

Arizona Wildlife Federation * Idaho Wildlife Federation * Michigan United Conservation Clubs * Nevada Wildlife Federation * North Dakota Wildlife Federation * Tennessee Wildlife Federation * Wyoming Wildlife Federation

September 3, 2024

Martha Williams, Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Subject: Comments on USFWS Docket Number: FWS-HQ-NWRS-2024-0034

Dear Director Williams:

The millions of hunters, anglers, recreational shooters, and natural resource management professionals we represent always welcome a U.S. Fish and Wildlife Service's "Hunt/Fish Rule" that opens new areas and opportunities for America's sportsmen and women to recreate on public lands. We appreciate your continued progress toward safe and compatible opportunities for hunters and anglers on NWRS lands.

Likewise, we applaud the Service's support of voluntary pilot program to educate hunters about alternative ammunition options for hunting, as recommended by the Hunting and Wildlife Conservation Council. While this effort is separate from the Hunt/Fish Rule, the program will impact national wildlife refuge operations and is clearly related.

We were disappointed that despite the positive action on the alternative ammunition pilot program in the weeks preceding the Hunt/Fish Rule announcement, the draft rule restricts the use of traditional ammunition on additional big game hunting opportunities. The Hunt/Fish Rule does not present a specific case of what measurable effect on a management objective traditional ammunition would cause, what measurable difference alternative ammo would make, and how these options compare in a cost-benefit analysis. Instead, the Rule only offers a general statement of possible harm. We ask that the requirement of using alternative ammunition for new hunting opportunities in the draft Hunt/Fish Rule be removed.

We look forward to working with the Service on the pilot program and to days afield on the 53 new hunting and fishing opportunities across 211,000 acres on 12 NWRs.

Thank you for considering our comments on this important matter.