

March 11, 2022

The Honorable Martha Williams
Director
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041

Re: *Center for Biological Diversity v. U.S. Fish and Wildlife Service* – Potential Settlement

Dear Director Williams:

The undersigned hunting, fishing, and other conservation organizations, representing millions of sportsmen and women across the United States, are aware from court filings in the above referenced litigation, that the U.S. Fish and Wildlife Service (Service) is engaged in settlement discussions with the Center for Biological Diversity (CBD). We respectfully request that the Service reject any settlement of pending litigation that would undermine or reduce the expansion of hunting and fishing opportunities on National Wildlife Refuges. A settlement would be inconsistent with the Service's responsibilities under the National Wildlife Refuge System Improvement Act of 1997 (Improvement Act). The Improvement Act directs the Service to prioritize the expansion of hunting and fishing on refuges. To this end, we also applaud your leadership and the recent expansion of hunting and fishing opportunities on 2.1 million acres (announced in August of 2021).

The lawsuit arises from the 2020 expansion of hunting and fishing on over 2.3 million acres of National Wildlife Refuges across the country. The plaintiff alleges that the Service violated the Endangered Species Act (ESA) and National Environmental Policy Act (NEPA), because additional hunting and fishing on these public lands poses a threat to endangered species through potential lead poisoning from ammunition and tackle. Several of the challenged hunting opportunities were requested by state wildlife agencies and intended to manage overly abundant or invasive species. We sincerely hope that the Service will not allow a lawsuit to dictate the conservation and management of wildlife on refuges.

The undersigned organizations strongly object to any settlement that would close hunting or fishing or ban the use of traditional ammunition or fishing tackle. It is especially concerning that the Service might consider closing refuges without any input from the hunting conservation community or state wildlife agencies.

It is our understanding that the National Wildlife Refuge System is underfunded and understaffed. Any settlement that would add to the Service's financial burden should be summarily rejected. The Service cannot afford to adopt the view of a single interest group that erroneously objects to particular priority recreational uses successfully allowed on refuges throughout the country.

In addition, we object to any settlement given the weakness of the plaintiff's legal claims. Several of the undersigned organizations provided extensive comments on the 2020 proposed rule opening hunting and fishing opportunities. These comments make clear that the rule already satisfies all applicable laws and advances the purposes of the Improvement Act.

Hunting and fishing are essential to funding and maintaining the National Wildlife Refuge System, and to conserving the wildlife that inhabits the refuges and adjacent state lands. Earlier this month, the Service announced a record \$1.5 billion in funding for wildlife and habitat conservation generated from excise taxes on hunting, shooting, and fishing equipment. In announcing this historic revenue, the Service confirmed that hunting and fishing are consistent with the President's "America the Beautiful" initiative.

In sum, any settlement which closes access for hunting and fishing on refuge lands is wholly inconsistent with the traditional and the current role that hunting and fishing play in the refuge system.

We strongly urge the Service to cease settlement discussions with CBD, vigorously oppose their baseless lawsuit, and defend the lawful and appropriate expansion of hunting and fishing on over 2.3 million acres of National Wildlife Refuges across the country.

Sincerely,

Alaska Professional Hunters Association
American Sportfishing Association
American Woodcock Society
Archery Trade Association
Backcountry Hunters & Anglers
Bass Anglers Sportsman Society
Boone and Crockett Club
California Waterfowl
Camp Fire Club of America
Coastal Conservation Association
Congressional Sportsmen's Foundation
Conservation Force
Council to Advance Hunting and Shooting Sports
Dallas Safari Club
Delta Waterfowl
Ducks Unlimited
Houston Safari Club
International Game Fish Association
Izaak Walton League of America
Masters of Foxhounds Association
Mule Deer Foundation
National Deer Association
National Professional Anglers Association
National Rifle Association
National Shooting Sports Foundation
National Wild Turkey Federation
Northwest Sportfishing Industry Association
Orion: The Hunter's Institute
Pheasants Forever
Quail Forever
Rocky Mountain Elk Foundation
Ruffed Grouse Society
Safari Club International
Sportsmen's Alliance
Student Anglers Federation
The Bass Federation
The Walleye Federation
Wild Sheep Foundation
Wildlife Forever
Wildlife Management Institute
Wildlife Mississippi