

Testimony of David J. Wielicki, Chief Executive Officer, South Carolina Waterfowl Association

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Hearing before the Subcommittee on Water, Wildlife and Fisheries

“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 Subcommittee. My name is David Wielicki and I am the Chief Executive Officer of the South Carolina Waterfowl Association, an organization that I founded in 1986 with the mission to enhance and perpetuate South Carolina’s wildlife heritage through education and wildlife habitat conservation.

My career as a waterfowl biologist spans forty years, working on waterfowl and their habitat across North America. My career has allowed me to foster and pass on my passion for ducks, their habitat and the rich tradition of waterfowl hunting through the establishment of the nation’s leading wildlife education center and the creation and annual management of thousands of acres of waterfowl habitat. Ducks and duck hunting have dominated my professional career and are an important part of my family heritage.

I come before the committee today with my professional and personal observations about the needs of ducks in a changing world as it relates to the proposed rule and policy updates commonly known as the biological, integrity, diversity, and environmental health (BIDEH). The BIDEH proposal represents a marked shift in how the National Wildlife Refuge System (NWRS) has managed these important lands and waters over the last century. I am concerned the prohibitions that would be established by BIDEH unless an undefined and unclear allowance criteria is met, have the potential to undermine nearly a century of work to promote biodiversity and wildlife populations. More specifically, I am concerned that the BIDEH proposal restricts the tools of refuge managers at a time when we should be seeking new and innovative ways to address today’s conservation challenges and changing ecosystems.

Today’s world is one where habitat is ever changing and where sustaining abundant waterfowl and wildlife populations we all desire is an ever-increasing challenge. There are myriad indications that the landscapes upon which waterfowl depend is trending towards continued loss of habitat and the remaining habitat lacking the necessary requisites for sustained population growth.

One need only look at the changes in important landscapes for waterfowl, shorebirds, and waterbirds. For example, agricultural practices along the Louisiana gulf coast have changed, much to the detriment of waterfowl and wildlife. Where rice once dominated and provided significant food resources for wintering waterfowl, shorebirds, and waterbirds, sugar cane now is the dominant crop providing nominal value. Post harvest flooding of agricultural fields in the Mississippi Alluvial Valley once provided very substantial habitat for foraging waterfowl but the practice is far less common today as producers pursue higher agronomic performance. Water scarcity in the west has also had consequences on refuges in the Central Valley of California and critical habitats like Lower Klamath National Wildlife Refuge along with other wetland areas of the intermountain west. Finally, all waterfowl biologists understand the ongoing and persistent loss of wetlands and upland nesting cover in the Prairie Pothole Region-the breadbasket of North American breeding duck populations.

I point these examples out as I believe it is important to understand and recognize both the scale and magnitude of habitat concerns across the whole of the annual cycle of waterfowl, shorebird, and waterbird populations. From north to south, and east to west, there are key stressors on the habitat which we should be conscious of. While the relatively recent published scientific paper dubbed the “3 billion” bird report documented waterfowl and other wetland dependent wildlife faring far better than other bird groups, there are clear indications that those populations face some significant headwinds over ongoing habitat loss and degradation.

As this is the case, our job as waterfowl managers gets more difficult. As habitat is lost or its functions and values are degraded, how do we manage to ensure waterfowl, migratory birds and other species can continue to flourish?

My experience in South Carolina and beyond has often wrestled with this challenge. Santee National Wildlife Refuge, a jewel of Atlantic Flyway refuges, was acquired and managed for the benefit of waterfowl, migratory birds and other wildlife in 1942. Back in the 1970’s the refuge annually wintered more than 150,000 ducks. This number declined to less than 5,000 ducks by 1998. Now to be fair, migrations have changed the Service staff complement has been drastically reduced (from 11 to 4 full time staff at Santee NWR), infrastructure is failing and operations and management capacity has declined drastically due to regular staff turnover.. It is important to be mindful of the regular staff turnover given the reliance on refuge staff to implement the many requirements found in the draft BIDEH policy.

As a waterfowl association that works closely with private landowners to secure and deliver on-the-ground conservation, I am proud of the work that we have done to restore and enhance habitat for waterfowl, shorebirds, and an abundance of other species near Santee NWR. However, private landowners cannot do this work in a vacuum. Put simply, SCWA and our private landowner partners cannot conduct conservation efforts at the scale that is necessary to meet modern day conservation challenges without a well functioning refuge system. With this in mind, it is critical that refuge managers have the tools and flexibility necessary to complement the efforts of SCWA, private landowners, and our other conservation partners.

The current refuges within the National Wildlife Refuge system require more capacity simply to achieve the directives they now have. Is it wise to place additional requirements, as found in the draft BIDEH policy, on refuge staff? Especially in the changing world described earlier, managers should have the greatest amount of flexibility and tools at their disposal to manage habitat, especially for waterfowl and other migratory birds.

I recognize that there has been ongoing debate and even litigation over the use of agriculture on refuges and that this is one of the central issues contained in the Service’s BIDEH proposed rule. I am sure that many people imagine refuges as parcels of nature and that agriculture may be antithetical to what they perceive as nature. The reality is agricultural practices have occurred on refuges since the 1930’s.

I think it is important to note that, at least for refuges in the lower 48, the overwhelming majority of refuges are found in the context of significant landscape change. Hydrology has been drastically altered and invasive species are present. With the exception of wilderness areas in the NWRS, many habitats found on refuges today are the result of direct and very intentional manipulation of

nature. Extensive networks of impoundments, dams, reservoirs, dikes, water control infrastructure and the like. To the general public, that wetland on a refuge is just that—a wetland. But in reality, there are miles of dikes, numerous water control structures and pumps all installed to harness and manage nature for the benefit of waterfowl and other migratory birds. National Wildlife Refuges are not National Parks. There is a reason the organic acts for these national treasures differ.

Refuges have historically benefited from active and intentional management to ensure they meet the stated refuge purpose. In numerous cases, this necessitates the use of cooperative agriculture to provide an efficient means to supply ducks with the critical food resources they need. Duck biologists have frequently used the term “duck energy days” or “duck use days” to identify foraging resources both on a site-specific basis or at larger regional scales. As noted earlier, because of less rice in places like Louisiana and Texas and less post-harvest flooding in the Mississippi Alluvial Valley, there are far fewer “duck energy days” available on the broader landscape. This means that refuges must shoulder more of the load to provide these resources. Many of these resources are efficiently provided by certain agricultural crops that supply the carbohydrate-rich diet necessary to fuel much needed energy to survive winter months and to accumulate fat reserves for their long and arduous migrations.

While natural moist soil management is often the best scenario for impoundment management and is of critical importance to ducks, the reality is, at current staffing levels and with existing infrastructure, it is very difficult, if not impossible, to fully implement a robust moist soil management program to meet all the foraging needs of ducks. In these cases, cooperative farming can provide managers with the opportunity to provide ample foraging resources with far less staff and resources. While perhaps not “natural” as some in the general public perceive, it is a necessary and vital tool to sustaining staging and wintering ducks and to fulfill the primary purposes of many refuges. As an example, research from waterfowl researchers in Mississippi, one acre of unharvested rice provides the same number of “duck energy days” as 21 acres of moist soil vegetation.

I think it is also important to remember that the majority of refuges across the country were acquired with Migratory Bird Conservation Fund dollars. The primary revenue source of the Fund is the sale of duck stamps, with the majority of duck stamp buyers being duck hunters. These refuges were acquired using, at least in part, funding from duck hunters and were chartered by Congress to be managed for the benefit of waterfowl and other migratory birds. That being the case, I think it is critical that these refuges continue to be managed consistent with the needs of ducks, geese and migratory birds, first and foremost. That was their founding purpose. While there are a great deal of other objectives that can and should be realized on refuges, our priority should be to ensure the promise is kept to waterfowl hunters, to the original charter by Congress by doing what is best to maximize the waterfowl and migratory bird habitat on refuges. As any wildlife biologist recognizes, the wetland and upland habitat conservation work focused on waterfowl enhances biodiversity through improving habitat for a myriad of other fish, plant, and wildlife species while simultaneously bolstering climate resiliency.

Thank you for the opportunity to provide this perspective on this important issue related to the future management of our National Wildlife Refuges.

Citations

State of the Birds Report (AKA 3 Billion Birds Report)

[state-of-the-birds-2022-spreads.pdf \(stateofthebirds.org\)](#)

USFWS Programmatic EA for GEC Use in Agriculture

[Draft Programmatic Environmental Assessment for Use of Genetically Engineered Agricultural Crops for Natural Resource Management on National Wildlife Refuges in the Southeastern United States \(fws.gov\)](#)

USFWS Status and Trends of Wetlands in the Conterminous United States 2009-2019

[Status and Trends of Wetlands in the Conterminous United States 2009 to 2019 | FWS.gov](#)

USFWS Farming for Waterfowl on National Wildlife Refuges in the Southeast Region (Report)

[Farming for Waterfowl on National Wildlife Refuge in the Southeast Region \(fws.gov\)](#)

Lower Mississippi Valley Joint Venture MAV Waterfowl Stepdown State Summaries

[MAV+Waterfowl+Stepdown+Aug+2015+FINAL+12-2-15.pdf \(squarespace.com\)](#)

[MAV_waterfowl_state_summaries2015_3-19-2019 \(squarespace.com\)](#)

Hagy, H., R. Wilson, J. Stanton, and Z. Cravens. 2022. *Waterfowl Population and Energy Objectives for National Wildlife Refuges in the Southeastern United States*. U.S. Fish and Wildlife Service. Version 1.4.

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