions is precluded by changing conditions, the Service should work to facilitate transitions so as to minimize loss of species, habitat types, and ecosystem functions. This will necessarily entail working across the broader landscape and with surrounding landowners (for instance, in the case of sea-level rise, the Service may need to facilitate transition of salt and tidal marshlands, which may include procuring easements inland of existing refuges).

Furthermore, Defenders urges the Service to recognize that the term “non-climate stressors” will increasingly be artificial, as climate change interacts with other ongoing environmental threats and stressors like destructive fires, water shortages, invasive species, disease transmission, and more. Even issues like habitat loss will be impacted by changes in human activity patterns in response to climate change, such as actions to protect or eventually abandon coastal development. The Service must take a holistic approach to assessment and management that accounts for the interactions between climate changes and other factors.

D. Expand Conservation Efforts Beyond Refuge Boundaries

Defenders supports recommendations to broaden conservation efforts beyond refuges. Wildlife species do not adhere to refuge boundaries, and the impacts of climate change may force many to move to unprotected areas. Working with other landowners and stakeholders is an important step in securing support for conservation goals across landscapes and garnering additional resources to achieve them. In particular, the comprehensive conservation planning process must involve the whole ecological neighborhood if refuge management is to keep pace with environmental and social changes throughout each plan’s 15-year lifespan.

E. Connect the Public with Nature

The American public has become increasingly disconnected from nature, a situation largely resulting from rapid urbanization and access to online technologies. While these advances may be here to stay, failure to engage people who have limited or no exposure to nature will only perpetuate this outcome and make the struggle for environmental stewardship even harder. As the only system of federal lands dedicated to wildlife conservation, the Refuge System is uniquely positioned to bridge this widening gap.

Defenders supports the recommendations to reach out to new audiences. We urge the Service to prioritize youth education, using refuges as outdoor classrooms to help train the next generation of conservationists. The Service should also retain the vision’s emphasis on engaging urban communities, where it is possible to inform a larger and more diverse population. These actions foster a broader awareness of ecosystems and of national wildlife refuges that can build much-needed support for protecting them.

F. Ensure Strict Interpretation of Appropriate Uses

The Appropriate Uses policy sets criteria for managers to determine whether a use should even be considered on a refuge. A more flexible interpretation, as proposed in Chapter 4 of the draft vision document, could open the door to uses that would compromise the Refuge System’s responsibility to conserve wildlife and maintain the System’s biological integrity. It could also undermine the

“wildlife first” vision that was adopted in 1998 – a principal that the new vision should build upon, not replace. One of the main reasons that comprehensive refuge reform legislation was needed over ten years ago was the rampant misuse of our national wildlife refuges. We should not reposition them so that, ten years from now, we need to be reminded again that wildlife comes first.

Hunting, fishing, wildlife observation, photography, and environmental education and interpretation were identified in the Improvement Act as priority public uses and, when compatible, refuges should continue to allow them. Although the call for greater flexibility is motivated by a desire to bring in new visitors, trying to make the Refuge System all things to all people will only threaten the qualities that make it unique. Rather than changing its identity, the Service should focus on appealing to new users by promoting the characteristics that set the System apart from any of our other public lands.

III. THE SERVICE SHOULD PLAN A STRATEGY TO MOVE FORWARD

A. Develop a Strong Implementation Plan

The final document must be joined to a strong implementation plan if the vision for the Refuge System is to be achieved. This plan should be developed under the assumption that appropriated funding may stay the same or even decline. The Service must, therefore, identify ways to improve efficiency, leverage resources through partnerships, and find new sources of funding such as the “duck stamp” for wildlife observers that has been suggested on the vision website as a bold idea.

Recommendations in the draft must identify specific, high-priority next steps and directly advance the mission of the System and the overarching vision statement that the Service puts forth. Although many tangential ideas have been suggested, failure to focus on the System’s ultimate responsibility to conserve America’s wildlife will undermine the success of this endeavor. To ensure goals are being met, actions must be pursued with clear benchmarks to measure their successes or failures, so that effective practices may be continued and underperforming ones may be reassessed.

B. Improve the Effectiveness of the Final Document

Each of the five core chapters in the draft vision offers a unique view of the Refuge System’s future; however, their differences in style, structure, and presentation result in a disjointed, unpolished, and often uninspiring document that does nothing to make the System appear more accessible to the public. To improve its clarity and effectiveness, Defenders offers the following suggestions:

- § Separate the visionary language from the background and explanatory text. These are mixed together in most chapters, making it difficult to determine which is which. Where possible, either eliminate background information, or relegate it to introductory subsections. Specific examples, like those on the Blackfoot Challenge in Chapter 2 and the Prairie Wetland Learning Center in Chapter 4, can be highlighted in text boxes to prevent them from slowing the momentum of the vision itself.
- § Be consistent and clear in the use of tense. In some instances, it is unclear whether the text is intended as a description of the current situation or of the desired future condition, as vision statements are often written in the present tense.
- § Be consistent in providing recommendations. Although it is helpful that many recommendations are clearly marked in the document, others are still embedded in the main

text, resulting in an unbalanced view of the System's priorities and implementation needs. Furthermore, recommendations that have been identified vary in specificity – some prescribe a well defined action, some suggest developing a new strategy or plan, and some fail to even identify a next step (e.g., Recommendation 5.3: “The Refuge System will find innovative and efficient ways to work with other agencies to establish positive relationships and partnerships”).

- § Enlist a professional writer to make grammatical edits, eliminate redundancies, and refine the document.

As the Service works on a final document, Defenders recommends that comments on the draft be considered and incorporated by a single group that includes the Steering Committee and one representative from each core team. Given the difficulties in merging the core teams' individual chapters into a cohesive draft, we are concerned that sending those teams back to incorporate feedback separately will lead to a similarly disjointed final document, and could result in inconsistencies among chapters and broad-level comments being inadvertently overlooked.

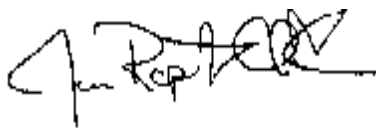
C. Maintain a Forum for Open Dialogue

The website for *Conserving the Future* has allowed for unprecedented dialogue among Refuge System and Service staff, experts, and partners who may not have otherwise had an opportunity or a forum to openly exchange ideas with one another. It also offered the general public a voice that is rarely heard beyond a formal NEPA process. Defenders encourages the Service to maintain this forum as a way to encourage new ideas and innovation, facilitate problem solving, and perhaps even increase public recognition of the System.

IV. CONCLUSION

Defenders appreciates the opportunity to provide comments. We look forward to participating in the remainder of this process and are committed to working with you to achieve a strong vision for the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Rappaport Clark". The signature is stylized with a large initial "J" and a prominent "R".

Jamie Rappaport Clark
Executive Vice President

cc: Dan Ashe, Deputy Director, U.S. Fish and Wildlife Service
Greg Siekaniec, Assistant Director, National Wildlife Refuge System