



THE WILDLIFE SOCIETY

5410 Grosvenor Lane • Bethesda, MD 20814-2144

Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: tws@wildlife.org

24 November 2009

Kurt A. Johnson
National Climate Change Scientist
Office of the Science Advisor
US Fish and Wildlife Service
4401 N. Fairfax Drive, Room 700d
Arlington, VA 22203

Dear Mr. Johnson,

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service Climate Change Strategy. The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association of over 8,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

TWS values science as a necessary tool to understand the natural world and supports the use of science to develop rational and effective methods of wildlife and habitat management and conservation, and to inform policy decisions that may affect wildlife and wildlife habitats. Science is the bedrock upon which natural resources management must stand to responsibly manage and sustain this nation's limited resources, including fish and wildlife populations.

We applaud the U.S. Fish and Wildlife Service (FWS) for developing a strong, science-based plan for addressing climate change. The plan makes it clear that FWS grasps the magnitude and seriousness of the threat of accelerating climate change, and appropriately delineates a role for FWS in addressing that challenge.

We appreciate that, as noted in the Action Plan, while the FWS' accomplishments each year will depend on adequate funding, the Strategic Plan and Action Plan have been developed to address the issue at hand, not to fit within a given budget. We encourage FWS and the Department of the Interior to request the funding necessary to accomplish the bold goals set forth in the plan.

We also appreciate your acknowledgment of adaptive management and your intentions to use it where appropriate. The unprecedented challenge of climate change offers you an opportunity to apply adaptive management principles to many management actions. We encourage you to take full advantage of this opportunity, using adaptive management as a viable and necessary approach to properly managing wildlife resources in the face of climate change and other threats.

The plan references in several places the need for coordination and cooperation with other agencies and organizations engaged in climate change research and adaptation. We are particularly encouraged to see the explicit mention of the State Wildlife Action Plans as a potential avenue of cooperation with states, as we believe these plans could be a powerful tool if given adequate emphasis. However, throughout the plan, coordination with the states could be improved by emphasizing the important role of state fish and wildlife agencies as key partners in the planning, development, and delivery of actions to address climate change.

In addition, the plan should more thoroughly explain how State Wildlife Action Plans, the National Fish Habitat Action Plan, the North American Waterfowl Management Plan, and other existing plans will be used to address climate change and how they will inform vulnerability assessments, the design of landscape conservation cooperatives, and monitoring frameworks. State-owned wildlife conservation lands, many purchased with federal aid dollars, should be specifically mentioned as important components for addressing landscape connectivity and designing landscape conservation cooperatives, as should tribal lands. Finally, monitoring frameworks and effectiveness measures should be developed in collaboration with state fish and wildlife agencies and tribal wildlife managers so that common protocols can be used and cross purposes met, ensuring efficiency and effectiveness.

There is also room for more coordination with the U.S. Geological Survey (USGS). For example, Objective 5.2 calls for developing standards, guidelines, and best management practices for biological carbon sequestration. USGS already has a biological carbon sequestration program underway, and collaboration on this project could benefit both agencies. Similarly, Objective 3.1 calls for creating a “national biological inventory and monitoring partnership.” Again, FWS should first determine if existing work by USGS, or the states, can be built upon.

Following are more specific comments on various objectives from the plan:

Objective 2.2: Take Conservation Action for Climate-Vulnerable Species

Many threatened or endangered species are particularly vulnerable to the disruptive effects of climate change because they tend to have smaller population sizes and limited ranges. This inherent vulnerability should be considered when conducting species and habitat vulnerability assessments and determining appropriate conservation actions.

Objective 2.3: Promote Habitat Connectivity and Integrity

We agree that connecting existing habitats will be crucial for adapting to climate change. We note that state-owned wildlife conservation lands, many of which were purchased with federal aid dollars, should be specifically mentioned as important components for addressing landscape connectivity and designing landscape conservation cooperatives. The same goes for tribal lands. In addition, we encourage the FWS to look to the Western Governors Association’s Wildlife Habitat Council and the Federal Highways Administration as sources of information regarding habitat connectivity and wildlife movement corridors

Objective 2.4: Identify and Fill Priority Freshwater Needs

Thank you for your commitment to acquiring key water rights and ensuring adequate in-stream flow. In June 2008, a report was released by Management Systems International entitled “An Independent Evaluation of the Effectiveness of the U.S. Fish and Wildlife Service’s National

Wildlife Refuge System.” Requested by FWS, the goal of the review was to assess and make recommendations for each of the Refuge System’s twelve strategic outcome goals, finalized in early 2007. The MSI report was “unable to evaluate” the Refuge System on its efforts to secure adequate water resources because so little information exists on which to gauge effectiveness. According to the report, the System “does not currently operate a well defined and structured water resources program. There is currently no individual or office designated to coordinate the Refuge System’s water rights and water quality activities.” In the face of climate change, in addition to increasing human demand, droughts, floods, and altered timing and volume of water flows, the Refuge System, and FWS as a whole, needs to anticipate and appropriately plan for future water-related challenges.

Objective 4.3 Offsets

This objective is lacking in detail, leading to concerns about the effectiveness of the FWS’ plans to purchase carbon offsets. FWS must ensure that such offsets are credible and that they benefit wildlife by creating, restoring, or enhancing habitat.

Objective 8.2: Address Fish and Wildlife Needs in Renewable Energy Development

In recent years, energy development has become a dominant fixture on many western landscapes, threatening the multiple-use public lands’ mandate and the long-term sustainability of fish, wildlife, and habitat. Unfortunately, federal policies that lease public lands for energy development often fail to adequately consider the consequences to fish and wildlife, habitats, and sporting recreation. While we as a nation seek to reduce our reliance on fossil fuels, we must learn from the success and mistakes of past energy development. Future energy development - including renewable energy development, transformer stations, transmission lines, and distribution facilities - must consider the many uses and values of public lands to the nation, Western landscapes, local economies, and local communities. TWS endorses the following guidelines for development of renewable energy resources on public lands, developed by Sportsmen for Responsible Energy Development:

1. Hunters and anglers should have a voice in the decision-making processes for renewable energy development on public lands. Open and transparent processes that encourage public input on important decisions, such as siting of renewable energy projects, distribution facilities, and transmission lines, are essential.
2. Roadless backcountry lands, National Parks, National Wildlife Refuges, and other local and state public conservation lands should be protected from the impacts of renewable energy development. Already-disturbed lands - where existing energy infrastructure might already be in place - should be prioritized for development of renewable energy.
3. Important fish and wildlife habitat must be adequately protected. Game-bird habitat, trout streams, deer and elk winter range, migration corridors, and fragile wetland and riparian habitats should not be inordinately sacrificed for renewable energy development projects.
4. Development and permitting decisions affecting fish, wildlife, and sporting recreation on federal public lands should be made in formal and documented consultation with state fish and wildlife agencies.
5. All decisions on renewable energy development projects should use the best-available scientific information on fish, wildlife, and water resources. Emerging science on impacts to critical fish and wildlife resources must be used to reach sound development decisions.

6. An improved permitting/leasing process should be developed for renewable energy projects. Existing processes using right-of-ways or special use authorizations fall short - leasing and permitting for renewable projects should be an open process that protects public land; recognizes the value of fish, wildlife, and related recreation; considers the cumulative effect of development; and balances the intended multiple uses of these lands.
7. Monitoring impacts to fish, wildlife, and water resources is critical. An essential component of developing renewable energy projects on public lands is a well-designed and adequately funded monitoring program that can determine if impacts are occurring as expected and make adjustments when effects to fish, wildlife and water resources exceed thresholds.
8. Mitigation and reclamation of impacts to fish, wildlife, and water resources must be an important component of the development of renewable energy projects. A fund established from permit revenues should be established to ensure that damages to fish and wildlife habitats are appropriately avoided, minimized, and mitigated.
9. Compliance with all pertinent bedrock environmental legislation including National Environmental Policy Act, Federal Land Policy and Management Act, National Forest Management Act, Clean Water Act, Safe Drinking Water Act and Resource Conservation Recovery Act, and other law and policy where applicable is essential to protect public-lands resources.
10. Industry should be accountable for the costs of developing renewable energy on public lands. In the past, public-lands energy development has taxed the federal government's ability to manage lands and resources in a balanced manner under multiple-use guidelines.

In closing, we encourage FWS to continue to work with others as they finalize and implement their Climate Change Strategy. Many entities (other agencies, scientific institutions, and NGOs) have initiated their own plans to address climate change and its effects on wildlife and habitat. In the coming years, a crucial challenge for resource professionals will be to organize and coordinate the myriad efforts at research, strategic planning, and conservation action that are underway. While the plan acknowledges several important efforts currently underway (such as those through the USGS National Climate Change and Wildlife Science Center), we encourage FWS and the entire Interior Department to cast a wide net when looking for already existing entities and processes that both encourage cooperation and are likely to produce the most valuable solutions to the complex challenges that climate change poses.

Thank you for considering the views of wildlife professionals. If we may be of further assistance on this or any other matter, please contact Laura Bies, Director of Government Affairs, at 301-897-9770 or laura@wildlife.org.

Sincerely,



Michael Hutchins, Ph.D.
Executive Director/CEO