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February 27, 2024

Public Comments Processing
Attn: FWS-HQ-NWRS-2022-0106
U.S. Fish and Wildlife Service
5275 Leesburg Pike
MS: PRB (JAO/3W)
Falls Church, VA 22041-3803

Re: National Wildlife Refuge System; Biological Integrity, Diversity, and Environmental Health; Docket No. FWS-HQ-NWRS-2022-0106

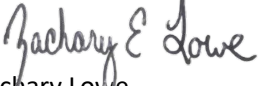
The Western Association of Fish and Wildlife Agencies (WAFWA) is a professional organization that represents 23 western state and Canadian provincial fish and wildlife agencies. The states within WAFWA hold nearly 60% of all National Wildlife Refuge (NWR) acres. The responsibility for the management of fish and wildlife in and around those NWR lands is held by the states' fish and wildlife agencies. That being the case, it is necessary for the leadership within each states' agency to have ample time to review materials that impact the management of their public-entrusted responsibility.

In 2023, the U.S. Fish and Wildlife Service requested our states review an earlier draft of the proposed BIDEH regulations and policy and provide feedback. Since that draft, substantial changes were made when producing the final document presented in the Federal Register. Furthermore, the feedback from our states, via Association of Fish and Wildlife Agencies submission, went largely unaddressed. This means that we need to amend our earlier feedback to incorporate edits in this final draft that have only confounded those original issues posed.

Fourteen of our eighteen active member states are in legislative session during this 30-day period. Over eighty-one million acres of NWR lands are in states that have had state fish and wildlife agency leadership involved with their state legislative sessions during this review period. **WAFWA requests that the public comment period be extended additional 60 days** to allow for our agency leadership to have time *after* their legislative sessions to give this the due diligence it requires.

We appreciate your consideration of a deadline extension to allow our state agencies the ability to effectively review the posted proposed BIDEH regulations and policy changes and to provide input using the formal public comment process.

Sincerely,


Zachary Lowe
WAFWA Executive Director

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Advancing collaborative, proactive, science-based fish and wildlife conservation and management across the West