

May 6, 2024

The Honorable Martha Williams  
Director  
U.S. Fish and Wildlife Service  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Director Williams,

The undersigned organizations, which represent millions of America's hunters, anglers, recreational shooters, wildlife scientists, and other conservation professionals, write regarding the recently proposed rule and policy updates known as the National Wildlife Refuge System (NWRS) biological integrity, diversity, and environmental health (BIDEH) proposal (Docket Number: FWS-HQ-NWRS-2022-0106).

Specifically, we write to express our significant concerns and disagreement with the BIDEH proposal given its marked and consequential change in direction on the management of the NWRS. We strongly urge the rescission of the BIDEH draft policy and manual chapter to initiate a new, more thoughtful, inclusive discussion about the management objectives and conservation challenges of the NWRS.

On February 26, 2024, many of the undersigned sent a letter to the U.S. Fish and Wildlife Service (FWS) requesting the 30-day comment period be extended by 60 days given that the original comment period was insufficient to conduct a thorough review of the extensive proposal. Additionally, the letter requested that a meeting with the Director be provided to discuss this proposal. We would like to thank FWS for delivering on this request by providing an extension of the comment period until May 6, 2024, as well as for speaking to many of the undersigned during the North American Wildlife and Natural Resources Conference in late March.

However, after more deliberative review, subsequent briefings, and Congressional testimony from FWS, we write today to request FWS terminate the BIDEH proposal, and then engage partners in a more transparent, inclusive, and thoughtful discussion about the needs, objectives, and real solutions for the conservation challenges facing the NWRS. A rescission of the proposal will provide the opportunity for a meaningful discussion regarding the scientific data indicating the need for this policy and impacts of a change to the current BIDEH policy to the management of individual refuges across the country.

The undersigned appreciated the opportunity to hear from the Director as well as senior FWS and NWRS staff in March, however, despite this engagement, we do not feel our voices are truly being heard, and that there appears to be a significant divergence between what we read in the proposed rule and what we are hearing from briefings from USFWS Refuge staff in terms of the implication of the rule. We believe that the current proposal in its entirety is too far adrift to be improved, and unfortunately, the proposal is far-reaching, too vague, and in conflict with many refuge purposes to simply be amended or altered.

In conclusion, we strongly urge FWS to entirely rescind the current proposal and initiate a new, more inclusive approach as recommended above. As you know, many of the partners below are strong advocates for the NWRs and move forward to address the real pressing needs of the System most notably addressing the challenges of staffing shortages, reduced operational capacity and failing infrastructure. We thank you for your consideration of this request.

Sincerely,

American Woodcock Society  
Archery Trade Association  
Backcountry Hunters & Anglers  
Boone and Crockett Club  
California Waterfowl Association  
Congressional Sportsmen's Foundation  
Conservation Force  
Council to Advance Hunting and the Shooting Sports  
Delta Waterfowl  
Ducks Unlimited  
Houston Safari Club  
Izaak Walton League of America  
Masters of Foxhounds Association  
National Deer Association  
National Rifle Association  
National Shooting Sports Foundation  
National Trappers Association  
National Wild Turkey Federation  
Pheasants Forever  
Professional Outfitters and Guides of America  
Quail Forever  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
Safari Club International  
Sportsmen's Alliance  
Theodore Roosevelt Conservation Partnership  
Whitetails Unlimited  
Wild Sheep Foundation  
Wildlife Mississippi

CC:

Siva Sundaresan, Deputy Director, U.S. Fish and Wildlife Service  
Cynthia Martinez, Chief, National Wildlife Refuge System