



June 2, 2023

Mr. John Armor, Director
NOAA Office of National Marine Sanctuaries
1305 East-West Highway, 11th Floor
Silver Spring, MD 20910

RE: NOAA-NOS-2023-0052, Notice of Intent for Proposed Pacific Remote Islands National Marine Sanctuary

Dear Mr. Armor:

On behalf of America's millions of recreational anglers and boaters, along with the fishing tackle and boat manufacturing industries, we seek to ensure recreational fishing and boating access is protected within our nation's marine sanctuary system. Thank you for the opportunity to comment on NOAA-NOS-2023-0052, Notice of Intent for Proposed Pacific Remote Islands National Marine Sanctuary.

According to NOAA's "Fisheries Economics of the United States, 2020" report, saltwater recreational fishing supports 595,000 jobs; generates \$98 billion in sales, and contributes \$55 billion in recreational value added impacts.

Recreational anglers have a strong collective conservation ethic based on how deeply the sport depends on good stewardship of marine resources. Between catch-and-release fishing, compliance with fishing laws and regulations, and the purchase of licenses, anglers actively engage in practices that promote the long-term sustainability of fish populations and their habitats. Through fishing license purchases, excise taxes and direct donations, the recreational fishing community contributes approximately \$1.7 billion toward aquatic resource conservation each year.

Given this, we would support the proposed sanctuary designation if it explicitly allows for non-commercial (recreational) fishing access, similar to the language contained in the [2016 proclamation](#) for

the expansion of Papahānaumokuākea Marine National Monument. Under “Regulated Activities,” the proclamation states,

Subject to such terms and conditions as the Secretaries deem appropriate, the Secretaries may permit any of the following activities regulated by this proclamation if such activity is consistent with the care and management of the objects within the Monument Expansion and is not prohibited as defined above: ... 6. Non-commercial fishing, provided that the fish harvested, either in whole or in part, cannot enter commerce through sale, barter, or trade, and that the resource is managed sustainably.

Allowing recreational fishing in the proposed Pacific Remote Islands National Marine Sanctuary is consistent with conservation goals for the sanctuary. The existing Pacific Remote Islands Marine National Monument already allows for non-commercial fishing. Therefore, it would be congruent to maintain the same for the proposed sanctuary. This allowance will benefit anglers, the ecosystem and the economy.

Furthermore, providing for recreational fishing access within the proposed designation would also be consistent with a critical part of President Biden’s America the Beautiful (ABT) initiative, to protect 30 percent of public lands and water by 2030. The recreational fishing community has appreciated the Administration’s emphasis on outdoor recreation access in the ABT framing documents. The consistent inclusion of allowing non-commercial fishing in marine sanctuaries meets ABT criteria and ensures that the public continues to have access to public marine resources. Therefore, we urge the Office of National Marine Sanctuaries to prioritize recreational fishing access throughout this process.

Sincerely,

Glenn Hughes, President
American Sportfishing Association

Dr. Guy Harvey, Ph.D., Chairman Emeritus
Guy Harvey Foundation

Chris Edmonston, VP Government Affairs
Boat Owners Association of the United States

Jason Schratwieser, President
International Game Fish Association

Jim McDuffie, President
Bonefish and Tarpon Trust

Matt Gruhn, President
Marine Retailers Association of the Americas

Jeff Angers, President
Center for Sportfishing Policy

Frank Hugelmeyer, President
National Marine Manufacturers Association

Patrick Murray, President
Coastal Conservation Association

Whit Fosburgh, President and CEO
Theodore Roosevelt Conservation Partnership

Jeff Crane, President
Congressional Sportsmen’s Foundation