October 24, 2023

Ms. Brittany Petersen
Superintendent
Northeast Canyons and Seamounts Marine National Monument
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035

Dear Superintendent Petersen,

The American Sportfishing Association (ASA) is the nation's recreational fishing trade association and represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 54.5 million recreational anglers. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, resulting in a $148 billion annual impact on the nation's economy.

ASA appreciates the opportunity to comment on the Draft Management Plan for the Northeast Canyons and Seamounts Marine National Monument, an important offshore recreational fishing area.

Offshore recreational fishing is a tremendous economic driver for coastal communities throughout New England. According to NOAA Fisheries, private recreational fishermen targeting highly migratory species contribute $266 million annually in total economic output to the economy of the Northeast and Mid-Atlantic regions, supporting 1,824 jobs[1]. For-hire and tournament trips for highly migratory species, for which economic expenditure data are not available currently, also contribute significantly to the region's economy.

We would like to express our gratitude to the Monument management team for their commitment to the principles outlined in Presidential Proclamation 9496. They have created a Draft Management Plan that allows for regulated recreational fishing, in line with the responsible stewardship and preservation of the Monument's resources.

Recreational fishing within the three deep-sea canyons — Oceanographer, Gilbert, and Lydonia Canyons — targets numerous migratory species, including yellowfin tuna, marlin, swordfish,

[1] Hutt, Clifford, Sabrina Lovell, and George Silva. 2014. *The Economic Contributions of Atlantic Highly Migratory Species Anglers in New England and the Mid-Atlantic*, 2011. U.S. Department of Commerce, NOAA Tech. Memo. NMFS-F/SPO-147, 34 p.

AMERICAN SPORTFISHING ASSOCIATION
1001 N. Fairfax Street, Suite 501, Alexandria, VA 22314 • 703-519-9691 • Fax: 703-519-1872
Web: www.ASAFishing.org • Email: info@ASAFishing.org

mahi mahi, wahoo, and many others. However, it's important to note that this type of fishing primarily occurs near the ocean's surface and does not involve any contact with the seabed. Consequently, the Draft Management Plan recognizes that recreational fishing aligns with the objectives of preserving the Monument, particularly regarding the deep-sea coral communities.

As detailed in the Monument's Draft Management Plan, the fish stocks targeted by recreational fishermen in the monument areas are closely regulated by the International Commission for the Conservation of Atlantic Tunas (ICCAT) NOAA Fisheries, the Regional Fishery Management Councils and the states. Additionally, NOAA Fisheries already has an effective permitting system in place, utilizing existing authority and established programs to permit recreational fishing within the Monument. Therefore, we agree that Alternative 2, which leverages this existing infrastructure, is the best direction for the Monument's Management Plan.

The recreational fishing community is a valuable partner when it comes to sharing information on how best to manage the Monument's resources for all stakeholders. Specifically, ASA remains committed to partnering with the Monument Management Team to achieve its goals and objectives of the Management Plan. As a first step, we offer the following specific recommendations for the goals and objectives of the plan.

Goal 1

Objective 1.1: We recommend reprioritizing funding resources to include the following two bullets considering the 2023 FY budget directs most funds towards research and education. Although NOAA fisheries has a robust permitting system, additional education and outreach to anglers who fish within the Monument is important.

- Publish a user-friendly, online permitting guide for the Monument.
- Improve awareness about the Monument's location and management measures by ensuring that its boundary is represented on nautical charts, maps, and ocean-related apps such as WhaleAlert.

Objective 1.3: The following bullet is too vague. What does the word significant mean in the context of abandoned, lost, discarded fishing gear? The scientific process associated with achieving objective 1.3 must be clarified.

- Should significant marine debris or ALDFG issues be found, evaluate their impacts, and explore management options for mitigating, replacing, or restoring injured Monument resources.

Objective 1.4: For "Recreational Uses", we recommend partnering with recreational fishing and boating associations to advance this objective. We appreciate being recognized as a potential partner for Goal 2 and suggest adding the National Marine Manufacturers Association and the International Game Fish Association as relevant partners. Additionally, we suggest integrating partnerships to achieve all the Goals of the Management Plan.

Objective 1.8: We offer help in developing a monument stewardship program. ASA worked collaboratively with partners of the Florida Keys National Marine Sanctuary to establish the Blue Star Program which aims to achieve similar objectives.

Objective 1.9: The following bullet needs more clarification and an example of "adaptive management toolkits".

- Implement adaptive management toolkits to assess Monument resource management needs.

Goal 2

Objective 2.4.: We recommend working with the recreational fishing and boating industry to advance an education and outreach plan that would serve as a solid foundation for industry and angler engagement in the monument's management plan. This suggestion can be incorporated into the execution of Goal 4, which focuses on engagement and education.

Goal 3

Objective 3.3: We recommend coordinating with the Atlantic States Marine Fisheries Commission and the Mid-Atlantic and New England Fishery Management Councils as all three bodies have a research planning process that would integrate well with achieving Goal 3. Also, we suggest that the diverse interdisciplinary working group of experts includes representatives who have conducted scientific research cooperatively with the recreational fishing community.

Goal 4

Many of goal 4's objectives align with the recreational fishing community's existing efforts to educate our diverse anglers on various fishery topics. We see the opportunity to leverage our industry membership to assist the Monument Management Team in meeting the objectives under Goal 4, especially the ones not currently expected to be funded under existing funding levels.

Thank you for considering our comments as you finalize the Monument's Management Plan. We look forward to continuing our work together to recognize the importance of recreational fishing as a sustainable use of the Monument.

Sincerely,



Michael Waine
Atlantic Fisheries Policy Director