



March 30, 2021

Mr. Benjamin Freidman  
Acting Administrator  
National Oceanic and Atmospheric Administration  
Herbert Clark Hoover Building  
1401 Constitution Avenue, NW  
Room 51030  
Washington, DC 20230

Dear Acting Administrator Freidman,

Thank you for the opportunity to comment on Executive Order 14008 – Tackling the Climate Crisis at Home and Abroad, and specifically Sec. 216, Conserving Our Nation’s Lands and Waters, which calls for identifying steps to conserve at least 30 percent of our lands and waters by 2030 (referred to hereafter as 30 by 30). Among the nation’s original conservationists, the recreational fishing and boating community is eager to work with you to help achieve the 30 by 30 goal in a way that recognizes the significant conservation, social, and economic benefits that recreational fishing and boating provides to the nation.

While our organizations have a broad interest in 30 by 30 at a national level, we wish to focus these comments primarily on how this policy is applied to marine waters given our particular interest in this area and some acute associated challenges in area-based marine conservation compared to terrestrial.

We have a long history of championing marine fisheries conservation policies – including gear restrictions, habitat restoration, time-and-area closures, measures to end overfishing, and more. We are eager to work with the Administration to help ensure that any 30 by 30 policies build upon the United States’ existing marine fisheries conservation efforts to support the long-term sustainability of these resources while maintaining access for public use and enjoyment.

## **Conservation, Social and Economic Benefits of Recreational Fishing**

In the past year, the societal benefits of recreational fishing and boating as a safe and healthy retreat for families have been at the forefront. We should build upon this momentum through this 30 by 30 initiative to ensure continued and expanded recreational access to America's public resources.

Recreational fishing and boating are significant drivers of the U.S. economy. Prior to the coronavirus pandemic, the outdoor recreation sector was growing at a faster rate than the overall U.S. economy. Since the pandemic, the recreational industry has helped hold up the U.S. economy as more and more Americans turned to the outdoors. According to the Bureau of Economic Analysis<sup>1</sup>, the Outdoor Recreation industry generates \$788 billion in economic output and accounts for 2.1 percent of the GDP, of which recreational fishing and boating are the largest contributors.

According to NOAA Fisheries<sup>2</sup>, in 2017, the nation's 9.2 million saltwater anglers contributed \$74 billion to the economy, supporting 487,024 jobs. While more recent data from NOAA Fisheries are not available, we know that recreational fishing participation increased significantly during the COVID-19 pandemic. One of the few positives of the COVID-19 pandemic has been Americans discovering, or rediscovering, the physical and mental-health benefits of outdoor recreation, including fishing and boating.

On average, state fishing licenses sales increased 14 percent in 2020 over 2019<sup>3</sup>. Revenues from the federal excise tax on fishing equipment increased 55 percent in fiscal year (FY) 2020 over FY 2019. These figures show that, during the challenging and unprecedented pandemic, Americans turned to fishing as a safe and beneficial way to cope under difficult circumstances. This fishing participation was critically important for local economies throughout the country, as sales related to fishing trips kept many related businesses and communities afloat.

These increases in fishing participation are also great news for conservation funding. Recreational anglers and boaters are among the largest contributors to conservation funding in the nation – providing approximately \$1.5 billion annually through licenses sales, excise taxes and donations. The 55 percent increase in fishing equipment excise tax receipts referenced earlier contributed to an \$83 million increase into the Sport Fish Restoration and Boating Trust Fund, which funds aquatic resource conservation and habitat restoration throughout the country.

In its 2020 Special Report on Fishing<sup>4</sup>, the Recreational Boating and Fishing Foundation found that the largest group of new anglers and boaters are younger, more urban and more diverse. They were drawn to fishing because it affords quality time with children and loved ones; provides peace, relaxation and mental health benefits; and builds a connection to nature. Encouragingly, 90 percent of these new anglers plan to keep fishing in the future.

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<sup>1</sup> Bureau of Economic Analysis, Outdoor Recreation Satellite Account, U.S. and States, 2019, [https://www.bea.gov/sites/default/files/2020-11/orsa1120\\_1.pdf](https://www.bea.gov/sites/default/files/2020-11/orsa1120_1.pdf)

<sup>2</sup> NOAA Fisheries, Fisheries Economics of the United States, 2017, <https://www.fisheries.noaa.gov/national/sustainable-fisheries/fisheries-economics-united-states>

<sup>3</sup> Recreational Boating & Fishing Foundation, Fishing License Sales, 2020, <https://news.takemefishing.org/license-sales-1020>

<sup>4</sup> Recreational Boating & Fishing Foundation, Special Report on Fishing, 2020, <https://www.takemefishing.org/getmedia/9865bdec-f64f-44ae-b83c-83933b15528d/2020-Anglers-and-Boaters-Ipsos-Final-Report-Dec2020.pdf>

In the context of 30 by 30, we believe these trends in fishing participation demonstrate the compatibility of recreational fishing with the Biden Administration's goals. Recreational fishing, and its increasingly diverse audience, provides a gateway to connect Americans from all backgrounds and demographics to nature in a way that builds long-lasting stewardship of our natural resources. It is therefore critically important that as 30 by 30 policies are considered, recreational fishing access be prioritized.

### **Case Studies of Marine Resource Executive Actions**

Significant executive actions in recent Administrations related to ocean resource management provide case studies in proper engagement with, and recognition of, the recreational fishing community. During the George W. Bush Administration, the Antiquities Act was used to declare marine monuments at the Northwest Hawaiian Islands and in the Pacific Ocean at Rose Atoll, the Mariana Trench and the Pacific Remote Island Area. These proposals were developed without consultation with the recreational fishing community, and thus, recreational fishing access was initially denied in these areas, causing significant outcry and opposition from our community. No justification was provided for restricting public access, and we were not provided an opportunity to engage in the policymaking process.

Early in the Obama Administration, an executive order establishing a National Ocean Policy (NOP) gave little recognition to recreational fishing, and our community was therefore concerned that the policy would lead to more unwarranted restrictions due to a lack of consideration for the conservation, social and economic benefits recreational fishing provides to the nation. However, the Obama Administration invested significant time and energy to engage with the recreational fishing and boating community and ensure that as NOP was implemented, we had a seat at the table and our community's priorities were heard.

We believe that engagement helped lead to a productive dialogue when the Obama Administration pursued additional marine monuments in the western Pacific and the northeast. Instead of implementing blanket closures to all fishing access, these marine monument designations recognized the substantial differences between commercial and recreational fishing, and the compatibility of recreational fishing with the conservation goals of these monument designations. We are eager to work with the Biden Administration to continue these successes and ensure that, as 30 by 30 policies are developed, we can build upon these positive examples of engagement with the recreational fishing and boating community and recognize the importance of sustaining recreational fishing access.

### **Our Vision for 30 by 30**

Along with dozens of fishing, hunting and conservation organizations, last fall our organizations released the "Hunting and Fishing Community Statement on the 30 by 30 Initiative."<sup>5</sup> This statement provides the following key principles that will guide our support for 30 by 30 policies:

- Recognition of the positive role that hunting and fishing play in conservation;

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<sup>5</sup> Hunt Fish 30x30, Hunting and Fishing Community Statement on the 30 by 30 Initiative, 2020, <https://www.huntfish3030.com/hunting--fishing-community-statement.html>

- Protected area definitions that allow for well-managed and sustainable wildlife-dependent activities;
- Consideration of existing protected areas in measuring progress toward stated goals;
- Targeted, science-based conservation measures developed through a stakeholder-driven process to address biodiversity threats; and
- Clearly defined roles and authorities for the entities charged with carrying out the 30 by 30 initiative proposal.

Building upon those key principles, there are several specific themes related to recreational fishing we hope will be addressed as the Administration carries out 30 by 30.

Climate Change – Research has shown the oceans are warming and becoming more acidic as a result of increased atmospheric levels of carbon. Warmer, more acidic ocean water leads to a cascading effect on the marine food web with impacts on marine food resources, habitat and fish migration patterns. Climate change effects, such as increased sea temperature and current flows, are shifting the distribution of marine fish stocks, with some species benefiting while others lose out. As this relates to 30 by 30, we hope to work with the Administration to support research to understand and help managers account for changes in fish migrations, ranges, and habitat, as well as programs and funding streams to build resilience and ensure coral, near-shore and estuarine systems are able to adapt to a changing climate.

Fisheries Management – While the Magnuson-Stevens Fishery Conservation and Management Act has facilitated substantial progress toward ending overfishing and rebuilding overfished stocks, it has yet to fully recognize the importance of recreational fishing, and its distinctions from commercial fishing. Progress was made through enactment and ongoing implementation of the Modern Fish Act, but ongoing challenges in fisheries such as Gulf of Mexico and South Atlantic red snapper, and Mid-Atlantic summer flounder, scup and black sea bass, show that much work remains to be done. These challenges largely stem from the federal fisheries management system being tailored to commercial fishing, and a lack of timely and accurate fisheries data. We encourage you to develop and use an array of data sources for fisheries management, including electronic reporting using smartphone apps, as well as assisting states in developing robust angler harvest data collection programs to supplement or replace the Marine Recreational Information Program where it fails to provide reliable information for management. The recent development of state-based surveys in states along the Gulf of Mexico has shown the potential for these sources to provide far more reliable and accurate data than MRIP, increasing access through longer seasons while ensuring sustainable, healthy fish populations. To fully achieve 30 by 30 related goals, such as improving conservation and expanding access, the federal government must do a better job of measuring and prioritizing saltwater recreational fishing. We must also continue making progress toward ending destructive commercial fishing practices that threaten the health of fisheries and habitat.

Despite the federal fisheries management system's shortcomings in properly managing recreational fishing, which we must continue working together to address, we encourage the hard work of fisheries management continue in the Regional Fishery Management Councils. This is the proper venue to identify and address federal fisheries conservation priorities.

Outdoor Access and Equity – Recreational fishing continues to be one of the most popular outdoor

recreation activities, ranking as the second-most popular activity behind only jogging<sup>6</sup>. The affordability of fishing relative to other outdoor recreation activities is a significant factor driving its popularity. Over 70 percent of boating outings involve fishing and 64 percent of boat owners have a household income less than \$100,000. With America's great outdoors serving as a great equalizing force for good across the country, ensuring that every American has access to America's public resources must be a top focus of 30 by 30 policies. Even in difficult economic times and circumstances, recreational fishing can flourish because of the enduring draw of getting outside. Led by the Recreational Boating and Fishing Foundation, which manages campaigns such as "Vamos a Pascar" aimed at making fishing more accessible to minority communities, we continue to encourage and promote the inclusion of more diverse populations in recreational fishing and boating. Most of the recent surge in fishing participation came from more diverse and more urban anglers. While it remains a priority for improvement, fishing opportunities are generally available in most urban areas of the country, especially along the coast, that have a high proportion of communities of color and economically disadvantaged communities. Fishing provides an opportunity for these communities to connect with nature in some settings where such opportunities are otherwise unavailable. Therefore, as marine-based 30 by 30 policies are considered, maintaining and enhancing recreational fishing access, particularly in urban areas, must be a top priority as we look to achieve our shared goal of increasing access for communities of color and economically disadvantaged communities.

Investments – Properly achieving the 30 by 30 goal must come with a recognition of the need to address funding limitations and needs. Federal funding for habitat restoration, fisheries management and research (particularly for recreational priorities), expanding public access, and other related areas falls short of current needs, and the 30 by 30 goal will only increase these funding needs. We look forward to working with the Administration to identify current funding priorities related to proper marine resource conservation, as well as additional needs that will be required to fully achieve the 30 by 30 goal.

Support Existing Resources that Balance Conservation and Access — We support working with NOAA's National Marine Sanctuaries to help achieve the 30 by 30 goal. Our organizations proudly partner with the National Marine Sanctuaries to ensure a healthy balance of access and conservation. In 2019, several of our organizations signed a Memorandum of Agreement with NOAA to develop and expand a framework of cooperation for planning and implementing mutually beneficial projects and activities to promote sustainable recreational fishing and boating conducted within federal marine waters, including national marine sanctuaries.

Support of Outdoor Recreation Economy – We believe outdoor recreation economic health can and should be an explicit criterion in 30 by 30 decision making. If marine resources are better conserved, managed, and funded, then the outdoor recreation economy – already 2.1 percent of GDP – can continue to grow and produce jobs while more Americans enjoy these more sustainably managed public resources.

### **Engagement Recommendations**

While we appreciate this opportunity to provide written comment, we look forward to additional, in-depth conversations as the Administration's 30 by 30 agenda continues to be developed. We hope to

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<sup>6</sup> Outdoor Foundation, Outdoor Participation Report, 2019, [https://outdoorindustry.org/wp-content/uploads/2015/03/19\\_OIA\\_008\\_Participation\\_Report\\_final\\_2.pdf](https://outdoorindustry.org/wp-content/uploads/2015/03/19_OIA_008_Participation_Report_final_2.pdf)

work with you to explore ideas on how to best engage more broadly with the recreational fishing and boating community in the months to come.

Specifically, we request that you host a recreational summit to facilitate a dialogue between stakeholders throughout the recreational industry, including fishing and boating, and your respective agencies to discuss the 30 by 30 initiative and recommendations to achieve a shared vision. We also respectfully request that the outdoor recreation industry is appropriately represented as you seek stakeholder input on 30 by 30, including on any potential advisory bodies that may be developed.

We recognize that you are still in the early stages of identifying strategies to achieve the 30 by 30 goal. We look forward to future opportunity to weigh in as these strategies, many of which we hope we have identified in this letter, become solidified. In addition, we hope to maintain open, productive dialogue as you transition toward implementation through regular, formalized communication and periodic meetings with Administration leadership and personnel.

As leading organizations representing saltwater anglers, boaters, boat builders, fishing equipment manufacturers, retailers, and other parts of the saltwater fishing community, we believe we are well suited to provide insights on how the recreational fishing and boating community can help you achieve a shared 30 by 30 vision. We also stand ready to engage our network of regional, state and local experts as more site-specific proposals may be developed.

Thank you again for the opportunity to provide input, and we look forward to many more such opportunities to come.

Sincerely,

American Sportfishing Association  
BoatU.S.  
Center for Sportfishing Policy  
Congressional Sportsmen's Foundation  
Guy Harvey Ocean Foundation  
International Game Fish Association  
National Marine Manufacturers Association  
Theodore Roosevelt Conservation Partnership