



Friends of Malheur National Wildlife Refuge
36391 Sodhouse Lane
Princeton, Oregon 97721

January 26, 2026

Director, U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Dear Mr. Director:

The purpose of this letter is to provide a more complete response to the questions put forth in Directors Order 230, issued by your agency on December 16, 2025. Please add the contents of this letter to the material collected for formal consideration and analysis in response to that order.

We are writing as the Friends of Malheur National Wildlife Refuge, a 501(c)3 non-profit organization dedicated to the conservation and appreciation of Malheur National Wildlife Refuge and the National Wildlife Refuge System. We are an organization with approximately 1,500 paid members and also represent a much larger community of citizens who regularly visit and care about the Malheur Refuge.

As you know, Malheur NWR has a long and important history. The refuge was first created in 1908 by Executive Order and today includes over 187,000 acres that provide critical nesting habitat for breeding birds and seasonal stopover and feeding opportunities for migratory species. This mission, which is in full compliance with the original proclamation made 118 years ago, remains the focus of the refuge.

This mission, originally established by Executive Order, has been reinforced over time by several important statutory requirements including the Migratory Bird Treaty Act of 1918, the National Wildlife Refuge System Improvement Act of 1997, and the Endangered Species Act. As you know, treaties and federal laws clearly take precedence over the President's executive powers.

We note with concern that the questionnaire asks questions about things that are already codified in the Refuge System Improvement Act. That Act clarifies the purpose of the system, providing a “wildlife first” mission and structure for science-based decision making. The law firmly establishes wildlife conservation as the Refuge System’s core purpose, helps insulate refuge management from external political pressures ,and prevents incompatible uses. The act also ensures public access to an array of outdoor activities by prioritizing compatible, wildlife-dependent recreation on refuges. Any changes made in the system’s policies and priorities must comply with this Act.

As an organization, we have reviewed both the questionnaire available for public comment (which we will complete and file separately) and the instructions in Order 230 sent directly to FWS field offices, including Malheur. The latter document places a clear and appropriate emphasis on operational efficiency and it is upon that issue that this letter would now like to focus.

To put it simply, in recent years Malheur NWR has not been operated in an efficient manner. This is not because of poor employee performance; the staff is dedicated and hard working. Nor does it reflect a mission failure. As we have stated above, the refuge’s mission is appropriate and is required by federal law. The inefficiency we identify is that for over fifteen years the refuge has been denied the staffing and funding required to work effectively.

During the period in question, overall permanent staffing at the refuge has been reduced by more than half. More recently, FWS has prevented filling critical vacant positions. Efficient management of Malheur NWR requires an active science and resources management program; it requires a maintenance staff proportional to the responsibilities inherent in sustaining a physical plant spread out over 187,000 acres and entailing over 250 water diversion structures and an extensive network of roads; it requires funding and specialized staff to protect cultural resources including both archaeological sites and historic buildings; it requires staff to educate and inform the refuge’s many visitors.

As it now stands, none of these requirements are being met. Current refuge employees are now striving to fill the responsibilities assigned a few years ago to multiple individuals. The result, as we have already made clear, is a profoundly inefficient operation that fails to meet legal requirements.

Efficient operation of Malheur NWR will require not the shuffling of personnel or rewriting of policies but instead a wholesale commitment to restaffing and refunding the refuge to meet the goals laid out in the National Wildlife Refuge System Improvement Act and Malheur's many planning documents. Nothing less will suffice.

Let us be clear. Malheur NWR is a federal responsibility. It was created by the federal government more than a century ago. It was the recipient in the 1930s of generous federal funding (the equivalent of many millions of 2026 dollars) to buy out failing local ranches and add their lands to the refuge. Until the past two decades, the refuge was funded and staffed in a manner that achieved its goals, but that has now changed.

Non-profit organizations like ours have a role to play here, but you must understand that we simply do not have the financial capacity to step into the very large gap created in recent years by chronic federal underfunding. Only the federal government can do that.

One of the legal missions of our organization is to advocate for the health of both our refuge and the remainder of the National Wildlife System. We are pleased to be able to do this. The refuge system is an important American asset – as important in many ways as our National Park System. As you review the mission, operations, and efficiency of the refuge system, we very much hope you will keep this in mind.

The 250th anniversary of the founding of our nation is a time to confirm what are our true national treasures. Certainly, our National Wildlife Refuge System ranks high on that list.

Sincerely,

/s/

William Tweed
President, Friends of Malheur National Wildlife Refuge