

Hunting and Wildlife Conservation Council

December 15, 2023

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council (Council) would like to thank you for your commitment to sportsmen and women and your support of the National Wildlife Refuge System (NWRS) within the U.S. Fish and Wildlife Service (Service). Today, we write to recommend that the Service modernize and enhance the Strategic Growth Policy (policy) for the NWRS.

As you know, the policy, which was finalized in September 2014, serves to direct the Service in future land acquisition and easement decisions for the NWRS. The Council recognizes the important role that the policy has played over the past decade and believes the current policy should be updated to more fully recognize the existing and potential value of the NWRS. With that in mind, the Council recommends the policy be amended to consider the six priority uses, known as the Big Six, that are enumerated by Congress within the National Wildlife Refuge System Improvement Act of 1997 (Improvement Act). We additionally request that the policy be amended to prioritize seasonal habitats for migratory ungulates as well as prioritizing habitat for at-risk species. Importantly, the Council urges the Service and the NWRS to maintain its support for the existing priorities within the policy, especially waterfowl conservation and wetlands acquisition.

The preceding two hunting and wildlife federal advisory councils (Wildlife and Hunting Heritage Conservation Council and the Hunting and Shooting Sports Conservation Council) both made recommendations to the Department of the Interior to integrate the “Big Six” – hunting, fishing, wildlife observation, photography, environmental education, and interpretation into the policy. When Congress passed the Improvement Act, the body recognized the history and value of outdoor recreation and wildlife conservation to the owners of the NWRS – the American people. However, as presently written, the policy does not prioritize or recognize the importance of the Service considering the “Big Six” uses when examining opportunities for easements and fee title acquisitions within the NWRS, despite the complementary relationship that often exists between wildlife dependent recreation and habitat conservation. The Council believes that incorporating the Big Six in the policy will not only enhance public understanding, public support,

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and public access to the NWRS, it will equip the Service to take full advantage of the three percent minimum of Land and Water Conservation Fund dollars that Congress has determined (Public Law 116-9)¹ must be used annually to provide and enhance recreational access on federal land. This funding requirement was not available when the Service developed their policy, and a change is needed now to intentionally utilize recreation access dollars.

As you know, the NWRS provides significant recreational benefits to the American public, creating a unique bond between the NWRS and wildlife conservation while building the public's understanding of and appreciation for the NWRS. As such, it is important to facilitate increased opportunities for the American public to enjoy the NWRS. Furthermore, the Council believes that future recreational opportunities can be maximized while benefiting, rather than jeopardizing, conservation considerations such as near urban NWRS units.

Additionally, the Council recommends that the Service update the policy to prioritize seasonal habitats for migratory ungulates for future acquisitions and easements. As currently written, the policy focuses on acquisitions and easements that benefit waterfowl, migratory birds, and threatened and endangered species, which the Council believes is a worthy endeavor. However, the Council believes that not all NWRS units are created equal in terms of their species-specific benefits. For example, some existing and prospective NWRS units are critical to ungulate habitat connectivity but may be marginal in value for migratory birds and T&E species. Given the significant investments and prioritization that the Department of the Interior has made over the past two Administrations to conserve and enhance migration corridors and habitat connectivity—and given the value of ungulate populations in supporting the broader ecological food web—the Council believes it is important to build upon these efforts by giving increased consideration to seasonal habitats for migratory ungulates.

Finally, the Council believes at-risk species that are in imminent danger of becoming listed as threatened and endangered if further declines occur should be prioritized through the policy. Conservationists, scientists, and agencies have increasingly recognized the importance of keeping fish and wildlife off the endangered species list, yet the policy hinders the Service's ability to strategically purchase easements or fee title where it could help prevent a future listing for species such as the greater sage grouse. An amendment to the policy seems prudent in helping to proactively prevent future listing decisions.

As always, the Council believes decisions by the Service to acquire land and easements should be made in close cooperation with States and Tribes, including fish and wildlife agencies.

Thank you for your consideration of this matter. The Council looks forward to working with the Department of the Interior and the Service to modernize and improve the policy. If you have any questions or need more information, please contact Council Designated Federal Officer Doug Hobbs at doug_hobbs@fws.gov.

¹ (1) IN GENERAL.—Of the amounts made available for expenditure in any fiscal year under section 200303, there shall be made available for recreational public access projects identified on the priority list developed under paragraph (2) not less than the greater of—
“(A) an amount equal to 3 percent of those amounts; or
“(B) \$15,000,000.

Sincerely,



Collin O'Mara
Chair



John Devney
Vice Chair

Cc: HWCC Members
Matt Strickler, Deputy Assistant Secretary – Department of the Interior
Martha Williams, Director - U.S. Fish and Wildlife Service
Cynthia Martinez, Chief - National Wildlife Refuge System