



765 University Avenue
Sacramento, California 95825
Tel: 916-649-7600
Fax: 916-649-7667
www.audubon.org

January 20, 2010

Mr. John Carlson, Executive Director
California Fish and Game Commission
1416 Ninth Street
Sacramento, CA 95814

Dear Mr. Carlson,

On behalf of Audubon California and our more than 100,000 members and supporters in California I write to request that the California Fish and Game Commission review and amend current regulations that allow for the use of lead shot on state wildlife management areas.

California's system of state wildlife areas protect over 627,000 acres of California's most important wildlife habitat and host many species that are listed as threatened, endangered or fully protected under state law. Wildlife management areas are islands of habitat that serve as magnets to wildlife and human visitors with excellent wildlife viewing, fishing and hunting opportunities. They should be managed in accordance to the highest standards of wildlife management. In our view allowing the continued use of lead shot in these areas is inconsistent with best practices.

It is our understanding that while the use of lead shot is not permitted for waterfowl hunting by federal law many of our wildlife areas that are providing needed waterfowl hunting opportunities do not restrict the use of lead ammunition in pursuit of other species including pheasant, quail and dove. For example, Grizzly Island Wildlife Area prohibits the use of lead shot while Gray Lodge Wildlife Area does not. Therefore it is possible for upland hunters at Gray Lodge and similar wildlife areas to inadvertently introduce lead into wetland environments in the otherwise legal pursuit of upland species. We believe this practice should cease.

Research continues to identify additional threats posed by lead to wildlife even beyond the wetland environments that precipitated the federal decision to ban lead shot in 1991. Twenty-five states have lead shot prohibitions for hunting beyond those required by the federal government for waterfowl. It is known that lead poisoning has been observed in 37 species of birds beyond waterfowl with impacts on mourning doves appearing to be especially acute (Wisconsin Department of Natural Resources). Of the 40 states that hunt doves, 16 have some level of nontoxic shot requirements specific to dove hunting. Some restrict the use of lead shot on all state lands, while others prohibit use on intensive dove areas and some on waterfowl/wetland areas. Research in Missouri has shown negative affects on dove behavior that could result in increased mortality from other sources (predation) within 24 hours of ingesting lead shot. The study also suggests that doves may select for shot while feeding (Missouri Department of Natural Resources.)

We respect the crucial role hunters play in wildlife management and conservation, particularly in funding through licenses and excise taxes on sporting equipment sales. Our request should not be seen as an effort to ban or inappropriately limit hunting on wildlife areas. However the threat posed by lead and the inconsistency we are currently experiencing on lead shot regulations on state wildlife areas warrants the Commission's attention. California's fish and wildlife are held in trust for the common good of all the people of California. On

Mr. John Carlson

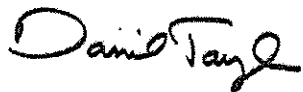
Page 2

land managed specifically for the fish and wildlife resource surely we should insist on applying the best standards possible to ensure that wildlife continue to thrive.

We look forward to working with the Commission on this issue and would be happy to share with you the information we are collecting from state wildlife agencies around the United States on this matter.

Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "David Taylor". The signature is written in a cursive style with a large, looped initial "D".

Director of Public Policy