



October 27, 2008

The Honorable James L. Connaughton
Chairman, Council on Environmental Quality
The White House
Washington, D.C. 20503

Dear Chairman Connaughton:

The National Marine Manufacturers Association (NMMA), the nation's leading recreational marine industry association, and the American Sportfishing Association (ASA), the sportfishing industry's trade association, are writing in regards to the initiative currently underway to identify potential new marine area designations in the Central Pacific Ocean. NMMA and ASA appreciate the opportunity to further the dialogue with you on this matter, and this letter is in addition to formal written comments we and additional groups filed with the Council on Environmental Quality on October 24, 2008.

NMMA represents nearly 1,700 boat builders, engine manufacturers, and marine accessory manufacturers who collectively produce more than 80 percent of all recreational marine products made in the United States. With almost 73 million boaters nationwide, the recreational boating industry is a major consumer goods industry with expenditures on recreational marine products and services of \$37.5 billion in 2007 alone. Spending by recreational boaters is responsible for 900,000 U.S. jobs nationwide and boating has an overall economic impact in the country of over \$100 billion annually. There are currently 18 million recreational boats owned in the United States, with 59 million boaters and more than 60 million recreational anglers. Fishing and boating are closely linked, with more than 60 percent of boats purchased for the primary purpose of angling.

ASA represents the interests of over 700 manufacturers, distributors, and retailers of fishing equipment and related fishing accessories, as members of the outdoor media. ASA invests in long-term ventures to ensure the industry will remain strong and prosperous, as well as safeguard and promote the enduring social, economic, and conservation values of sportfishing in America. America's 60 million anglers generate over \$45 billion in retail sales with a \$125 billion impact on the nation's economy creating employment for over one million people. Of that, saltwater fishing generates over \$11 billion in retail sales, \$1.8 billion in state and local tax revenues, and contributes over \$30 billion to the nation's economy.

In addition, through the Federal Aid in Sport Fish Restoration Act, passed in 1950 at the request of the fishing industry, special excise taxes on fishing gear and boating fuel have contributed over \$8 billion for fish conservation. Added each year to this are the nearly \$650 million in annual fishing license sales plus approximately \$200 million in private donations by anglers for conservation efforts.

As you are surely aware, the current economic climate in the United States and around the world has put enormous pressure on the American recreational marine manufacturing sector. Many boat builders—large and small—have begun furloughing plants or closing them outright, implementing painful layoffs, and dramatically scaling down production in all segments in the marine market, including large offshore fishing yachts designed for remote angling trips. Overall, the boating industry is at least 20 percent down in units sold. The recreational fishing industry is also suffering a 20% percent reduction in business. While we are confident that our industries can weather this economic storm, we strongly urge the Administration to resist implementing any policies or actions that could exacerbate the current economic environment.

We urge the Administration to fully consider the direct and indirect economic consequences of any large-scale action to reduce or signal the reduction of recreational fishing or boating access, even in areas that are currently infrequently visited by boaters and anglers. The current economic environment is an inopportune time for the Administration to cause the boating and fishing consumer to think that their right to access the natural resources held in their trust is endangered without very good, scientifically justifiable cause. The Administration may view a large-scale monument designation in the Central Pacific as largely symbolic, but such a designation will have real economic impacts on the angling and boating industries.

NMMA, ASA and their allies recognize that the Pacific Remote Island Areas and other parts of the Pacific that are currently under consideration for a U.S. National Monument designation are remote destinations worthy of protection. As yet, however, there is no evidence that well-regulated recreational fishing in these areas poses any harm to the ecosystem. With no discernable added environmental benefit to implementing bans on recreational fishing, it would seem imprudent to even marginally risk the economic sustainability of boating and angling.

A permanent closure in these areas could specifically impact an emerging recreational angling practice — destination angling. Recreational fishing destination trips are increasingly common. The billfishing segment of the U.S. recreational fishing community offers long-distance, remote trips for anglers to continue to experience a uniquely satisfying angling experience. But this angling segment will be seriously imperiled by the perception of arbitrary closures even and especially in remote ocean areas.

These recreational fishing expeditions are expensive and economically significant projects that involve anglers who seek high-encounter rates with fish. Distant remote fishing trips are becoming an increasingly popular option for those who can afford it. Such trips require the services of a “mothership operation,” either through the lease of a vessel and full crew, the purchase of a fractional ownership and use rights, or the outright purchase and operation of a vessel. Motherships provide a staging platform from which smaller sportfishing vessels are launched for actual fishing. An operation of this type requires a minimum investment of \$10 million just for the vessel, typically in the 135 -150 foot range. Additional costs include the smaller sportfish boats, equipment for each vessel, and the crew, fuel, supplies, and maintenance.

A fishing trip of this magnitude involves a year of planning and preparation and will last at least a year or longer. The amount of jobs in the U.S. supported just in readying the whole operation—from procuring a vessel, outfitting the group and deploying—is substantial. Once underway, these operations make abundant use of local resources by replenishing supplies and making repairs in local ports, obtaining goods and services for anyone new joining the tour at the local market or securing local navigational assistance.

Again, Mr. Chairman, we hope you recognize the direct and indirect, short- and long-term economic implications of any large-scale U.S. National Monument designation in the Pacific – as well as the precedent set for other U.S. waters. Our organizations fully recognize the need to conserve special marine ecosystems, but a well-regulated recreational fishery would not, in our view, impair the ability of resource managers to sustain the important coral reefs, fisheries and habitats in the Central Pacific. We appreciate your consideration of our views on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Dammrich', with a large, stylized initial 'T'.

Thomas J. Dammrich
President, National Marine Manufacturers Association

A handwritten signature in black ink, appearing to read 'Michael Nussman', with a large, stylized initial 'M'.

Michael Nussman
President, American Sportfishing Association