



# THE WILDLIFE SOCIETY

*Leaders in Wildlife Science, Management and Conservation*

14 March 2024

Attn: FWS-HQ-NWRS-2022-016  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: PRB(JAO/3W)  
Falls Church, VA 22041-3803

**RE: National Wildlife Refuge System; Biological Integrity, Diversity, and Environmental Health [FR Doc. FWS-HQ-NWRS-2022-0106]**

Dear U.S. Fish and Wildlife Service,

The Wildlife Society appreciates the opportunity to provide comments concerning your proposed updates to the National Wildlife Refuge System's (NWRS) Biological Integrity, Diversity, and Environmental Health (BIDEH) policy (601 FW 3) and corresponding proposed regulations (§ 29.3).

Founded in 1937, The Wildlife Society (TWS) 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.

TWS is pleased to provide the following comments, informed by the expertise and knowledge of our members and working groups.

**Biological Diversity, Integrity, and Environmental Health**

TWS recognizes that biodiversity is threatened globally, and that maintaining ecosystem integrity is a critical component of the conservation of biodiversity. We support the intent of the U.S. Fish and Wildlife Service (USFWS) policy revisions to better conserve and manage for BIDEH across the National Wildlife Refuge System as part of our broader [advocacy for policies that conserve biological diversity](#). We are especially pleased to see language in the updated policy that recognizes the need to manage novel ecosystems adaptively, including the explicit consideration of historical conditions as a reference point rather than an end goal in section 3.12 (A). This policy empowers wildlife professionals in the NWRS to incorporate flexibility into their management plans, and is well-aligned within the Resist-Accept-Direct (RAD) framework of management.

## **Management Directives to Ensure BIDEH**

### Address Climate Change

While the impacts of climate change vary across wildlife species and their habitat, TWS recognizes the significant impacts of human-caused climate change on wildlife populations and supports the need for climate change mitigation actions in wildlife management planning. We are pleased to see the explicit directive to address climate change across the NWRS in section 3.10 (A) of the proposed policy and corresponding rule language. This policy language includes elements of the RAD framework of management supported in both [TWS' Position Statement on Climate Change, Sustainability, and Wildlife](#), and the recommendations of the [2021 National Fish, Wildlife, and Plants Climate Adaptation Network](#).

### Promote and Maintain Healthy Soil, Water, and Air

Prescribed fire is a [critical tool](#) for maintaining and restoring ecosystems and increasing ecosystem resilience. It is imperative that the language of this policy not prevent refuge managers from utilizing prescribed fire to achieve management goals designed to conserve BIDEH and other resources consistent with the needs and original purposes of individual refuges. The specific reference to prescribed fire in section 3.10 (E) may be limiting or overly burdensome to refuge managers, and should be removed in order to retain prescribed fire as a critical and readily available management tool.

## **Management Decisions**

The Wildlife Society supports science-based decision-making governing wildlife management across the NWRS. Our membership, publications, and network of sections, chapters, and working groups are a collective source of expertise that should be utilized to inform wildlife management decisions on refuges under this, and other, NWRS policies.

### Native Predator Control

We thank the Service for the inclusion of subsistence harvest and legal, regulated hunting and trapping as activities not considered to be native predator control in the language of this policy and corresponding regulations. TWS would like to note several components of this policy language that may be confusing and potentially burdensome to natural resource professionals carrying out wildlife management across the NWRS in accordance with this policy:

This policy lacks a definition for the term “predator”. The “term” predator is subject to interpretation, and predators are defined and managed differently across the country. Omitting guidance on this term from the policy is problematic for managers implementing native predator management on refuges. We suggest that language should be included in the policy which clearly states that predation is a behavior which can be exhibited by many species and which cannot always be defined taxonomically. We recommend that the definition be ecologically based, with a focus on the function of predation.

The definition of “native” (section 3.4) specifically excludes introduced species, however this definition is problematic for several species of wildlife. For example, coyotes were introduced in North Carolina by humans, but also naturally expanded into the state. Would the Service

consider coyotes native for the purpose of predator control at Alligator River National Wildlife Refuge? This definition lacks clarity for wildlife managers in this scenario. The Virginia opossum was most likely brought to California by humans, possibly accidentally. This definition should also clarify if introduction of a species must be intentional.

Importantly, a blanket prohibition on predator control except as a last resort has the potential to be significantly limiting to wildlife professionals across the NWRS. If the best available science indicates that native predator control is an efficient and effective strategy, demonstrating the need for this management or working through other less effective strategies may be burdensome, costly, and result in negative outcomes. Prohibitions on native predator control may also limit the directive of this policy to employ a landscape-level perspective in collaboration with agency partners and adjacent landowners. To align with the proposed changes to USFWS, rule language pertaining to native predator control in § 29.3 (d)(1) should be amended to read "...and the best-available science supports the use of such control to address a specific, significant conservation concern, ensuring biological integrity, diversity, and environmental health, or to meet the needs and original purpose of an individual refuge".

#### Invasive Species Management

We recommend minor changes to the proposed rule language in § 29.3 (d)(4) to convey the proactive approach to invasive species management across the NWRS that is emphasized in the revised policy. This language should read, "We pursue actions to control invasive species and prevent their establishment as part of an integrated pest management plan..."

#### **Policy Implementation Across the National Wildlife Refuge System**

We ask that the Service ensures that any changes made to this policy and associated regulations as a result of the public comment process retain enough flexibility for managers to balance BIDEH with the needs and original purpose of individual refuges, in keeping with the directive of the National Wildlife Improvement Act of 1997.

Implementation actions and goals associated with the proposed policy should be incorporated into Comprehensive Conservation Plans (CCPs) and step-down management plans, and we would hope to see more information from the Service on their intended process for implementing this policy given existing need for revisions to many of these plans. We recognize the ongoing need for greater staff capacity for conservation planning across the NWRS and continue to advocate for adequate funding to fully-staff the NWRS.

The Wildlife Society thanks the U.S. Fish and Wildlife Service for the opportunity to provide comments on policy and regulations affecting the National Wildlife Refuge System. Any questions on these comments can be directed to TWS policy staff at [policy@wildlife.org](mailto:policy@wildlife.org).

Sincerely,



Certified Wildlife Biologist®  
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