



**Subject:** Organizations Oppose H.R. 615, Support Sportspeople-Led Conservation and Secretarial Land Stewardship

Dear Representative,

The undersigned groups are writing in staunch opposition to H.R.615 – Protecting Access for Hunters and Anglers Act of 2023.<sup>1</sup> H.R. 615 would prohibit the Secretaries of Interior and Agriculture from regulating the use of lead ammunition or tackle on certain Federal lands or waters under their jurisdiction. H.R. 615 would effectively bar the Secretaries from being able to protect and steward the lands and wildlife under their purview based on scientific principles, and protect hunters and anglers from consuming game and fish poisoned by dangerous lead ammunition and fishing tackle.

H.R. 615 is not a bill aimed at protecting or creating access for sportspeople on federal lands. Instead, it would restrict the ability for federal authorities to follow best available science and steward wildlife within their jurisdiction by effectively preventing the replacement of lead ammunition and tackle with commonly used non-lead alternatives.

The bill does carve out an exception for declines in wildlife populations on a specific unit of land caused discretely by lead ammunition or tackle. However, this is an impossible standard to meet as population monitoring data is not available at the unit scale in most cases. It also dismisses well established facts about the dangers of lead, is inconsistent with widely accepted scientific methods, and would preclude responsible management actions that could avoid population declines.

For species like California condors, mountain lions, black bears, bald and golden eagles, common loons, and myriad others,<sup>2</sup> ingestion of lead remains a persistent threat and hampers

ongoing conservation and recovery efforts. Ingestion of spent lead ammunition is the leading cause of death for the critically endangered California condor,<sup>3</sup> and a 2022 paper cited population-level growth suppression in both bald and golden Eagles stemming from ingestion of spent lead ammunition.<sup>4</sup> Aquatic species like loons succumb to lead toxicosis via ingesting loose tackle or ingesting fish which have consumed lead tackle.

The bill also allows for the handful of actions taken by a State wildlife agency to control lead ammunition and tackle to continue. State wildlife agencies, however, do not have primary jurisdiction over national parks, national forests, national conservation lands, or national wildlife refuges – it is an inherently federal responsibility to manage and conserve these areas.

The bill would further constrain federal management of federal land by conflicting with conservation statutes including the Endangered Species Act. The establishment of narrow conditions under which lead may be regulated could prevent federal agencies from ensuring that their activities are not likely to jeopardize the continued existence of listed species.

Non-toxic steel, copper, and alloy bullets and non-lead fishing tackle are affordable and available in all 50 states. Hunters and anglers in states and areas that have restrictions or have already banned lead have made successful transitions to non-toxic ammunition and tackle. Over a dozen manufacturers of bullets have designed and now market many varieties of non-lead, non-toxic bullets and shot with satisfactory to superior ballistic characteristics. Moreover, sportspeople that use non-lead ammunition carry on the proud tradition of wildlife conservation by preventing animals from being exposed to lead.

We believe the pathway to less-toxic environments and fewer wildlife poisonings is paved with more sportsperson education, widely accessible non-toxic ammunition and tackle exchange programs, informed decisions by individuals and communities, and regulatory action where applicable.

We strongly urge you to oppose H.R. 615 and, instead, to consider any legislation or regulation which creates toxic ammunition and tackle exchange programs, sportsperson education initiatives, or decreases the likelihood of wildlife poisonings from lead. Thank you for your consideration.

Sincerely,

Aiken Audubon Society  
American Bird Conservancy  
Audubon Colorado Council  
Born Free USA  
Bozeman Birders  
Californians for Western Wilderness  
Center for Biological Diversity  
Defenders of Wildlife  
Earthjustice  
Endangered Habitats League  
Endangered Species Coalition

Environmental Protection Information Center- EPIC  
Evergreen Audubon  
Forests Forever  
FOUR PAWS USA  
Friends of Merrymeeting Bay  
Hawk Mountain Sanctuary Association  
Hilton Pond Center for Piedmont Natural History  
Humane Society Legislative Fund  
Kentucky Heartwood  
Kettle Range Conservation Group  
Klamath Forest Alliance  
Maryland Ornithological Society  
National Wildlife Rehabilitators Association  
New Hampshire Audubon  
Oregon Wild  
PacificaRiptide.com  
Public Employees for Environmental Responsibility  
Raptors Are The Solution  
Raptor Education Group, Inc.  
Resource Renewal Institute  
Rockbridge Bird Club  
Salem Audubon Society  
Saving Maine  
Sequoia ForestKeeper  
The Conservation Angler  
The Humane Society of the United States  
Urban Wildlands  
Voices of Wildlife in NH  
Western Nebraska Resources Council  
Western Watersheds Project  
Wyoming Wildlife Advocates

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<sup>1</sup> <https://www.congress.gov/bill/118th-congress/house-bill/615/text?s=1&r=1>

<sup>2</sup> Rogers, T. (2010). Lead exposure in large carnivores in the greater Yellowstone ecosystem. *University of Montana Graduate Student Theses, Dissertations, & Professional Papers*. 615. <https://scholarworks.umt.edu/etd/615>

<sup>3</sup> <https://www.nps.gov/subjects/condors/threats.htm>

<sup>4</sup> Slabe, V. et al. (2022). Demographic implications of lead poisoning for eagles across North America. *Science*. doi: 10.1126/science.abj3068