

August 6, 2026

Mr. Brian Nesvik

Director, U.S. Fish and Wildlife Service

1849 C Street, NW, Room 3331, Washington, DC 20240

Re: Docket No. FWS–HQ–NWRS 2026–2641, Policy and Regulations Branch, U.S. Fish and Wildlife Service, MS: PRB (JAO/3W), 5275 Leesburg Pike, Falls Church, VA 22041-3803.

The undersigned organizations, representing millions of hunters, conservationists and professionals across the United States, write today to express our perspectives on the Request for Information on Implementation of Tile Setbacks on U.S. Fish and Wildlife Service (USFWS) easements.

While we appreciate the ongoing diligence in eliciting feedback on previous rules to continue improving USFWS programs and policies, we are also concerned about any implication that the Service is evaluating prior rulemaking related to the continued habitat value of wetland easements voluntarily acquired with hunters' dollars. Reviewing prior rule-making is sound, as Administrations change; however, any weakening of the USFWS easement program by changing setback criteria that could diminish habitat value is of grave concern to us, our members, and sportsmen and women nationwide.

USFWS wetland easements are a voluntary, landowner-driven tool that conserves vital wildlife habitat, primarily on working farms and ranches. These easements support a wide range of species, including breeding ducks, upland game birds, big game species, and countless non-game wildlife that depend on wetlands. These easements have largely been acquired through generations of funding from the Federal Duck Stamp, purchased by sportsmen and women, and, as such, represent a legacy investment by the sporting conservation community. Any management that threatens the integrity or function of wetlands is strongly opposed by our community. As we continue to lose wetlands at an accelerated pace across the Prairie Pothole Region, any USFWS action should seek to minimize the rate of loss, not facilitate it.

Additionally, the use of easements was identified as an Administration priority during the first Trump Administration by then-Secretary Zinke in Secretarial Order #3356. It drew universal praise from the organizations listed below and from hunters and conservationists across the country.

If these wetlands are lost, our waterfowl and hunting heritage are lost with them. USFWS should maintain 60 years of precedent and uphold its commitment to protecting publicly funded, voluntary conservation easements, critical wildlife habitat, and America's outdoor traditions.

In summary, we urge the Administration to recognize the successful approach used by the USFWS and ensure that tile setbacks do not compromise the functions and values of easement wetlands. As these easements play an outsized role in conserving critical breeding habitats and sustaining our Nation's cherished hunting traditions, we ask for your action to preserve their unique value.

Sincerely,

Archery Trade Association

Backcountry Hunters & Anglers

Boone and Crockett Club

California Waterfowl Association

Congressional Sportsmen's Foundation

Conservation Force

Delta Waterfowl

Ducks Unlimited

Houston Safari Club

Izaak Walton League of America

Masters of Foxhounds Association

Mule Deer Foundation

National Bobwhite and Grassland Initiative

National Shooting Sports Foundation

National Trappers Association

National Wildlife Federation

National Wildlife Refuge Association

North American Falconers Association

Pheasants Forever

Professional Outfitters and Guides of America

Quail Forever

Rocky Mountain Elk Foundation

Safari Club International

Sportsmen's Alliance

The Conservation Fund

The Wildlife Society

Theodore Roosevelt Conservation Partnership

Whitetails Unlimited

Wildlife Forever

Wildlife Management Institute

Wildlife Mississippi