



*Bringing back the birds*

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



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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,





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Applegate Wildlife Pond

Audubon Miami Valley

Audubon of Southwest  
Florida

Bexar Audubon Society

Bird Conservation  
Network

Blue Ridge Audubon  
Chapter

Brookline Bird Club

Central Lakes College  
Natural Resources  
Program

Compassion for All Living  
Beings Cooperation Circle

Conservation CATalyst

Conservation Council For  
Hawaii

Crab Creek Conservancy

Eastern Long Island  
Audubon Society

Eco Magic

Ecology Center of  
Southern California

Endangered Species  
Coalition

Environmental Protection  
Information Center- EPIC

Freedom Center for  
Wildlife, Inc.

Friends of Atascadero  
Wetlands (FAW)

Friends of the Earth

Genesee Valley Audubon  
Society

Hampshire Bird Club

Hawai'i Alliance for  
Progressive Action

Hawk Mountain Sanctuary  
Association

Herbicide-Free Campus

Illinois Ornithological  
Society

IXIA Chapter of the  
Florida Native Plant  
Society

John Muir Project of Earth  
Island Institute

Kankakee Valley Audubon

Kentucky Ornithological  
Society

Kettle Range Conservation  
Group

Kirkland Bird Club

Lane County Audubon  
Society

Linnaean Society of New  
York

Los Angeles Audubon  
Society

Madrean Archipelago  
Wildlife Center

Maryland Ornithological  
Society

Menotomy Bird Club

Mid-Michigan  
Stewardship Initiative

Missouri River Bird  
Observatory

Native Plant Society of the  
United States

Natural Resources Defense  
Council

New Hampshire Audubon

New York City Audubon  
Society

North Cascades Audubon

Northwest Arkansas  
Audubon Society

NY4Whales.org

NY4Wildlife

Olympic Forest Coalition



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Oregon Wildlife  
Federation

Tennessee Ornithological  
Society

Osa Birds Research and  
Conservation

The Ethician Foundation

Pelican Island Audubon

The Linnaean Society of  
New York

Pollinate Minnesota

The Urban Wildlands  
Group

Presque Isle Audubon  
Society

The Wildlife Trust

Prince George's County  
Audubon Society

Toxic Free North Carolina

Raptors Are The Solution

Tree Fredericksburg

Resource Renewal Institute

Umpqua Watersheds

Rogue Valley Audubon  
Society

West Virginia Highlands  
Conservancy

Salem Audubon Society

Western Nebraska  
Resources Council

San Fernando Valley  
Audubon Society

Wild Nature Institute

San Francisco Bay  
Physicians for Social  
Responsibility

Wildbird Recovery, Inc.

Santa Clara Valley  
Audubon Society

WildCare of Western New  
York

Soda Mountain Wilderness  
Council

Wolf Conservation Center

Southern Maryland  
Audubon Society

Sussex County Bird Club  
Corporation

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