

February 22, 2012

National Ocean Council
722 Jackson Place, NW
Washington, DC 20503

Comment on the “Draft National Ocean Policy Implementation Plan” from the National Marine Manufacturers Association

In July 2011 the National Marine Manufacturers Association (NMMA) submitted comments on the National Ocean Council’s “Coastal and Marine Spatial Planning, Strategic Action Plan, Full Content Outline.” NMMA specifically applauded the outline’s recognition of the “social, economic, public health, and conservation benefits of sustainable recreational use of the ocean, coastal, and Great Lakes resources, such as fishing, **boating** [emphasis added], swimming and diving, by providing improved coordination with recreational users to ensure continued access and opportunities to enjoy these activities consistent with economic, safety, and conservation goals.”¹

It was with the greatest disappointment, therefore, that NMMA read through the 118 pages of the “Draft National Ocean Policy Implementation Plan” and found no mention whatsoever of recreational boating. When an NMMA staff member raised this issue during the January 12, 2012, conference call after the Plan was released, he and others on the call were told that the authors of the plan “had not listed every activity, so as not to leave out any.” The NMMA staffer pointed out that both snorkeling and SCUBA diving were mentioned, not that he had any problem with them, but these activities are hardly of the same economic or participatory magnitude as recreational boating.

This disingenuous response by staff for the National Ocean Council leads us to wonder at the reason for the startling omission of recreational boating from the draft plan. It seems so obvious as not to require pointing out, but many of the activities that were named in the plan—SCUBA diving, snorkeling, whale watching, and fishing—are done quite frequently from recreational (i.e., non-commercial) boats. The omission of recreational boating is also glaring in light of the economic impact of an activity like recreational saltwater and Great Lakes fishing, which almost by necessity is conducted from a recreational boat. The economic effect of saltwater and Great Lakes recreational fishing is well-documented.

According to the National Oceanic and Atmospheric Administration (NOAA), 12 million saltwater recreational anglers take 85 million fishing trips a year.² This number does not reflect the millions of recreational fishing trips that are taken each year on the Great Lakes, but together these saltwater and Great Lakes anglers are a tremendous economic engine for our country.

¹ National Ocean Council, 06-02-11, “Coastal and Marine Spatial Planning, Strategic Action Plan, Full Content Outline,” P. 3.

² NOAA, National marine Fisheries Service, “Recreational Fisheries at NOAA: A Growing Legacy,” May 18, 2011, P. 3.

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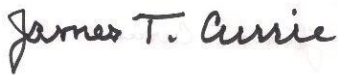
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Saltwater and Great Lakes anglers—precisely the geographic areas covered by the National Ocean Policy—generate approximately \$13.8 billion in retail sales and \$38.5 billion in total expenditures each year. Furthermore, saltwater and Great Lakes recreational anglers support some 363,000 jobs and contribute \$114 million to state income tax collections, \$1.6 billion in federal income tax payments, and over \$595 million in state sales taxes each year.³

It should be clear, then, that omission of the importance of recreational boating from any National Ocean Policy Implementation Plan is a serious error that must be corrected before the draft plan is finalized.

Sincerely,

A handwritten signature in black ink that reads "James T. Currie". The signature is written in a cursive, slightly slanted style.

James T. Currie
Legislative Director
National Marine Manufacturers Association

³ National Marine Manufacturers Association, *2010 Recreational Boating Statistical Abstract*, P. 67.