

Government Operations Committee  
409 State Office Building  
100 Rev. Dr. Martin Luther King Jr. Blvd.  
St. Paul, Minnesota 55155

**Re: Support for H. F. No. 3342**

Dear Members of the Committee:

Audubon Minnesota supports the Minnesota Department of Natural Resources proposed rules requiring use of nontoxic shot within wildlife management areas (WMAs) within the farmland zone. Therefore, Audubon Minnesota supports the passage of H.F. 3342.

Audubon Minnesota included WMAs within many Important Bird Area (IBA) designations because WMAs are managed explicitly for wildlife. IBAs are critical places that support diverse, threatened, and endangered bird species. More than 170,000 acres of IBAs are within WMAs affected by this rule change.

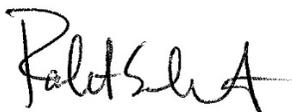
Minnesota has a strong and allied conservation community that recognizes hunting as a valued cornerstone of our outdoor heritage. On the issue of lead, all of us who rely on the land – wildlife managers, farmers, birders, hunters and anglers alike – can work together in forwarding sustainability and protection of our natural resources for the public good. This proposed rule change allows for a reasonable, phased in approach toward minimizing the lead shot found on our public lands and in our waterways.

It is well documented that the use of lead for hunting has had detrimental impacts on our birds, wildlife and public health.<sup>1,2,3</sup> The use of lead shot is no longer necessary, as quality, affordable alternatives that do not deposit toxins into the environment are readily available to hunters.<sup>4</sup> Audubon regards the use of lead shot as a pollution issue that directly impacts birds.

Audubon Minnesota has been actively involved in finding workable solutions to the lead issue since 2006, when our Director of Bird Conservation served on the Nontoxic Shot Advisory Committee (NSAC). This committee consisted of representatives from the manufacturing and retail industry, traditional hunting constituencies, environmental groups and technical experts. Within the diverse group of the NSAC, they came to a consensus on their efforts' guiding principles, the first of which being that *"Lead is toxic to both humans and wildlife and simply is not required for life."*<sup>5</sup>

Audubon has a long history of working to remove toxins from our environment and lead is no different. The proposed rule changes are a common sense approach toward conserving our landscapes for birds and other wildlife.

Sincerely,



Rob Schultz  
Executive Director  
Audubon Minnesota



Luis Ramirez  
Conservation Director  
Audubon Minnesota

<sup>1</sup> N. De Francisco , J.D. Ruiz Troya & E.I. Agüera (2003) *Lead and lead toxicity in domestic and free living birds*, *Avian Pathology*, 32:1, 3-13 <http://dx.doi.org/10.1080/0307945021000070660>

<sup>2</sup> Clark AJI, Scheuhammer AM (2003) *Lead poisoning in upland-foraging birds of prey in Canada*.  
<http://www.ncbi.nlm.nih.gov/pubmed/12739854>

<sup>3</sup> Ian J. Fishera,\*, Deborah J. Paina , Vernon G. Thomasb (2006) *A review of lead poisoning from ammunition sources in terrestrial birds* [http://endangeredink.com/campaigns/get\\_the\\_lead\\_out/pdfs/Fisher\\_et\\_al\\_2006.pdf](http://endangeredink.com/campaigns/get_the_lead_out/pdfs/Fisher_et_al_2006.pdf)

<sup>4</sup> Vernon George Thomas (2013) *Lead-Free Hunting Rifle Ammunition: Product Availability, Price, Effectiveness, and Role in Global Wildlife Conservation* <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3758820/>

<sup>5</sup> *Report of the Nontoxic Shot Advisory Committee, December 2006:*  
[http://files.dnr.state.mn.us/recreation/hunting/fawweb/nts/nontoxic\\_shot\\_report.pdf](http://files.dnr.state.mn.us/recreation/hunting/fawweb/nts/nontoxic_shot_report.pdf)