

July 12, 2022

The Honorable Martha Williams
Director
U.S. Fish and Wildlife Service
1849 C Street NW
Washington, D.C. 20240

RE: 2022-2023 Station-Specific Hunting and Sport Fishing Regulations

Dear Director Williams,

The undersigned recreational fishing businesses and organizations write to express opposition to restricting lead fishing tackle as proposed in the United States Fish and Wildlife Service's (USFWS) 2022-2023 Station-Specific Hunting and Sport Fishing Regulations (Docket Number: FWS-HQ-NWRS-2022-0055).

The sportfishing industry fully supports conservation and we have a long record of making changes and sacrifices for the betterment of the environment. However, conservation must be rooted in sound science.

The proposed rule simply states, "*lead ammunition and tackle may have negative impacts on both wildlife and human health,*" with no supportive documentation on what wildlife and human health impacts have been identified in these refuges to support wholesale lead tackle bans.

In general, efforts to ban lead fishing tackle have been based on concerns regarding mortality of individual waterfowl due to incidental ingestion. Common loons are the most frequently cited species with lead tackle interactions. However, fish and wildlife in the U.S. are managed at the population – not individual – level. Loon populations are stable or increasing throughout their range and are listed as a species of "least concern" by the International Union for Conservation of Nature.

Nevertheless, several states within the nesting range of loons, primarily in the northeastern U.S., have implemented restrictions on lead sinkers and jigs. These restrictions are based on a weight or length range most likely to be ingested by loons.

While these state restrictions lack justification based on population-level impacts, in contrast, the USFWS's proposed rule lacks any justification whatsoever. The two refuges in which lead fishing tackle would be prohibited are not located within the breeding or wintering range of loons. We are unaware of any wildlife species located in these refuges that are experiencing negative population-level impacts from lead fishing tackle, and the proposed rule does not provide any explanation.

In addition, the proposed rule is not even limited to certain categories of tackle that an individual animal such as waterfowl might practically encounter, instead banning all types of lead fishing tackle. Lead can be found in a wide range of tackle, including sinkers, jigs, weighted fly line,

ballast in lures, spinners, other terminal tackle and even components in reels. A strict interpretation of the language in the rule as proposed would ban a wide range of fishing equipment far beyond sinkers and jigs, which are typically the categories targeted by lead tackle restrictions.

Anglers should have the option of choosing non-lead tackle alternatives, but it is important to recognize that these alternatives generally come with the tradeoff of higher cost or poorer performance. Unnecessarily mandating changes of traditionally used fishing tackle can negatively impact fishing participation, economic activity and conservation funding.

We urge USFWS to follow the science and recognize that anglers should continue to be allowed to use traditional fishing tackle as they safely have for generations.

Sincerely,

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