



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 <a href="website">website</a>. 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 <u>2013 report</u> concluded a single seed coated with neonicotinoid insecticide is enough to kill a songbird. Neonicotinoids are <u>found residually</u> 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,

















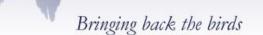












Olympic Forest Coalition

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**Environmental Protection** 

**Information Center- EPIC** 

Applegate Wildlife Pond Freedom Center for Linnaean Society of New Wildlife, Inc. York Audubon Miami Valley Friends of Atascadero Los Angeles Audubon Audubon of Southwest Wetlands (FAW) Society Florida Friends of the Earth Madrean Archipelago Bexar Audubon Society Wildlife Center Genesee Valley Audubon **Bird Conservation** Society Maryland Ornithological Network Society Hampshire Bird Club Blue Ridge Audubon Menotomy Bird Club Hawai'i Alliance for Chapter **Progressive Action** Mid-Michigan **Brookline Bird Club** Stewardship Initiative Hawk Mountain Sanctuary Central Lakes College Missouri River Bird Association Natural Resources Observatory Program Herbicide-Free Campus Native Plant Society of the Compassion for All Living Illinois Ornithological United States Beings Cooperation Circle Society Natural Resources Defense IXIA Chapter of the Conservation CATalyst Council Florida Native Plant Conservation Council For Society New Hampshire Audubon Hawaii John Muir Project of Earth New York City Audubon Crab Creek Conservancy Island Institute Society Eastern Long Island North Cascades Audubon Kankakee Valley Audubon **Audubon Society** Kentucky Ornithological Northwest Arkansas Eco Magic Society **Audubon Society Ecology Center of** Kettle Range Conservation NY4Whales.org Southern California Group NY4Wildlife **Endangered Species** Kirkland Bird Club

Lane County Audubon

Society





Oregon Wildlife Federation

Osa Birds Research and Conservation

Pelican Island Audubon

Pollinate Minnesota

Presque Isle Audubon Society

Prince George's County Audubon Society

Raptors Are The Solution

Resource Renewal Institute

Rogue Valley Audubon Society

Salem Audubon Society

San Fernando Valley Audubon Society

San Francisco Bay Physicians for Social Responsibility

Santa Clara Valley Audubon Society

Soda Mountain Wilderness Council

Southern Maryland Audubon Society

Sussex County Bird Club Corporation Tennessee Ornithological

Society

The Ethician Foundation

The Linnaean Society of

New York

The Urban Wildlands

Group

The Wildlife Trust

Toxic Free North Carolina

Tree Fredericksburg

Umpqua Watersheds

West Virginia Highlands

Conservancy

Western Nebraska Resources Council

Wild Nature Institute

Wildbird Recovery, Inc.

WildCare of Western New

York

Wolf Conservation Center

For information please contact:

Hardy Kern Director of Government Relations, Pesticides and Birds Campaign 412.337.4673 ehardykern@abcbirds.org