

American Sportfishing Association * Association of Fish and Wildlife Agencies * Boone and Crockett Club * Congressional Sportsmen's Foundation * Dallas Safari Club * Delta Waterfowl * Houston Safari Club * Izaak Walton League of America * Mule Deer Foundation * National Association of Forest Service Retirees * National Bobwhite & Grassland Initiative Foundation * National Deer Association * National Shooting Sports Foundation * National Wild Turkey Federation * National Wildlife Federation * Pheasants Forever * Pope and Young Club * Public Lands Foundation * Quail Forever * Rocky Mountain Elk Foundation * Safari Club International * Sportsmen's Alliance * Theodore Roosevelt Conservation Partnership * Whitetails Unlimited * Wild Sheep Foundation * Wildlife Forever * Wildlife Management Institute * Wildlife Mississippi *

The Honorable John Thune
Majority Leader
511 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Chuck Schumer
Minority Leader
322 Senate Office Building
Washington, DC 20510

October 27, 2025

Re: America's Wildlife Conservation Partners Opposition to Senate Joint Resolution (S.J. Res.) 69

Dear Majority Leader Thune and Minority Leader Schumer,

On behalf of the millions of hunters, anglers, recreational shooters, natural resource professionals, and other outdoor enthusiasts our organizations represent, we write to express our opposition to S.J. Res. 69. Two important tenets of the North American Model of Wildlife Conservation are that the best available science will be the basis for informed decision-making in wildlife management and that science-based laws and regulations developed and enforced by state and federal agencies will guide the proper use of wildlife resources. The use of the CRA in this instance would erode those important pillars of conservation. While we recognize that Congress retains oversight authority of Federal agency actions under the Congressional Review Act (CRA), we are collectively concerned that the use of this mechanism to overturn a species-specific wildlife management strategy would establish a deeply troubling precedent.

At the outset, it is important to recognize the threat that this use of the CRA would set for wildlife management decisions in the future. More specifically, the CRA will not be limited to immediate implications for the Northern spotted owl but will undermine the very principles that have brought many species of wildlife back to the thriving populations that we enjoy today. Future management plans or even those already established but not codified by rule, such as the 2019 Greater Sage-Grouse Resource Management Plan Amendments (RMPs), would be jeopardized as the plans for each state were finalized via Records of Decision rather than Final Rules. Further, passage of S.J.

Res. 69, would establish precedent to overturn management decisions regarding lethal control of invasive species on federal land, which is a longstanding and often necessary management tool for our professional wildlife managers to have available to them.

The U.S. Fish and Wildlife Service (Service), Bureau of Land Management, National Park Service, Animal and Plant Health Inspection Service, U.S. Forest Service, Oregon Department of Fish and Wildlife, Washington Department of Fish and Wildlife, and California Department of Fish and Wildlife were all cooperating agencies in the development of Service's *Record of Decision (ROD) for the Barred Owl Management Strategy; Washington, Oregon, and California* (Strategy). This science-based strategy, collaboratively developed with state and federal partners, is critically important to the management and recovery of the Northern spotted owl. The partnership through which the Strategy was formed exemplifies the cooperative federalism model Congress has long endorsed, under which state agencies hold primary statutory authority to manage wildlife within their borders and work with the federal agencies to co-manage species Congress has placed under federal jurisdiction, in this case through the Endangered Species Act.

Unfortunately, the resolution fails to recognize that the ROD is the culmination of a targeted, science-based effort to address an invasive species that threatens the Northern spotted owl. Under the ROD, the Service is authorized to issue permits for the lethal control of barred owls under the MBTA, but it does not mandate or fund such actions. The implementation of the Strategy falls squarely on States, Tribes, and willing landowners to provide the necessary resources. While the Service fills an administrative role, the ROD does not mandate or provide federal funding for any actions. If concerns remain regarding federal expenditure to implement the Strategy, we would suggest that those concerns may be addressed within the appropriations process rather than through the blunt use of the CRA.

We respectfully urge opposition to S.J. Res. 69 and ask that Congress not establish a dangerous precedent by undermining the rigorous process through which management plans are developed.

Thank you for your consideration.

Sincerely,

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Quail Forever
Safari Club International
Sportsmen's Alliance
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Whitetails Unlimited
Wild Sheep Foundation
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Wildlife Management Institute
Wildlife Mississippi