

**STATEMENT OF  
WILLIAM P. HORN  
ON BEHALF OF THE  
UNITED STATES SPORTSMENS ALLIANCE  
BEFORE THE  
SUBCOMMITTEE ON FISHERIES, WILDLIFE & OCEANS  
REGARDING  
FUNDING AND MANAGEMENT OF THE NATIONAL WILDLIFE  
REFUGE SYSTEM**

September 24, 2008

Madame Chair: My name is William P. Horn appearing on behalf of the U.S. Sportsmen's Alliance (USSA). We appreciate the opportunity to appear before the Subcommittee to discuss issues facing the National Wildlife Refuge. USSA is a national association of hunters, anglers, and trappers, and sporting organizations representing over a million members and affiliates committed to protecting and advancing America's heritage of hunting, fishing and trapping. USSA has long been committed to ensuring a vital well managed Refuge System that conserves our incomparable wildlife resources while providing important opportunities to hunt, fish, and trap.

My testimony also reflects perspectives gained during my prior service as Assistant Secretary of the Interior for Fish, Wildlife and Parks under President Reagan and the privilege of serving as Chairman of the National Wildlife Refuge Centennial Commission in 2002-2003.

We commend the Fish and Wildlife Service for commissioning the Independent Evaluation of the effectiveness of the Refuge System. Few agencies demonstrate the courage to ask for such review and then cooperate openly with the reviewers. The Service deserves high marks on both counts. Review of the evaluation indicates that the Service is doing an outstanding job with limited resources and we were pleased that the agency's performance for nine of the twelve Strategic Outcome Goals (SOGs) was considered effective and in only two cases was performance considered "ineffective." USSA wishes that other federal land management entities, with budgets dwarfing the Service, performed so well.

Following our review of the Independent Evaluation, five areas presented issues we wish to address: SOG 3 – Wilderness; SOG 5 - Wildlife Dependent Recreation; SOG 7 - Law Enforcement; SOG 8 – Infrastructure and Funding; and SOG 10 – Growing the System.

SOG 3 - Wilderness – The Service is in desperate need of new guidance regarding Wilderness management issues and a recent U.S. District Court ruling involving the Kofa Refuge in Arizona should provide the impetus to finally resolve this issue. Proposed Wilderness guidance issued eight years ago failed to recognize that Wilderness designations of Refuge lands are designed to provide "supplemental" management purposes and guidance. Indeed, the "supplemental" reference is an express term of the 1964 Wilderness Act. Despite this statutory clarity, previously proposed guidance improperly elevated Wilderness purposes contrary to the

more fundamental wildlife conservation objective of the Refuge System as clearly articulated in the 1997 Refuge Improvement Act.

This hierarchy has been affirmed in a recent lawsuit in Arizona. There the Service, Arizona Game and Fish, and local conservationists like the Arizona Desert Bighorn Sheep Society and the Yuma Valley Rod and Gun Club (USSA affiliates) developed water catchments to enhance desert sheep populations. An interest group named Wilderness Watch objected and argued that the Wilderness Act barred such water catchments within the Refuge even though they would help wildlife populations. The District Court rejected this nonsense and affirmed that the primary purpose of Refuges is wildlife conservation. The Service should promptly complete new Wilderness guidance that reflects this approach.

SOG 5 - Wildlife Dependent Recreation – The express recognition of Wildlife Dependent Recreation, including hunting and fishing, in the 1997 Refuge Act was one of its primary accomplishments. The Service’s effective implementation of this statutory policy is widely recognized and deeply appreciated within the sporting community. However, there are some looming problems that Congress ought to promptly redress.

First, animal rights radicals and anti-hunting activists have filed suit in U.S. District Court to compel the Service to prepare more paperwork and more evaluations before hunting and fishing programs can be approved. Although contrary to the intent of the 1997 Act, over the last two years the Service has had to expend substantial time, effort and resources to prepare this extra and superfluous documentation. During a period of limited personnel and monetary resources, the Service has better things to do with those resources. Accordingly, we strongly urge Congress to take action to make it clear that the evaluations conducted as part of the Comprehensive Conservation Plan process and the annual analyses associated with migratory bird hunting regulations are sufficient and that additional “cumulative effects” work is unnecessary to authorize hunting programs. This would save substantial money and free up limited personnel resources for more important conservation and refuge management work.

Second, USSA is extremely apprehensive about language in the Independent Evaluation referring to “prioritizing” allocation of limited resources “among the various recreational activities.” The last time we saw similar language was in 1995 when the Clinton Administration attempted to curtail hunting and fishing opportunities on Refuges in the name of budget shortfalls. That effort to put hunting and fishing programs on the chopping block was a primary impetus for enactment of the 1997 Improvement Act and its recognition of hunting and fishing as priority public uses of the Refuge System. Hunting and fishing activities generate more revenues for the Service, and their partners in the state fish and wildlife agencies, than do the other priority public use activities. If budget shortfalls absolutely mandate use restrictions, hunting and fishing programs must be the last to be impacted.

Third, we have concerns regarding any efforts to define “quality” hunting. This is a highly subjective standard and we have witnessed efforts by some Refuges to restrict traditional hunting activity on the grounds that it doesn’t provide sufficient “quality.” USSA supports quality experiences but wants to ensure that any proposed restrictions advanced in the name of

“quality” must be very carefully vetted with local hunters and the appropriate state fish and wildlife agency.

SOG 7 - Law Enforcement – USSA sympathizes with the need for enhanced law enforcement on refuges. We are concerned though that simply increasing funding and personnel for the Law Enforcement (LE) division without clear management objectives in place will not produce the anticipated benefits. From our perspective, the LE division continues to wrestle with its priorities and old fashioned on-the-ground enforcement within the Refuge System appears to be at the bottom of the priority list. Rather the focus is on import/export matters including CITES, migratory bird enforcement aimed at incidental takes, and homeland security related measures. If additional funding is provided to LE, it must be clearly designated for improved on-the-ground activities within Refuges. Without that limitation, we fear that enforcement within Refuges will remain at the bottom of LE’s priorities.

SOG 8 - Infrastructure and Funding – After a period of increased operations and maintenance funding that coincided with the Refuge System Centennial, funding has begun to slide. One option is for Congress to simply appropriate additional funds. However, it is evident that as the System grows and wildlife dependent recreation uses expand, the need for funding will outstrip Congresses ability to simply provide additional monies. Similar problems afflict the Forest Service and the Bureau of Land Management.

USSA is persuaded that we need a new paradigm for funding public land management systems. The hunting and fishing community has been at the funding forefront for a century by providing hundreds of millions annually via licenses, fees, stamps, and excise taxes for wildlife conservation. Many of these dollars are for the benefit of the Refuge System. There is no doubt the sporting is prepared to do more but it lacks the resources to bear the burden of funding the system – a burden that would inequitable as well. Today we are in no position to present that new paradigm. Rather we strongly suggest that Congress, the Service, and the conservation community come together to pursue development of new funding methods and options. One hundred years ago the sporting community, in cooperation with the Teddy Roosevelt Administration, developed what has become the North American Model for wildlife conservation funding. A similar effort is needed today for our Refuge system.

In the near term, however, we strongly endorse recommendations to tailor administrative requirements for smaller refuge units. “One size fits all” rules do not work and it is clear that there is significant waste associated with making small units comply with same bureaucratic procedures as large units. Streamlining these procedures for small units will enable the Service to stretch its available dollars.

SOG 10 - Growing the System – This was one of two goals where Service management was rated as ineffective. My experience indicates, however, that this “ineffectiveness” is a result of outside forces beyond the Service’s control. The report noted that land purchases for Refuges often do not match the priorities identified by the Land Acquisition Priority System (LAPS). This particular problem has existed for over 25 years and can be readily fixed by the Congress. I directed establishment of LAPS in 1985 because Congressional appropriators were ordering land acquisitions inconsistent with the System’s bona fide needs. LAPS was designed to enable the

Service to identify those lands that ought to be acquired to advance Refuge System goals. Unfortunately, Congress frequently disregards these priorities. A bit of self discipline in the Congressional agency funding process (i.e., follow the resource priorities set by the professionals in the Service) would correct this problem.

Another problem created outside the Service is the Interior Department's land appraisal procedures. Created as an overreaction to criticism from the Inspector General, the new system is time consuming, complex, costly, and simply doesn't get the job done. The system is more focused on nit-picking appraisals than efficient acquisition of environmentally valuable lands. We strongly concur with the recommendation of the Independent Evaluation that the appraisal function be returned to the Service.

Thank you again for the opportunity to appear today. The Service continues to do an excellent job of managing the Refuge System with limited resources. We need to assist the Service in making the most efficient use of these resources while working to develop a new funding model to assure that sufficient funds are available to ensure sound conservation, management, and use of our incomparable Wildlife Refuges.