



THE WILDLIFE SOCIETY

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Department of the Interior
America's Great Outdoors
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To Whom It May Concern:

The Wildlife Society appreciates this opportunity to submit comments on President Obama's America's Great Outdoors initiative to encourage conservation and connect people to natural places.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

At the Chesapeake Bay Regional Listening Session this summer, representatives from TWS were disappointed by the lack of attention given to climate change. To protect America's Great Outdoors and the wild places and animals that people love from a changing climate, Congress must pass comprehensive climate change legislation that reduces greenhouse gas emissions. The administration must also do its part to encourage lawmakers to put aside partisan politics and address this pressing threat to our natural heritage. We can make natural resource conservation efforts even stronger by directing revenue from auctioning emissions credits to an adaptation program. Climate change is the backdrop against which all conservation activity must take place.

We appreciate the efforts of Interior staff to hold a listening session at the recent American Wildlife Conservation Partners meeting in Fall River, Kansas. Below, please find TWS's comments on what works in conservation, the challenges that we face, the role of the federal government, and the tools we need to make our efforts more successful, as requested during that listening session.

What Works

Hunting is a key component of the **North American Model of Wildlife Conservation**, which was developed in the U.S. and Canada. Through license fees, excise taxes on equipment, and other related spending, hunters, trappers, and anglers provide the primary source of funding for

wildlife and habitat conservation. The regulated and ethical hunting heritage of this country should be sustained through access programs that provide places for the public to hunt, trap, and fish; educational programs to attract and retain hunters, trappers, and anglers; and continued legal access to sporting arms and ammunition.

Conservation programs in the Farm Bill connect farmers and ranchers to the land while allowing them to continue to work and live on it. At the same time, they protect habitat for a myriad of wildlife species and safeguard clean air and water; as such, DOI should work with USDA to promote and support Farm Bill programs.

Five years ago, each state and territorial fish and wildlife agency in collaboration with their partners and the public developed a **State Wildlife Action Plan** that identified thousands of conservation actions that are needed to keep common species common and prevent future endangered species listings. These plans provide blueprint for conservation success across the country. However, as noted below, state still lack the funded needed to implement these plans.

Challenges

One of the principal barriers to effective and efficient conservation of fish and wildlife species is the **lack of dedicated funding for the full array of fish and wildlife**. For decades, the Pittman-Robertson Act and Dingell Johnson Act have provided critical funding for states to conserve game species, successfully bringing back wild turkeys, striped bass, elk, and many other species. However, they do not directly address the needs of over 90% of the nation's fish and wildlife that are not hunted or fished.

For nearly a quarter century, conservationists have advocated for dedicated funding for all species, particularly those at-risk. Although the plans are being implemented in all fifty states and six territories, current federal funding through the State Wildlife Grants Program, averaging about \$1.2 million per state/territory, is insufficient to meet the needs of the 12,000 species that states determined to be at-risk. A steady funding stream allows states to make long-term management and conservation plans. The State Wildlife Grants Program and Teaming with Wildlife Act can provide that security for the future.

Preserving and strengthening our great outdoors also depends on **science-based decision making**; when policy and management plans are not based on the best available science, our conservation goals suffer. Science is the bedrock upon which natural resources management must stand to responsibly and objectively manage and sustain this nation's limited resources, including fish and wildlife populations. It must guide natural resource management and conservation decisions; the information supporting these policies should be available to the public, and the process used to make the decision must be transparent. The public deserves to be fully informed about resource decisions and to understand the role science plays in the decision-making process. While we understand that natural resource decisions must take many other factors into account, we feel strongly that all options should be identified, the potential consequences fully understood, and the final decision justifiable. In an open, democratic society, it is never appropriate to suppress or alter scientific findings to reach a predetermined decision.

This country's professional natural resource scientists and managers deserve to work in an environment where scientific findings are appreciated and valued, and where decision-makers apply them properly.

The Role of the Federal Government

TWS supports a **thoughtful approach to alternative energy development** that considers the effects of solar, wind, and biofuel on wildlife and wildlife habitat at every step of the way. Choosing alternative energy sources is an important way for people to make a difference for wildlife, and choosing to develop those energy sources in an environmentally conscious way should be a top priority for the federal government as it crafts national energy policy and plans for its own facilities and agencies.

Invasive species are a profound threat to ecosystems across North America. TWS encourages effective laws and regulations at the state and federal levels that **control the spread of invasive species** by discouraging further introduction of invasive species for any purpose; prevention of the accidental escape of exotic animals already in captivity into the wild; and programs to monitor and control invasive species capable of modifying native wildlife habitat and affecting biological diversity. These efforts can help to preserve the natural American ecosystems that support tourism, recreation, and love of the outdoors.

The **federal conflict of interest statute** (18 U.S.C. § 208) should be amended to exclude professional and scientific societies, so that service in leadership positions within these organizations is encouraged. Full participation by a variety of individuals, including federal employees, in professional and scientific societies is essential for the conduct of science and the integration of research into management decisions. Federal agency scientists and managers that use science should not be speaking only among themselves. This increases the probability that the agencies will become isolated and develop an insular culture that does not interact with or is not aware of information or ideas being generated by academia, NGOs and industry. The federal government's agencies and their ability to do their important job of protecting our natural resources will be strengthened as their employees benefit from membership in professional societies.

Tools

The **Land and Water Conservation Fund** draws funds from oil and gas royalties to provide matching grants to states for conservation. Although it is authorized at \$900 million, it has only met this funding level twice in the forty years since its inception. Parks, wildlife refuges, national forests, and BLM lands all benefit from LWCF funding. Funding LWCF to its full authorization level will increase opportunities for the public on these important lands.

The **jurisdiction of the Clean Water Act** should be restored to include intermittent streams and intrastate, geographically isolated wetlands, as it did before key Supreme Court decisions in 2001 and 2006. Wetlands provide ecosystem services like water filtration and flood mitigation, and offer an opportunity for people to experience distinct and diverse plant and animal communities.

The **Endangered Species Act** should be strengthened to increase the effectiveness of threatened and endangered species conservation, through improvements to the law and its funding, administrative implementation, and integration with efforts by other parties, especially private landowners. The success of the ESA is apparent in the recovery of species and populations such as the Yellowstone grizzly bear, which draw thousands of visitors to the National Park System each year.

Thank you for considering the views of wildlife professionals. Please feel free to contact Laura Bies, Director of Government Affairs, at laura@wildlife.org or at (301) 897-9770 x 308 if you need further information or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leopold", written in a cursive style.

Bruce D. Leopold, Ph.D.
President