



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

7 March 2018

The Honorable Mick Mulvaney
Director, Office of Management and Budget
725 17th St NW
Washington, DC 20503

Re: Conservation Programs in the FY 2019 Budget

Dear Director Mulvaney,

The Wildlife Society is writing to express concern over the de-prioritization of science and scientifically sound wildlife conservation and management programs within the Trump Administration's FY 2019 budget request.

The Wildlife Society, founded in 1937, is a non-profit professional society representing over 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 habitat through science-based management and conservation.

Many conservation programs within the Departments of the Interior and Agriculture assist the federal, state, private, and non-profit biologists and managers we represent in maintaining wildlife populations as a public trust resource for the benefit of all Americans. Relative to the FY2019 budget request, of notable importance to our members are the United States Geological Survey (USGS) Cooperative Research Units (CRU) Program, the State and Tribal Wildlife Grants Program, the National Wildlife Refuge System, the USDA Wildlife Services - Wildlife Damage Management Program, and the Forest Service Research and Development Program.

Without funding for these programs, applied science and monitoring programs will be lost, and practical, proactive conservation and management measures carried out by federal entities in coordination with state, tribal, and local partners will be impossible to implement. This will leave federal agencies with an unfillable knowledge gap, and has the potential to cause costlier, reactive conservation measures, such as Endangered Species Act listings. Such listings can be a significant burden to private sector economic activity and lead to burdensome regulations at both state and federal levels.

USGS Cooperative Research Units Program

The CRU, within the USGS Ecosystems Mission Area, is a true partnership among federal, state, non-governmental organizations (NGOs), and academic institutions to provide applied science tailored to the needs of on the ground wildlife managers, and helps develop the next generation of wildlife biologists and managers. With 40 CRUs housed at universities in 38 states, these partnerships **leverage more than three dollars in external funds for every federal dollar invested.**

Each CRU is a collective endeavor and product of its cooperators, which usually include the university, the state fish and wildlife agency, a federal natural resource agency, and the Wildlife Management Institute. In many states, CRUs are the research arm of state fish and wildlife agencies, providing agencies with the science to support sustainable hunting, fishing, and trapping opportunities that largely drive conservation funding in the U.S. In consultation with cooperators, in 2016-2017 CRU scientists and

students conducted 149 research projects to enhance the management and conservation of some of America's most iconic game species including elk, white-tailed deer, mule deer, pronghorn, moose, and black bear while also addressing science needs for multitudes of other native species critical to ecosystem sustainability and human well-being.

Federal partners also greatly benefit from adequate funding of the CRUs. In 2016-2017, CRUs partnered with the Bureau of Land Management, Bureau of Reclamation, Department of Defense, NASA, National Park Service, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service (USFWS), and the USDA Forest Service to help meet these agencies' research needs.

For the National Park Service, CRU scientists and students developed a structured decision making process to help officials determine appropriate cruise ship priorities for Glacier Bay National Park that considered recreational opportunities and native wildlife needs. For the USFWS, CRU scientists and students pioneered incorporating population viability models into species status assessments, a model that was eventually applied in the Service's Endangered Species Act not-warranted decision for the Sonoran desert tortoise (*Gopherus morafkai*).

Resource agencies partner with the CRUs not only because they are highly responsive to their scientific needs and are composed highly reputable, skilled researchers, but also because they are highly cost-effective. **Elimination of CRUs, as the Trump Administration budget requests, would have devastating impacts to the scientific capacity and science-based wildlife management decisions of partner state and federal agencies.** This proposal would result in the termination of 40 cooperative agreements with 38 state governments, 40 universities, the USFWS, and the Wildlife Management Institute, and end nearly 800 ongoing research projects funded with approximately \$40.5 million in externally-sourced, reimbursable funds. Agencies charged with managing wildlife as a public trust resource do not have the funding, infrastructure, or scientific capacity to compensate for elimination of CRUs.

State and Tribal Wildlife Grants

The State and Tribal Wildlife Grants Program (STWG), within the USFWS budget, is the nation's only program that directly supports developing and implementing State Wildlife Action Plans (SWAPs), which are fundamental to preventing listing of more species under the Endangered Species Act. This program was created in 2000 to empower states and their partners to proactively and cost-effectively conserve fish and wildlife at the state level. This funding led to the congressionally mandated development of SWAPs in every state, territory, and the District of Columbia. These recently updated plans are the blueprints for conserving over 12,000 species deemed at-risk of decline or in need of additional monitoring efforts to determine their status, distribution, and trends in populations, critical information to avoid ESA listing. **The FY 2019 budget request proposes a 50% reduction in this program**, undoing years of work to conserve species before they become threatened or endangered.

Current funding levels, despite being well below the level required to implement the critical conservation actions identified in SWAPs, have assisted in Endangered Species Act delistings, downlistings, and not-warranted decisions for many previously at-risk species.

For example, in September 2015, the New England cottontail (*Sylvilagus transitionalis*) was determined by the USFWS to not warrant listing under the Endangered Species Act, in part due to state and regional work made possible by STWG. This work included coordinated habitat management, field surveys involving DNA sampling, technical assistance to private landowners, captive breeding, and reintroduction to suitable habitats. This cooperative science and management effort was only possible with support from the STWG program.

Another species, the Delmarva fox squirrel (*Sciurus niger cinereus*), was delisted from the Endangered Species Act as a result of the state-based collaborative efforts partly funded through this program. These efforts not only included habitat conservation and management, but also monitoring that provided the data necessary for delisting.

USFWS National Wildlife Refuge System

The Administration's FY 2019 budget request for the National Wildlife Refuge System (NWRS) outlines an **\$11 million reduction and realignment of the accounts currently funded.**

The NWRS first came into creation under the leadership of President Theodore Roosevelt, who established the country's first 51 refuges during his time in office. Today, the NWRS hosts 566 refuge units, 38 wetland management districts, and 5 marine national monuments spanning over 850 million acres of land and water in every U.S. state and territory.

While these units are essential in the conservation of native species for the enjoyment of all Americans, they also carry notable value for surrounding communities, generating approximately \$4.87 in economic activity for every \$1 appropriated by Congress.

The economic benefits of investing in the NWRS have unfortunately not been reflected in the system's appropriated funding levels in recent fiscal years. Each year, the NWRS budget must absorb fixed management cost increases between \$8 million and \$15 million in real dollars. This means that the FY 2019 Refuge System request is nearly \$100 million, or 17.4% less than, the system's FY 2010 funding levels. This has resulted in a federal program with an operations and maintenance backlog of over \$3.3 billion, where real and increased infrastructure investment is sorely needed.

Due to this shortfall, hundreds of positions will remain vacant while more are eliminated. This should not be seen as a cost-saving measure, but rather a missed opportunity to perform collaborative conservation work with other private, federal, state, local, and tribal officials in surrounding areas.

Refuge Comprehensive Conservation Plans, which are congressionally mandated planning tools created in cooperation with the state and local stakeholders of each refuge, will cease to be effective. Thousands of acres of invasive species will remain unchecked, hunting and other wildlife-associated recreation programs will be reduced, and refuge professionals will be unable to maintain visitor standards or implement conservation measures, many directed to help species already listed under the Endangered Species Act.

USDA APHIS Wildlife Services - Wildlife Damage Management Program

Wildlife Services' Wildlife Damage Management program would see a **45% reduction in funding, down to \$46 million, under the FY2019 budget proposal.**

The Wildlife Damage Management program within USDA Animal and Plant Health Inspection Services provides expertise and management assistance to cooperators throughout the states, aiming to maintain human and wildlife health and prevent human-wildlife conflict. In practice, this has been done through programs like the National Rabies Management program, which distributes oral rabies vaccines to wildlife within targeted areas with the goal of eradication; and the feral swine (*Sus scrofa*) management program, which works with cooperators to protect natural and manmade resources against highly destructive feral swine.

These projects are conducted via agreements with local, state, and tribal authorities, who provide some of the funding necessary to complete these programs in order to enlist Wildlife Services as the federal coordinating body that works to uniformly and cost-effectively address these issues at all levels of governance.

Rabies, feral swine, and the many other conflicts handled by Wildlife Damage Management do not abide by jurisdictional boundaries. The colonization of nuisance wildlife in one jurisdiction can quickly have disastrous implications for surrounding jurisdictions if the issue is not effectively managed by a coordinating body. In order to aggressively target these problems to protect both wildlife and human health, the Administration must maintain its supportive role in partnerships focused on invasive and nuisance species management.

USDA Forest Service Research and Development Program

Building on over 100 years of research, Forest Service Research and Development (FSRD) programs inform policy and land management decisions that improve the health and use of the nation's forests, grasslands, and adjoining aquatic systems and increase the competitiveness of U.S. products in the global marketplace. This program also provides critical information for managing many wildlife species on privately owned lands. Funding for these important activities is critical to sustaining the nation's natural resources. Unfortunately, **the Trump Administration's FY 2019 budget request calls for a \$47 million decrease to Forest and Rangeland Research within the FSRD line item.**

Continuing the trend of reductions in FSRD will result in significant gaps in the knowledge base and data sets necessary to address the many threats facing our nation's forest economy. The Forest Service is responsible for more research on forestry and forest-related resources than any other organization in the world. Through long-term monitoring and collaborative research efforts with states and other partners, FSRD generates an understanding of wildlife-habitat relationships for multiple species and communities that enables informed land management decisions that benefit wildlife and people. This includes informing conservation efforts that have helped to avoid Endangered Species Act listings for several forest and rangeland wildlife species, such as the greater sage-grouse (*Centrocercus urophasianus*).

In 2015, the U.S. Fish and Wildlife Service decided not to list the greater sage-grouse after an unprecedented conservation partnership, supported in part by FSRD, significantly reduced threats to the greater sage-grouse and its habitat. Through these actions, the partnership not only helped enhance health of the sage brush ecosystem that supports over 350 additional species and an estimated \$1 billion in outdoor recreation, but also effectively avoided the economic and regulatory uncertainty associated with an ESA listing across an estimated 173 million acres. This precedent has shaped the way FSRD works to proactively conserve species proposed for listing under the ESA.

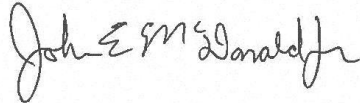
The Need for Conservation Funding

The North American Model of Wildlife Conservation, the primary basis of our country's success in wildlife management and conservation, stresses science as a proper tool for the discharge of wildlife policy. This has been understood by multiple Administrations, beginning with that of President Theodore Roosevelt who initially harnessed this idea.

Today, the generation and application of science is still understood to be the root of all effective natural resource policies and regulations. Without an investment in these programs, the policies by which we govern our natural resources will suffer due to a lack of current and unbiased information. This is not only bad policy, but as noted above it has the potential to be financially cost-intensive.

The Wildlife Society urges the Trump Administration to reconsider proposed decreases in funding in future budget cycles to the CRUs, the State and Tribal Wildlife Grants Program, the NWRS, the USDA Wildlife Services-Wildlife Damage Management Program, the FSRD program, and other programs that support science-based wildlife conservation and management.

Sincerely,

A handwritten signature in black ink that reads "John E. McDonald, Jr." The signature is written in a cursive style with a large initial "J" and "M".

Dr. John E. McDonald, Jr.
President