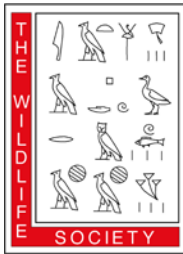


# Policy Toolkit

## APPENDIX: SAMPLE LETTER AND COMMENT SUBMISSION





## THE WILDLIFE SOCIETY

5410 Grosvenor Lane • Bethesda, MD 20814-2144

Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: [twswildlife.org](mailto:twswildlife.org)

The Honorable Jack Reed  
The Honorable Lisa Murkowski  
United States Senate  
Appropriations Subcommittee on Interior,  
Environment, and Related Agencies  
Dirksen Senate Office Building 131  
Washington, DC 20510

The Honorable Ken Calvert  
The Honorable Jim Moran  
United States House of Representatives  
Appropriations Subcommittee on Interior,  
Environment, and Related Agencies  
Rayburn House Office Building B-308  
Washington, DC 20515

June 6, 2014

Dear Chairman Reed, Ranking Member Murkowski, Chairman Calvert, and Ranking Member Moran:

On behalf of The Wildlife Society, I am writing today to urge you to include funding provisions from the Wildfire Disaster Funding Act (WDFDA), S. 1875 and H.R. 3992, in the Fiscal Year 2015 Interior, Environment, and Related Agencies Appropriations bill.

The Wildlife Society was founded in 1937 and is a non-profit professional society representing nearly 10,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

As professional managers of wildlife and their habitats, we are greatly concerned by the current practice of 'fire borrowing' within the U.S. Forest Service (USFS) and Department of the Interior (DOI) where funds are diverted from non-fire accounts within these agencies in order to make up for shortfalls in wildfire suppression funding. The USFS alone has spent \$3 billion in seven of the past 12 years from non-fire accounts to fight increasingly large and devastating wildfires. While Congress eventually repaid all but \$400 million through emergency funding measures, this still leaves a huge funding gap, and there are typically long delays between when funds are borrowed and when emergency funds are repaid, causing serious disruptions in agency operations, including those critical to wildlife and habitat management.

Wildfires, especially those in the western U.S., are increasing in size and severity due to recent documented changes in weather patterns and climate, increased development in the wildland-urban interface, and excessive forest fuel loads. Heat waves have become more frequent across the U.S. in recent decades and tree ring data indicates the last decade in the western U.S. has been the driest in 800 years. The combination of high temperatures and dry conditions has caused the fire season to increase in length by two and a half months since the 1970s. Unfortunately, studies project the number of extremely hot days will continue to increase over much of the U.S.

Longer wildfire seasons with larger and more severe fires will require more and more funds for wildfire suppression. The cost of fire suppression has already necessitated an average of \$375.9 million annually beyond appropriated levels between 2004 and 2012. This level of 'fire borrowing' is

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simply not sustainable and is detrimental to agency activities that help decrease fire risk, such as managing brush and other fire fuels in national forests.

Many other essential programs agencies are charged with implementing cannot be undertaken because of 'fire borrowing'. In FY 2013, USFS borrowed \$183 million from Restoration of Forest Lands and Improvements, \$40 million from the National Forest System, \$30 million from Brush Disposal, and \$30 million from Capital Improvements and Maintenance. These transfers have resulted in fewer fuels treatment activities in forests, reduced invasive species control efforts, the elimination or interruption of habitat assessment and restoration for threatened, endangered, and at-risk species, deferment of land acquisition, and the delay of storm damage risk reduction. Fund transfers not only affect the agencies themselves, but the many state, local, tribal, and other partners these agencies work with on a regular basis to carry out critical projects that ensure forest health and sustainability.

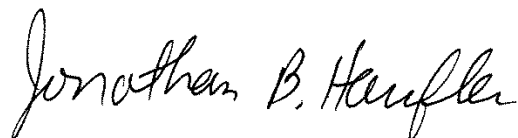
The WDFFA prepares our nation for anticipated wildfire disasters by funding a portion of wildfire suppression through a budget cap adjustment to the Balanced Budget and Emergency Deficit Control Act of 1985. This is the same disaster cap used by the Federal Emergency Management Agency (FEMA) to fund responses to floods, hurricanes, and other natural disasters. As a natural disaster, wildfires should be funded through the same mechanism. WDFFA does not add to spending levels beyond the levels agreed to in the Budget Control Act and does not compete with FEMA for funds by reducing the entire disaster cap ceiling by the same disaster cap adjustment of \$2.869 billion.

If enacted, WDFFA will fund 70 percent of the average cost for wildfire suppression over the past 10 years through the discretionary annual appropriations process. The remaining 30 percent of the 10 year average and anything beyond the 10 year average (up to \$2.869 billion) will be funded from the disaster cap.

As heat waves and drought increase in frequency and wildfire seasons lengthen, it is crucial that USFS and DOI have a reliable source of funds to fight the most devastating wildfires. The largest and most intense wildfires are natural disasters and should be provided funds in the same manner as any other natural disaster. Including the funding structure set forth by the WDFFA in the Interior Appropriations bill will provide the security agencies need to battle wildfires effectively and allow critical forest health management projects to go forward unabated.

Thank you for considering the recommendations of wildlife professionals. Please contact Laura Bies, Director of Government Affairs at (301) 897-9770 x308 if you require further information or have any additional questions.

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive, flowing style.

Jon Haufler, President  
The Wildlife Society



# THE WILDLIFE SOCIETY

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Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: [twswildlife.org](mailto:twswildlife.org)

June 16, 2014

A.J. North  
Regulations Program  
National Park Service  
1849 C Street NW, MS-2355  
Washington, DC 20240

## **RE: Regulation Identifier Number 1024-AE06**

Dear National Park Service Regulations Program,

The Wildlife Society thanks you for the opportunity to provide comments and support for the National Park Service's recent clarifications regarding domestic and feral animal policies.

The Wildlife Society (TWS) was founded in 1937 and is a non-profit professional society representing nearly 10,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

Non-native, feral species are recognized as one of the most widespread threats to native wildlife populations and natural ecosystems. Feral cats are significant predators on small mammals, birds, reptiles, and amphibians. Some studies have estimated feral cats kill over a billion birds each year in the U.S. Feral swine populations have continued to spread across the U.S., including several NPS-managed lands. Feral swine are known disease reservoirs and cause extensive damage to property, agriculture, and natural resources through their aggressive "rooting" behavior that churns up the soil and destroys native habitats.

TWS supports the NPS's efforts to define feral species and clarify more comprehensive policies regarding at large domestic and feral animal management approaches for the protection of the public's native wildlife resources.


To improve the proposed rule, TWS suggests some additional clarification in the definition of "feral animals" to indicate these designations are based on the *species* of animal, and not an *individual* animal. Many feral species reproduce outside of a domesticated setting and the offspring of those animals should also be regarded as feral. The definition for "feral animal" as currently written could be interpreted to only include *individual* animals which at one point in their lifetime were tamed to live in the human environment and now exist in an untamed state. This interpretation could prove problematic for NPS's intention to protect wildlife and native ecosystems from impacts caused by *reproducing feral populations* and could be avoided with more clarification in the definition.

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TWS believes the proposed rules are a good advancement and provide needed updates to NPS's policies regarding domestic and feral animals that, with some additional modification, will allow NPS employees to appropriately address threats feral populations pose to the public's native wildlife resources. These provisions will enable NPS to meet its statutory purpose "to conserve the scenery and the natural and historic objects and the wild life [in the parks]... by such means as will leave them unimpaired for the enjoyment of future generations."

Thank you for considering the recommendations of wildlife professionals and working to reduce the impacts feral species have on native wildlife populations. Please contact Keith Norris, Assistant Director of Government Affairs at (301) 897-9770 x309 if you require further information or have any additional questions.

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive, flowing style.

Jon Haufler, President  
The Wildlife Society

Enclosed: TWS Position Statements "Feral & Free Ranging Domestic Cats" and "Feral Swine in North America"