

# United States Senate

WASHINGTON, DC 20510

July 22, 2022

The Honorable Martha Williams  
Director  
United States Fish & Wildlife Service  
1849 C Street, NW  
Washington DC, 20240

Dear Director Williams:

We write today with concern about the agricultural use of pesticides within National Wildlife Refuges due to their harmful impact on wildlife and natural resources. We respectfully request that the Fish and Wildlife Service stop approving new uses of agricultural pesticides on National Wildlife Refuges and initiate a rulemaking to fully phase-out such pesticides across the Refuge System.

The Refuge System was established to provide sanctuary for listed threatened and endangered species, migratory birds, and other wildlife. The Refuges' migratory sanctuary and breeding grounds are especially critical for North American birds, as they have faced precipitous population declines; there are 3 billion fewer breeding birds in North America than there were in 1970.<sup>1</sup> Unfortunately, these birds and other threatened species are being put at risk by pesticide use in the Refuges that were designed to protect them.

The Environmental Protection Agency (EPA) recently determined that some of the most commonly used agricultural chemicals are likely to adversely affect endangered species. For example, EPA found that glyphosate—popularly known as Roundup and the most widely used herbicide in the U.S.—is likely to adversely affect 93% of all species listed as Endangered or Threatened under the Endangered Species Act. Of the neonicotinoids—the most widely used chemical class of insecticides in the U.S.—EPA found that imidacloprid was likely to harm 80% of all listed species, clothianidin 82%, and thiamethoxam 81%. Despite the clear danger these chemicals pose, they continue to be used in the Refuges.

Further, agricultural pesticides used in Refuges leach into the surrounding groundwater and soil and are picked up by native flowering plants and pollinators. This directly threatens non-target organisms, the 53 million annual visitors to the Refuges, and the surrounding waters and ecosystems.

In 2014, the Fish and Wildlife Service released a memorandum which phased out the use of all prophylactic uses of neonicotinoid pesticides on Refuges. The memorandum acknowledged the

---

<sup>1</sup> Rosenberg, K.V., Parr, M., et al. (2019). Decline of the North American avifauna. *Science*, 366 (6461). Pp. 120-124. DOI: 10.1126/science.aaw1313

need for the Refuge System to reevaluate its priorities and only use synthetic pesticides when absolutely necessary for the protection of wildlife. To our disappointment, this memorandum was rescinded four years later in 2018.

To protect wildlife and support the true purpose of Refuges, we request that the Fish and Wildlife Service expeditiously begin a rulemaking process to phase out the use of agricultural pesticides on National Wildlife Refuges. Specifically, we ask that:

1. All chemical or biological pesticides registered under Section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act be subject to phase out on National Wildlife Refuge land, which would automatically exempt minimum risk pesticides such as organic compounds.
2. Provisions be made so that the use of pesticides for the control of invasive or non-native species is only authorized on a limited basis when necessary so long as it is compatible with each Refuge's Comprehensive Conservation Plan and strictly in conformity with an Integrated Pest Management plan.
3. As a short-term fix, we ask that the 2014 memorandum issued by the United States Fish and Wildlife Service Chief James Kurth be reinstated, phasing out neonicotinoids.

We look forward to working with you in protecting our nation's migratory birds and endangered species through the judicious use of pesticides. Thank you and we look forward to your response.

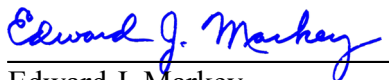
Sincerely,



Cory A. Booker  
United States Senator



Dianne Feinstein  
United States Senator



Edward J. Markey  
United States Senator



Bernard Sanders  
United States Senator



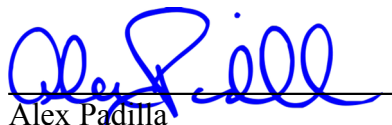
---

Kirsten Gillibrand  
United States Senator



---

Elizabeth Warren  
United States Senator



---

Alex Padilla  
United States Senator



---

Martin Heinrich  
United States Senator