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Ms. Sarena Selbo  
Division of Natural Resources and Conservation Planning  
National Wildlife Refuge System  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Room 600A  
Arlington, VA 22203

Email: [nwrsstrategicgrowthpolicy@fws.gov](mailto:nwrsstrategicgrowthpolicy@fws.gov)

March 3, 2014

RE: Comments on Draft Refuge Growth Policy/ FWS-HQ-R-2013-N246  
FXRS12650900000-145-FF09R20000

**VIA U.S. MAIL & EMAIL**

Dear Ms. Selbo:

I am submitting these comments relating to the U.S. Fish and Wildlife Service (Service), proposed policy to implement a strategic approach to the growth of the National Wildlife Refuge System on behalf of Public Employees for Environmental Responsibility (PEER). Our two comments are that 1) the Service expansion plans are not cost-effective; and 2) these plans do not cogently account for the effects of climate change, especially sea-level rise.

**I) Not Cost-Effective**

The proposed policy makes references to developing an “efficient network of lands and waters” in a “cost-effective” manner in the face of “increased land prices.” Yet nowhere does the draft policy include land cost as an explicit factor in setting priorities for acquisitions to expand the National Wildlife Refuge System.

In late 2011, PEER submitted a Freedom of Information Act (FOIA) request on this topic to your agency. The documents which your agency produced revealed the following:

- The Land Acquisition Priority System (LAPS) used by the Service only accounts for conservation benefits without systematically accounting for costs;

- As a result, refuge lands purchased from Land and Water Conservation Fund dollars are not optimized to provide the maximum return on investment;
- There is strong scientific support that optimization actually enhances the overall conservation benefits achieved by land purchases;
- Agency internal analyses indicate that land acquisition costs are substantial and measurable enough to be incorporated effectively in an optimization process;
- The 2011 White House report, *Sustaining Environmental Capital: Protecting Society and the Economy*, called for federal agencies to increase the positive impact of conservation expenditures by giving highest priority to those expenditures that maximize the conservation benefits gained for each dollar invested...”; and
- Executive Order 13514 (October 5, 2009) declares federal policy that to “support their respective missions, agencies shall prioritize actions based on a full accounting of both economic and social benefits and costs...”

These conclusions are contained in briefing materials which appear to be addressed to you and your chain of command. Significantly, the more than 500 pages of documents provided to us by your agency did not contain a shred of information countering, minimizing or rationalizing away these conclusions. Most curiously, the documents contained no coherent justification for the current system nor do they provide an explanation as to why the Service refuses to optimize its land acquisitions.

On January 19, 2012, PEER wrote a letter to Director Dan Ashe seeking an explanation for failure of the Service to include cost factors in its land acquisition priority system and urging him to commence optimization in Fiscal Year 2013. Director Ashe did not answer that letter, did not take any action to initiate optimization and even failed to include explicit and systemic consideration of land process in this proposed policy for growing the refuge system.

Other federal agencies, such as the Department of Agriculture and the Bureau of Reclamation (which like the Fish & Wildlife Service is part of the Interior Department), as well as land conservancy organizations, already use cost as an explicit component of their land acquisition systems.

The continued failure by the Service to optimize land costs will prevent it from getting the biggest bang for its shrinking land acquisition buck.

## **II) Fails to Cogently Address Climate Change**

As with the issue of cost, this proposed plan makes repeated reference to the effects of climate change and the need to consider ‘resilience.’. Yet nowhere does the plan spell out in any detail how those effects are integrated into expansion planning.

According to agency documents obtained by PEER under FOIA, the National Wildlife Refuge System is still not prepared to deal with the implications of sea-level rise “threatening our 159 coastal refuges.” Thus, more than a quarter of the 550 National Wildlife Refuges will be affected by sea-level rise. In the absence of a coherent plan taking this into account, taxpayers are spending too much to buy “unsuitable lands” with eroding habitat value, among other liabilities.

Despite claims by the Service that it is a pioneer in climate change planning, agency documents indicate that basic steps to use available information on sea-level rise in land purchase plans and wildlife evaluations have yet to be taken. Agency memos point out that due to rising sea levels –

- “We sometimes pay high prices for unsustainable lands”;
- Nonetheless, “the Refuge System will need more coastal property to replace coastal ecosystems lost to sea-level rise” but has no overall plan to address this cycle; and
- As real estate markets values eventually drop along besieged coastlines, refuge purchases of devalued lands could provide “storm and surge protection to adjacent inland communities.”

This lack of prudent planning, the memos contend, is compounded by the fact that the Service’s land acquisition priority system does not even take the price of land into account. This weakness hampers strategic investment to compensate for the effects of rising sea-levels.

One proposal the Service has yet to act upon would integrate models of climate change impacts, such as the Sea Level Affecting Marshes Model (or SLAMM), into all coastal refuge plans. These models should also be included as a factor in forecasting populations of target species, such as migratory birds.

Despite the Service’s conceptual recognition of climate change impacts, individual refuges are still futilely trying to hold back the rising tide. In late 2011, for example, Prime Hook National Wildlife Refuge in Delaware scraped its beaches of sand to rebuild dunes shielding private beach homes. The re-built dune was over-washed by Delaware Bay less than four days after completion. The wash-out did not even require a storm; the new dune-line did not survive the first full moon high tide.

In summary, PEER would urge the Service to openly and directly factor land costs and sea-level rise into all future land acquisition plans.

Sincerely,

Jeff Ruch  
Executive Director