

April 19, 2020

Pamela Wingrove  
Branch Chief, Conservation Planning  
USFWS Southeast Region  
1875 Century Boulevard NE  
Atlanta, GA 30345

*Submitted via electronic mail*

**RE: U.S. Fish and Wildlife Service Draft Programmatic Environmental Assessment for Use of Genetically Engineered Agricultural Crops for Natural Resource Management on National Wildlife Refuges in the Southeastern United States**

Dear Ms. Wingrove:

The undersigned organizations appreciate the opportunity to make comments to the United States Fish and Wildlife Service (US FWS) regarding its draft Programmatic Environmental Assessment (dPEA) for the use of genetically engineered agricultural crops (GECs) on National Wildlife Refuges (NWRs) in the Southeastern United States. We support Alternative 2 in the dPEA to allow the use of GECs on NWRs.

We appreciate that the dPEA recognizes the important role of agriculture in NWRs. These benefits include bringing food sources to waterfowl and other wildlife as well as controlling invasive species. The dPEA specifically addresses the benefits of using GECs in NWRs in the southeast in order to meet wildlife management objectives. As noted in multiple places in the dPEA, GECs have proven environmental and economic benefits and their use in NWRs is in compliance with the FWS objectives and policies.

It is important to point out that the dPEA makes clear that the document is intended to provide a programmatic evaluation of the use of GECs on NWRs within the southeast. As stated in the dPEA, "In the future, the Service will undertake individual project-level environmental reviews of the use of GECs on specific refuges via tiering to this analysis".

The dPEA notes the most common model for agricultural use in NWR is through a cooperative agreement with local farmers. In the southeast the most commonly grown crops through this program are corn, soybean and rice. Currently, there is no commercially available GE rice on the market. However, corn and soybean are predominantly GE as described in the dPEA. Allowing GECs to be used in the NWRs in addition to conventional and organic varieties provides for greater flexibility to use the most suitable crop characteristics for the particular growing conditions.

The dPEA recognizes the rigorous regulatory framework that GECs are subject to prior to coming to market. Under the Coordinated Framework for Biotechnology, the U.S. Department of Agriculture Animal and Plant Health Inspection Service (USDA-APHIS), Food and Drug Administration (FDA) and U.S. Environmental Protection Agency (EPA) have been evaluating and overseeing the safe use of GECs in accordance with their statutory authorities for over 30 years. Importantly as referenced in the dPEA,

“APHIS completed environmental assessments of the use of GECs on threatened and endangered species, species proposed for listing, designated critical habitat, and habitat proposed for designation and has not identified any stressor that could affect the reproduction, numbers, distribution, or critical habitat (USDA APHIS 2006, 2007, 2013a, 2013b, 2014a, 2014b, 2016)”. USDA-APHIS is currently undertaking rulemaking to modernize their regulations on biotechnology. Once finalized, their new evaluation criteria can inform future FWS determinations.

As noted in the dPEA, allowing GECs to be used on NWRs for natural resource management mirrors what is already done in wildlife areas managed by state agencies as well as on private lands. For this and the other reasons stated above, we support Alternative 2 in the dPEA to allow the use of GECs on NWRs.

Sincerely,

Agricultural Retailers Association  
American Farm Bureau Federation  
American Seed Trade Association  
American Soybean Association  
Crop Science Society of America  
National Corn Growers Association  
National Cotton Council