



Date: June 8, 2020

To: Virginia Rettig, Refuge Manager
Edwin B. Forsythe NWR
P.O. Box 72
Oceanville, NJ 08231

RE: Comments on the Edwin B. Forsythe National Wildlife Refuge Recreational Fishing Plan

From: The Congressional Sportsmen's Foundation
Brent A. Miller
Senior Director, Northeastern States & States Program Administrator

Dear Ms. Rettig:

On behalf of the Congressional Sportsmen's Foundation, thank you for the opportunity to provide comments on the Edwin B. Forsythe National Wildlife Refuge (Refuge) Recreational Fishing Plan. While we fully support the expansion of additional angling opportunities, we oppose the proposed ban on lead fishing sinkers.

Since 1989, CSF has maintained a singleness of purpose that has guided the organization to become one of the most respected and trusted sportsmen's organization in the political arena. CSF's mission is to work with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting and trapping. The unique and collective force of the Congressional Sportsmen's Caucus, the Governors Sportsmen's Caucus, and the National Assembly of Sportsmen's Caucuses, working closely with CSF, and with the support of major hunting, recreational fishing and shooting, and trapping organizations, serves as an unprecedented network of pro-sportsmen elected officials that advance the interests of America's hunters and anglers.

Lead fishing sinkers are the most widely used, readily available, and cost-efficient fishing weights used by anglers to present natural baits or artificial lures at the appropriate depths to catch fish. Requiring the use of more costly, non-lead alternatives that are not as readily available will likely result in unnecessarily discouraging some anglers from fishing at the Refuge.

The primary concern surrounding the use of lead sinkers is the potential effects on waterfowl, like the loon, that ingest whole pebbles (or small lead sinkers) to aid in the digestion of their food. Although there have been documented individual loon deaths linked directly to lead fishing sinkers

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in isolated locations, there has been no documented evidence that lead fishing sinkers, of any size, have a detrimental impact on local or regional loon populations.

Neither the plan's Compatibility Determination (Appendix A), nor the Environmental Assessment (Appendix C) provide any science-based evidence that the use of lead fishing tackle is having deleterious effects on local wildlife populations. Additionally, U.S. Fish and Wildlife Service publications on the specific species of birds that frequent the Refuge indicate that loon presence within the 40,000 acres is uncommon, occasional, rare, or non-existent (depending on the season). This information provides further argument that any effect of lead sinkers in the environment – even with regards to individual loons within the population – is not likely to shift as a result of the Refuge's policy on lead sinkers. In short, the lead tackle restriction in the proposed Plan is a “solution in search of a problem.”

In the absence of any biologically-based evidence that lead fishing tackle is causing any negative, localized effects on Refuge wildlife, and to ensure every visitor to the Refuge who wishes to participate in fishing can do so equally with the weights of their choosing, we urge you to remove the prohibition on the use of lead fishing tackle from the final Plan.

Sincerely,



Brent A. Miller

Congressional Sportsmen's Foundation
Senior Director, Northeastern States
States Program Administrator

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