April 12, 2022

The Honorable Deb Haaland
Secretary
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

The Honorable Martha Williams
Director
United States Fish and Wildlife Service
1849 C Street, NW
Washington, D.C. 20240

Re: Petition for Rulemaking

Dear Secretary Haaland and Director Williams,

The undersigned organizations are writing to support a petition submitted by the Center for Biological Diversity and Center for Food Safety requesting a rulemaking to ban the use of agricultural pesticides on National Wildlife Refuges.

The National Wildlife Refuge system is different from other U.S. public lands because “wildlife conservation drives everything, from the purposes for which each Refuge was established, to the recreational activities offered, to the resource management tools used,” according to language on the Fish and Wildlife Service’s website. As such, it is the responsibility of the Service to manage Refuge lands through means which do not endanger the wildlife or people which use and rely on them.

The petition calls for commonsense protections such as halting new pesticides for commercial agricultural purposes on Refuges, initiating rules to eliminate uses of agricultural pesticides as further defined by the language proposed in the petition for inclusion at 50 C.F.R § 29.3, and reinstating at 2014 memorandum requiring the halt of neonicotinoid insecticides on National Wildlife Refuges.

American Bird Conservancy’s 2013 report concluded a single seed coated with neonicotinoid insecticide is enough to kill a songbird. Neonicotinoids are found residually in soil, pollen, and nearby waterways, often killing non-target aquatic invertebrates which are the foundation for local food webs. Aquatic invertebrates are important food sources for resident and transient wildlife which utilize the Refuge system.

Growing corn, soybeans, grains, and other crops on national wildlife Refuges is commonplace. This practice has been hailed as a way to work cooperatively with local farmers and meet the caloric needs of migratory birds and other species of wildlife. However, providing food for wildlife on National Wildlife Refuges should not come with the caveat of potentially poisoning the same species cooperative farming on Refuges aims to help.

The petition recognizes the necessity of agricultural pesticide usage on Refuges in emergency situations, such as for the control of non-native or invasive species, so long as the use is
compatible with a Refuge’s Comprehensive Conservation Plan and is made transparent through publication in the Federal Register.

**Overreliance** on pesticides leads to pest resistance, inundation of secondary pests, increased environmental toxicity, and ecosystem collapse. Seed treatments, foliar applications, and aerial sprays are just a few of the many ways chemicals are brought into Wildlife Refuges, contaminating the plants, animals, lands, and waters the Refuge System was designed to preserve.

National Wildlife Refuges should be just that; areas of respite, safety, and dependability for native wildlife. We the undersigned encourage the petition be swiftly reviewed and responded to and its requested actions be adopted.

Sincerely,
For information please contact:

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