September 10, 2024

The Honorable Cliff Bentz The Honorable Jared Huffman Chairman Ranking Member Subcommittee on Water, Wildlife, and Fisheries Subcommittee on Water, Wildlife, and Fisheries Committee on Natural Resources Committee on Natural Resources U.S. House of Representatives U.S. House of Representatives 1324 Longworth House Office Building 1332 Longworth House Office Building Washington, D.C. 20515 Washington, D.C. 20515

Dear Chairman Bentz and Ranking Member Huffman:

On behalf of our organizations and our millions of members and supporters we are writing to express our strong opposition to the “Biodiversity Oversight Scaled-back And Fully Erased (BIOSAFE) Act,” (H.R. 8632), one of the bills being heard today by the Subcommittee.

As the only network of lands and waters dedicated to wildlife conservation, the National Wildlife Refuge System’s importance to American biodiversity cannot be overstated. Unprecedented challenges threaten the System’s viability, including climate change, habitat loss, and the proliferation of invasive species, to name a few.

The U.S. Fish and Wildlife Service’s (Service or FWS) proposed rule— “National Wildlife Refuge System: Biological Integrity, Diversity, and Environmental Health” (BIDEH)— seeks to address these challenges by creating a science-driven management framework that favors natural conditions and processes. Regrettably, the so-called BIOSAFE Act would require the withdrawal of the proposed rule, undermining the Service’s mandates under the National Wildlife Refuge System Administration Act of 1966, as amended (Refuge Act).

The BIDEH mandate is a visionary directive requiring FWS to “protect the [Refuge] System and individual refuges from threats”[[1]](#footnote-2) by “ensur[ing] that the biological integrity, diversity, and environmental health of the System are maintained for the benefit of present and future generations of Americans.”[[2]](#footnote-3) Following its passage into law, the Service adopted a BIDEH policy in 2001 but did not promulgate regulations addressing specific threats such as pesticide or agricultural use. The proposed rule and updated policy finally rectify this shortcoming by providing common-sense management direction addressing activities with the potential to harm BIDEH.

This strategic approach is just as Congress intended. The Refuge System must be managed for wildlife as a cohesive unit of nearly 600 refuges, while affording managers the flexibility to achieve the establishment purposes of their individual refuges. Because the Service accomplishes both with the proposed rule, we strongly support the agency’s approach and oppose the BIOSAFE Act.

Thank you for your attention.

Sincerely,

1. H.R. Rep. No. 105-106, at 10 (1997). [↑](#footnote-ref-2)
2. 16 U.S.C § 668dd(a)(4)(B). [↑](#footnote-ref-3)