

\*\*\* Alabama Wildlife Federation \*\*\* Arizona Wildlife Federation \*\*\* Idaho Wildlife Federation \*\*\*  
Michigan United Conservation Clubs \*\*\* Nevada Wildlife Federation \*\*\* North Dakota Wildlife  
Federation \*\*\* Oregon Hunters Association \*\*\* Tennessee Wildlife Federation \*\*\* Wyoming Wildlife  
Federation

Shannon Estenoz  
Assistant Secretary for Fish and Wildlife and Parks  
U.S. Department of Interior  
1849 C Street N.W.  
Washington, DC 20240

March 1, 2024

Assistant Secretary Estenoz:

We write to express concern with the proposed National Wildlife Refuge System's (NWRS) biological integrity, diversity, and environmental health (BIDEH) proposed rule and proposed policy updates (Docket Number: FWS-HQ-NWRS-2022-0106). We first ask that you extend the comment period to at least a 90-day period due to the complex nature of this proposal and the need for additional stakeholder input. Our organizations have the privilege of representing tens of thousands of hunters, anglers, and conservationists in each of our respective states.

Establishing a broad, top-down structure such as the proposed BIDEH rule, where widely accepted wildlife habitat management practices, such as cooperative agriculture, predator control, and use of pesticides, are first prohibited unless justified, will reduce the necessary flexibility to meet the goals of each unique refuge unit. Mechanical and chemical management practices are important tools that wildlife managers should be able to utilize in managing each Refuge and the current regulations are sufficient to prevent ecological harms.

Additionally, we are concerned that the BIDEH proposal does not safeguard the primary purpose of each individual NWRS unit. The Improvement Act requires that when conflict arises between the NWRS mission and the established refuge purpose, the purpose of the unit itself supersedes the NWRS mission. The BIDEH proposed rule appears contradictory.

Further, as the National Wildlife Refuge System presently needs more money from Congress to address deferred maintenance, chronic understaffing, and executing habitat improvement projects, this is not the time for new obstacles to this important work. Instead, the National Wildlife Refuge System could best advance its mission with greater clarity about projects, programs, and deferred maintenance.

We appreciate your consideration of additional time to comment on this proposal and look forward to working with the agency to make this proposed rule work for our members.

Sincerely,

Alabama Wildlife Federation  
Arizona Wildlife Federation

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