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The Honorable Dan Ashe
Director
U.S. Fish and Wildlife Service
1849 C Street, NW
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Dear Director Ashe,

The National Audubon Society strongly supports the decision of the U.S. Fish and Wildlife Service to end the use of neonicotinoid pesticides on National Wildlife Refuge lands. Thank you for your leadership in taking this step to ensure that the health of these vital landscapes is maintained on behalf of birds, other wildlife, and the millions of Refuge visitors every year that enjoy wildlife recreation.

As you know, the National Wildlife Refuge System has a long and storied connection to protecting birds, beginning with the preservation of Pelican Island in Florida. Now, more than 700 species of birds can be found on the over 560 Refuges throughout the nation. As reflected in the Service's policy on Biological Integrity, Diversity, and Environmental Health (BIDEH), Refuges are places where wildlife comes first, in which birds and other wildlife should thrive in historic conditions in order to preserve and restore biodiversity. Practices such as Integrated Pest Management and taking a precautionary approach to conservation are important tools that can help achieve these goals.

The decision to ban neonicotinoid pesticides on these lands conforms to these strategies, and we commend you and the Service for taking this action. Birds associated with grasslands have faced some of the largest declines of any bird group, and they simply cannot afford new threats. The use of neonicotinoids on Refuge land is unwarranted in areas specifically set aside to benefit wildlife, as it poses avoidable risks to birds. The systemic nature of these pesticides creates an array of concerns, from the direct consumption of coated seeds, to the longer-term persistence in vegetation, soil, and water, and from the threats to the populations of insect prey. Healthy populations of insects are critical for birds, particularly during the breeding season, so reducing this potential threat is a key step in ensuring that bird populations can be maintained and increased on Refuge lands.

Again, we thank you for taking a precautionary approach to managing our extraordinary National Wildlife Refuge System by ending the use of neonicotinoid pesticides, so that our nation's Refuges will continue to be world-class sanctuaries for birds and other wildlife.

Sincerely,

David Yarnold
President
National Audubon Society