



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



July 17, 2014

Memorandum

To: Regional Refuge Chiefs, Regions 1-8

From: Chief, National Wildlife Refuge System

Subject: Use of Agricultural Practices in Wildlife Management in the National Wildlife Refuge System

James W. Kunth

This Memorandum records the decision of the National Wildlife Refuge System Leadership Team (Leadership Team) regarding the use of agricultural practices for wildlife management on national wildlife refuges. On May 21, 2014, we concluded discussion about current agricultural practices across the National Wildlife Refuge System (System) to meet refuge objectives, the use of genetically engineered crop seeds, and the use of pesticides.

The Leadership Team agreed that by January 2016, the System will only use an agricultural practice where it specifically contributes to wildlife objectives. This conforms to 601 FW 3, the Service's Biological Integrity, Diversity and Environmental Health policy (BIDEH). BIDEH directs us to maintain and restore the biological integrity, diversity, and environmental health of refuges and is based on the underlying principle of wildlife conservation that favors management that restores or mimics natural ecosystem processes or functions to achieve refuge purpose(s).

By January 2016, we will no longer use neonicotinoid pesticides in agricultural practices used in the System. Service policy 569 FW 1 Pest Management directs that we use long-standing integrated pest management principles to guide and evaluate our pesticide use practices. We have determined that prophylactic use, such as a seed treatment, of the neonicotinoid pesticides that can distribute systemically in a plant and can potentially affect a broad spectrum of non-target species is not consistent with Service policy. We make this decision based on a precautionary approach to our wildlife management practices and not on agricultural practices.

There can be appropriate and specialized uses of neonicotinoid pesticides and decisions for those uses in the Service are subject to review through all applicable laws, regulations, and policies including, but not limited to, the National Environmental Policy Act.

By January 2016, we will phase out the use of genetically modified crops to feed wildlife. Service policy 601 FW 3.15 C states: "We do not use genetically modified organisms in refuge management unless we determine their use is essential to accomplishing refuge purpose(s) and the Regional Chief, National Wildlife Refuge System, approves the use." Refuges throughout

the country successfully meet wildlife management objectives without the use of genetically modified crops. We have demonstrated our ability to successfully accomplish refuge purposes over the past two years without using genetically modified crops, therefore, it is no longer possible to say that their use is essential to meet wildlife management objectives. We will no longer use genetically modified crops to meet wildlife management objectives System-wide.

Agricultural practices are sometimes used in habitat restoration and the techniques are variable for different locations, therefore, we will consider whether the temporary use of genetically modified crops in habitat restoration is essential on a case-by-case basis.

Finally, the Leadership Team recognized that transitioning any refuge land from a primarily agricultural use to restored, native habitat works to achieve the Service goal of minimizing our carbon footprint as set forth in *Rising to the Urgent Challenge, Strategic Plan for Responding to Accelerating Climate Change* (USFWS 2010). The Leadership Team agreed to assess and identify refuges that have the ability to replace row crops used to meet wildlife management objectives with moist soil management or other techniques that restore or mimic natural ecosystem processes or functions to meet wildlife and carbon objectives.

Refuges with lands mandated for agricultural purposes, including, but not limited to, Tule Lake, Upper and Lower Klamath NWRs subject to Public Law 88-567 (Kuchel Act 1964) and Crab Orchard NWR subject to Public Law 80-361 may follow these agreements, however, the mandates which direct those refuges' purposes are their primary authority.

If there are any questions, please contact Deputy Refuge Chief Cynthia Martinez at (703) 358-2632 or by email at Cynthia_Martinez@fws.gov.