



*Bringing back the birds*

Hunting and Wildlife Conservation Council  
via Douglas Hobbs, Designated Federal Officer  
United States Fish and Wildlife Service

12 December 2022

RE: Additional HWCC Virtual Meeting Written Comment

American Bird Conservancy (ABC) supports the expansion of hunting and fishing opportunities on public lands in the United States but strongly believes that a rulemaking is necessitated to institute the phase-out of all uses of lead ammunition and fishing tackle.

ABC has also submitted joint comments with the National Wildlife Refuge Association addressing this concern and now submits this comment to specifically address the use of lead on National Parks.

Lead use also continues unabated within National Parks; approximately 60% of the total acreage operated by the National Parks System is open to hunting and/or fishing at some point during the year.<sup>1</sup> Lead ammunition or tackle used on these lands has potential to find its way into hundreds of species of birds, mammals, fish, and amphibians.

In particular, scavenging raptors and waterbirds are in critical danger from lead ammunition and fishing tackle. Bald and Golden Eagles experience threats to population resiliency<sup>2</sup> and growth<sup>3</sup> from lead. The National Park Service itself has listed lead as the greatest current threat to California Condors. One if Five common loons will meet their demise due to lead poisoning.<sup>4</sup>

The threats posed by lead ammunition are incompatible with the goals of the National Parks Service and merit serious consideration of removal.

American Bird Conservancy believes that a rulemaking process is needed to concretely establish a timeline for phasing out the use of lead ammunition and fishing tackle on National Wildlife Refuges and National Parks as swiftly as possible.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "E. Hardy Kern III". The signature is written in a cursive, flowing style.

E. Hardy Kern III  
Director of Government Relations, Pesticides and Birds Campaign  
American Bird Conservancy  
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# AMERICAN BIRD CONSERVANCY



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<sup>1</sup> <https://www.doi.gov/blog/hunting-and-fishing-national-parks-and-fish-and-wildlife-refuges#:~:3Americans%20have%20the%20opportunity%20to.Park%20Service%20that%20permit%20hunting>.

<sup>2</sup> Hanley, B. et al. (2022). Environmental lead reduces the resilience of bald eagle populations. *The Journal of Wildlife Management*. <https://doi.org/10.1002/jwmg.22177>

<sup>3</sup> Slabe, V. et al. (2022). Demographic implications of lead poisoning for eagles across North America. *Science*, 375(6582). <http://dx.doi.org/10.1126/science.abj3068>

<sup>4</sup> Pain, D.J., Mateo, R., & Green, R.E. (2019). Effects of lead from ammunition on birds and other wildlife: a review and update. *Ambio*, 48. <https://doi.org/10.1007/s13280-019-01159-0>