



## NATIONAL SHOOTING SPORTS FOUNDATION, INC.

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LAWRENCE G. KEANE  
SENIOR VICE PRESIDENT &  
GENERAL COUNSEL

March 16, 2009

Mr. Daniel Wenk  
Acting Director, National Park Service  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Mr. Wenk:

I am writing to register the National Shooting Sports Foundation's (NSSF) objection to the National Park Service's (NPS) sudden and unwarranted rule to ban the use of traditional ammunition for hunting in national parks, which was announced in your March 10<sup>th</sup> press release. NSSF is the trade association for the firearm, ammunition, hunting and shooting sports industry. We request a meeting with you to begin a dialogue with the NPS to address your concerns with traditional ammunition and calls by some unsupported by science to ban its use for hunting. Meanwhile, we urge the NPS to immediately rescind this arbitrary rule.

In short, there is simply no scientific evidence that humans, wildlife populations in general or the environment are harmed by the use of traditional hunting ammunition. Ammunition containing lead components has been the choice of hunters for hundreds of years. While lead ingestion appears to occur in a small number of individual animals, overall populations are unaffected. Moreover, there has never been a documented case of lead poisoning among humans who have consumed game harvested with traditional ammunition. A recent study by the Centers for Disease Control and Prevention of North Dakota hunters confirmed that there is no human health risk to those who consume game harvested using traditional ammunition. The NPS's press release makes erroneous comparisons between organic lead found in gasoline and the metallic lead used in ammunition, demonstrating an apparent lack of knowledge of the relevant science.

We are troubled and dismayed that this rule was adopted without public comment. Prior to announcing this rule the NPS failed to engage our industry, any other sportsmen or conservation stakeholder organization or the general public in a dialogue. The rule

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was adopted in secret. Equally disconcerting to NSSF is the suddenness of the announcement. The arbitrary and secretive process the NPS used in implementing this rule runs counter to legal requirements, government openness and transparency.

The affect of this rule will be to severely limit and restrict hunting on national park land. Excise taxes paid by firearm and ammunition manufacturers have raised more than \$5.6 billion over the past 70 years. These precious dollars play a leading role in our nation's conservation efforts. Traditional ammunition is the most common, least expensive ammunition type and the number one choice of hunters—especially during these difficult economic times. Banning its use will wall off access to hunters who cannot afford higher-priced alternative ammunition that is not available in all hunting calibers.

We will contact your office in the near future to schedule a meeting. In the meantime, we look forward to a further announcement from the NPS rescinding this unwarranted and improper rule.

Sincerely,



Lawrence G. Keane

LGK/mas

Hon. Ken Salazar, Secretary of the Interior