



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

16 October 2023

Public Comments Processing
Attention: FWS–HQ–NWRS–2023–0024
Policy and Regulations Branch
U.S. Fish and Wildlife Service
MS: PRB(JAO/3W)
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: National Wildlife Refuge System Planning Policies (602 FW 1-4) for the U.S. Fish and Wildlife Service [Docket No. FWS–HQ–NWRS–2023–0024]

Dear U.S. Fish and Wildlife Service,

The Wildlife Society appreciates the opportunity to provide comments concerning updated National Wildlife Refuge System Planning Policies (602 FW 1-4). Founded in 1937, The Wildlife Society and our network of affiliated chapters and sections represent over 15,000 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 their habitat through science-based management and conservation.

The Wildlife Society has been extensively engaged in issues pertaining to the National Wildlife Refuge System, and knows the NWRS to be an essential component of wildlife conservation across North America and the globe. TWS is supportive of proposed changes to the National Wildlife Refuge System Planning Policies drafted to update existing 602 FW 1-4. Specifically, we support the increased flexibility and greater consideration for planning in the midst of anthropogenic climate change and the effort toward greater tribal and state collaboration in national wildlife refuge planning.

602 FW 1

TWS supports the Service's prioritization of wildlife conservation in the goals for refuge planning established in 602 F1 §1.6B. This policy will ensure that fish and wildlife as well as their habitats receive the highest priority when managing the refuge system. We are also pleased to see the focus on the enhancement of habitat connectivity and consideration of the development of wildlife corridors across the landscape conveyed in 602 F1 §1.6E. The Wildlife Society [supports](#) the use of science in policy and management decisions, and is pleased to see this stance reflected in the Service's integration of the best available science into refuge planning and management in this planning policy.

The Wildlife Society [supports](#) the development and testing of creative conservation actions that aim to assist wildlife in their adaptation to climate shifts. The recognition of climate change

considerations as they relate to refuge planning goals, objectives, and strategies, is a welcome addition to 602 F1 §1.7.

We agree that enhanced partnerships between state and tribal fish and wildlife agencies are needed in order to effectively implement conservation efforts and planning on National Wildlife Refuges. TWS is supportive of the commitment established in 602 F1 § 1.8 to coordinate with Tribes, Alaska Native Corporations (ANC), Alaska Native Organizations (ANO), and the Native Hawaiian community during refuge planning. 602 F1 §1.6F also stresses the importance of transparency with Tribes throughout the refuge planning process. The acknowledgment of the impacts of climate change on the traditional way of life for many Indigenous peoples in 602 F1 §1.8D is a valuable addition to this planning policy, and we support the continued emphasis on the importance of engagement with communities with environmental justice concerns.

602 FW 2

The Wildlife Society supports the land protection planning goals described in 602 F2 §2.6. Specifically, 602 F2 §2.6A2 commits to furthering ecological connectivity, continuous habitat, and facilitation of wildlife corridors within wildlife refuges and with other public and private lands. TWS promotes the coordination of resource management activities to maximize the retention of biodiversity across multiple spatial scales. TWS also encourages cooperation and collaboration between refuge managers and private landowners to increase habitat connectivity for wildlife populations.

TWS is supportive of coordination between federal, state, and tribal agencies, as well as the Native Hawaiian community throughout the land protection planning process as established in 602 F2 §2.5A. 602 F2 §2.6C emphasizes transparency with landowners adjacent to refuges which will lead to increased collaboration and better opportunities for wildlife populations and habitat. TWS recognizes both public and private landowners' ability and responsibility for conserving biological diversity.

602 FW 3

The Wildlife Society [supports and promotes](#) policies and programs to conserve biological diversity that are biologically, socially, environmentally, and economically valid, effective, and practical. 602 F3 §3.5A3 describes an important goal of comprehensive conservation planning; restoring and enhancing the biological integrity, diversity, and environmental health of the system.

TWS values the six priorities in wildlife-dependent recreational refuge uses listed in 602 F3 §3.5B: hunting, fishing, wildlife observation, wildlife photography, environmental education, and interpretation. The Wildlife Society endorses the principle that [hunting](#), when properly regulated following biological principles, is an appropriate means of managing wildlife populations. TWS also [supports](#) educational efforts, policies, practices, and regulations by fish and wildlife agencies to reduce the exposure of wildlife to lead from spent hunting ammunition and lost fishing tackle and advance the voluntary replacement of lead-based hunting ammunition and fishing tackle with non-lead products.

We also appreciate the inclusion of Tribes, ANCs, ANOs, and the Native Hawaiian Community during CCP development as established in 602 F3 §3.10.

602 FW 4

The Wildlife Society agrees with the reasoning listed for writing step-down plans, specifically 602 F4 §4.8A1 which emphasizes the first priority is to conserve, manage, and restore fish and wildlife as well as their habitats. Engaging tribes and the Native Hawaiian Community in conservation and co-stewardship as described in 602 F4 §4.8A3 is a valuable and needed approach. We support the emphasis on effective collaboration between state and tribal wildlife agencies as written in 602 F4 §4.14, and encourage the Service to engage with state and tribal wildlife agencies in all levels of planning.


The Wildlife Society acknowledges that the impacts of climate change will affect communities, cultures, and nations inequitably and that the burden of actions to limit, mitigate, and adapt to the effects of climate change should be shared equitably. Adapting refuge policies to more meaningfully consider climate change while promoting collaborative strategies among state and tribal partners are necessary updates to this planning policy.

Conclusion

In closing, we are encouraged by the Administration's efforts to modernize this suite of planning policies guiding the National Wildlife Refuge System. Particularly efforts that bring in the coordination of state and tribal partners to conserve biological diversity and effectively implement these policies.

Thank you for considering the views of natural resource professionals. If we can be of any further assistance, please contact policy@wildlife.org.

Sincerely,



Don Yasuda

Certified Wildlife Biologist®

President | The Wildlife Society