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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

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February 26, 2024

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

Dear Director Williams,

As a member of the Migratory Bird Conservation Commission (MBCC), a current member and past co-chair of the Congressional Sportsmen's Caucus, and as a co-chair of the National Wildlife Refuge Caucus, I write today regarding the proposed National Wildlife Refuge System (NWRS) biological, integrity, diversity, and environmental health (BIDEH) rule and policy updates (Docket Number: FWS-HQ-NWRS-2022-0106). This proposed rule will have far reaching consequences for the NWRS, fish and wildlife, sportsmen and women, and importantly, the American public at-large. I strongly urge the U.S. Fish and Wildlife Service (FWS) to extend the comment period to a minimum of 90 days.

If implemented, BIDEH would be a monumental change in the management of the NWRS — this should not be taken lightly. I am concerned that a 30-day comment period woefully recognizes the need to receive public comment from hunters, anglers, and other users of the NWRS that are included in the "Big Six," as codified by the National Wildlife Improvement Act of 1997. When examining other proposals put forward by FWS, the comment period provided for the BIDEH proposal is wholly inadequate in comparison to what was provided for more inconsequential proposals. For the NWRS to remain relevant and supported by the American public, stakeholders — including Members of Congress — need sufficient time to carefully review and evaluate the BIDEH proposal.

**Congress of the United States**  
**Washington, DC 20515**

As one of four Members of Congress who serve on the MBCC, I am concerned with this proposal. As you know, the MBCC is primarily responsible for considering and approving lands and waters for purchase or rental to conserve wetlands and other habitat for migratory birds under the Migratory Bird Conservation Fund (Fund). A significant source of money provided to the Fund is generated through the sale and purchase of Federal Duck Stamps. In total, the Fund has provided funding to acquire over 300 NWRS units that have been established with the primary purpose of conserving waterfowl. Unfortunately, it is unclear how this proposal will enhance waterfowl conservation or advance the purpose of each individual NWRS unit. Furthermore, I am concerned that as a member of the MBCC who regularly interacts with sportsmen and women, these important stakeholders and supporters of the NWRS do not appear to have been consulted in the development of this proposal. The sale of Federal Duck Stamps generates more than \$40 million annually, much of which is used by the NWRS for acquisition, management, and restoration. The constituency that supports these efforts should be considered and given proper time to provide comments and input on this proposed rule.

Again, this proposal represents a consequential shift in the management of the NWRS. Given the major changes proposed in BIDEH, I strongly urge FWS to extend the comment period to a minimum of 90 days.

Thank you for your consideration of the important request. Please contact Will Sroka at 202-225-4261 or [will.sroka@mail.house.gov](mailto:will.sroka@mail.house.gov) with any questions regarding this request.

Sincerely,



Robert J. Wittman  
Member of Congress

CC: Siva Sundaresen, Deputy Director, USFWS  
Stephen Guertin, Deputy Director, USFWS  
Cynthia Martinez, Chief, NWRS