



Gulf fritillary feeding on Deertonogue at Okefenokee NWR | James Cutler/NWRA

Building Back

America's National Wildlife Refuge System

Recommendations for President-Elect Joseph R. Biden Jr.

National Wildlife Refuge Association

November 2020



Dear President-elect Biden:

Congratulations on your successful campaign and election to the Presidency of the United States! As conservationists and advocates for a connected landscape of wildlife-centric protected habitats, we anticipate an excellent working relationship with your Department of the Interior transition team, political appointees, and, of course, the consummate professionals of the U.S. Fish and Wildlife Service.

As you think about your conservation legacy and the needs of our nation's public lands, we direct your attention to the National Wildlife Refuge System. Accessible to all Americans in 50 states, 4 territories, and across diverse landscapes, the Refuge System provides wildlife habitat to thousands of species of mammals, birds, reptiles, and amphibians as well as ample recreation and education opportunities.

Since the first refuge was established in 1903 at Pelican Island in Florida, leaders and staff of the Refuge System have focused on acquiring and protecting the most critical landscapes in the country. Today, the Refuge System includes 568 units on 850 million acres of land and water—nearly 100 million acres of land and 750 million acres of marine national monuments.

But the Refuge System is in danger, and we need your help. The last four years have been devastating for wildlife refuges. The Arctic National Wildlife Refuge has been opened for oil and gas development. The Northeast Canyons and Seamounts Marine National Monument have been opened for commercial fishing, negating the purpose of the monument designation. And most critically, five refuges along the border with Mexico have had to contend with deforestation, drained aquifers, fragmented habitats, and slashed wildlife corridors as part of the effort to build an unnecessary and destructive wall.

Funding is also a critical issue. Most recently funded at \$502 million, each acre of the Refuge System receives a mere 59¢ *per year*. Programs like environmental education are either difficult to find, non-existent, or run by volunteers. Law enforcement personnel on refuges, who are critical to protecting wildlife resources and habitat, are managing the largest system of public lands and waters at 22% operational capacity. Refuge staff cover multiple units, sometimes hundreds of miles apart, and maintenance and biological work is suffering. Vacant positions remain unfilled for years. And the conservation planning program remains virtually unfunded again, leaving refuges with no funding for drafting Comprehensive Conservation Plans required by law. Refuges need at least \$900 million a year in order to meet their mission.

We hope that the information contained in this report is helpful for your transition team, your future Department of the Interior team, and we look forward to working with you to address the negative impacts of the last four years and to build back the Refuge System for future generations.

Sincerely,

Geoffrey L. Haskett, President of the National Wildlife Refuge Association



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We are the National Wildlife Refuge Association.



As the leading voice advocating on behalf of the National Wildlife Refuge System, the National Wildlife Refuge Association works to protect, promote, and enhance America's wildlife heritage through strategic programs that serve the System and wildlife beyond its boundaries. Our workforce is largely centered in Washington, DC, but our work impacts the entirety of the Refuge System. We vigorously advocate for efforts that advance wildlife conservation, while vigilantly contesting policies and legislation that undermine the integrity of the National Wildlife Refuge System.

We are a group of non-profit wildlife professionals, advocates, fundraisers, and communicators. We work closely with the incredible federal staff of the Refuge System, from their Headquarters in Virginia to the smallest units in the field. We work with Congress to ensure representation for the System as a whole, and to advocate for the protection and enhancement of the lands and waters it encompasses. We work with local Friends groups, refuge recreationists, and non-profit partners to build the System's strong grassroots support. And we look forward to working with a President who appreciates and values the diversity of species and landscapes the National Wildlife Refuge System protects.



We are the National Wildlife Refuge System.

In addition to the work we do to protect and promote the Refuge System, we are all users of the System. Our staff and board are also members of Friends groups, birdwatch and hunt on refuges, volunteer our time, and cherish these lands and waters for the incredible habitat they provide for thousands of species of birds, mammals, reptiles, amphibians, fish, invertebrates, and plants.

Encompassing 850 million acres of lands and waters, the National Wildlife Refuge System is the largest system of public lands set aside for wildlife habitat in the world. 100 million acres of land are contained in 563 units across Alaska, Hawaii, the contiguous United States, and all 4 island territories. 750 million acres of water make up the 5 marine national monuments; four in the Pacific Ocean and one in the Atlantic Ocean.

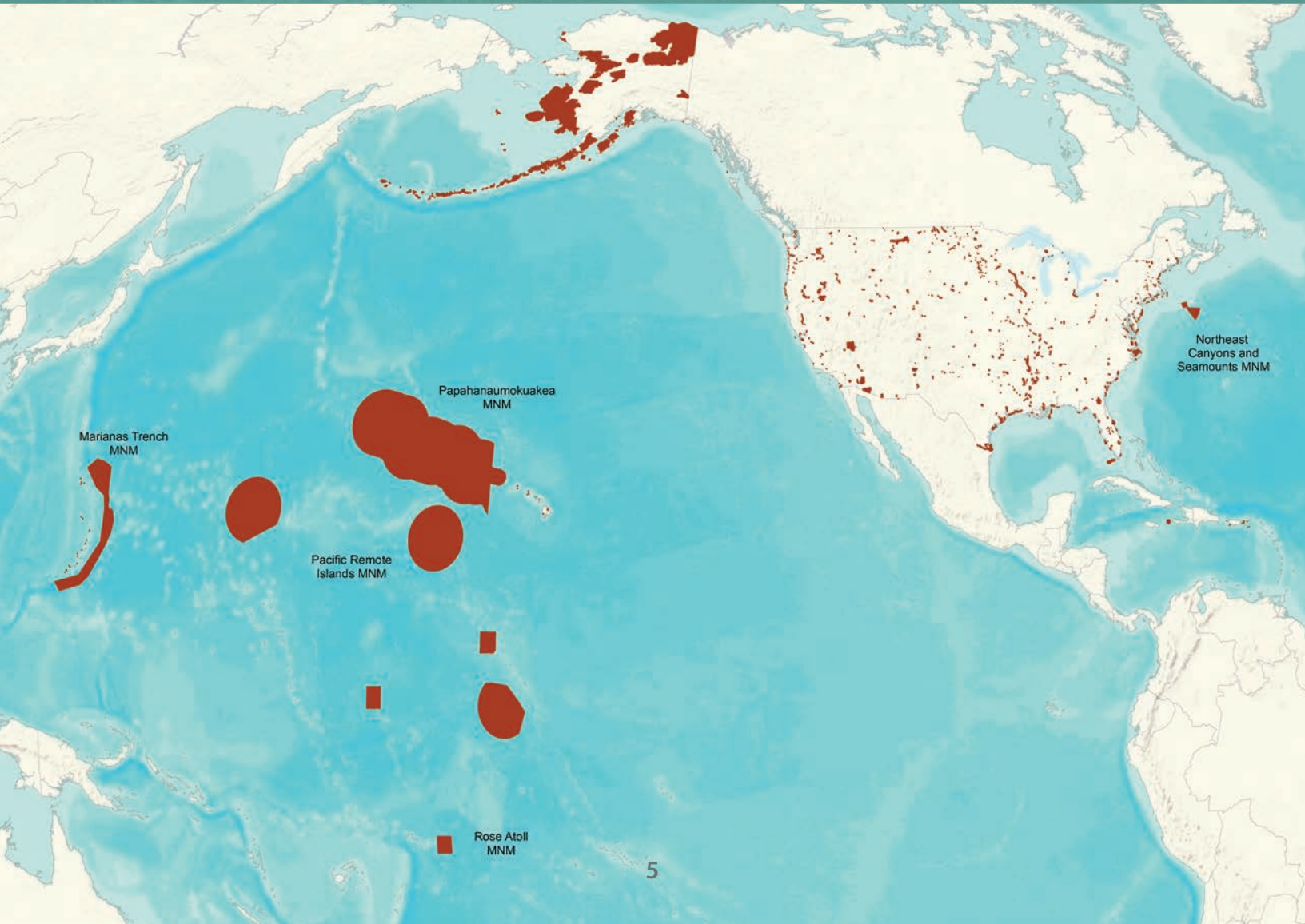
Protecting the integrity and health of these lands and waters is vital to our fight to address climate change. As our planet's atmosphere continues to heat up, habitats will degrade, and wildlife species will need a place to migrate to or risk extinction. The Refuge System, combined with other public lands systems in the United States, stands ready to provide habitat for these species.





Evening views at the Baca NWR | Dana Shellhorn/USFWS

The National Wildlife Refuge System



Climate Change

It is clear that the most pressing problem facing wildlife populations is the urgent issue of climate change. Within the Refuge System, we have seen overwhelming numbers of invasive species, stress on endangered species, massive erosion, and shifts in habitats. Without a focus on creating wildlife corridors, proper funding for invasive species control, and sound science informing policy decisions, the Refuge System cannot keep up with the massive changes we will face in the coming years.

The Refuge System covers vast stretches of the Pacific Islands, the wildernesses of Alaska, and hundreds of smaller units in the Lower 48 states. These refuge units stretch across oceans, mountains, wetlands, and coasts. Birdwatchers, hunters, photographers, children and families, and scientists flock to these lands in huge numbers: 59 million Americans visited refuges in 2019. If taken alone, the Refuge System's lands and waters would be equivalent to the land area of India.



Over the last four years, the FWS hasn't been able to even talk about climate change, let alone take any needed actions. Sea level rise, ocean acidification, converted marshlands, and retreating coastlines are enormous threats to not only wildlife but also people. We have precious little time left to address climate change.

As you begin to tackle this incredibly complex problem, we ask that you look to the Refuge System to help alleviate future impacts associated with wildlife migration. Coupled with other state and federal public lands systems, the Refuge System has the potential to contribute to critical wildlife corridors for species such as the Pronghorn antelope in the western high plains, to Ocelot along the Texas/Mexico border, to Florida panthers in the Southeast, not to mention millions of migratory birds. Without intervention, many of these species will be lost forever.

RECOMMENDATIONS

1. Add Priority Lands to the Refuge System as part of the "30 x 30" campaign.

Refer to the FWS' proposed lands for priority acquisition to identify new units to be added to the Refuge System. Since Refuge System lands are often smaller wetlands and other more specialized units harboring endangered species, migratory birds and other species, they must be well-represented in the "30x30" conservation commitment.

2. Include the National Wildlife Refuge System in your consideration of climate change actions. The System offers established, on-the-ground conservation projects with professional wildlife biologists who are trained and knowledgeable in species movement and needs. Any and all options should be on the table, from prescribed wildfire, to wildlife corridors and bridges, to expansion of the System to protect critical habitat in areas where ecosystems are likely to shift.

Funding For The National Wildlife Refuge System

Insufficient funding is by far the most pressing issue putting the Refuge System at risk. The vast majority of Refuge System funding flows through Refuge System Operations and Maintenance, which goes through the Interior Subcommittee of the Appropriations Committee.

Current funding (FY2021) is \$502 million, just shy of FY2010 funding peak of \$503 million. Adding inflation and fixed costs to cover the last ten years, level funding for O&M appropriations should be \$600 million to effectively meet the mission.

This shortfall has been felt keenly over the past decade by refuges everywhere. None of the refuge units have the recommended levels of staff, and none are considered adequately staffed. More than half of refuge units have no staff on site. Federal wildlife officers are operating at 22% capacity, or roughly 250 officers for 100 million land acres and 750 million ocean acres.

NWRA Recommends
\$600 million for the
**Operations and
Maintenance** of the
National Wildlife Refuge
System in **FY2022**



Prescribed fire on Charles M Russel NWR | Mike Granger/USFWS

Wildfires rage out of control because there are not enough staff to perform prescribed burns to reduce the fuel load, and not enough staff to fight the wildfires that follow. Invasive species that would be eliminated by prescribed burns then proliferate and choke out native species crucial to functioning habitats.

Refuge staff are being asked to do the impossible, and they've been doing the impossible without relief in sight.

Over the last four years, critical funding has been diverted to require that wildlife refuge officers leave behind their actual duties and repeatedly deploy to the borders of Arizona and Texas for non-refuge work. Taxpayer dollars are going to line the pockets of oil companies and to abuse the Arctic National Wildlife Refuge and threaten the survival of caribou and polar bears as well as the livelihood and future of the indigenous Gwich'in people, who depend on the wilderness protected by the refuge.



LA Zoo event at Hopper Mountain NWR



Kids planting native species at Tijuana Slough NWR | Angie Horn/National Wildlife Refuge Association

RECOMMENDATIONS

1. We ask that you request \$600 million for Refuge System O&M in your FY2022 President's Budget Request in February, to show America that our public lands and wildlife are critical to the future of our country.
2. We ask that you provide funding to fill out acquisition boundaries for refuge units using the Land and Water Conservation Fund. In particular, funding for the Everglades Headwaters Conservation Area has been largely abandoned despite the urgency of protecting this habitat from increasing pressures. We recommend \$10 million each year for the EHCA through LWCF.
3. We ask that your Administration complete and update outstanding land protection plans and comprehensive conservation plans.
4. We ask that your Department of the Interior expand the current focus on hunting and fishing and embrace all of the main compatible uses of the Refuge System: photography, wildlife watching, environmental education, interpretation, hunting, and fishing.

Priority Issues Facing The National Wildlife Refuge System

Under the current Administration, the Refuge System has suffered and continues to suffer from intentional attacks to its ability to operate effectively as a system with the mission of protecting wildlife and habitat throughout our country. This section covers damages to individual refuges and to underlying principles that can be solved with executive orders or administrative action.

Arctic National Wildlife Refuge in Alaska

Izembek National Wildlife Refuge in Alaska

Kenai National Wildlife Refuge in Alaska

Northeast Canyons and Seamounts

Marine National Monument in the Atlantic

**Southern Border refuges in Texas — Lower Rio Grande NWR,
Santa Ana NWR, San Bernardino NWR, Cabeza Prieta NWR,
and Buenos Aires NWR**

Migratory Bird Treaty Act Takings Policy

Okefenokee National Wildlife Refuge in Georgia

Desert National Wildlife Refuge in Nevada

Nomination of a U.S. Fish and Wildlife Service Director

Arctic

National Wildlife Refuge

In December 2017, the Tax Act opened the 1002 Area Coastal Plain of the Arctic NWR to oil and gas development for the first time since the creation of the refuge. Pro-drilling forces found a powerful ally in the Trump Administration and are doing all that they can to expedite lease sales and move oil rigs onto the coastal plain before we can stop them. We are currently looking at seismic testing on the coastal plain in December 2020 or January 2021, which is incredibly destructive to the Arctic tundra and denning polar bears. During this lame duck period, the Trump Administration is moving to conduct a lease sale prior to Inauguration Day.

No refuge is more threatened than the Arctic National Wildlife Refuge. Experts have long agreed that oil and gas development in this area would permanently and irreversibly disrupt the ecological integrity of the refuge. Climate change in Alaska is accelerating rapidly, and it is beyond foolish to implement further fossil fuel development in this area.

The Refuge Association has always fought to keep this refuge closed to oil and gas development. Without immediate and strong opposition to drilling in the refuge, the destruction of “America’s Serengeti” — one of the last truly great wilderness areas in the world — is imminent. The Trump Administration has moved quickly — too quickly — to implement oil and gas development in the Arctic NWR, and in the process, ignored laws and science, and threatened the livelihood and futures of the wildlife and native peoples who live there.

RECOMMENDATIONS

1. Immediately halt all activities related to the lease sale program. All new lease issuances should be suspended, and any already-issued leases should be suspended and canceled.
2. Suspend any seismic exploration and testing occurring on the refuge, and suspend any further activities related to oil and gas development, including pending permits and authorizations.
3. Decline to defend the Record of Decision in court.
4. Work with the Congress to repeal the 2017 Tax Act language authorizing drilling in the Arctic NWR.
5. Work with Congressional allies to remove oil and gas development as a purpose of the Arctic NWR
6. Work with Congress to designate the entirety of the refuge as wilderness.

Izembek

National Wildlife Refuge

A rainbow arcs over the September grasses at Izembek NWR | Rebecca Fabbri/USFWS

The Izembek Refuge sits at the tip of the Alaskan peninsula, on a narrow isthmus between the village of King Cove and the all-weather airport of Cold Bay. Residents of King Cove, along with the Alaska Congressional delegation, have been fighting for years to build a road through Izembek, heedless of its sensitive wetland habitat and its status as an internationally recognized Ramsar Convention wetland. Alternatives to a road have been proposed and implemented over the years, but residents have rejected all of these options and demanded a land exchange so they could build a road.

The Obama Administration declined to approve a land exchange, saying the ecological damage to the area would be too great. The Trump Administration forged ahead anyway, approving a land exchange with the King Cove Corporation. Two different judges have thrown out two different exchange agreements in 2019 and 2020—huge wins for the Izembek NWR.

RECOMMENDATION

1. Reverse all attempts to build a road through the protected wetlands of the Izembek NWR, including dropping all appeals related to *Friends of Alaska National Wildlife Refuges et al vs. David Bernhardt and King Cove Corporation et al*.
2. Reaffirm the Obama Admin/Sally Jewell decision as a Biden Administration policy, acknowledging that a road through the Izembek NWR is not compatible with the purpose of the refuge and refuting any measures that attempt a land exchange.

Kenai

National Wildlife Refuge

Set on the Kenai Peninsula, several hours south of Anchorage, Alaska, the Kenai Refuge covers nearly 2 million acres of transitional boreal forest, ice fields and glaciers, mountain tundra, and lakes, wetlands, and rivers. A stunning collection of lands, the Kenai Refuge attracts millions of visitors due to its prime location along the road system from Anchorage to Homer.

The U.S. Fish and Wildlife Service, however, has issued a proposed rule that would unlawfully subject Kenai Refuge to hunting and trapping techniques codified in the State of Alaska's 1994 Intensive Management Act despite being incompatible on Service lands. If the Service allows such liberalized hunting and trapping regulations, several laws and policies for predator control will be rendered useless.

Among the most egregious of the proposed changes would remove trapping restrictions and training requirements and thereby allow bait hunting of brown bears. These two changes alone would reduce the already tenuous population of brown bears on the refuge and would allow the killing of non-target species such as birds and even dogs that stumble into traps placed too close to trails. This application of the 1994 Intensive Management Act rule is flawed and must be rescinded.

RECOMMENDATION

The Refuge Association recommends that the Biden Administration decline to finalize this rule. Should the Trump Administration finalize the rule prior to inauguration, we ask that you take steps to reverse and rescind the final regulation.

Northeast Canyons and Seamounts

Marine National Monument

The most recently designated marine national monument, the Northeast Canyons and Seamounts MNM is located off the coast of Massachusetts. Established by the Obama Administration in 2016, the monument encompasses over 3 million acres including 3 underwater canyons and 4 seamounts.

The only marine monument in the Atlantic Ocean, this area is critically important habitat for species such as the endangered sperm whale, crabs, and deep-sea corals. In just one hour during an exploration trip in 2013, scientists spotted more than 1,200 individual animals while surveying the Monument.

On June 5, 2020, President Trump announced a Proclamation to end the protections against commercial fishing in both units of the monument. Located rather far from shore, this area was never a popular area for fishing, but it has now been opened for destructive techniques such as longlines and bottom trawling. Corals along the ocean floor and bi-catch species are now highly at risk.

RECOMMENDATION

We ask that the Biden Administration restore the Northeast Canyons and Seamounts MNM to its original protections as created in 2016 by the Obama Administration.

Border wall

impacting 5 National Wildlife Refuges

One of the Trump Administration's key promises was to build a wall along the southern border, and they have indeed kept their word, running roughshod through fragile habitat that is damaged quickly and slow to recover. Work on border infrastructure, consisting of a new, much larger fence design, has accelerated in an extremely destructive manner. Approximately 350 miles of new border infrastructure along the 2,000 mile long border with Mexico has been completed as of October 5, 2020.

Impacts on San Bernardino NWR have resulted in a loss of critically important spring water which sustains rare desert fish. At Cabeza Prieta NWR, designated wilderness immediately adjacent to wall construction has been adversely impacted; wall construction has impeded or completely stopped the movement of wildlife through the desert. In the Rio Grande Valley of Texas, Lower Rio Grande Valley NWR and Santa Ana NWR habitats have been fragmented by wall construction in numerous locations.

This construction prevents movement of wildlife among isolated islands of habitat. In some locations, public use of the refuge has been impacted preventing this world class birding location from reaching its full potential as a destination for wildlife observation.

RECOMMENDATIONS

1. Construction or replacement of border infrastructure must cease until the impacts of the work are evaluated through a comprehensive NEPA analysis and Endangered Species Section 7 consultations with the Fish and Wildlife Service and other applicable federal environmental laws.
2. Border fencing on certain portions of the border should be examined for removal, especially in areas where migration of critical wildlife species is now restricted.
3. A strategic approach to construction of walls should be developed if the project is to continue. Border walls are effective in some locations but are largely completely unnecessary in remote areas such as on national wildlife refuges.
4. Mitigation for unavoidable impacts resulting from construction should also be addressed. Mitigation could include habitat restoration and endangered species surveys and restoration.

Lower Rio Grande Valley NWR, Danielle Bhatnagar, USFWS

Migratory Bird

Treaty Act Takings Policy



In December of 2017, the Department of the Interior issued what became known as the Jorjani Opinion, which reversed protection for migratory birds. Under the new opinion, issued by the DOI Solicitor, the Migratory Bird Treaty Act and pursuant regulations were interpreted to require prosecution of any person harming migratory birds only when the take was intentional. Since the law was passed over one hundred years ago, the MBTA protections allowed for prosecution even if there was no intention of harming birds. This allowed the Fish and Wildlife Service to use discretion and seek prosecution for the loss of large numbers of birds caused by flagrant violations of the law.

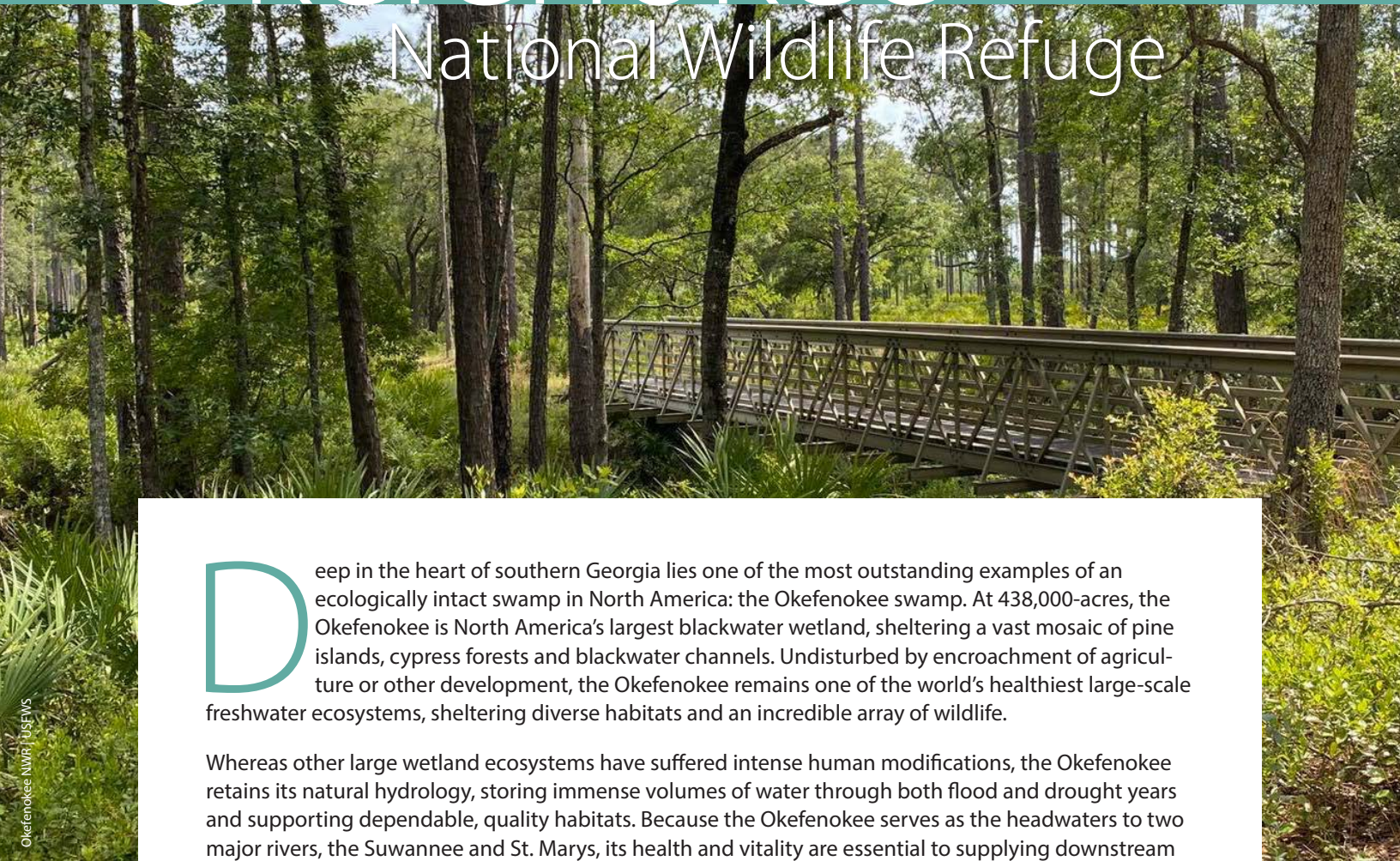
Fortunately, the DOI Solicitor's opinion was struck down by the courts in August 2020. However, DOI is again attempting to undermine protections for migratory birds by issuing guidance directing law enforcement efforts to be focused only on intentional take of birds, which is presented as a valid means of managing limited law enforcement resources. Preventing any active protection of migratory birds will inevitably result in reduced populations.

RECOMMENDATIONS

1. Restore the original policies for Fish and Wildlife Service enforcement of the Migratory Bird Treaty Act. There should be no direction such as that from the Trump Administration that limits prosecution of violators.
2. Rescind the Jorjani Opinion and the subsequent guidance on prosecutorial discretion for enforcement of the MBTA

Okefenokee

National Wildlife Refuge



Deep in the heart of southern Georgia lies one of the most outstanding examples of an ecologically intact swamp in North America: the Okefenokee swamp. At 438,000-acres, the Okefenokee is North America's largest blackwater wetland, sheltering a vast mosaic of pine islands, cypress forests and blackwater channels. Undisturbed by encroachment of agriculture or other development, the Okefenokee remains one of the world's healthiest large-scale freshwater ecosystems, sheltering diverse habitats and an incredible array of wildlife.

Whereas other large wetland ecosystems have suffered intense human modifications, the Okefenokee retains its natural hydrology, storing immense volumes of water through both flood and drought years and supporting dependable, quality habitats. Because the Okefenokee serves as the headwaters to two major rivers, the Suwannee and St. Marys, its health and vitality are essential to supplying downstream ecosystems with clean freshwater.

The Okefenokee National Wildlife Refuge is now threatened by a proposed open pit mine. The U.S. Army Corps of Engineers is reviewing the application and the more than 60,000 comments received in opposition to issuance of the permit. The impacts of such a mine, extending over thousands of acres immediately adjacent to the Swamp, threaten water quality and quantity vital to the continued health of the ecosystem.

A similar proposal was made during the Clinton Presidency and was defeated through the efforts of then Secretary Bruce Babbitt.

RECOMMENDATION

We ask that your Administration deny a permit for this project. At a minimum, additional study is needed to make certain that any mining in the area will not adversely impact the refuge. Preparation of an Environmental Impact Statement, not an Environmental Assessment, would provide a means to evaluate the impact of this open pit mine.

Desert

National Wildlife Refuge



For over 70 years, the U.S. Air Force has used portions of the Desert National Wildlife Refuge for practice operations, as part of a withdrawal agreement between the USAF and the U.S. Fish and Wildlife Service. At 1.6 million acres, the Desert NWR is the largest refuge in the continental US. However, over half the refuge operates under a “joint use agreement”, which allows the Department of Defense to severely restrict access by wildlife agencies, hunters, and tribes. On roughly 740,000 acres, the USAF can fly over but ground movement is limited. Another 112,000 acres of the refuge is under the primary use of the DOD, and they have taken advantage of this, building towns and roads and runways, as well as storing chemicals and other contaminants.

Nevada has given up public access to over half the refuge already, but the Trump Administration is attempting to take over another 1.1 million acres, including the only road through the refuge, the Alamo Road. Access to the public would be almost eliminated, and the prime Desert bighorn sheep and Desert tortoise habitat would be subject to the whims of the DOD rather than protected as it has been since 1936.

We expect Desert NWR language to be included in the National Defense Authorization Act, and for that bill to be passed during a lame duck session in late 2020. We are recommending status quo language, and both chambers of Congress have included such language in their versions of the National Defense Authorization Act.

RECOMMENDATION

We ask that the Biden Administration stand firmly with the conservation community, the State of Nevada, and the Southern Paiute tribes in opposing any attempt to grant access or control to the Air Force on even a single additional acre of the Desert NWR.

Nomination

of U.S. Fish and Wildlife Service Director



The Director of the U.S. Fish and Wildlife Service is an extremely important position, one which oversees the entire National Wildlife Refuge System. For the first three years of the Trump Administration, no Director was nominated or confirmed by the Senate, and the Refuge System suffered under a rotating succession of career Acting Directors and political staff.

16 U.S. Code § 742b states that “No individual may be appointed as the Director unless he is, by reason of scientific education and experience, knowledgeable in the principles of fisheries and wildlife management.” We believe that the new Director should meet the legal qualifications for education and experience in fish and wildlife management, including public land management and with an equal focus on the Big 6: wildlife watching, photography, environmental education, interpretation, hunting, and fishing.

RECOMMENDATIONS

1. Hire a U.S. Fish and Wildlife Service Director with a robust background in wildlife conservation, a deep knowledge of the national wildlife refuge system, and a strong belief in the science used to manage these refuge lands and wildlife populations.
2. Ensure the Director understands and appreciates the Refuge Friends groups and partnerships that help make the Refuge System succeed. These local Friends groups bring local volunteers and grassroots support for refuges — support that is essential to Refuge System operations.
3. Ensure the Director has a strong background in climate adaptation, and ways the Refuge System can be managed to protect wildlife populations into the future.
4. The new Director should review all Executive/Secretarial Orders 2017-2020 and recommend those that adversely impact the NWRS be revoked.
5. The new Director should restore the 2016-era regional boundaries.
6. The new Director should examine the hiring practices of recent years that have left numerous staffing positions open across the Refuge System.

Friends and Partnerships

Refuge Friends are independent, nonprofit organizations run by individuals that support the purposes and objectives of the National Wildlife Refuge System. Many groups are well established and provide extensive assistance to their refuges; others have just gotten started.

The first Refuge Friends organizations started in the 1980s. Today, roughly 200 organizations build links between communities and refuges. Refuge Friends support local refuges and the National Wildlife Refuge system by:

- **Advocating for funding, protection and improved programming of all refuges**
- **Conducting public events that teach visitors and connect the community with conservation**
- **Restoring habitat, maintaining trails, coordinating volunteers**
- **Operating nature stores and raising funds**

“Midway Atoll is one of the oldest atoll formations in the world and home to millions of seabirds. But mice have been introduced, and are overwhelming these birds, who nest on the ground.

‘The year that I was there, the attacks were all over the place on the island and we had hundreds upon hundreds of albatross die.’”

Wieteke Holthuijzen, Friends of Midway Atoll National Wildlife Refuge, Pacific Ocean



Friends of Neal Smith NWR, our Friends Group of the Year in 2020! | Friends of Neal Smith

Refuge Friends form a network of organizations that are the core of the National Wildlife Refuge Association's grassroots advocacy efforts. Whenever possible, we coordinate with local Refuge Friends and rely on their support to give the National Wildlife Refuge System a local voice in support of our national advocacy efforts on behalf of the National Wildlife Refuge System.

"My heart is to see that the refuge is first known about, and then used by a greater diversity of cultures and people in general."

Louie Olivares, Friends of Tualatin River National Wildlife Refuge, Oregon



With the enormous deficit of appropriations funding that the Refuge System has operated under for many years, refuge Friends Groups have supplied tens of thousands of hours in volunteer work. They have raised money for boardwalks and buildings and to purchase new refuge lands. They have provided citizen science and manpower in the Visitor Centers and work closely with refuge staff to supplement the work these professional staff members are able to do.

There are limits, however, to what these Friends members can do. Without refuge staff on site, it is very difficult to monitor volunteer work or to provide a unified vision and management plan for the refuge. Volunteers cannot run a national wildlife refuge by themselves, and for years, Refuge Friends have advocated for increased funding for the Refuge System Operations and Maintenance fund so that refuge lands can continue to be productive public lands well into the future.

RECOMMENDATIONS

1. The Director of the Fish and Wildlife Service should examine the role Friends groups have with the Service and how that relationship can be improved. In particular, the Director should be aware of the Inspector General's report on the Friends program that came out in September. The IG report was incomplete, inaccurate, and made numerous assumptions that were not correct. The OIG recommendations, along with the additional recommendations added by Director Skipwith, should be reexamined and reassessed.
2. The Director should reexamine the effect the 2014 Friends Policy has had on the partnership between the Friends and the Service. Over the last year or so, the Service has adopted a policy of zero-tolerance with the Policy and the Friends Partnership Agreements, which has alienated many Friends groups and members. Numerous Friends groups are now saying they are willing to walk away from their long-standing partnerships and continue to support the Refuge System from afar, not as a registered Friends group. This is a direct result of the discord stemming from the Friends Policy and Friends Partnership Agreements, and we ask that your staff reexamine this Policy. Losing Friends Groups will directly impact national wildlife refuges that depend upon their volunteer support, community awareness, and fundraising.

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