

Hunting and Wildlife Conservation Council Fall Virtual Meeting: September 12, 2023

Meeting Agenda

Meeting venue: Virtual meeting via Microsoft Teams

All times are eastern time

- 1:00 p.m. **CONVENE**
Welcome and Council member introductions

Meeting overview
 - Collin O'Mara and John Devney, HWCC Chair & Vice Chair

Approval of April 17, 2023 meeting minutes
- 1:05 p.m. Comments of Martha Williams, Director – U.S. Fish and Wildlife Service
- 1:15 p.m. Public comment session
- 1:25 p.m. Council Subcommittee report-outs
- Conservation Funding: Joel Pedersen, Chair (5 minutes)
 - Private Lands: Michael Crowder, Chair (5 minutes)
 - Public Engagement/R3: Keith Tidball, Chair (5 minutes)
 - Hunting & Recreational Shooting: Jeff Crane, Chair (10 minutes)
 - Discussion of proposed recommendations to federal hunting programs.
 - Public Lands: Joel Webster, Chair (15 minutes)
 - Discussion of possible recommendations related to the federal land appraisal process, water issues on Klamath Refuge, and deferred maintenance projects on Refuge lands.
 - Wildlife Health: Land Tawney, Chair (20 minutes)
 - Discussion of Subcommittee work regarding possible best practices for considering the future use of lead-based ammunition on lands of the National Wildlife Refuge System
- 2:00 p.m. **BREAK**
- 2:15 p.m. HWCC Subcommittee report-outs, continued

3:00 p.m. Federal agency briefings (approximate times)

IRA/BIL funding spend down update (30 minutes)

HWCC has requested an update on the spend down of IRA and BIL funding from the USFS and NRCS. Council would also like to hear what, if any, spending bottlenecks the agencies are experiencing.

- *Greg Smith, Associate Deputy Chief – U.S. Forest Service*
- *Astrid Martinez, Director - Conservation Planning and Technical Assistant Division, Natural Resources Conservation Service*
- *Gayle Barry, Natural Resources Conservation Service*

Related to the Refuge System Biological Integrity, Diversity and Ecological Health analysis: (15 minutes)

HWCC has requested a briefing on the Biological Integrity, Diversity and Ecological Health (BIDEH) process that is currently underway. Members have asked that the briefing focus on the status of the process and how it will impact Refuge managers ability to utilize linkages to agricultural production on Refuges, prohibition on GMO seeds and pesticides, grazing, silviculture and trapping and predator management.

- *Mark Chase, Chief – Natural Resource Program Center, National Wildlife Refuge System, U.S. Fish and Wildlife Service*
- *Kate Harrigan, Senior Policy Advisor, National Wildlife Refuge System, U.S. Fish and Wildlife Service*

Related to MAPLand implementation: (40 minutes)

HWCC has requested an update briefing from the Service, BLM, and Forest Service on implementation of MAPLand Act, Dingell Act Sec. 4105 access priority lists, and how the agencies are leveraging the 3% of LWCF dollars directed toward recreation access to open public access in a way that is distinct from LWCF core.

Section 4103 presentation

- *Kelsey David, Geospatial Data Standards Specialist, Geospatial Management Office, U.S. Forest Service (on behalf of interagency team)*

Section 4105/LWCF presentation

- *Jeff Cartwright, Public Land Access Program Manager and Land and Water Conservation Fund Program Lead, Bureau of Land Management*
- *Eric Alvarez, Deputy Chief – National Wildlife Refuge System, U.S. Fish and Wildlife Service*
- *Shayna Carney, Realty Specialist – National Wildlife Refuge System, U.S. Fish and Wildlife Service*

USDA nutrition database (15 minutes)

HWCC has requested a briefing to learn more about issues associated with the USDA nutrition database; specifically, the process for & challenges associated with adding wild game data to the nutrition database maintained by USDA.

- Pamela R. Pehrsson, PhD, Scientific Lead, Food and Nutrition Research Methods and Application of Food Composition Lab, Agriculture Research Service – U.S. Department of Agriculture

BLM use of Mule deer / Sage grouse categorical exclusion (10 minutes)

HWCC has requested a briefing on the extent of use of the sage-grouse and mule deer CAT X passed through the Farm Bill. A Council member passed along that you all have recently rescinded the administrative categorical exclusion that BLM had, and are relying on the Farm Bill CE.

- Renee Chi - Wildlife Biologist (Sagebrush Conservation & Migratory Birds), Division of Wildlife Conservation, Aquatics, & Environmental Protection, Bureau of Land Management

5:00 p.m. **ADJOURN**

****NOTE: Meeting minutes will be available no later than 90 days after the meeting date.**

HUNTING & RECREATIONAL SHOOTING SUBCOMMITTEE

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretaries Haaland and Vilsack,

The members of the Hunting and Wildlife Conservation Council (Council) are thankful for your leadership and commitment to sportsmen and women as demonstrated through the formation of the Council. Today, we write to you regarding Sunday hunting opportunities within the National Wildlife Refuge System (NWRS) and the National Forest System (NFS).

Specifically, we recommend that the U.S. Fish and Wildlife Service (FWS) and the U.S. Forest Service (USFS) modify Sunday hunting rules for NWRS units and NFS lands to be consistent with the laws and regulations of individual states. This includes, but is not limited to, NWRS units and NFS lands in: Alabama, Delaware, Maryland, New Hampshire, North Carolina, Pennsylvania, Rhode Island, South Carolina, and Virginia. We also urge you to leverage the expertise and institutional knowledge of the Council members to identify NWRS units and NFS lands where Sunday hunting can be expanded or opened.

Sunday hunting bans are some of the last remaining examples of puritanical blue laws in existence. In recent years, many of the prohibitions on Sunday hunting have been lessened or repealed by state legislatures and state fish and wildlife agencies, but in many cases, the federal land management agencies have not updated their Sunday hunting regulations accordingly. Today, 40 states have no restrictions on Sunday hunting, and 46 states allow Sunday hunting in some capacity on public lands. In many states where Sunday hunting has been allowed for decades, there are no restrictions prohibiting Sunday hunting on federal public lands including NWRS units and NFS lands, yet the FWS and USFS have not updated their regulations to allow Sunday hunting in many cases.

As you are likely aware, access, including temporal-access, is a major barrier to entry for hunters. For example, access is often cited as the number one reason why sportsmen and women no longer participate in hunting, and it also impacts prospective hunters who are interested in getting involved with this time-honored tradition but lack sufficient access opportunities. For example, adult hunters are often limited to weekend hunting because of work schedules, while youth are also limited due to education and extra-curricular activities during weekdays. Providing adults and youth with an additional weekend day afield is critical to recruiting, retaining, and reactivating hunters. Rolling back antiquated Sunday hunting restrictions is, therefore, a top priority of many sporting-conservation organizations, several of which are represented on this Council.

In the case of the NWRS, synthesizing state and federal Sunday hunting regulations is consistent with efforts of the FWS to improve hunting opportunities through the Hunt Fish Rule. Furthermore, hunting is one of the six wildlife-dependent recreational uses of the NWRS as

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codified through the National Wildlife Refuge Improvement Act of 1997. As for the USFS, hunting is supported on National Forests through the Multiple Use Sustained-Yield Act of 1960 and the Dingell Conservation, Management, and Recreation Act that states “federal land shall be open to hunting” unless there is a specifically closed area. With that in mind, we strongly encourage the FWS and USFS to improve access by increasing Sunday hunting opportunities in accordance with applicable state law.

Furthermore, both the Department of the Interior and Department of Agriculture are signatories to President Biden and Vice President Harris’ “United States Government Interagency Memorandum of Understanding on Promoting *Equitable Access* [emphasis added] to Nature in Nature-Deprived Communities.” As declared by the Memorandum of Understanding, the effort shall focus on “investments in communities who have been locked out of the benefits nature provides to ensure all Americans can benefit from safe parks, natural areas, and waterways where they live, work, and play by expanding access to local parks, tree canopy cover, conservation areas, open space and water-based recreation, public gardens, beaches, and waterways...” which is strongly consistent with the request of the Council to improve Sunday hunting opportunities on federal public lands. Maintaining the religious-based day of rest prohibition against only one user-group, hunters, contravenes the intent of the MOU, and we urge you to correct this access imparity to provide “equitable access” for hunters to effectuate the MOU.

In closing, the Council would like to thank you for your consideration of this important matter. We look forward to working with you, the FWS, and the USFS to increase access for sportsmen and women by improving Sunday hunting opportunities consistent with state law. If you need additional information or have any questions, please contact the Council’s Designated Federal Officer, Doug Hobbs, at doug_hobbs@fws.gov.

Sincerely,

CC:

Shannon Estenoz, Assistant Secretary, Fish and Wildlife and Parks
Martha Williams, Director, U.S. Fish and Wildlife Service
Homer Wilkes, Under Secretary, Natural Resources and Environment
Randy Moore, Chief, U.S. Forest Service
HWCC members

Martha Williams
Director
United States Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Dear Director Williams:

The Hunting and Wildlife Conservation Council is writing you to recommend that the U.S. Fish and Wildlife Service direct National Wildlife Refuge (NWR) managers whose lands offer public hunting to provide an opportunity each year for licensed hunters to provide feedback and input, utilizing a range of options for receiving public input, on hunting programs on their respective Refuges.

Currently, some NWRs provide local hunters the opportunity to comment on the public hunt programs for those lands. This is typically accomplished via an on-person or virtual meeting where the refuge manager discusses the hunting results from the previous season, expected habitat and water conditions for the upcoming season and any proposed changes to the hunt program. The hunters provide their feedback and suggestions, but the final call on any modifications to the hunt program appropriately remains with the refuge manager. However, not all refuge managers who administer a hunt program offer these hunter input meetings. And of those who do, the meetings are not always held on an annual basis.

In California, for example, state law requires the California Department of Fish and Wildlife to annually give licensed hunters the chance to provide feedback on hunt programs and habitat conditions on the Department's waterfowl management areas. This is typically done through a public meeting (which may include discussion of several waterfowl management areas), but can also be accomplished through hunter surveys, comment cards at check stations/kiosks or other formal input.

Hunter participation in the meetings is generally good, and the information exchange has not only helped to improve the quality of the public hunt programs, but allowed the Department to educate hunters about budgetary, operations and other challenges it faces in managing its lands. The presentations provided at the meetings are also posted on-line so that hunters who were not able to attend can have access to the information provided.

Requiring refuge managers to similarly host a public hunt program meeting or provide other opportunities for formal input each year would help to proactively answer hunter inquiries prior to hunting season, and not substantially increase refuge manager workload. This outreach may reduce workload by decreasing hunter inquiries and information requests during the hunting season.

Thank you for your consideration of our recommendations. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

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PUBLIC LANDS SUBCOMMITTEE

HWCC Discussion DRAFT 9/12/2023

The Honorable Deb Haaland Secretary

United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council urges the United States Department of the Interior (DOI) to improve and standardize its appraisal processes and functions to ensure successful implementation of numerous land acquisition programs. The Council is concerned that the effectiveness of the Migratory Bird Conservation Act and the Land and Water Conservation Fund (LWCF) are being undermined by structural inefficiencies and policy gaps at DOI. The Council recommends that you return the appraisal function for land transactions to the individual bureaus, significantly shorten appraisal completion timing, modernize policies for utilizing non-federal partners, and strengthen the decision-making authority of the realty functions in each Bureau.

Hunting and fishing in America depend on enhanced public access and conserved habitats. Our community celebrated the Great American Outdoors Act in 2020 with the full and permanent funding of LWCF, and we have long supported implementation of the Migratory Bird Conservation Act. These two programs have had an enormous impact over decades to support our traditions, and we are excited about their potential to further unlock public lands for sportsperson's access and conserve vital habitats for fish and wildlife.

In order for these programs to function as intended, the federal government must create a fair and reasonable playing field to engage with private landowners on real-estate transactions. It is unrealistic to expect willing landowners to wait an unreasonable timeframe when looking to conserve habitat or provide public access through a land acquisition proffer to the Federal government. Because of the potential to miss out on important land acquisition opportunities, we are concerned about chronic and long-standing problems with land appraisal timeframes under DOI's Appraisal and Valuation Service Office (AVSO).

AVSO was created in 2003, and prior to that time, the appraisal function at DOI was carried out by the individual bureaus. Prior to 2003, for example, U.S. Fish and Wildlife Service and National Park Service appraisals typically required 90 days. As of 2021, AVSO aimed to deliver appraisals within 150 days, and averaged over 200 days. Conservation and access opportunities are being lost because of these inefficiencies, and we recommend that appraisals get back to 90-day timeframes. We recommend that you return the appraisal function to the individual bureaus and to move AVSO into an oversight and auditing role, as it does with the numerous federal grant programs.

Additionally, we recommend that DOI update its policies, ensuring authority rests with the Bureaus' realty functions regarding project priorities, project partnerships including utilizing non-federal facilitators, transaction structure, and timing needs.

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We recognize and support the oversight actions by the U.S. Congress regarding similar concerns to ours, and we would appreciate an update from appropriate staff on the DOI plan to improve the appraisal process prior to our next Council meeting (date TBD). These collective recommendations will position DOI to take advantage of important conservation and access opportunities—furthering to the conservation and restoration of America the Beautiful—and increase the success of important federal conservation programs.

We would appreciate a response to the recommendations and an update from appropriate staff on the USDA and USFS plan to improve the appraisal process prior to our next Council meeting, the date to be determined.

Thank you for your consideration of our recommendations. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

Chair

CC: Director Sams, National Park Service
Director Stone-Manning, Bureau of Land Management
Director Williams, U.S. Fish and Wildlife Service

HWCC Discussion DRAFT 9/12/2023

The Honorable Thomas J. Vilsack
Secretary
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Secretary Vilsack:

The Hunting and Wildlife Conservation Council urges the U.S. Department of Agriculture (USDA) to improve and standardize the appraisal processes and functions within the United States Forest Service (USFS) to ensure the successful implementation of the Land and Water Conservation Fund (LWCF). The Council recommends you eliminate significant appraisal policy and practice inconsistencies among Forest Service Regions, shorten appraisal completion timing, modernize policies for utilizing non-federal partners, and strengthen the decision-making authority of the Forest Service's realty function.

Hunting and fishing in America depend on enhanced public access and conserved habitats. Our community celebrated the Great American Outdoors Act in 2020 with the full and permanent funding of LWCF, which has had an enormous impact over decades to support our traditions. The Council is excited about its potential to further unlock public lands for sportsperson's access and conserve vital habitats for fish and wildlife—we must rise to this opportunity.

For LWCF to function as intended, the federal government must create a fair and reasonable playing field to engage with private landowners on real-estate transactions. It is unrealistic to expect willing landowners to wait an unreasonable timeframe when looking to conserve habitat or provide public access through a land acquisition proffer to the Federal government. We are concerned about chronic and regionally divergent problems with appraisal timeframes and practices under the USFS appraisal function. The Council recommends that you take steps to improve appraisal volume and speed, and to standardize efficient appraisal policies and practices across the Regions.

To bridge the gap in landowner timing and funding needs and to provide a public conservation service, partnerships with non-governmental organizations have been paramount to the success of the USFS lands program. Following the enactment of the Great American Outdoors Act, these partnerships are more imperative than ever. Thus, the Council also recommends that you expand partnerships and to standardize land policies and practices across the Regions.

Additionally, the USFS must update its policies, ensuring authority rests with its realty function regarding project priorities, transaction structure, timing needs, and the utilization of non-federal facilitators. USDA and USFS leadership needs to put an immediate end to mission creep by the appraisal support function, ensuring that conservation efforts are not undermined and that decision-making authority is properly vested. The Council recommends that the USFS update its landownership Manuals and Handbooks for appraisals, purchases and donations and other sections, as necessary.

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We recognize and support the oversight actions by the U.S. Congress regarding similar concerns to ours, and we appreciate your responsiveness to their requests. These collective recommendations will position USDA to take advantage of important conservation and access opportunities—furthering the conservation and restoration goals of America the Beautiful—and increase the success of LWCF and other important federal conservation programs and initiatives.

We would appreciate a response to the recommendations and an update from appropriate staff on the USDA and USFS plan to improve the appraisal process prior to our next Council meeting, the date to be determined.

Thank you for your consideration of our request. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

Chair

Cc: Under Secretary Wilkes, Natural Resources and Environment, USDA
Chief Moore, USDA Forest Service

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The Honorable Deb Haaland
Secretary
United States Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council wishes to express our concerns about the lack of water deliveries from the Klamath Project to the Lower Klamath National Wildlife Refuge (LKNWR) and Tule Lake National Wildlife Refuge (TLNWR) in northeastern California, which continue to negatively impact waterfowl and other wetland-dependent wildlife. Specifically, we recommend that water deliveries to the refuges be included in the Bureau of Reclamation's (Reclamation) proposed action in the upcoming biological opinion for Klamath Project operations. The Department of the Interior (DOI) should also utilize available funding from the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA) to permanently acquire water rights from willing sellers for the benefit of LKNWR.

It is our understanding that Reclamation's 2023 Operations Plan does not include any water deliveries to the refuges. We appreciate the complexity of water management in the Klamath Basin but find it unacceptable that refuges remain the only water user in the basin that are not receiving water given the negative impacts on waterfowl populations and habitat in the Pacific Flyway. The current Interim Operations Plan for the Klamath Project has resulted in almost no meaningful deliveries of water, other than a limited amount in the winter, for managed wetlands of the Klamath Refuges.

We understand that the Department of the Interior (DOI) is currently developing a new biological opinion for operation of the Klamath Project, and we strongly urge you to include water deliveries to refuges as a part of the Proposed Action. Doing so would ensure compliance with the National Wildlife Refuge Improvement Act (NWRIA), which states the Secretary "shall assist in the maintenance of adequate water quantity and water quality to fulfill the mission of the System and the purposes of each refuge; . . . and, acquire, under State law, water rights that are needed for refuge purposes."

DOI holds two sources of state-adjudicated water rights for the LKNWR: Claim 312, Bureau of Reclamation, and Claim 313, Fish and Wildlife Service. These rights should be recognized and honored in annual operations plans and biological opinions for the Klamath Project. Previous Secretaries pledged to make a determination regarding the LKNWR's within-Project priority under Claim 312, which the evidence clearly establishes should be an "A" priority. We respectfully recommend that you review the record and undertake to complete that long-awaited decision, which would greatly help in recovering from a substantial loss of food supply and habitat at the refuge.

As you are aware, the last three years have been amongst the driest period on record for the Klamath refuges. Because of reduced water deliveries, waterfowl counts in both 2020 and 2021 were among the lowest ever recorded. In 2020, 60,000 waterfowl and other waterbirds died from an avian botulism outbreak at LKNWR and neighboring Tule Lake Refuge, which was

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exacerbated by low water conditions. Aerial surveys later that fall showed waterfowl numbers at both refuges down 86 percent, the lowest fall counts ever recorded.

This spring and summer, the only flooded wetland habitat on LKNWR was the result of water purchases that were brokered and paid for by the California Waterfowl Association. This includes a spot market purchase of 2,500 acre-feet this spring from the Klamath Drainage District that was delivered to Unit 2, the main sanctuary unit for the LKNWR. A separate, voluntary, water rights purchase agreement of 3,750 acre-feet from a landowner in the Wood River Valley of Oregon also provided water to Unit 2.

While including deliveries to the Klamath refuges in the Klamath Project biological opinion is necessary, financial assistance from the federal government is still critical. Congress made funding available in the Bipartisan Infrastructure Law for ecosystem restoration in the Klamath Basin. DOI should expedite completion of the above-mentioned 3,750 acre-foot water rights purchase, as well as the acquisition of additional water rights from willing sellers identified in a 2021 Environmental Assessment by the U.S. Fish and Wildlife Service. It should be noted that a similar water rights purchase strategy has helped nearby Stillwater Refuge in Nevada obtain a more reliable supply of water to meet its annual wetland management needs.

We would appreciate a response to these recommendations and an update from appropriate staff on the DOI plan to address the LKNWR and TLNWR water crisis prior to our next Council meeting, the date yet to be determined.

Thank you for your consideration of this request. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

Chair

cc: Martha Williams, Director, U.S. Fish and Wildlife Service

HWCC Discussion DRAFT 9/12/2023

Martha Williams
Director
United States Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Dear Director Williams:

The Hunting and Wildlife Conservation Council is writing today to recommend that the U.S. Fish and Wildlife Service utilize funding from the Restore our Parks (ROPA) provision in the Great American Outdoors Act (GAOA) to invest in badly needed infrastructure improvements for the betterment of waterfowl habitat on our Nation's National Wildlife Refuges (NWRs).

As you know, the sporting and conservation community unified around passage of the GAOA. This was due, in part, to the fact that all stakeholders recognized the dire straits of our outdoor recreation and conservation infrastructure. Indeed, the condition of many NWRs were central to our concerns about conservation infrastructure. In fact, it was work by partners in consultation with Refuge staff that helped make the case for ROPA funding. This work generated a list of priority infrastructure needs, specifically related to wetland and waterfowl habitat management, which was compelling for key authors of the GAOA and resulted in ROPA's inclusion in the final legislative text.

As you know, there is a long and storied linkage between the Refuge system and wetlands-many of our most recognized and historic refuges are closely associated with continentally important wetland and waterfowl habitat. Yet, a significant number of these refuges have had their ecological function compromised by hurricanes, aging or degraded infrastructure, water delivery limitations and other causes. These stressors are coming during a time when one could argue that the role of these key waterfowl staging, breeding and wintering landscapes, is more reliant than ever on these infrastructure assets.

We all recognize that there is an incredible backlog of infrastructure and deferred maintenance needs across the whole spectrum of the Refuge system programming. We are also wholly cognizant of the significant reductions in staff capacity that has occurred over the last decade. Yet, we recognize Congress has provided an opportunity to make gains in our capability to enhance habitat and recreational values on our Refuges and we believe the present time is crucial.

As the ROPA authorization will sunset next year, we are optimistic that we can advocate for continuing or perhaps permanent funding authorizations to sustain more of this work into the future. However, understanding and documenting meaningful progress will be central to this effort. Therefore, the Council recommends that you prioritize investments in the management infrastructure necessary to sustain habitat and subsequent enjoyment of our treasured migratory birds.

We would appreciate a response to this recommendation, as well as an update from appropriate staff on the plan to deliver significant ROPA investments for enhanced wetland management in

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Refuge system planning and budgets for the coming year prior to our next Council meeting, the date to be determined.

Thank you for your consideration of our request. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

Chair

DRAFT

WILDLIFE HEALTH SUBCOMMITTEE

Addressing the future use of lead ammunition on National Wildlife Refuge System lands

1. Public-private partnerships to educate and incentivize voluntary use of non-lead ammunition.
 - a. Public-private partnerships to address concerns surrounding use of non-lead ammo, including its availability and affordability.
 - b. Education: Share information with the hunting public on the unintended impacts of lead ammunition; also, what non-lead ammo is, its current availability, and its effectiveness
 - c. Voluntary and incentive-based programs to support hunter choice of non-lead ammunition vs. bans or phase-outs
2. Science-based decision making at a unit level.
3. Address research and development impediments for industry

1. Utilization of public-private partnerships and federal incentives to educate, incentivize, and fund the voluntary use of non-lead ammunition:

The Council believes that the most effective and least interruptive path forward in positively influencing consumer behavior related to the purchase and use of nonlead alternative ammunition (and away from purchase/use of traditional, lead ammunition) and to minimize negative impacts to wildlife species and their habitats is through the establishment of public-private partnerships and incentive-based programs. These partnerships will work to educate the public on the benefits of selecting non-lead ammunition, share best management practices, and establish programs that will address the issues of availability and affordability of non-lead ammunition throughout the United States. These PPPs will include federal, state, and tribal governments, nongovernmental organizations, and industry, including both manufacturers and retailers.

a. Public/Private Partnerships:

Because the issue around use of traditional, lead ammunition is complex, no single organization or entity is positioned to effectively address the many aspects of efforts to Public-private partnerships between states, industry, nongovernmental organizations and the federal government should be established to work to promote best management practices, including but not limited to addressing availability and affordability of non-lead ammunition.

b. Education/information sharing regarding use, availability, and affordability:

The PPPs will utilize multiple communications platforms to share information with the hunting public on the unintended impacts of lead-based ammunition; also, what non-lead ammo is, its current availability, and its effectiveness. In-person workshops, testing opportunities and hosted hunts that utilize non-lead ammunition can be undertaken to help educate the hunting public about the effectiveness, availability, and affordability.

Action: Establish consumer-focused marketing campaigns that highlight the effectiveness, affordability, and availability of non-lead ammunition. Tactics to employ could include:

- a. Use of community influencers, “meet ups” at shooting ranges for consumers to test non-lead ammo, etc.
- b. In person workshops / Federal-state hosted hunts that provide non-lead ammo for the hunt or recreational shooting opportunity.
- c. Utilize social media-based platforms
- d. Utilize traditional media e.g. magazine, video, television, radio
- e. Utilize pamphlets and other print material available at visitor and education centers

c. Voluntary/Incentive Based:

PPPs will undertake and pursue voluntary and incentive-based programs to promote and drive consumer adoption/demand for non-lead ammunition.

Action: Formation of PPPs to include the federal, state, and tribal governments, nongovernmental organizations, and industry, including both manufacturers and retailers.

Action: Specific budget request by agencies to develop and implement non-lead ammunition rebate and subsidy programs. Determination by federal and state governments on the appropriateness of utilizing funds from the Wildlife Restoration Program to fund these programs.

Action: Develop framework of program and ask all managers to adapt

Action: Identify financial resource needs and submission of budget requests by agencies to secure adequate funds to implement PPP efforts.

2. Science-based decision making at a unit level:

The Council believes that current/future regulatory decision-making regarding the use of lead ammunition on NWRS and other federal lands should be made utilizing the best available, species and site specific (e.g. field data) studies. Such information should be utilized to inform future regulatory actions so that any restrictions on the use of traditional, lead ammunition will be targeted to specific and finite geographic areas place and over finite and specific time periods. Federal and state governments, in partnership with NGOs, should collaborate to address gaps and shortfalls in information needed to make targeted regulatory decisions with existing legal mandates in mind.

Action: Develop process that includes NGO stakeholders, state agencies, and federal representatives to generate information needed to address significant wildlife and health impacts.

Action: Support continued research to better understand the relationship between lead and wildlife and the social science to support adaptive mitigation for the unintended impacts of lead ammunition.

3. Research Impediments:

The DOJ Bureau of Alcohol, Tobacco, and Firearms interpretation of portions of the Gun Control Act (18 U.S.C. § 921(17)(B)) has negatively impacted the ability of the firearms industry to develop and bring to market alternative non-lead projectiles designed and intended by the manufacturers for the hunting market. America's leading ammunition manufacturers have been working to develop and market new and innovative rifle hunting ammunition projectiles (bullets) made with a wide array of metals and alloys (e.g. brass, bronze) other than lead which is used to make traditional ammunition. Increasingly, however, these alternative rifle hunting ammunition projectiles are being misclassified in a manner as to prevent their development. The Council believes the Departments can play a role in addressing this issue by urging the ATF to undertake needed actions to provide an appropriate policy environment in which the firearms industry can research, develop and bring to market new effective and affordable non-lead ammunition.

Action: Recommend that the Secretary of Agriculture and Secretary of the Interior author a joint letter to the Bureau of Alcohol, Tobacco, and Firearms asking its engagement in positively addressing the need for increased use of the "sporting exemption" to enable and increase further development of non-lead alternative ammunition.

Public-Private partnership example:

North American Non-lead Partnership: <https://www.nonleadpartnership.org/>