

November 4, 2014

Mr. William Kane  
Chair  
Colorado Parks and Wildlife Commission  
6060 Broadway  
Denver, CO 80216

**RE: Citizen Petition to Ban Traditional Lead Ammunition**

Dear Chairman Kane:

The undersigned organizations, representing numerous Colorado sportsmen and women, write to you in regard to a citizen petition filed by Broomfield resident Paula Brown requesting that the Colorado Parks and Wildlife Commission promulgate a rule to ban the use of traditional ammunition made with lead components and require that only alternative ammunition made with metals be permitted for use while hunting.

The issue at hand is not whether lead, when ingested in a sufficient quantity and metabolized by an animal can be injurious to that particular animal, but, instead, what is the population-based impact to a species at a local or regional level. Indeed, state fish and wildlife agencies have applied that very test in determining if, and when, special regulations regarding traditional ammunition are needed to address population-level impacts and taken management action as appropriate.

One of the seven tenets of the North American Model of Wildlife Conservation is that the best science available will be used as a basis for informed decision making in wildlife management rather than by opinion or conjecture, or as in this case, false inference. The body of scientific literature on the use of traditional ammunition does not support the petitioner's underlying conclusion that the past and continued use of traditional ammunition has resulted in negative wildlife population level effects. The petition, as posted on the website "Care2 – thepositionsite.com", refers to spent lead ammunition as a "widespread killer of more than 75 bird species" and "nearly 50 mammals", but fails to cite anything resembling a legitimate source of factual evidence that would substantiate these claims.

In addition, this false line of reasoning is also true of the petitioner's claim regarding the threat to public health. According to a joint study of the potential health risks associated with lead in game meat conducted by the U.S. Center for Disease Control and Prevention (CDC) and the North Dakota Department of Health, not one of the 736 individuals tested had results indicating a

blood lead level (PbB) above the 10 micograms per deciliter threshold for individual case management recommended by the CDC.<sup>1</sup>

Since the petitioner fails to specify whether her request is limited to ammunition used for hunting, we are concerned that the petition could potentially be interpreted to include additional regulation of ammunition used by recreational shooters. Alternative ammunition is more expensive for hunters<sup>2</sup> - and despite the petitioner's claims, there are not commercially available alternatives available for many hunting calibers. But, for target shooters, who consume far more ammunition in pursuit of their sport, the cost would be prohibitively expensive. The importance of recreational shooting to state fish and wildlife agency revenue cannot be overstated. Approximately seventy percent of ammunition sold in the United States is for non-hunting purposes, much of it for target shooting. And traditional ammunition accounts for ninety five percent of all ammunition sold.

We are also concerned that hunting participation would decrease due to the increased costs associated with procuring non-lead ammunition. A study conducted by Southwick Associates in the wake of California's recent decision to ban traditional ammunition indicates that higher ammunition prices will keep sportsmen and women out of the field, resulting in few license sales and decreased revenue for the California Department of Fish and Wildlife. According to an analysis of the data collected in the study, the state is predicted to lose between \$2,656,342 and \$4,014,929 in license revenue and between \$695,038 and \$1,050,516 in federal Wildlife Restoration Fund (Pittman-Robertson Act) revenue annually after the lead ammunition ban is fully implemented.<sup>3</sup>

In addition, the signatories of this letter support the following principles that are relevant to this petition as agreed upon by the Association of Fish and Wildlife Agencies (AFWA) in a resolution adopted September 29, 2010:<sup>4</sup>

- Decisions related to future regulation of lead ammunition and lead fishing tackle should be based on the best available science related to wildlife population health.
- State agencies should focus regulation efforts where population-level impacts to wildlife are substantiated.
- State fish and wildlife agencies should lead efforts to develop the best science, and AFWA should provide this information to members for their use in bringing hunters, anglers and various interests together to determine the need for and nature of any needed management approaches to use of lead ammunition and lead fishing tackle.

---

<sup>1</sup> <http://www.ndhealth.gov/lead/venison/2008-2009LeadFragmentsInGroundVenisonProcessorsStudy.pdf>

<sup>2</sup> [http://nssf.org/share/PDF/CA-Alternative-Ammo-Impacts\\_9-15-2014.pdf](http://nssf.org/share/PDF/CA-Alternative-Ammo-Impacts_9-15-2014.pdf)

<sup>3</sup> [http://nssf.org/share/PDF/CA-Alternative-Ammo-Impacts\\_9-15-2014.pdf](http://nssf.org/share/PDF/CA-Alternative-Ammo-Impacts_9-15-2014.pdf)

<sup>4</sup> [http://www.fishwildlife.org/files/AFWA-Lead-Resolution\\_9-10.pdf](http://www.fishwildlife.org/files/AFWA-Lead-Resolution_9-10.pdf)

In conclusion, we are unaware of any adverse wildlife population impacts or public health concerns that would require the unwarranted level of intervention that this petition seeks. Consistent with the principles outlined in the AFWA resolution, we urge the Commission to engage stakeholders – including hunters and recreational shooters – proactively if Colorado Parks and Wildlife chooses to evaluate the necessity of additional regulation of traditional lead ammunition based on scientific evidence of population level impacts to Colorado’s fish and wildlife resources.

Sincerely,

Bull Moose Sportsmen’s Alliance

Mule Deer Foundation

Colorado Mule Deer Association

National Rifle Association

Colorado Outfitters Association

National Wild Turkey Federation

Colorado Sportsmen for Fish and Wildlife

Pheasants Forever

Colorado Trappers Association

Quail Forever

Colorado Youth Outdoors

Rocky Mountain Elk Foundation

Congressional Sportsmen’s Foundation

Safari Club International

cc: Colorado Parks and Wildlife Commission  
Bob Broscheid, Director, Colorado Parks and Wildlife Commission  
Jeff Ver Steeg, Assistant Director, Colorado Parks and Wildlife