



Testimony of Geoffrey L. Haskett

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“The National Wildlife Refuge System at Risk: Impacts of the U.S. Fish and Wildlife Service’s Proposed BIDEH Rule”

Good afternoon, Chairman Bentz, Ranking Member Huffman, and members of the Committee. I am Geoffrey Haskett, President of the National Wildlife Refuge Association (Refuge Association). Thank you for the opportunity to appear before you to discuss the National Wildlife Refuge System (Refuge System).

The Refuge Association is a non-profit exclusively focused on protecting, promoting, and enhancing the National Wildlife Refuge System. As the nation’s only set of federal lands dedicated to the conservation and management of America’s native wildlife, it is the world’s largest and most diverse network of conservation lands and waters, encompassing more than 850 million acres of unique habitats that our native wildlife species depend on. Our national wildlife refuges are essential for protecting biodiversity and climate-resilient habitats, providing community-driven conservation, and expanding wildlife-dependent recreational opportunities nationwide.

We are pleased to see the U.S. Fish and Wildlife Service (USFWS) propose regulatory and policy revisions to maintain and improve the Refuge System’s Biological Integrity, Diversity, and Environmental Health (BIDEH). This proposal largely codifies existing BIDEH processes that the USFWS has followed since the implementation of the National Wildlife Refuge System Improvement Act of 1997, which mandated that the BIDEH of the Refuge System be maintained. The BIDEH mandate is an important and unique directive and is an essential element of the Refuge System mission itself.

The goal of the proposal is to provide an updated, consistent framework for how BIDEH should be considered in management decisions, and untether this framework from achieving historical conditions as the end goal for refuge management. This proposal recognizes the cascading and often irreversible effects of climate change and other human activities (anthropogenic stressors) on wildlife and their habitats, and the complex, contemporary challenges facing refuge managers as a result. Codifying and updating the decades-old BIDEH policy to reflect these modern conservation challenges is timely and essential.

The Refuge Association strongly supports the BIDEH proposal and the efforts of the USFWS to address the dual threats of climate change and biodiversity loss by codifying and clarifying existing processes and legal requirements for ensuring the BIDEH of the Refuge System—the best tool we have to combat the worsening climate and biodiversity crises on a national scale. This proposal will support the USFWS’ ability to conserve imperiled species and diverse wildlife

populations on national wildlife refuges across the country and continue this good work that they are already doing into the future for the benefit of the American public.

We also note that this proposal is still open for public comment, and many diverse stakeholders are currently providing input. While we appreciate the opportunity to provide our perspective before the Committee today, we believe it is important to allow the USFWS to complete its public comment period and have the opportunity to make adjustments accordingly before considering any next steps.

In considering the mandate to ensure BIDEH under the Improvement Act, it is important to recognize that the ability to implement management activities to ensure BIDEH successfully has been stymied by over a decade of a severe lack of funding and resources. Any discussion about the Refuge System must consider the reality that steadily increasing funding needs paired with insufficient budgets has led to a Refuge System that is quickly eroding in habitat management and an ability even to keep refuges open. Understanding these impacts is necessary to begin addressing the significant challenges facing our native wildlife and ensure the health and integrity of the Refuge System well into the future.

USFWS' limited staffing capacity has several negative impacts on the ecological health of the Refuge System. For example, only 27% of the threatened and endangered populations occurring on refuges are monitored due to limited capacity. This leads to compromised adaptive management capability, inability to manage invasive species, the destruction of native habitat, and the potential loss of more species. With its current resources, USFWS can only successfully control 7% of the lands infested with non-native species, which has increased 30% since 2005. Importantly, 60% of refuge units require a new Comprehensive Conservation Plan or revision, many of which were finalized before the issuance of the original BIDEH policy in 2001. Limited capacity is hampering these efforts and severely limits landscape-level planning and adaptability to changing conditions.

Significant investments must be made today to begin working towards better outcomes for our native wildlife. USFWS has done excellent work to deploy creative solutions and new partnerships to manage the Refuge System as well as possible with their existing resources. But USFWS should not have to make hard decisions every year about how to operate under this longstanding funding crisis. The insufficient funding and capacity impacts are felt System-wide, impacting not just conservation planning and wildlife and habitat management, but also visitor services, law enforcement, and maintenance. Congress must provide adequate resources to effectively administer the Refuge System.

The \$503 million appropriated to the Refuge System in fiscal year (FY) 2010, when the Refuge System relatively saw its highest funding and staffing levels, is worth approximately \$765 million today. Yet current funding sits at \$527 million, or \$0.62 per acre. Considering the level of inflation and increased needs of the Refuge System since FY2010, the Refuge System budget has effectively decreased, and USFWS has been forced to do more with less every single year. The failure to offset the impacts of inflation has resulted in a Refuge System that has long been strained under the weight of critically low staffing levels and lost capacity. Rising fixed costs are also eating into any increases in appropriations. It costs the Refuge System an estimated \$3 million for every one percent raise in payroll costs. Without base increases in the budget to cover these fixed costs, several much-needed positions are eliminated every year. This situation is completely unsustainable.

National wildlife refuges are important recreational and tourism destinations in communities across the United States, providing families and everyday Americans access to some of the nation's best opportunities for wildlife observation, sustainable hunting and fishing, photography, and environmental education for people of all ages and backgrounds. Since 2010 the Refuge System has added 21 new refuge units, hundreds of millions of acres of marine national monuments, opened 6 million acres for hunting and fishing, and visitation has grown to over 67 million annual visitors—an increase of 36% since FY2010. This generates over 41,000 jobs and provides more than \$3.2 billion in economic output each year. It has also added new services, such as the Urban Wildlife Conservation Program, which was launched in 2012 and seeks to address inequalities in recreational access and conservation participation. While these additions have enhanced the Refuge System and benefited the communities around these refuges, this growth has also put more pressure on the already stressed and underfunded Refuge System.

The number of full-time employees (FTEs)—already a fraction of the other comparable federal land agencies—has decreased by 16% since FY2010. This has made it difficult for the Refuge System to manage its vast network of lands and waters and to fulfill its mission of conserving wildlife and habitats. No refuges are fully staffed, and more than half of refuges have zero staff on site. While not all refuges need on-site staffing, many refuges and refuge complexes have been de-staffed or understaffed significantly. Multiple refuges are closed to the public and are completely unmanaged. Many employees must manage multiple wildlife refuge units, sometimes traveling over vast distances, hundreds of miles per day.

Visitor Services staff has decreased by 25% since FY10, yet the number of visits has steadily increased by an average of 3.8% annually. Sadly, nearly all of the Refuge System's 125 visitor facilities operate on limited hours, with some centers completely closed, and none would function without volunteers. However, many volunteer programs have been cut back or eliminated due to a lack of supervision from professional FTEs or necessary infrastructure. In 2023, there were 48% fewer volunteers than in 2016. As an example of visitor center impacts, Bosque del Apache National Wildlife Refuge in New Mexico, renowned for its birding opportunities, receives 142,000 visitors annually but can only serve fewer than 1% due to curtailed visitor center hours.

A nationwide study conducted by the International Association of Chiefs of Police in 2005 indicated that the Refuge System only has 20% of the recommended 1,074 Federal Wildlife Officers (FWOs) needed to provide adequate public safety and resource protection. As of February 2024, the Refuge System has the lowest number of FWOs in over 10 years with 221 officers, while simultaneously seeing its highest visitation and crime rates in its history. Currently, seven states have no officers stationed within their boundaries (CT, DE, IA, MI, NH, OH, VT), and nine states have just one officer (GA, Guam, HI, IN, KY, PA, PR, RI, WY).

In 2022 alone, officers responded to a total of 10,854 criminal incidents on Refuge System lands. There have been 1,384 significant incidents in the last four years—an average of 1 per day. There have been 1,605 arson or vandalism cases since 2019. Since 2016, the USFWS has sustained \$1.7 million dollars in property loss due to theft or damage. However, USFWS does not currently have the authority to collect civil damages for repairs and restoration. We applaud the bipartisan Refuge System Protection Act, introduced by Congressmen Mike Thompson (D-CA) and Rob Wittman (R-VA), which would help address these issues and grant authority to the USFWS to collect civil damages to repair and restore damaged wildlife refuges.

The Refuge System also has a large deferred maintenance backlog of \$2.65 billion, with most structures near or past the end of their maximum useful life spans, such as buildings, roads,

bridges, and trails. Under current appropriations, supplemented by the Great American Outdoors Act (GAOA), deferred maintenance costs are projected to reach \$28 billion by FY2050. Additional funding is necessary to address this backlog, or assets will continue to degrade well beyond their recommended life spans. This could jeopardize visitor access, safety, climate resilience, and wildlife conservation efforts, as well as double or triple long-term maintenance costs over the next 20 years. We support the permanent authorization of GAOA and increasing the allocation of GAOA funds to USFWS from 5% to at least 15% so it can begin to address its deferred maintenance backlog.

Congress must recognize and understand the Refuge System's budget realities to begin addressing the significant challenges facing our native wildlife and habitats and ensure the health and integrity of the Refuge System for future generations. To achieve a healthy and adequately staffed Refuge System, the Refuge Association believes it needs at least \$2.2 billion in annual appropriations to effectively fulfill its conservation mission, provide opportunities for wildlife-dependent recreation, and connect communities to nature. The President's FY2025 Budget Request of \$602 million is an important step towards that goal.

While we are only representing the interests and perspectives of the Refuge Association before the Committee today, we would like to highlight that we have chaired the Cooperative Alliance for Refuge Enhancement, or CARE, since its founding in 1995. CARE is a national coalition of 24 wildlife, sporting, scientific, and conservation organizations that span the political spectrum. Our organizations came together for one shared goal: adequate funding for the National Wildlife Refuge System. While every member of CARE has a different interest in the Refuge System, each organization understands the value of the habitat and wildlife that make the Refuge System unique. CARE brings together these disparate groups around shared values and their love of wildlife to advocate for increased funding for the Refuge System—lands where wildlife and humans can thrive. We hope the CARE coalition illustrates that sufficient funding for the Refuge System is and should be a shared bipartisan goal.

The Refuge Association urges Congress to prioritize the Refuge System and address these overarching funding challenges to ensure that the USFWS is equipped to effectively manage the wildlife, habitat, programs, and visitorship that rely on the health and integrity of the Refuge System. Strong investments must be made today so these protected areas are available tomorrow for shifting conservation needs.

Thank you again for the opportunity to discuss the issues impacting the National Wildlife Refuge System before the Committee.