

April 15, 2009

Mr. William Shafroth
Principal Deputy Assistant Secretary
for Fish and Wildlife and Parks
1849 C Street, NW
Washington, DC 20240

RE: April 6, 2009 meeting on NPS lead policy

Dear Mr. Shafroth:

Thank you very much for meeting with us on April 6, 2009 and providing us the opportunity to address our significant concerns over the National Park Service's (NPS) policy on the use of traditional ammunition and fishing tackle containing lead components in the National Park System.

We appreciate the NPS acknowledging that the communities we represent should have been notified, if not consulted, prior to the announcement of the policy. However, we wish to underscore that our primary concern is with the policy itself and not simply the process leading up to or the wording of the announcement on March 10th and its clarification on March 18th.

We hope the Department of the Interior and the NPS will agree to our request that the current internal NPS policy be rescinded so that a genuine and open-minded dialogue with the conservation community and industry can occur. This will provide the NPS time to undertake a more careful and rigorous scientific review of this issue, as outlined during our meeting by Steve Williams, president of the Wildlife Management Institute. We believe the current policy is inconsistent with the intent of the President's memorandum of March 9th committing his Administration to scientific integrity and directing that science be made the guide for natural resource management and conservation decisions.

During our meeting, we submitted that there was no scientific evidence of a population-level impact on fish or wildlife and that the Center for Disease Control study conducted in North Dakota found that consuming game harvested using traditional ammunition posed no human health risk. Likewise, we cited a comprehensive Fish and Wildlife Service study indicating that only a small percentage of water birds ingest lead fishing sinkers. We noted, too, that the use of traditional ammunition containing lead components at shooting ranges is not considered an environmental contamination by the Environmental Protection Agency. We pointed out that the NPS March 10th release inappropriately compares organic lead in gasoline and paint to metallic lead used in ammunition and fishing tackle.

Science is the bedrock upon which natural resources management must stand to responsibly manage and sustain this nation's limited resources, including fish and wildlife populations. Science must guide natural resource management and conservation

decisions. The information supporting these decisions should be made available to the public and the process used should be transparent. The public deserves to be fully informed about resource decisions and to understand the role science plays in the decision-making process.

While we understand that natural resource decisions must take many other factors into account, we strongly believe that all options should be identified, the potential consequences fully understood, and the final decision justifiable. In an open, democratic society, it is never appropriate to suppress or alter scientific findings to reach a predetermined decision. Because of the NPS' public statements and quotes attributed to its staff, we remain concerned that the NPS will not approach this issue with an open mind and will continue to pursue a preordained policy result. We can provide those statements and quotes to you should you desire. In order to facilitate a constructive dialogue with the NPS, the conservation community and industry urge the NPS to rescind the policy and start anew with an open and transparent process.

Thank you again for meeting with us and we look forward to a productive working relationship with you and the Department of the Interior.

Sincerely,

Gordon Robertson, American Sportfishing Association
Susan Recce, National Rifle Association
Lawrence G. Keane, National Shooting Sports Foundation
Steve Williams, Wildlife Management Institute
Matt Hogan, Association of Fish and Wildlife Agencies
Jeff Crane, Congressional Sportsmen's Foundation
Chris Horton, B.A.S.S./ESPN Outdoors