



Government Affairs

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September 15, 2010

The Honorable Lisa Jackson
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID EPA-HQ-OPPT-2010-0681

Dear Administrator Jackson:

I am writing with regard to the recent petition from the Center for Biodiversity and other organizations that seek to ban the use of lead in fishing tackle. BoatU.S. has significant concerns with this proposal and I strongly urge you deny this request.

BoatU.S. is the largest organization of recreational boaters in the United States, with more than 500,000 members nationwide. More than two-thirds of our members enjoy recreational fishing as one of the primary activities in their boats. The availability and affordability of appropriate fishing tackle plays a significant role in this activity. While the petitioners suggest that affordable alternatives are available, our review of the situation reveals this not to be the case. Many of the suggested alternative materials have significantly higher commodity costs and would not provide an appropriate level of performance. Placing additional obstacles to full enjoyment of this sport on boating anglers is not justified. Furthermore, there is little evidence that lead in fishing tackle poses any threat to either wildlife or humans at all.

We noted that this proposal would ban the sale of fishing tackle containing lead. This may have the unintended consequence of causing some anglers who still desire to use lead in their fishing tackle to fashion their own. This would cause an even greater risk to human health given they would not have the appropriate material handling equipment or training.

A hallmark of wildlife management in the United States is the concept of "User pay-User benefit." Through the Sport Fish Restoration and Boating Trust Fund, boating anglers provide funds to support aquatic resource

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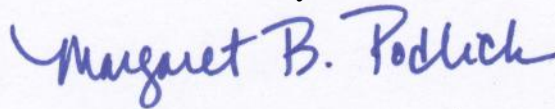
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conservation through taxes on boats, motors and fishing tackle that they buy. Placing additional cost burdens on this activity could discourage fishing participation and result in less revenue being available for the management of sport fish and other aquatic natural resources.

Please feel free to contact BoatU.S. with additional questions regarding this proposal or any other recreational boating issues

Sincerely,

A handwritten signature in blue ink that reads "Margaret B. Podlich". The signature is written in a cursive style with a large initial 'M'.

Margaret Podlich
Vice-President, Government Affairs
BoatU.S.