

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA  
PRESCOTT DIVISION**

**CENTER FOR BIOLOGICAL DIVERSITY,  
et al.**

Case No.: 3:12-cv-08176-SMM

**Plaintiff,**

**vs.**

**UNITED STATES FOREST SERVICE, et  
al.,**

**Defendants,**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA and SAFARI CLUB  
INTERNATIONAL,**

**Defendant-Intervenor-Applicants**

**DECLARATION OF GEORGE ZACHARY TAYLOR**

I George Zachary Taylor declare as follows:

1. I am a resident of Rio Rico, Arizona.
2. I am 65 years old.
3. I am a member of Safari Club International.
4. I am also a Life Member of the NRA, a Life Member of Texas State Rifle Association and a Life Member of Arizona State Rifle & Pistol Association.
5. I am an Arizona Hunter Education and Safety Instructor for Arizona Game & Fish Department.
6. I started hunting when I was in elementary school. At that time, my grandparents had land in the country where they raised fruits, vegetables and chickens. It was my job to

shoot the squirrels, opossums and raccoons that stole the fruits and vegetables and to remove the weasels, foxes and bobcats that would kill the chickens. I accomplished those tasks with a .22 single shot rifle and/or a 20 gauge pump shotgun.

7. Because most of my early rifle shooting was done on live, moving targets I became a better than average game shot.
8. I grew up in Northeast Florida. In Junior High School I would go duck hunting with my classmates.
9. When I earned my Eagle Scout rank my scoutmaster at that time took me deer hunting on Cumberland Island. The deer there were plentiful to the point of overpopulation and we harvested several.
10. While in junior college in Marianna, Florida, I did some squirrel, dove and deer hunting.
11. At the University of Florida in Gainesville, Florida, I helped design a new curriculum for the School of Forestry. I graduated with a Bachelors Degree in the Wildlife Ecology program that I had written.
12. I was a Florida Game Warden from about July 1970 through August 1973 in the area from Key West to Jacksonville, Florida. During that time I hunted white tail deer, wild turkey, feral hogs, squirrel, waterfowl and trapped black bear for relocation. I spent much of my last year capturing and moving nuisance alligators.
13. In 1976 I accepted a competitive appointment to the U.S. Border Patrol in Brackettville, Texas. While there, I hunted white tail deer, javelina, jack and cottontail rabbit, quail and dove, coyote and bobcat.
14. When I transferred to McAllen, Texas, I hunted white wing doves and mourning doves. During that time, I also had access to several local ranches to hunt white-tail deer. I went on my first Colorado elk and mule deer hunt while living at McAllen.
15. After I was transferred to Nogales, Arizona in 1988, I developed a passion for hunting elk and the elusive coues deer.
16. While living in Nogales/Rio Rico, Arizona, I have gone hunting in New Mexico for elk and mule deer. I also hunted in Colorado for elk.

17. Since 1988, I have gone on frequent hunts in Southern Arizona for either dove or quail.
18. In 2006, my son and I went to South Africa for a ten day hunt for plains game where we took impala, blesbuck, waterbuck, gemsbok, nyala, greater kudu, warthog, bushbuck, franklin, sand grouse and guinea fowl.
19. Each year since 1988 I have applied for the lottery draw for big game tags in Arizona. I have applied for and drawn both deer and elk tags in Unit 9. Last year (2011) I drew a tag for elk in Unit 9 and mule deer in Unit 34B. This year I only drew a coues deer tag. My coues deer hunt will take place during the first week of December in Unit 35B.
20. I successfully hunted elk in 2011 with non-lead ammunition, but I learned a great deal about the effectiveness of non-lead ammunition as a result.
21. When I hunt, I use a rifle caliber (300 H&H). I have full confidence in the lead-based handloaded ammunition that I had used in the 300 H&H rifle for over 24 years. At the time that the State of Arizona requested that we use non-lead based ammunition, that ammunition alternative was not available for my rifle.
22. My initial response was to use an alternative rifle, a .338 Winchester Magnum Caliber, as non-lead ammunition was commercially available for that rifle.
23. I quickly learned that the 230 grain commercially available non-lead Winchester Fallsafe ammunition was so inaccurate that it was unacceptable for hunting.
24. Because of that, I developed a handload for the .338 Winchester Magnum. That load, when shot through a water filled milk jug, backed by wet newspaper, demonstrated better accuracy. This non-lead alternative showed a reduced disruption channel from leaded ammunition and increased penetration, similar to what you would expect from a full metal jacketed military bullet. For this reason, this alternative was also not suitable for hunting.
25. I took that rifle and load on an elk hunt and had to pass up easy shots on two different bull elk on two different days. In the first instance, the two bulls were standing side-by-side and in the second there were other elk feeding nearby. Because of the increased penetration of this non-lead alternative ammunition, I was certain that the non-lead bullet would penetrate the targeted bull elk and go right through to the animal behind it. As I was not permitted to take two elk in one season, I did not take the shot. As a result I did not take any elk on that hunt and I did not fill my tag that year.
26. As a result of that experience, I developed a non-lead load for the 300 H&H, which also showed a reduced wound channel and greater penetration than the leaded bullet I had used for over 24 years. However, this load is acceptable, accurate and significantly less powerful than the .338 Caliber Rifle.

27. Because my experiences taught me that the non-lead bullet from the 300 H&H rifle would not provide as effective channel and tissue disruption as the lead-based bullet, I felt it necessary to limit my shots to head and spine shots. By limiting myself to head and spine shots I was shooting at a far smaller target and had to pass up shots that would have been easy with the lead-based bullet where I could take the preferred heart-lung shot. After taking only spine and head shots on both deer and elk it appeared to me that the on game performance was not as effective as the leaded ammunition.
28. At this point in time I understand the limitations of the non-lead ammunition in my elk and deer rifles, 300 H&H and 338 Win Mag. I understand that up until now that the use of non-lead ammunition was voluntary and I honored the request of Arizona Game and Fish Department by finding a way to comply with their request.
29. Because of the limitations of the non-lead ammunition in my rifles, my elk hunting in the Kaibab National Forest has already been adversely impacted to the extent that I pass up shots that I would not hesitate to take with lead-based ammunition with 100% certainty of success. To make non-lead ammunition mandatory will in my opinion be a mistake because of the risk of over penetration and reduced effectiveness on game.
30. I have definite plans to hunt again in Unit 9, which includes areas within the Kaibab National Forest, and the strip, when and if I am awarded a permit.
31. If the Plaintiffs in this case are successful in forcing a ban on lead-based ammunition, it will significantly diminish my ability to successfully and confidently hunt in the Kaibab National Forest. If I am required to use non-lead alternatives, I will sacrifice game taking accuracy and effectiveness and it will further deprive me of the certainty that I have with lead-based ammunition, to take any reasonable shot presented to me.
32. I make this statement in support of Safari Club International and the National Rifle Association of America's motion to intervene in this lawsuit.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 25 day of October, 2012, at Rio Rico, Arizona

  
George Zachary Taylor

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CERTIFICATE OF SERVICE

I hereby certify that on this 21<sup>st</sup> day of November, 2012, I electronically transmitted the Declaration of George Zachary Taylor to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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/s/C.D. Michel  
C.D. Michel